

# NORTH CENTRAL ARKANSAS WORKFORCE DEVELOPMENT BOARD

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WDB Policy #: 1.70

Effective Date: 12/13/2017

Revision Date: 3/14/2018, 6/13/2018, 6/16/2021

SUBJECT Confidentiality

PURPOSE

This policy is to ensure personnel are aware how to handle confidential information. WIOA personnel have access to personal information that must remain confidential. Any person with access to personal information is required to read and understand the Family Education Rights and Privacy Act (FERPA) and must sign a confidentiality agreement.

CONFIDENTIALITY

Participant information can only be given to the participant or parent/legal guardian if youth under 18 years of age.

No personally identifiable information regarding an individual, including a Social Security number, student identification number, or other identifier, may be disclosed without the prior written consent of the individual.

Participant information should only be shared with other case managers or other WIOA employees on a "need to know" basis. Participant information should never be shared or discussed outside the office.

All participant files shall be located in a secure site with a locking door and only accessible to WIOA case managers and supervisors and will be locked at the end of the business day. Any participant files located in field offices are required to be kept in a locking file cabinet and locked at the end of the business day.

All medical or disability related materials shall be kept in the "Medical Files" cabinet with a marking on original file that there is also a "Medical file" for that participant. Medical information should NOT be entered into AJL.

All participant files or documents electronically transferred must be sent through the HIPPA compliant "SharePoint" portal. Time sheets may be faxed or emailed.

WIOA shall not share participant information with other agencies without a signed consent form by participant.

Participants may request their information not be made public and their file shall be marked "Private."

Career Specialists will use laptops for WIOA purposes only. Laptops must have a screen saver with password protection or keyboard locking programs activated on them.

WIOA computers are for office use only. WIOA staff may not download or install any software on computers without prior consent from supervisor.

Background checks may be required for individuals with access to confidential information.

The use of network activity may be monitored without an employee's knowledge or consent

A confidentiality notice must be appended to all e-mail messages

Confidential information cannot be discussed or disclosed in telephone conversations unless it is certain that the other party has authorized access to the information.

Paper documents must be secured in a manner so that unauthorized access (such as people walking into room) is unlikely

Computer monitors must be positioned such that unauthorized viewing is unlikely

Documents and papers containing confidential information must be shredded personally or brought to the Batesville office for shredding.

All servers must contain anti-virus software that is updated automatically

Misuse, mishandling, or unauthorized disclosure of confidential information will result in a write up and/or termination.

Procedure for disaster recovery of paper and electronic information-All WIOA financial documentation is stored to the main server, which is backed up every two hours to an offsite storage facility with encryption, eliminating the chance for a compromised domain account accessing the file share. Twelve months of back-up is stored at any given time.

Approved by the NCAWDB on:

6/16/2021

Gayle Cooper, NCAWDB Chairperson:

