

Personally Identifiable Information (PII)

Effective: December 1, 2016

Background:

USDOL Training and Employment Guidance Letter No. 39-11; Privacy Act of 1974; Computer Security Act of 1987; NYS OTDA Local Commissioners Memo 14-LCM-15; OMB Memoranda M-07-16, M-06-15 and M-06-19

Policy:

The Oswego County WDB will require all staff to take all reasonable measures to ensure the privacy and confidentiality of all PII including social security numbers (SSN). When handling PII, the following principles will be observed:

1. Oswego County Workforce New York will collect, use, record and/or retain PII only as necessary to comply with requirements of the law or to carry out necessary business functions;
2. Oswego County Workforce New York will protect the confidentiality of PII and limit access to such information only for legitimate business purposes. OCWNY will use PII only for the purposes for which the information was originally obtained. OCWNY will obtain the consent of the person concerned before externally disclosing PII, except to the extent necessary to (i) respond to judicial orders or subpoenas; (ii) investigate, prevent or act regarding suspected illegal activities, fraud, claims against OCWNY or to ensure the safety of Company persons or property; or (iii) as otherwise authorized or required by law or contract. OCWNY will not communicate any PII to the public;
3. Where a unique identification number is required for a purpose not based in law, Oswego County Workforce New York will attempt to use a number other than an SSN, in most cases the OSOS ID number or, if there is no current reasonably feasible alternative, will make special efforts to ensure that SSN's are maintained in files which are protected from unauthorized disclosure. This includes, but is not limited to customer case files, email communications and other correspondence;
4. Oswego County Workforce New York staff will remove files or technology containing PII from the One-Stop Center only as necessary in conducting business and will remain conscious of and avoid any potential security breaches; and

5. Oswego County Workforce New York will use appropriate methods for destroying sensitive PII in paper files (i.e. shredding or burning).

Incident Reporting:

Oswego County Workforce New York staff or contractors will report any breach or suspected breach of PII to their immediate supervisor and the computer services assistant within one business day of the incident. Staff or contractors should be prepared to provide details as to the nature, location, date, time, individuals and PII involved in the incident. Additional information may be requested as needed. The supervisor and computer services assistant will investigate and keep the One-Stop Operator apprised of the situation.