

INSTRUCTION LETTER



INSTRUCTION NUMBER: WIA 13-02

TO: Upstate WIA Contractors (Adult, Dislocated Worker and Youth)

SUBJECT: Personally Identifiable Information (PII)

DATE ISSUED: July 25, 2013 DATE EFFECTIVE: Immediately DATE EXPIRES: Indefinitely

PURPOSE: To issue local policy regarding expectations regarding Personally Identifiable Information (PII) in WIA participant files.

BACKGROUND: During the PY12 review, SCDEW monitors discovered a voided check in a participant's file. The voided check was being used as proof of purchase so that the participant could be reimbursed for costs incurred. The bank account number in conjunction with the person's name, is considered "Personally Identifiable Information" (PII) and should not be displayed in the participant file.

The US Department of Labor (USDOL) characterizes "Protected PII" as follows:

PII, which when disclosed, could result in harm to the individual whose name or identity is linked to that information. This is distinguished from "Non-sensitive PII," the disclosure of which cannot reasonably be expected to result in personal harm. Protected PII includes, but is not limited to: Social Security number, credit card number, bank account number, residential address, residential or personal telephone number, biometric identifier (image, fingerprint, iris, etc.), date of birth, place of birth, Mother's maiden name, criminal records, medical records, and financial records. Please view instruction letter 13-01 for detailed information regarding criminal records and medical records.

The South Carolina Department of Employment and Workforce (SCDEW) provided the following clarification:

Residential address, residential or personal phone number and date of birth are acceptable items in WIA participant files. These items are often used to verify program eligibility and do not violate PII.

ACTION: All participant files should be reviewed for the information listed above. Information should be redacted from WIA participant files no later than August 30, 2013. Upstate WIB monitors (OneStop and Youth) will also ensure this issue is given priority during local monitoring. The SC Works Upstate Quality Assurance Specialist, Center Managers and Career Consultants should also look for PII when conducting reviews during regular in-house monitoring. Youth service providers should also review files for PII on a regular basis.

INQUIRIES: Should you have questions regarding this instruction letter, please contact Ms. Dana Wood at dwood@upstatewib.org or 864-562-4244 (TTY:711).


Ann Angermeyer, Director

Source: SCDEW PY12 Monitoring Report (issues 5 and 7)