



MID-CAROLINA WORKFORCE & TALENT DEVELOPMENT

Policy Letter #16

TO: All Mid-Carolina Workforce Development Service Providers

FROM: Justin Hembree, Interim Director

SUBJECT: Electronic File Storage and Protecting Personally Identifiable Information

PURPOSE

This policy provides guidance on the use of electronic file storage, protecting Personally Identifiable Information (PII), and retrieval of the workforce and other federal funds, participant, program, and financial documents.

BACKGROUND

Local Workforce Development Areas and the North Carolina Division of Workforce Solutions (DWS) must maintain many forms of documentation and data for federal funds purposes. These documents and data may be stored electronically and must have the ability to be retrieved as per the guidance in this policy statement.

US Department of Labor (USDOL) Training and Guidance Letter (TEGL) No. 39-11 provides additional “Guidance on the Handling and Protection of Personally Identifiable Information.”

POLICY

Mid-Carolina Workforce Development area and DWS office must meet the minimum requirements as outlined in Attachment I to maintain and protect information. Local Workforce Development areas must also protect consumer Personally Identifiable Information (PII) as outlined in Attachment II. Effective July 1, 2016, all participant and program-related documents will be scanned in and stored in NCWorks Online.

PROCEDURE

It is expected that Mid-Carolina Workforce Development staff, NCWorks staff, and Service Providers will take necessary steps to protect Personally Identifiable Information data collected from individuals and employers. This includes redacting any unnecessary personal identifiable data when using for verification.

Within attachment III, outlines the processes and procedures that must be followed when scanning documents into the system.

In addition to the NCWorks Online data, all customer information must be protected as outlined in DWS Policy Statement 08-2017 and TEGL No. 39-11.

Redaction should be completed on all documents to remain compliant with federal, state and local policies where applicable. At a minimum all instances of an individual's driver's license, credit card numbers, bank account numbers, and the first five digit of the SSN ***must be redacted***. No PII data that is loaded into the state's NCWorks.gov system should be stored or transferred on any portable device.

NC General Statute (NCGS) 20-30 makes it unlawful "To make a color photocopy or otherwise make a color reproduction of a driver's license, learner's permit, or special identification card..." All documents that are scanned into NCWorks.gov ***must be*** scanned in grayscale.

Attachment A: DWS Operational Guidance: OG 17 – 2021

North Carolina Guidance for WIOA and Other Federal Funds, Electronic Image Storage

North Carolina Guidance for WIOA and Other Federal Funds, Protection of Personally Identifiable Information (PII)

North Carolina Guidance for WIOA and Other Federal Funds, Scanning Procedures for Consumer Documents in NCWorks

Attachment B: REDACTION & DOCUMENT SAVING PROCEDURE

Creation Date

July 2022

**Workforce Development Board
Workforce Innovative Opportunity Act (WIOA)**

REDACTION & DOCUMENT SAVING PROCEDURE

This procedure provides guidance on the use of electronic file storage, protecting Personally Identifiable Information (PII - Board Policy #25), and retrieval of workforce and other federal funds, participant, program, and financial documents enrolled in the WIOA program.

It is expected that Cumberland County Workforce Staff, Cumberland County NCWorks staff (to include Service Providers) will take necessary steps to protect Personally Identifiable Information (PII) data collected from individuals and employers. This includes redacting any unnecessary personal identifiable data when uploading as verification.

Redaction should be completed on all documents to remain compliant with federal, state and local policies where applicable.

At a minimum all instances of an individual's driver's license, credit card numbers, bank account numbers, and the first five digit of the SSN ***must be redacted***

Documents for Redaction:

- **Social Security Card:** Any and all documents containing the participant's social security number(s) should be redacted; ***only*** the last four digits should be visible with an authorized signature.
- **DD-214** only the participants name and last four SSN, with the word "honorable discharge" and authorized signature should be visible.
- **School Records:** only participants name, last four SSN and the enrollment/expiration date.

File name: (SSN) Social Security Number

Selective Service: Nothing to redact; all male U.S. citizens born after December 31, 1959 who are 18 but not yet 26 years old are required to register 30 days before their 18th birthday.

Selective Service (males 18-25) register at www.sss.gov

File Name: Selective Service

Public Assistance: Only the participant's name and approval/denial status (eligibility line) should be visible. ***File name: Public Assistance (i.e. SNAP or TANF)***

- Supplemental Nutrition Assistance Program (**SNAP**), formerly known as food stamps, is a federal nutrition program that helps with food budget and buying healthy foods.
- Temporary Assistance for Needy Families (**TANF**) is a time limited assistance program to assist with a family's basic needs.
- **Free Lunch Program** is a federally assisted meal program that provides low-cost balanced meals.

