



GREATER MEMPHIS LOCAL WORKFORCE DEVELOPMENT BOARD (GMLWDB)

GREATER MEMPHIS LOCAL WORKFORCE DEVELOPMENT AREA

EFFECTIVE DATE: July 1, 2020

DURATION: Indefinite

POLICY: Policy Regarding Handling and Protection of Personally Identifiable Information (PII)

PURPOSE: In an effort to comply with federal requirements and protect an individual's personal information against fraud and identity theft, this Policy implements reasonable and appropriate measures that WMS staff must follow to protect against the loss, misuse and alteration of personally identifiable information ("PII") and other sensitive information under GMLWDA's control.

REFERENCE(S):

APPLICABLE STATUTES, REGULATIONS, AND GUIDANCE:

- A. U.S. Employment and Training Administration, Training and Employment Guidance Letter No. 39-11 (June 28, 2012);
- B. Privacy Act of 1974 (the Privacy Act);
- C. Federal Information Security Management Act (FISMA);
- D. OMB M-06-15 *Safeguarding Personally Identifiable Information* (May 22, 2006);
- E. OMB M-06-19 *Reporting Incidents Involving Personally Identifiable Information and Incorporating the Cost for Security in Agency Information Technology Investments* (July 12, 2006);
- F. Combating Identity Theft: A Strategic Plan (President's Task Force on Identity Theft, May 10, 2006 (www.idtheft.gov));
- G. OMB M-07-16 *Safeguarding Against and Responding to the Breach of Personally Identifiable Information* (May 22, 2007);
- H. NIST SP 800-122 *Guide to Protecting the Confidentiality of PII* (April 2010);
- I. Tennessee Identity Theft Deterrence Act of 1999, codified at Tenn. Code Ann. §47-18-2101 et seq.

BACKGROUND:

As part of its grant activities, GMLWDA has business reasons to collect or handle personally

identifiable information ("PII") relating to WMS and staff; subgrantee and partner organizations and staff; and individual program participants. This information is generally found in personnel files, participant data sets, performance reports, program evaluations, grant and contract files, and other sources. The State of Tennessee and the federal government have issued laws and several rules, regulations, and guidelines pertaining to the privacy of information.

GMLWDB is a proud partner of the American Job Center network, is an Equal Opportunity Employer. The Career Center System is an Employer/Equal Opportunity Program. Auxiliary aids and services are available upon request to individuals with disabilities. TTY: 1-800-848-0299

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PRIVACY ACT NOTICE

Federal and state laws require that you be furnished this Notice because you are being asked to provide personal identifying information about yourself, including but not limited to name, social security number (SSN), date of birth, employment information, telephone number(s), address(es), income information, the information needed for identification verification, and other personal information, necessary to complete the application for services offered by WMS.

Authority: The Workforce Innovation and Opportunity Act. Sections 101, 188(a)(5) and 189(h) of the Workforce Innovation and Opportunity Act provide that, in order to receive services pursuant to the WIOA, an individual must present proof of United States citizenship (or authorization to work in the United States), age, and where applicable, Military Selective Service Registration and documentation substantiating other program eligibility criteria

Purpose: Your personal identifying information (including SSN) will be used by and disclosed to WMS personnel, partners and contractors, or other agents who need the information to assist in activities related to The Workforce Innovation and Opportunity Act (WIOA) services.

Routine Uses: Your SSN is used to verify your identity, and as an account number (identifier). The personal identifying information (including SSN) will be used for processing your application to determine your eligibility for WIOA services. Your personal information will be disclosed to WMS contractors for purposes of administration of WMS programs, for enforcement purposes, for use in connection with audits or other investigations. Also, your SSN and other personal identifying information will be used to report services provided to you by WMS to the State of Tennessee Department of Labor and Workforce Development or other local, state, and/or federal government agencies. Your personal identifying information (including SSN) will be retained for as long as is required by applicable law or regulation.

Disclosures: Your disclosure of this personal identifying information (including SSN) for this purpose is voluntary. However, your failure to provide the requested information may delay or prevent the processing of your application for WIOA services.

By signing below, I certify that I have read and understood this Privacy Act Notice.

Printed Name: _____

Signature: _____

Date: _____