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## Western Arkansas Workforce Development Area Policies and Procedures

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<b>TITLE</b>	Personal Identifiable Information (PII) & Client File Controls
<b>NUMBER</b>	P0003-23
<b>TYPE</b>	Policy - Programmatic
<b>APPROVING AUTHORITY</b>	Western Arkansas Planning & Development District
<b>EFFECTIVE DATE</b>	12/12/2023
<b>NEW/REPLACED</b>	New

To protect PII (personally identifiable information) of clients the following procedure is enacted as required by ETA/DOL and noted in TEGL 39-11. These procedures also ensure trackability of client files.

1. Upon receipt of a client application a file will be created or updated and secured in the file room.
2. ALL files and documents containing PII must be secured in the file room. The exception is when a staff member is working on the file. When staff is not immediately working on a file it is to be secured in the file room including overnight, weekends and holidays.

Any PII received or scanned to a computer or temporary storage must be expediently placed in the appropriate file and promptly deleted from any non-designated site.

3. To maintain track of files, a sign in and out sheet has been created and will be maintained in the file room. This is to ensure files can be located any time.
4. To make this manageable for all staff, a file cabinet has been designated and marked for in-process files. This cabinet can be used to place in-process files in your designated drawer or in the appropriate program file drawer.

Staff members must keep the in-process drawers in an orderly manner. This option exists for your convenience of access to client files you are working as you are in the office.

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Approval Signature:

John Craig, Board Chair