FAMILY SIZE: *File name: Family Size*

- Family: two or more persons related by blood, marriage, or decree of court, who are living in a single residence and are included in one or more of the following categories:
- A married couple and dependent children,
- A parent or guardian and dependent children, or
- A married couple
- Composition of a family is determined at the ***date of the application***. Members in the household who do not meet one of the categories identified in the definition of family are not included in family size.
- Dependent child of family includes children living in a single residence with parent(s) or guardian(s) and who DO NOT meet the definition of independent child based on the Free Application for Federal Student Aid (FAFSA) guidelines.

Independent child: shall include those children living in a single resident with parent(s) or guardian(s) and who fall into one (or more) of the following categories:

- Is 24 years of age or older by December 31 of the current year;
- Is an orphan or ward of the court or was a ward of the court until the individual reached the age of 18;
- Is a graduate or professional student (in college, beyond a bachelor's degree);
- Is a veteran of the Armed Forces of the United States;
- Is a married individual;
- Has legal dependents other than a spouse;

Is currently living with parents(s) or guardian(s) but provides more than 50% of his/her own support

Verification Documents for Date of Birth: *File name: DOB Verification*

Date of Birth Verification: For verifying ***date of birth***, follow the below validation information:

- **Driver's License:** only the participant's name, date of birth, expiration date and authorized signature should be visible.
- **Passport and/or Birth Certificate:** only the participant's name, date of birth, expiration date and authorized signature should be visible.
- **Alien Registration Card:** only participant's name, expiration date, and residence since date should be visible.
- **DD-214 (Department of Defense):** DD-214 only the participant name, date of birth, the words "honorable discharge" and authorized signature should be visible.

Address Verification: *Verification Documents for Address*

Verification Documents for Address: for verifying addresses follow the below validation information.

- **Driver's license** physical address, expiration date, and authorized signature should be visible;
- **Utility bills** the address section, billing period and participant's name should be visible;
- **Lease Agreement** the participant's name, address, termination date and authorized signature should be visible.
- **Enlisted Record Brief (ERB):** also known as Solider Record Brief (SRB), only the name and address information should be visible.
- **VA Income Verification Letter:** only the participant's name and address should be visible.
- **Tax Forms:** only the participants name and address should be visible.
- **Permanent Change of Station Orders (PCS):**

- Change in military station; with moving from one duty station to another and authorizes many entitlements (services) and monetary allowances, only the participant's name, address current status information should be visible.
- **DD-214 (Department of Defense):** Certificate of Release or Discharge from Active Duty, is a document of the United States Department of Defense, issued upon a military service member's retirement, separation, or discharge from active duty in the Armed Forces of the United States, only the name, address the words "honorable discharge" and authorized signature should be visible.
- **Enlisted Record Brief (ERB):** Also known as Solider Record Brief (SRB), is a multi-component snapshot that provides the soldiers military career record/information. The below is relating to the document redaction process; only the name and address information should be visible, all other information should be redacted.

Bank Account information: *Only participants name should be visible.* All bank information should be redacted such as;

- Routing (ABA) number;
- Account number; and
- Bank name and physical address

File name: *Bank Account (payroll)*

Payroll: Only the participant's name, pay period, and dollar amount should be visible; all other information should be redacted. The file should include participants completed signed timesheets, copy of paycheck for each pay period per month.

File name: *Payroll PPE (date of period – i.e., March 2019)*

Tax Forms: Only the participants name should be visible; Tax forms should be redacted as follows:

- Social security number, only the last four digits should be visible;
- Participants Address; and
- Tax Identification Number and/or Employee Number

File name: *(type of tax form) i.e., W2 Form*

VA Income Verification Letter: Is a letter issued by the Department of Veterans Affairs that verifies financial information used to determine eligibility for VA health care services. Only the participant's name should be visible.

File name: *VA Income Verification Letter*

School Verification: *File name: Education Verification*

School Records: Diplomas (GED / HSD), Degrees, Certifications and/or Drop out Letter

School Records / Transcripts: Documented evidence of a student's permanent academic record, which usually means all courses taken, all grades received, all honors received and degrees conferred to a student from the first day of school to the current school year.

- Only the participant's name, school term/year, school name and address should be visible; all other information should be redacted.

Enlisted Record Brief (ERB): Also known as Solider Record Brief (SRB), is a multi-component snapshot that provides the soldiers military career record/information. The below is relating to the document redaction process:

- **Education Verification:** only the name, civilian education, technical certification, military education, awards & decorations and foreign language should be visible, all other information should be redacted.

Reference:

WIOA and Wagner Peyser Employment Act Participant Eligibility Reference Guide: Operational Guidance: OG 06-2021

Electronic File Storage and Protecting Personally Identifiable Information (PII) DWS Operational Guidance: OG 17-2021

Revised:

Revision	Date	Description of changes	Requested By
1.0	09.09.2020	Updated initial version	Tamara Hodge
2.0	07.14.2021	Updated Guidance OG 17-2021	Tamara Hodge