

	Policy No: P-208
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	New ☐ Revised ☒
PERSONAL INFORMATION AND DATA	

PURPOSE

To establish guidelines and instructions related to the protection of confidential job seeker, employer and wage information in carrying out official duties for the workforce system. This policy identifies sources of confidential information and establishes procedures for safe handling of this information.

BACKGROUND

The Office of Management and Budget defines Personal Identifiable Information (PII) as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal identifying information that is linked or linkable to a specific individual. Examples of protected PII include but are not limited to social security numbers (SSN), credit card numbers, bank account numbers, ages, birthdates, medical history, financial history and computer passwords.

As an important and inherent part of the services provided to customers, service providers and WorkSource staff must collect a wide variety of PII from customers. While the information collected as a matter of routine is often critical to effectively serving customers and providing them with the best possible services, collection of PII also brings with it a statutory responsibility to safeguard customers' PII from unauthorized use or disclosure.

REFERENCES

TEGL 39-11 Guidance on the Handling and Protection of Personally Identifiable Information (PII)
 2 CFR 200.1, Personally Identifiable Information
 Oregon Revised Statutes §350.150 and §660.339
 Oregon Administrative Rules 471-010-0105, 589-020.0320 and 589-020-0330

POLICY

Although an employee may be authorized to access confidential data, the employee may access the data only in connection with the performance of his/her official duties.

Confidential PII records include entire record systems, specific records or individually identifiable data that are not subject to public disclosure under Oregon Revised Statutes 192, and may include all documents, participant file content, computer files, letters, and other notations of records or data.

Documents that contain PII (participants' or family members') social security numbers, driver's license, birth certificates, I-9 documents, TANF/SNAP, etc., will be stored in a confidential section of the file management system, which is only accessible by appropriate staff, kept separate from the working files. The working file may not contain any PII documents.

Computers that have access to customer data must be locked when not in use and anytime a staff person is away from their workstation.

In Oregon, electronic participant information is stored in the WorkSource Oregon Management Information System (WOMIS) on servers maintained by Oregon Employment Department and administered under the rules of the Oregon Department of Administrative Services. Information is also stored in I-Trac which is administered by Worksystems, Inc. Access to these systems and their data is restricted to individuals who have successfully completed DAS Information Security Testing and I-Trac User and Confidentiality Training. SOWIB participant files are stored in an electronic filing system which is maintained under contract. All staff with access to these systems must follow the procedures set out by the administering agency. Electronic information and data is subject to all the requirements of this policy.