

**ST. LAWRENCE COUNTY  
WORKFORCE DEVELOPMENT BOARD**

[www.slconestop.com](http://www.slconestop.com)

**WORKFORCE INNOVATION AND  
OPPORTUNITY ACT**

**CONFIDENTIALITY & PROTECTION  
OF PERSONALLY IDENTIFIABLE  
INFORMATION POLICY**

Adopted by the St. Lawrence County Workforce Development Board: September 9, 2015

September 9, 2015

ST. LAWRENCE COUNTY WORKFORCE DEVELOPMENT BOARD  
Resolution No. 15-I09-15

**AUTHORIZING THE ACCEPTANCE AND ADOPTION OF BYLAWS, POLICIES AND PROCEDURES, CONTRACTS AND LEASES/SUBLEASES, ADOPTED BUDGETS AND OTHER FINANCIAL RESPONSIBILITIES, TOGETHER WITH ALL OTHER CONTINUING RESPONSIBILITIES AND POWERS, FROM THE ST. LAWRENCE COUNTY WORKFORCE INVESTMENT BOARD**

**WHEREAS**, coming into compliance with the Workforce Innovation and Opportunity Act of 2014 (WIOA) requires that Workforce Investment Boards become Workforce Development Boards; and

**WHEREAS**, WIOA has mandated several other changes in the organization of Workforce Investment Boards; and

**WHEREAS**, the St. Lawrence County Workforce Investment Board took actions at its June 10, 2015 meeting to initiate all these changes and to transfer its WIOA-compliant operations to the St. Lawrence County Workforce Development Board (WDB) ; and

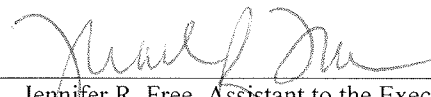
**WHEREAS**, at its August 3, 2015 meeting the St. Lawrence County Board of Legislators (BOL) took official action to replace the temporary WDB it had appointed at its July 7, 2015 meeting with membership that was fully compliant with WIOA requirements; and

**WHEREAS**, both the County BOL and the WDB recognize that the WDB is and should be the successor in due course to the WIB;

**WHEREAS**, now that a WIOA-compliant WDB is in place, it is appropriate and prudent for the WDB to officially accept and adopt the bylaws and all the policies and procedures, contracts and leases/subleases, and adopted budgets and other financial responsibilities, together with all other continuing responsibilities and powers, from the WIB ; and

**NOW, THEREFORE, BE IT RESOLVED** that the St. Lawrence County Workforce Development Board does hereby officially accept and adopt the bylaws and all the policies and procedures, contracts and leases/subleases, and adopted budgets and other financial responsibilities, together with all other continuing responsibilities and powers, from the St. Lawrence County Workforce Investment Board effective on July 1, 2015 and authorizes, empowers, and directs its staff to continue to operate the workforce development system in St. Lawrence County according to the precedents established prior to July 1, 2015 when and as appropriate and consistent with WIOA.

I, Jennifer R. Free, Assistant to the Executive Director of the St. Lawrence County Workforce Development Board, DO HEREBY CERTIFY, that I have compared this copy of this Resolution, adopted September 9, 2015; with the original record in this office and that the same is a correct transcript thereof and of the whole of said original record.



Jennifer R. Free, Assistant to the Executive Director  
St. Lawrence County Workforce Development Board  
September 9, 2015

The St. Lawrence County WIB is committed to ensuring the protection of the Personally Identifiable Information (PII) and other confidential information as may be obtained and recorded in the course of determining WIA eligibility and in providing services, including follow up.

Confidentiality and Protection of Personally Identifiable Information (PII)
---

Definition: Protected PII is defined by the US Department of Labor as that which is disclosed could result in harm to the individual whose name or identify is linked to that information. Examples include social security numbers, addresses, home phone numbers, ages, birthdates, marital status, spouse names, educational history, biometric identifiers (fingerprints, voiceprints, iris scans etc...), medical information, financial information and computer passwords.

The following steps will be taken:

1. Prior to collection of PII or sensitive personal information:
  - a. Individuals shall be notified that such information will only be used for purposes of service under the WIA-funded grant program and its attendant regulations. As part of the WIA program application individuals shall sign a release acknowledging such.
  - b. Individuals shall also be notified that with written consent, such information may be shared with other partner organizations for purposes of referral and potential coordination of services beyond WIA.
  - c. The individual may agree in writing to release all or portion of their information and be provided the opportunity to indicate what information may or may not be shared. The individual may also indicate if there are specific organization(s) to which their information may not be shared. The consent may be modified or revoked by the individual at any time by providing written notice. Customer initials should be obtained to document customer designations and subsequent changes.
  - d. Unless modified or revoked by the individual, written consent shall remain in effect four years from the date of last signature.
  - e. WIA paid staff and other personnel who will have access to sensitive/ confidential/ proprietary/private data must be advised by the service provider of the confidential nature of the information, the safeguards required to protect the information and the safeguards in handling such information. Written acknowledgements, such as confidentiality agreements, from staff and other partner personnel shall be kept by the WIA service providers.
2. Safeguarding of PII and sensitive information once obtained:
  - a. PII of WIA participants shall not be transmitted by email or stored CDs, DVDs, thumb drives etc... unless it can be encrypted using federally approved standards.
  - b. All PII data of WIA participants will be stored, at all times, in an area that is physically safe from access by unauthorized persons and the data will be processed using OSOS. Accessing, processing and storing of WIA grant PII data on personally owned equipment, at off-site

locations and by non-grantee managed IT services is strictly prohibited unless approved by the St. Lawrence County IT department.

- c. No PII or sensitive information will be used for any purpose other than necessary under the WIA. Any information collected for customer service or continuous improvement efforts will be aggregated, reported anonymously without any connection to an individual.
- d. No third-party market opinion surveys, research, panel or focus groups shall be granted access to PII and other sensitive WIA participant information without prior written consent of the WIB.
- e. PII and sensitive data will be destroyed by shredding documents and securely deleting sensitive electronic PII.