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SDA Instruction 12-05  
With signatures

Personally Identifiable  
Information (PII)

July 1, 2012

Resent

August 26, 2013

And October 27, 2014

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**ATLANTA REGIONAL WORKFORCE BOARD INSTRUCTION 12-05**

**DATE: July 6, 2012 – Update – Resent August 26, 2013 and October 27, 2014**

**SUBJECT: Update TEGL 39-11: Guidance on the Handling and Protection of Personally Identifiable Information (PII)**

1. **PURPOSE:** The purpose of this instruction is to disseminate Guidance from the Governor's Office of Workforce Development for Handling and Protection of Personally Identifiable Information (PII)
2. **REFERENCES:** USDOL/ETA Advisories: Training and Employment Letter (TEGL) Update –TEGL 39-11
3. **BACKGROUND:**  
**Per TEGL 39-11:** Protected PII and non-sensitive PII – the Department of Labor has defined two types of PII, protected PII and non-sensitive PII. The differences between protected PII and non-sensitive PII are primarily based on an analysis regarding the "risk of harm" that could result from the release of the PII.  
Protected PII is information that if disclosed could result in harm to the individual whose name or identity is linked to that information. Examples of protected PII include, but are not limited to, social security numbers (SSNs), credit card numbers, bank account numbers, home telephone numbers, ages, birthdates, marital status, spouse names, educational history, biometric identifiers (fingerprints, voiceprints, iris scans, etc.), medical history, financial information and computer passwords.

Guidance Issued by the Governor's Office of Workforce Development:

- (1) Have the participant sign a release acknowledging the use of PII for grant purposes only.
- (2) Whenever possible, ETA recommends the use of unique identifiers for participant tracking instead of Social Security Numbers (SSNs). If SSNs are to be used for tracking purposes, they must be stored or displayed in a way that is not attributable to a particular individual, such as using a truncated SSN.
- (3) *For the duration of the Gold Standard Evaluation, ARWB will continue the current process of using the Gold Standard Evaluation unique identifier in conjunction with SSNs.*
- (4) Use appropriate methods for destroying sensitive PII in paper files (i.e. shredding or using a burn bag) and securely deleting sensitive electronic PII.
- (5) Do not leave records containing PII open and unattended.
- (6) Store documents containing PII in locked cabinets when not in use.
- (7) Immediately report any breach or suspected breach of PII to GOWD's Executive Director who will report the breach or suspected breach or PII to ETA Information Security and the Federal Project Officer responsible for the grant.

4. ACTION REQUIRED:

- a. All career resource center staff must now use the above referenced policy.
- b. All career resource center staff must read, initial and date this instruction.
- c. Each Adult, Dislocated Worker and Youth Applicant/Participant is to sign a release acknowledging the use of PII for grant purposes only.
- d. All Career Resource Center Staff and Youth Provider Staff must read, initial and date this instruction. The SDA instruction with original staff signatures is to be sent to Anna Thompson, Atlanta Regional Commission, 40 Courtland Street, Atlanta, GA 30303.

EFFECTIVE DATE: October 27, 2014

Mary Margaret Garrett  
Chief, Workforce Development

MMG.at

cc: All WFD staff, All Career Resource Centers, Youth Providers

Signatures of Staff of Rockdale  
Career Resource Center - \_\_\_\_\_ Branch  
[Signature] Carol A. Guertin 10/27/14  
Signature Print Name

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Signature Print Name

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Signature Print Name

(If you need more signature lines, please copy before anyone signs)

