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Monmouth County Policy Personally Identifiable Information (PII) Policy

Purpose: to establish a policy related to Personally Identifiable Information for the Monmouth County Division of Workforce Development. To inform of the importance on the transmittal of personal information regarding clients served.

Background: NJ WIN 6 – 15 addresses the United States Department of Labor’s Training and Employment Guidance Letter 39 – 11 which mandates the handling and protections of personally identifiable information (PII). As part of its grant activities, staff of the Monmouth County Division of Workforce Development office, its partners, may have in their possession a large quantities of protected information related to clients. This information is generally found in personnel files, participant data set, performance reports, program evaluations, contract, and client files. Protected information is information that if disclosed could result in harm to the individual whose name or identity is linked to that information. Examples of protected information include, account numbers, home telephone numbers, social security numbers, credit card numbers, ages, date of birth, martial status, educational history, biometric identifiers (fingerprints, voiceprints, iris scans), medical history, financial information and computer passwords.

Personal Identifiable Information

The Division of Workforce Development and its funded partners agree to cooperate with the provision of Personally Identifiable Information (PII). Defined by the federal OMB (Office of Management and Budget) as information that can be used to distinguish or trace and individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. Federal Law, OMB guidance and departmental policies require that PII and other sensitive information be protected. In addition to the above, all must also comply with the following:

- a. All PII obtained through grant shall be stored in an area this is physically safe from access by unauthorized persons at all times.
- b. Persons who have access to sensitive, confidential/proprietary/ private data must be advised of the confidential nature of the information, the safeguards required to protect

the information and that there are civil and criminal sanctions in place for non-compliance.

- c. Access to PII created by any grant must be restricted to only those persons who in their official capacity to perform duties in connection with the scope of the work.
- d. PII data obtained by the Grantee through a request must not be disclosed to anyone but the requesting individual.
- e. Use appropriate methods of destroying sensitive PII in paper filed and securely deleting sensitive electronic PII.
- f. Immediately report any breach or suspected breach of PII to your Immediate Supervisor.
- g. **Personal Identifiable information, including Social Security numbers must not be sent electronically, either in email format or fax on documents that are shared between the Division of Workforce Development and our funded partners. On all documentation, please use only the last (4) four digits of the social security number.**