

PRINCE GEORGE'S COUNTY WORKFORCE DEVELOPMENT BOARD
DATA SECURITY AND PERSONALLY IDENTIFIABLE INFORMATION

POLICY NUMBER: 1.4000.100.037
EFFECTIVE DATE: September 18, 2024
APPROVING AUTHORITY: Board Chair
Prince George's County Workforce Development Board
RESPONSIBLE STAFF: All Staff, Sub-contractors, and Service Providers
RESPONSIBLE OFFICE: Director, Program Integrity & Data Administration

BACKGROUND:

The Prince George's County Public Workforce System, modeled as a free membership network and branded as the Prince George's County American Job Center Community Network, is the workforce system for the Prince George's County Local Workforce Development Area. The Prince George's County Local Workforce Development Area is one of 13 Local Workforce Development Areas in Maryland. Each Local Workforce Development Area is led by a Chief Local Elected Official and governed by a Local Workforce Development Board. The Prince George's County Executive is the Chief Local Elected Official for Prince George's County, and the Local Workforce Development Board is the Prince George's County Workforce Development Board. Based on the Prince George's County Local Workforce Area WIOA Local Governance Agreement between the Prince George's County Executive, the Prince George's County Workforce Development Board, and Employ Prince George's, Inc. (EPG), EPG serves as the administrative staff and fiscal agent of the Prince George's County Workforce Development Board (WDB).

PURPOSE:

Board staff, sub-contractors, and service providers, in the course of conducting business, collect and store the personal information of thousands of individuals each year. Each agency and organization receiving funding from the Prince George's County Workforce Development Board, regardless of the funding source, is obligated to maintain privacy and data security related to this information.

In order to prevent unauthorized access to Personally Identifiable Information (PII), identity theft, or leaking of sensitive information, Board staff, sub-contractors, and service providers must take the steps necessary to ensure the privacy of all PII obtained from participants and/or other individuals and to protect such information from unauthorized disclosure.

POLICY:

Personally Identifiable Information (PII) is any information that can be used to distinguish or trace a person's individual identity, either alone or when combined. Entities that receive funding through the Prince George's County Workforce Development Board, including all Board staff, all sub-contractors, and all service providers must protect personally identifiable information throughout the life cycle of data collection, storage, transmission, and disposal. Collection of PII should be limited to only what is needed for the performance of the function. For example, when collecting program eligibility documentation, do not include extraneous information or PII not necessary for determining eligibility.

Sub-contractors and service providers must restrict access to only those employees or contractors who need it in their official capacity to perform duties in connection with the agreed upon scope of work. While safeguards must be in place at the organizational level to ensure the security of PII, it is the responsibility of the individual staff user to protect the data to which they have access.

In addition to the contents of this policy, Board staff, sub-contractors, and service providers must familiarize themselves with *Training and Employment Guidance Letter (TEGL) 39-11* and *Maryland Department of Labor Policy Issuance 2019-04* and any subsequent revisions or replacements.

Technology

PII may never be stored on personal equipment and must only be securely stored on Board, sub-contractor, or service provider owned or operated equipment.

Board staff, sub-contractors, and service providers must adhere to their agency's or organization's Information Technology requirements regarding asset management and security. At a minimum, desktop computers, laptops, Cloud storage, portable storage, servers, cell phones, tablets, etc., should be password protected and permission restricted. Equipment may not be left logged in or unlocked and unattended and individuals with access to PII must not share passwords, which could lead to unauthorized access of PII.

E-mail and electronic transfer of data

No PII may be emailed or electronically transferred to any party who is not authorized to access or receive the information. The Prince George's County Workforce Development Board strictly prohibits emailing or electronically transferring unencrypted PII to authorized recipients. Encryption must meet the minimum requirements listed in US Department of Labor's Training and Employment Guidance Letter (TEGL) 39-11 https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2012/TEGL_39_11.pdf PII may not be emailed to or from personal email addresses or equipment and must only be securely transferred when necessary and appropriate on Board, sub-contractor, or service provider owned or operated systems.

Third-party data systems

Board staff, sub-contractors, and service providers are authorized to utilize third-party data systems which must be built to restrict unauthorized access. Board staff, sub-contractors, and service providers must ensure that third-party system providers have a security plan with a system of checks and controls to ensure data security. Systems should utilize up-to-date security protocols; outdated or obsolete technology poses an unacceptable security risk. Board staff, sub-contractors, and service providers must strictly adhere to processes that remove access to data systems for users who are no longer employed or contracted.

Physical files

Physical files must be protected in locked storage restricted to only those with a need to access the files in the

performance of their duties. Unsecured physical files should never be left unattended.

Transporting of physical files is discouraged, but when necessary, authorized personnel must ensure that files are not transported loose and are secure. Whenever possible, transportation should occur directly from the original location to the new and returned promptly; each stop is an added risk. Vehicles, homes, and public places pose a particular risk and every effort should be made to reduce exposure.

Disposal

Securely disposing of PII documentation is an important part of ensuring data security. No PII documents should ever be placed in trash or recycle bins. Complete destruction is required for duplicate or unneeded PII. After the required record retention period, physical files must be completely destroyed. Electronic files stored on desktop computers, laptops, Cloud storage, portable storage, servers, cell phones, tablets, etc should be deleted and completely erased or physically destroyed.

Monitoring

Prince George's County Workforce Development Board may monitor, audit, or evaluate Board staff, sub-contractors, and service providers for adherence to this policy.

Breach

Board staff, sub-contractors, and service providers who suspect, discover, or are notified of an actual data security incident or *potential* breach of security and/or privacy relating to Personally Identifiable Information, must immediately and NO LATER THAN 48 HOURS from suspicion, discovery, or notification contact the Board's Director, Program Integrity & Data Administration who will then notify the Executive Director and the Prince George's County Workforce Development Board Chair.

A security incident or breach refers to any situation where data was accessed or potentially accessed by someone other than an authorized user and/or for other than authorized purposes.

EXCLUSIONS TO THE POLICY:

None

RESOURCES:

Training and Employment Guidance Letter (TEGL) 39-11

https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEGL/2012/TEGL_39_11.pdf

Maryland Department of Labor Policy Issuance 2019-04 <https://labor.maryland.gov/employment/mpi/mpi4-19.pdf>

2 CFR 200.79 and 2 CFR 200.82 <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D?toc=1>

FORMS:

None

APPROVING SIGNATURES:



Brad Frome
Board Chair
Prince George's County Workforce Development Board

Nov 1, 2024

Date