

Confidentiality Policy

The Confidentiality Policy provides guidance to protect employees and participants of activities funded through the local workforce development area from issues related to the handling of confidential information. The Confidentiality Policy #307 pertains to identifiable data and the [Privacy Policy #308](#) pertains to the person. A separate policy exists for handling and managing Personally Identifiable Information (PII): [Personally Identifiable Information \(PII\) Policy](#).

Any confidential participant information which can be accessed by any individual, including but not limited to NWPA Workforce Development Board (WDB), its staff, program services contractor and staff, grantees, sub-grantees, PA CareerLink[®] employees or other agencies providing program services funded through the Local Workforce Development Area shall comply with the [Privacy Act of 1974](#)

Individuals that provide services and activities funded through the local workforce development area and have access to confidential information must keep all medical information in a separate file and secured in a locked location. Medical information will only be shared with individuals with authorized access to the information to ensure that there are no inappropriate disclosures of protected health information per appropriate federal and state guidelines.

Personal information, especially Social Security numbers, must be protected and kept confidential. Confidential information will only be shared with individuals with authorized access.

Staff that provide program activities funded through the local workforce development area and are responsible for client files shall comply with The Privacy Act of 1974, by assuring that each participant's file only contains information that is specific to the participant (i.e. do not put class rosters with other participant names, Social Security numbers or other personal information in client files).

Contractors shall not use or disclose any information about a participant receiving services under this contract except with the written consent of either the participant or the participant's parent or guardian. Nothing in this clause is to be construed as a bar to the contractor's responsibility to assist with a federal or state agency in conducting an audit or an evaluation.

Contractors will comply with the Department of Labor procedures for release of information under the [Freedom of Information Act](#) including participant characteristics,

program operations, financial reporting, and other subsequent requests by individuals, community groups, or organizations. Contractors shall only dispose of personal information via a process that at all times protects the privacy and confidentiality of the individual's information in accordance with federal and state requirements, as well as in compliance with the [WDB Record Retention Policy](#).

REFERENCE

2 CFR 200.303

USDOL Training and Employment Guidance Letter (TEGL) No. 39-11

20 CFR 680.110

HISTORY

Name	Date	Rev. Level	Description of change	Effective Date
Deb O'Neil	08/05/15	A	New Policy	08/12/2015
Deb O'Neil	03/15/2017	B	Update language per WIOA	06/09/2017