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|  | West Central Region Local Policy | |
| | Subject: Local Confidentiality Policy | Release Date: 9.27.23 |
| | Reference: OWD Issuance 10-2022 | Revision: 4 |

Purpose

This local issuance communicates that the Workforce Development Board of Western Missouri, Inc. and sub-recipients will follow OWD Issuance 10-2022 and expands on information specific to the local workforce area.

Background

The Workforce Innovation and Opportunity Act (WIOA) (as well as other laws affecting Trade Act Assistance, education, and social services) provides direction to the Missouri Workforce Development System. That system includes the Missouri State Workforce Development Board, the Division of Workforce Development (OWD), Local Workforce Development Boards (Local WDBs) and their sub recipients, and partner agencies. All these entities use confidential information daily. The Workforce Development Board of Western Missouri, Inc. must ensure the privacy of customers and safeguard their confidential information by following the process as stated below:

- Identifying the local custodian for the West Central Region’s Confidential Information Authorized Users List
- Determining access eligibility and registry for WDB, sub-recipient staff, and partner agency staff within the region requiring a “WR Number”
- Maintaining confidential medical records
- Safeguarding confidential demographic information, when tied to the identity of an individual;
- Monitoring for compliance

West Central Region Specific Processes

Local Custodian:

Workforce Development Board of Western Missouri, Inc. designates Tara Colter-Lappat, Programs/Compliance Specialist, as the custodian of the Local Workforce Development Area Confidential Information Authorized Users List. Direct all inquiries or comments about the Local Workforce Development Area Confidential Information Authorized Users List to Tara Colter-Lappat at (660) 827-3722 or email t.lappat@wcregion.org

WDB will maintain the Confidential Information Authorized User List composed of the statewide electronic case-management system (SECMS) and other online data systems users for the LWDA and Missouri Job Centers (and sub-recipients), including all partners who have a “WR Number” within the region. Local OWD Staff will be tracked separately by OWD Customer Support Unit (OWD-CSU).

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Confidentiality Test Request:

Functional Leaders will assist all Job Center trainees in accessing the online tutorial on the State of Missouri Learning Management System (LMS), OWD Issuance 10-2022, and local policy. Once these materials are reviewed, Functional Leader will contact the local custodian.

The Functional Leader will send the Confidential Information User Attestation Form (UAF), signed by the trainee, to the local custodian before moving forward. Functional Leaders will also submit completed UAFs to the respective agency’s personnel office.

New System Training:

Before full access eligibility and registry, the trainee must first complete new system training. Training can be scheduled using the State of Missouri Learning Management System.

Read-only access can be obtained after reading OWD Issuance 10-2022 and signing the Confidential User Attestation Form (UAF).

Access Eligibility and Registry Process:

The Functional Leader will assist the trainee’s supervisor (if applicable) in completing the System Access Request Form to designate the types of information the user will be accessing. The completed form will be signed by the trainee’s supervisor and sent to the local custodian. The local custodian will send requests to OWD’s CSU to be processed. This process excludes any local OWD staff, who will be tracked separately by OWD CSU.

The same access eligibility and registry process will be followed if at any time a change of access is needed for a system user.

When a staffing change occurs, the Functional Leader will assist the supervisor (if applicable) to ensure that all confidential information is returned and to terminate the departing user’s access using the System Access Request Form. Submission of the form to the local custodian should be within two weeks prior to the employment action taking effect, or as soon as possible, if not given notice.

Medical and Disability Related Information:

Medical and disability related information will be kept in a separate, secure location, physically removed from the main files for participants or employees. Electronic files must be password-protected and physical files must be kept in a secure, locked location.

The use or disclosure of medical and disability related information is limited to specific, lawful purposes.

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Direct all inquiries or comments about secure medical and disability records to Tara Colter-Lappat, Local Equal Opportunity Officer, at (660) 827-3722 or email t.lappat@wcregion.org.

Confidentiality of Demographic Information:

Demographic information, when tied to the identity of the individual (participant or employee), is considered confidential information and is to be handled and stored with the same guidelines described in Attachment 1 of OWD Issuance 10-2022.

Personal Identifiable Information

Personal Identifiable Information (PII) is information in records, such as a name or identification number, used to trace an individual’s identity, directly or indirectly, through linkages with other information. PII includes not only direct identifiers such as name and SSN, but also indirect identifiers such as date and place of birth. Protected PII means an individual’s first name or first initial and last name in combination with any one or more of types of information, including, but not limited to, social security number, passport number, credit card numbers, clearances, bank numbers, biometrics, date and-place of birth, mother’s maiden name, criminal, medical, and financial records, [and] educational transcripts. This does not include PII that is required by law to be disclosed.

WDB prohibits the transfer of personal identifiable information (PII) through any medium including but not limited to email, text, etc. with the following exception:

- Personal identifiable information (PII) can be transferred through secure file transfer and sharing software such as Share File or SharePoint.

Documents that are related to approvals should be uploaded to MO Jobs.

If circumstances arise that preclude a document from being uploaded into MO Jobs or the document contains medical and disability information that cannot be uploaded into MO Jobs, please contact the WDB for further instructions.

Monitoring for Compliance:

Local monitoring may occur at any time to ensure compliance with the Local Confidentiality and Information Security Policy.