## Marsharee O'Connor

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**From:** Marsharee O'Connor  
**Sent:** Friday, September 12, 2014 10:58 AM  
**To:** 'Amy Cunningham'; 'Angelica Lucas'; 'Anika Rolling'; 'Barbara Coleman'; 'Becky Smith'; 'Brian Wren'; 'Courtney Rushin'; 'David Nguyen'; 'Dawn Oparah'; 'Debbie Anglin'; 'Destiny Williams'; 'Ervin Smith'; 'Evelyn Cooksey'; 'Gene Pope'; 'Jacinto Hall'; 'James Bruin'; 'James Williams'; 'Jane Scott'; 'Janice Jacoby'; 'Jashaunna Brown'; 'Jenna Stringer'; 'Jennifer Abreu'; 'Jesse Barnett'; 'Jill Pate'; 'Joan McNeil'; 'Juanita Horsey'; 'Kallie Palmer'; 'Karen Robertson'; 'Kevin Claussen'; 'Kim Dung T Nguye'; 'Klyde Kim'; 'Kristi Collins'; 'Lavonia Stepherson'; 'Lelia C. Lomax M. S.'; 'Lesia Glasper'; 'Linda Shepard'; 'Magally Taylor'; 'Maria Favors'; 'Marie Spesert'; 'Megan Harrison'; 'Melia Haile'; 'Melinda Le'; 'Michael Springer'; 'Michael Taylor'; 'Natashia Lewis'; 'Nguyen Vu'; 'Pam Reid'; 'Patrice Wuerth'; 'Pota Coston'; 'Renee Davilar'; 'Sandi Hill'; 'Scott Aaronsen'; 'Sonia Carruthers'; 'Susan Crumbley'; 'Tammy Miller'; 'Tamy Braxton'; 'Tara Bass'; 'Trinh Pham'; 'Twa Nanabuluku'; 'Walter Reeves'; 'Wendy Shaw'; 'Yotin Srivanjarean'  
**Cc:** Jim Radford; Anna Thompson; Denise Dixon  
**Subject:** RE: Securing Participants' Personal Identifiable Information (PII)

Good Day YSPs,

Just a reminder that the request indicated below is due today.

Regards,  
Marsharee

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**From:** Marsharee O'Connor  
**Sent:** Monday, September 08, 2014 4:28 PM  
**To:** 'Amy Cunningham'; 'Angelica Lucas'; 'Anika Rolling'; 'Barbara Coleman'; 'Becky Smith'; 'Brian Wren'; 'Courtney Rushin'; 'David Nguyen'; 'Dawn Oparah'; 'Debbie Anglin'; 'Destiny Williams'; 'Ervin Smith'; 'Evelyn Cooksey'; 'Gene Pope'; 'Jacinto Hall'; 'James Bruin'; 'James Williams'; 'Jane Scott'; 'Janice Jacoby'; 'Jashaunna Brown'; 'Jenna Stringer'; 'Jennifer Abreu'; 'Jesse Barnett'; 'Jill Pate'; 'Joan McNeil'; 'Juanita Horsey'; 'Kallie Palmer'; 'Karen Robertson'; 'Kevin Claussen'; 'Kim Dung T Nguye'; 'Klyde Kim'; 'Kristi Collins'; 'Lavonia Stepherson'; 'Lelia C. Lomax M. S.'; 'Lesia Glasper'; 'Linda Shepard'; 'Magally Taylor'; 'Maria Favors'; 'Marie Spesert'; 'Megan Harrison'; 'Melia Haile'; 'Melinda Le'; 'Michael Springer'; 'Michael Taylor'; 'Natashia Lewis'; 'Nguyen Vu'; 'Pam Reid'; 'Patrice Wuerth'; 'Pota Coston'; 'Renee Davilar'; 'Sandi Hill'; 'Scott Aaronsen'; 'Sonia Carruthers'; 'Susan Crumbley'; 'Tammy Miller'; 'Tamy Braxton'; 'Tara Bass'; 'Trinh Pham'; 'Twa Nanabuluku'; 'Walter Reeves'; 'Wendy Shaw'; 'Yotin Srivanjarean'  
**Cc:** Jim Radford; Anna Thompson; Denise Dixon  
**Subject:** Securing Participants' Personal Identifiable Information (PII)

