August 5, 2022

EASTERN CAROLINA LOCAL AREA ISSUANCE NO. 2021-08, Change 1

SUBJECT:	Protecting Personally Identifiable Information (PII), Naming and Uploading Documents in NCWorks Online
PURPOSE:	To update the guidance on protecting personally identifiable information (PII), naming and uploading documents in NCWorks Online and rescind Eastern Carolina Local Area Issuance No. 2021-08 dated March 29, 2022.
BACKGROUND:	All WIOA Service Providers must maintain many forms of documentation and data for federal funds purposes. These documents may contain personally identifiable information (PII) that must be protected. USDOL Training and Employment Guidance Letter (TEGL) No. 39-11 provides additional "Guidance on the Handling and Protection of Personally Identifiable Information."
ACTION:	All WIOA Title I service providers are to comply with the attached guidance to ensure that all personally identifiable information is protected. Service providers should use all preventive measures to ensure that the confidentiality and integrity of all PII remains intact. It is expected that all WIOA Title I service providers will take necessary steps to protect PII data collected from individuals and employers. This includes redacting any unnecessary PII data when using for verification. Further, all PII data collected for use in Workforce Innovation and Opportunity Act (WIOA) programs must comply with the Statewide Security Information Manual.

https://files.nc.gov/ncdit/documents/Statewide_Policies/Statewide-Information_Security_Manual.pdf |
EFFECTIVE DATE:	Immediately
EXPIRATION DATE:	Indefinite
CONTACT:	Executive Director
DISTRIBUTION:	All WIOA Title I Service Providers

Tammy L. Childers, Executive Director

Attachment: A - Guidance on Protecting PII, Naming and Uploading Documents into NCWorks Online

Guidance on Protecting Personally Identifiable Information (PII), Naming and Uploading Documents into NCWorks Online

Protection of Personally Identifiable Information (PII)

Each WIOA Title I service provider must take all necessary precautions to protect the PII of consumers. USDOL TEGL No. 39-11 gives the following definitions and information related to PII:

PII – Federal Office of Management and Budget defines PII as information that can be used to distinguish or trace an individual's identify, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.[1]

Sensitive Information – any unclassified information whose loss, misuse, or unauthorized access to or modification of could adversely affect the interest or the conduct of federal programs, or the privacy to which individuals are entitled under the Privacy Act.
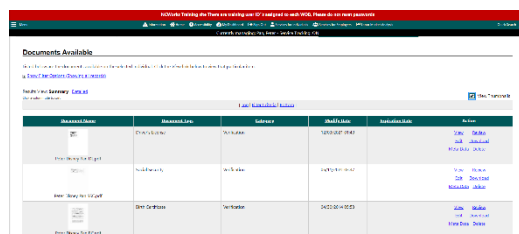
Protected PII and non-sensitive PII – the USDOL has defined two types of PII, protected PII and non-sensitive PII. The differences between protected PII and non-sensitive PII are primarily based on an analysis regarding the "risk of harm" that could result from the release of the PII.

1. 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 (SSN), credit card numbers, bank account numbers, home telephone numbers, ages, birthdates, marital status, spouse name, educational history, biometric identifiers (fingerprints, voiceprints, iris scans, etc.), medical history, financial information, and computer passwords.

2. Non-sensitive PII is information that if disclosed, by itself, could not reasonably be expected to result in personal harm. Essentially, it is stand-alone information that is not linked or closely associated with any protected or unprotected PII. Examples of non-sensitive PII include information such as first and last names, email addresses, business addresses, business telephone numbers, general education credentials, gender, or race. However, depending on the circumstances, a combination of these items could potentially be categorized as protected or sensitive PII.

To illustrate the connection between non-sensitive PII and protected PII, the disclosure of a name, business email address, or business address most likely will not result in a high degree of harm to an individual. However, a name linked to a SSN, a date of birth, and mother's maiden name could result in identity theft. This demonstrates why protecting the information of our program participants is so important.

Uploading Documents

All participant documents/information must be uploaded into NCWorks Online. Documents can be uploaded on NCWorks Online in the application, under documents and in a case note. All documents regardless of where you upload them are displayed under documents *(see screenshot).*

Documents should be uploaded as separate files and not as one file containing all participant information. Only complete documents should be uploaded. Signature pages should not be uploaded separately from the core document. Eligibility Items should be uploaded individually.

Service providers should not maintain any electronic participant file separate from NCWorks Online. It is not required that service providers maintain a hard copy of participant records. Should a service provider elect to maintain a hard copy of participant records, all PII information in the hard copy must be permanently redacted after it has been uploaded into NCWorks Online.

No PII data that is loaded into NCWorks Online system should be emailed, stored, or transferred on any portable devices. This includes laptops, tablets, mobile phones, thumb drives, CDs or other similar devices that are not protected by "Encryption Technology".

Redacting PII

When uploading verifying documentation in NCWorks Online, protected PII that, if disclosed, could result in harm to the individual whose name or identify is linked to that information should be redacted *(see screenshot)*. The list below provides guidance on what should be redacted on specific documents. The list is not all inclusive and service providers should be mindful of PII whenever uploading any documents in NCWorks Online. **At a minimum, all instances of an individual's driver's license number, credit card numbers, bank account numbers, and the first five digits of the SSN must be redacted**.

