

## **GRWDB Personally Identifiable Information (PII) Policy**

**Purpose:** The Greater Raritan Workforce Development Board (GRWDB) approved a Personally Identifiable Information (PII) Policy at its Oct. 6, 2022, meeting. The policy is required under Workforce Innovation and Opportunity Act (WIOA) programs, as per NJWIN 6-15. This policy was updated to incorporate a procedure for using unique identifiers in place of PII and was approved by the full board on April 9, 2026.

**Background:** NJWIN 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 Greater Raritan Workforce Development Board, system partners and contractors providing WorkFirst New Jersey, Youth and Adult and Dislocated Worker grant program services, may have in their possession large quantities of protected information related to their organization 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. 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, but are not limited to name, 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.

TEGL 39-11 also recommends the use of unique identifiers for participant tracking instead of SSNs. While SSNs may initially be required for performance tracking purposes, a unique identifier could be linked to the individual record. Once the SSN is entered for performance tracking, the unique identifier may be used for tracking purposes.

**Policy:** Greater Raritan system partners and contractors procedures for PII must include:

1. Written policies and procedures and incorporated into all agreements.
2. All PII is stored in an area safe from access by unauthorized individuals.
3. PII is not processed on unauthorized equipment.
4. There is no transmission of unencrypted PII.
5. Forms, folders and other paper documents do not include SSNs.

GRWDB staff, partners and contractors must ensure the privacy of all PII obtained from participants and/or other individuals and to protect such information from unauthorized disclosure. GRWDB staff, partners and contractors must maintain such PII in accordance

with the standards for information security described in TEGL 39-11 and any subsequent updates.

Per TEGL 39-11, 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. For unique identifiers, service providers and partners also may use the individual's AOSOS number or their unemployment claimant number.

All employees, partners and contractors must review this policy and sign to acknowledge receipt of this policy as shown in Attachment A.

**Attachment A**

As an employee/partner/contractor working in the Greater Raritan Workforce Development Board system serving Hunterdon and Somerset Counties, I understand that I have access to sensitive and confidential information as defined above. I understand the importance of maintaining the security of the confidential information to which I have access.

I agree that I will use protected information only for the purpose prescribed in the scope of my work. I agree to not remove any protected information in any format my work area. I agree that I will not use a personal computer, personal cell phone or other personal electronic device to transmit protected information. I agree that I will shred any documents containing protected information that is not needed for the secured customer file. I acknowledge that there may civil and or criminal sanctions for the improper use of protected information to which I have access. I acknowledge that failure to abide by this policy may result in disciplinary action, up to and including termination of employment, or loss of contract.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_