Good Day YSPs,

The attached SDA regarding safeguarding participants' Personal Identifiable Information (PII) was sent out to you last year (7/11/2012). On the first page of the SDA, take note of number 7 under the section called "Guidance Issued by the Governor's office of Workforce Development" where it states **any breach or suspected breach must be reported to the GOWD's Executive Director who will then report the breach to the federal government.** Meaning, if a YSP submit PII to ARC without the information being secured, ARC must take actions by notifying GOWD who will then report it to the federal government. As to prevent any current or future occurrences, please ensure that we are all operating in accordance with this SDA policy. Also, ARC will closely monitor all communication sent via email and fax to ensure that we are in compliance with this requirement.

**Action Steps:**

- YSP Directors, please ensure that all your staff (especially new staff) have read and sign the signature page of the SDA Instructions. Though no line for date indicated, the staff must indicate next to their names the date they read the SDA. A copy of the signed and dated signature page must be submitted to ARC for record keeping. **This must be done by close of business on Friday 9/12/14.**

To be able to send a file using a secure link, please visit the following web link <http://www.7-zip.org/> .

**Regards**

Marsharee O'Connor  
Principal Program Specialist

**Atlanta Regional Commission**  
**regional impact + local relevance**

40 Courtland Street, NE  
Atlanta, Georgia 30303-2538

P | 404.463.3338

F | 770.344.5984

[moconnor@atlantaregional.com](mailto:moconnor@atlantaregional.com)  
[atlantaregional.com](http://atlantaregional.com)

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Follow us on [Twitter](#) »

*For information on the Workforce Investment Act (WIA) training program or to download the training application packet, please go to <http://www.atlantaregional.com/wiatraining>*

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**CPACS**

- Use appropriate methods for destroying sensitive PII in paper files (i.e., shredding or using a burn bag) and securely deleting sensitive electronic PII.
- Do not leave records containing PII open and unattended.
- Store documents containing PII in locked cabinets when not in use.
- Immediately report any breach or suspected breach of PII to the FPO responsible for the grant, and to ETA Information Security at [ETA.CSIRT@dol.gov](mailto:ETA.CSIRT@dol.gov), (202) 693-3444, and follow any instructions received from officials of the Department of Labor.

6. Inquiries. Questions should be addressed to the appropriate Regional Office.

7. Attachment. Appendix: *Applicable Federal Laws and Policies Related To Data Privacy, Security and Protecting Personally Identifiable and Sensitive Information*

| <u>NAME</u>        | <u>SIG</u>   | <u>DATE</u> |
|--------------------|--|-------------|
| KLVOE KM           |    | 7/10/14     |
| Yotin Srivanjavean |   | 9/10/14     |
| Rochelle Hall      |   | 9/12/14     |
| Melia Haile        |   | 9-12-2014   |
| Jamie Gallardo     |   | 9-12-14     |
| Jacinto Hall       |   | 9/12/14     |
| Michael Sampson    |  | 9-12-14     |

4. ACTION REQUIRED:

- a. All career resource center staff must now use the above referenced policy.
- b. All career resource center staff must read, initial and date this instruction.
- c. Each Adult, Dislocated Worker and Youth Applicant/Participant is to sign a release acknowledging the use of PII for grant purposes only.
- d. **All Career Resource Center Staff and Youth Provider Staff must read, initial and date this instruction. The SDA instruction with original staff signatures is to be sent to Anna Thompson, Atlanta Regional Commission, 40 Courtland Street, Atlanta, GA 30303.**

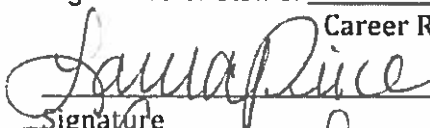
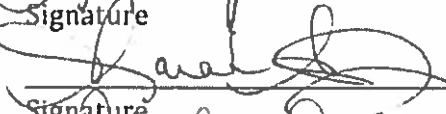
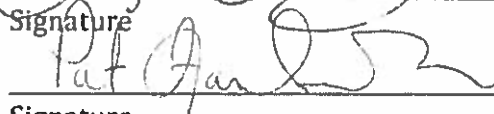
EFFECTIVE DATE: October 27, 2014