Document	What Should be Redacted
Social Security Card	First Five Digits
Birth Certificate	Parent Information (unless using to establish parenting youth)
NC Driver License/Identification	Entire Driver License/Identification Number
DD 214	First Five Digits of Social Security # and Date of Birth if not using to verify this item
Income Verification Documents	Social Security # and any Banking Information used for Direct Deposit
Family Size Verification Documents	Social Security Number(s)
Public Assistance Verification	Social Security Number
SNAP Verification	Social Security Number
Disability Verification	Social Security Number
Dislocated Worker Verification	Social Security Number
Youth Verification Documents	Social Security Number
Assessments	Social Security Number
Supportive Services Documents	Social Security Number
Occupational Skills Training Documents	Social Security Number
Work Experience Employment Documents	Social Security Number

NC General Statute 20-30 makes it unlawful "To make a color photocopy or otherwise make a color reproduction of a driver's license, learner's permit or special identification card…" When scanning driver's licenses, social security cards, passports and birth certificates into NCWorks Online, please be sure that all images are in grayscale *(see screenshot)*.
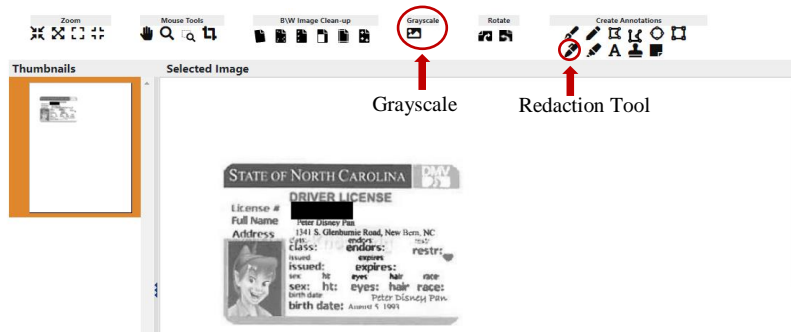
Naming Documents When Uploading into NCWorks Online

All documents must be associated to the appropriate application (see screenshot below).

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When naming documents, the name should indicate **what the document is** (*ex. Birth Certificate*). The document tag should indicate **what the document is verifying/being used for** (*ex. Verification of DOB*). The list provided below is not all inclusive of every document that will be uploaded into NCWorks Online but will provide some general guidance on how the documents should be uploaded, named, and tagged in NCWorks Online. The document names and document tags listed below do not reflect the actual names for your documents. Where the wording is *italicized,* you will need to include that information as part of the name/tag.

Document Name	Document Tag	How it should be uploaded
What the Document is	**What the document is verifying/being used for**	**How a document is uploaded depends on what the document is. It could be uploaded individually, as one document and with supporting documentation, if applicable.**
WIOA Application	WIOA Signed Application	**ALL** pages as one document
Social Security Card	Verification of Social Security Number	Individually
Birth Certificate	Verification of Citizenship **OR** Verification of Citizenship and DOB	Individually
Drivers License	Verification of DOB **OR** Verification of Address **OR** Verification of DOB and Address	Individually
Selective Service	Verification of Selective Service	Individually
DD214	Verification of Veteran Status	Individually
Document Name used to verify SNAP (ex. Letter from DSS)	Verification of SNAP	Individually
Document Name used to verify TANF (ex. Letter from DSS)	Verification of TANF	Individually
Document Name used to verify Public Assistance	Verification of Public Assistance	Individually
Paystubs for *Eligibility Determination Period*	Verification of Income	Individually (all income as one file)
Document Name used to verify Income for *Eligibility Determination Period*	Verification of Income	Individually (all income as one file)
Document Name used to verify Family Size	Verification of Family Size	Individually
Document Name used to verify disability	Verification of Disability	Individually
Document Name used to verify Dislocated Worker	Verification of DW Status	Individually (all DW documents as one file)
Document Name used to verify Youth	Verification of Youth Eligibility	Individually (barrier)
Document Name used to verify Employment Status	Verification of Employment Status	Individually
Document Name used to verify School Status	Verification of School Status	Individually
Disclosure Release	Disclosure Release	Individually
EEO	EEO	Individually
Participant Orientation	Participant Orientation	Individually
Financial Award Analysis for *Year*	FAA for *Program Year*	Individually (with supporting documents) every year
Individual Training Account for *Training Course*	*Semester and Year* ITA	Individually uploaded each semester (all supporting documents for ITA amount)
Attendance Sheets	*Month/Semester Year* Attendance	All attendance sheets/verification for the month/semester/week
Attendance Sheets for *Training Course* (WFD/CE courses)	Attendance Sheets for *Name of Training Course Month Year* or *Dates Attended*	All attendance sheets for the Workforce Development/Continuing Education Course month/semester/week
Document Name used to verify Grades	Grades for *Semester and Year*	Individually by semester
WEX Forms for *Name of Worksite Begin-End Dates*	WEX Agreement, Job Description, Supervisor Orientation and Employment Forms	All as one document
WEX Timesheets for *Name of Worksite*	WEX Timesheets for *Pay Period*	All timesheets by pay period
WEX Participant Evaluation from *Name of Worksite*	WEX *2 Week/Midpoint/Final* Evaluation	Individually as it occurs
OJT Forms for *Name of OJT Employer Begin-End Dates*	Pre-Award, Employer Agreement, Training Plan, Training Plan Justification, Job Description, resume (if not uploaded separately), Skills Gap analysis	All as one document
OJT Reimbursement for *Reimbursement Period*	OJT Invoice *Number/Final* and Time Records	Individually as received
OJT Trainee Evaluation	OJT *Midpoint/Final* Evaluation	Individually as it occurs

[1]OMB Memorandum M-07-16, Safeguarding Against and Responding to the Breach of Personally Identifiable Information (May 22, 2007)