Mary Margaret Garrett  
Chief, Workforce Development

MMG:at

cc: All WFD staff, All Career Resource Centers, Youth Providers

Signatures of Staff of \_\_\_\_\_  
Career Resource Center - Gwinnett Tech Branch

|   |                 |
|---|-----------------|
|  | Laura Price     |
| Signature   | Print Name      |
|  | Sarah A Jackson |
| Signature   | Print Name      |
|  | Pat Fawbush     |
| Signature   | Print Name      |

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Signature Print Name

(If you need more signature lines, please copy before anyone signs)

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EFFECTIVE DATE: October 27, 2014

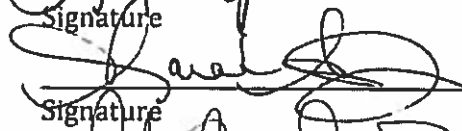
Mary Margaret Garrett  
Chief, Workforce Development

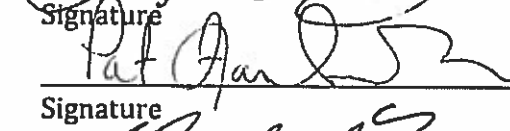
MMG:at

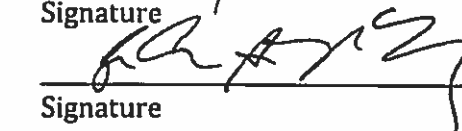
cc: All WFD staff, All Career Resource Centers, Youth Providers

Signatures of Staff of \_\_\_\_\_  
Career Resource Center - Gwinnett Tech Branch

 \_\_\_\_\_  
Signature Print Name  
Laura Price

 \_\_\_\_\_  
Signature Print Name  
Sarah A Jackson

 \_\_\_\_\_  
Signature Print Name  
Pat Fawbush

 \_\_\_\_\_  
Signature Print Name  
Brenda Beverly

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Signature Print Name

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Signature Print Name

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EFFECTIVE DATE: September 25, 2013

Mary Margaret Garrett  
Chief, Workforce Development

MMG:at

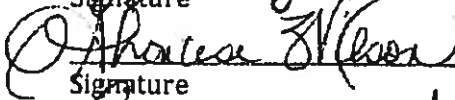
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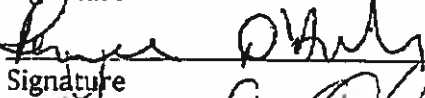
*Received*  
*4-21-14*

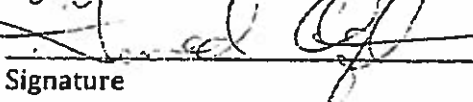
Signatures of Staff of      Connecting Henry  
Youth Service Provider Program Name

|  |                                    |
|--|------------------------------------|
| <br>Signature | <u>Susan Cumbley</u><br>Print Name |
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| <br>Signature | <u>Janice Jacoby</u><br>Print Name |
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| <br>Signature | <u>Shareese Wilson</u><br>Print Name |
|--|--------------------------------------|

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| <br>Signature | <u>Renee Davilar</u><br>Print Name |
|--|------------------------------------|

|  |                                    |
|--|------------------------------------|
| <br>Signature | <u>Gerald Carter</u><br>Print Name |
|--|------------------------------------|

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| _____<br>Signature | _____<br>Print Name |
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| _____<br>Signature | _____<br>Print Name |
|--------------------|---------------------|

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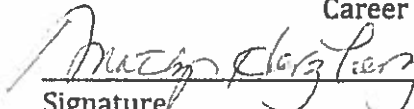
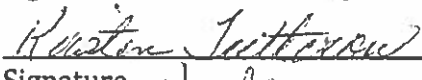
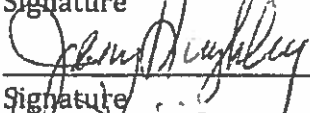

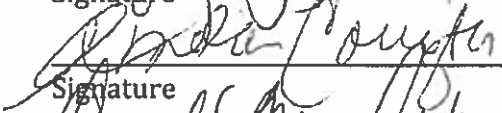

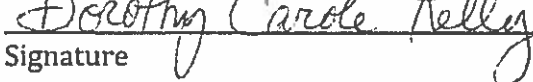
Mary Margaret Garrett  
Chief, Workforce Development

MMG:at

cc: All WFD staff, All Career Resource Centers, Youth Providers

Signatures of Staff of \_\_\_\_\_

Career Resource Center - Clayton Branch

|   |                             |
|---|-----------------------------|
|  | <u>Dorothy Herzberg</u>     |
| Signature   | Print Name                  |
|  | <u>Kirsten Tutterow</u>     |
| Signature   | Print Name                  |
|  | <u>Jean Hughley</u>         |
| Signature   | Print Name                  |
|  | <u>Courtney Killings</u>    |
| Signature   | Print Name                  |
|  | <u>Amelia Covington</u>     |
| Signature   | Print Name                  |
|  | <u>Angela Myers-Lockers</u> |
| Signature   | Print Name                  |
|  | <u>Dorothy CAROLE KELLY</u> |
| Signature   | Print Name                  |

Signature

Print Name

(If you need more signature lines, please copy before anyone signs)

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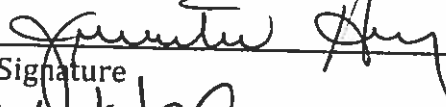
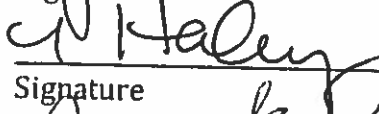


EFFECTIVE DATE: October 27, 2014

Mary Margaret Garrett  
Chief, Workforce Development

MMG:at

cc: All WFD staff, All Career Resource Centers, Youth Providers

Signatures of Staff of \_\_\_\_\_  
Career Resource Center - Duluth Branch

|   |                      |
|---|----------------------|
|  | <u>Juanita Haley</u> |
| Signature   | Print Name           |
|  | <u>Teshira Haley</u> |
| Signature   | Print Name           |
|  | <u>Jane Scott</u>    |
| Signature   | Print Name           |
|  | <u>Gene Pope Jr.</u> |
| Signature   | Print Name           |

Signature \_\_\_\_\_ Print Name \_\_\_\_\_

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EFFECTIVE DATE: October 27, 2014

Mary Margaret Garrett  
Chief, Workforce Development

MMG:at

cc: All WFD staff, All Career Resource Centers, Youth Providers

Signatures of Staff of \_\_\_\_\_  
Career Resource Center - Duluth Branch

Tammy Paterson Signature      Tammy Paterson Print Name

Loretta A McCullough Signature      Loretta A McCullough Print Name

Clinton E. Cougler Signature      Clinton E. Cougler Print Name

Beverly M. Ellis Signature      Beverly M. Ellis Print Name

Suzette Tui H Signature      Suzette Tui H Print Name

Marlen Ruiz Signature      Marlen Ruiz Print Name

CARLENE C. H. ER Signature      CARLENE C. H. ER Print Name

JAMES E. BRWIN, JR. Signature      JAMES E. BRWIN, JR. Print Name

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Mary Margaret Garrett  
Chief, Workforce Development

MMG:at

cc: All WFD staff, All Career Resource Centers, Youth Providers

Signatures of Staff of \_\_\_\_\_  
Career Resource Center - Douglas Branch

Theresa Thomas / Theresa Thomas  
Signature Print Name

Cassandra Y. Moore-Bailey / Cassandra Y. Moore-Bailey  
Signature Print Name

\_\_\_\_\_  
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