POCONO COUNTIES
WORKFORCE DEVELOPMENT BOARD (WDB)/AREA (NE 135)

WORKFORCE SYSTEM OF RECORD/ DATA SECURITY POLICY

1. **Purpose**

The purpose of the policy is to ensure that all WIOA Program Operators within the Pocono Counties Workforce Development Area are in compliance with **WORKFORCE SYSTEM POLICY (WSP) No. 01-2015 (Change 1).**

WSP
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This policy serves to affirm that CWDS/PA CareerLink® is the system of record for the participant tracking of WIOA, WIA, Wagner-Peyser Act and TAA programs. All participants, employers and providers served by these funding streams (for all levels of services, including career planning) must have their services and/or activities entered into CWDS/PA CareerLink® expeditiously to ensure a common record and, when appropriate, assignment of a common exit date. Additionally, CWDS/PA CareerLink® is the system of record for all financial reporting by local workforce development board staff regarding WIOA, WIA, Wagner-Peyser Act and TAA funded programs.

This policy also ensures that all WIOA Program Operators are in compliance with the requirements of the **Workforce Innovation and Opportunity Act (WIOA)** Title I-B Programs regarding eligibility, and allowable services as authorized in the Act. The policy also explains the interaction between the Title I-B Adult Priority of Service Policy and the Veterans' Priority of Service requirement of the OA. Pennsylvania's data-management system, CWDS/PA CareerLink®, is the required entry point for all workforce investment activities in Pennsylvania. All workforce investment activity (to include participant and employer registrations, job postings, job matching, career planning, case progress notes, activities and outcomes pertaining to workforce programs funded through the authorization of WIOA, WIA, the Wagner-Peyser Act, TAA and related grants) must be entered into CWDS/PA CareerLink® to ensure compliance with federal and state statutes, regulations and policies.

Note: Career planning activities must first be entered into CWDS/PA CareerLink®. Within any alternative system, participants' Participant Identification Number, or PID, employers' and providers' Federal Employer Identification Number, or FEIN, and employers' job posting order numbers must identically match the identifier used within the system of record, CWDS/PA CareerLink®.

The purpose of this policy is also to ensure that all WIOA Program Operators are in compliance with Data Sharing/Security Agreements and related Source Documentation Security Practices related to CareerLink® customer sensitive and personal information.

2. EFFECTIVE DATE

12/11/19

3. IMPLEMENTATION

Fiscal Agent/Local WIOA Operator Implementation

System of Record Policy

A.   All WIOA, WIA, Wagner-Peyser Act and TAA grant recipients are required to report individual participant data and financial data via Pennsylvania's system of record, CWDS/PA CareerLink®.

B.   All participant, employer and provider data should be entered into CWDS in a timely manner (e.g. service start date, and hold date, entered employment, certifications, assessments, program exit dates).

C.   Requests for funds by a local workforce development board will be made using CWDS/PA CareerLink.

D.   PA CareerLink® sites will use CWDS/PA CareerLink® as the common information-management system. CWDS/PA CareerLink® is the official system of record used for all data collection and reporting for all required partners located in comprehensive and affiliate PA CareerLink® sites. Shared information and data agreements will be used to support access to information and information sharing among partners as allowed by authorizing law and regulations.

E.   PA CareerLink® sites will use CWDS/PA CareerLink® as the job-match system when job seekers are looking for employment and employers are searching for candidates.

F.   Local WIOA Operators may use supplemental forms or systems for the purpose of documenting WIOA customer registration, eligibility documentation, IEPs, Case Notes, other services, program outcomes, and other related case management information, as long as the supplemental information is consistent with the information reported in CWDS, the system of record.

G.   Local WIOA Operators will comply with BWPO Policies regarding digitizing and uploading of eligibility documentation to CWDS for WIOA applications.

Data Security Policy

A. All WIOA Program Operator staff who have access to CWDS must complete and have on file a Data Sharing Agreement, outlining their responsibilities, access, use, and potential penalties for misuse or improper handling of customers personal information and documentation in CWDS and any documentation, paper files, or local data management systems containing such information.

B. Any local Case Management files, whether in computerized or paper forms must be properly secured at all times to prevent customers' personal information from being accessible to unauthorized individuals.

C. Hard drives or network servers utilized to store customer information must be properly secured and destroyed in the event the equipment is no longer in use.

D. Local Case Management paper files must be secured in locked cabinets when not in use. WIOA Program Operators will comply with the Pocono Counties WDB record retention policy, and take steps to ensure that participant files and documents are destroyed once they are beyond the dates required under the record retention policy.

E. WIOA Program Operator staff must avoid the use of Customer Personal Identifying information, such as Social Security numbers, etc. in written or electronic communications. Communications with individuals with CWDS access should avoid the use of full social security numbers and other confidential identifying customer information unless absolutely necessary. Any forms utilized by WIOA Program staff in an individual's file including their Social Security # should use only the last 4 digits, unless it is a document (I-9, W-2, etc. requiring the full SS#. A Participant's CWDS ID number should be used whenever practical, to identify the customer when necessary.

F. All CareerLink® staff should receive training and instruction in best practices for the handling and proper use of customers' sensitive and personal information.

G. WIOA Program Operators should, within reasonable time frames, delete digitized eligibility documents from local computers or network servers once they are uploaded to CWDS to ensure that sensitive personal information is not accessible to unauthorized users or inadvertently uploaded to another WIOA customers CWDS folder.

H. WIOA Program Operator staff will not transmit sensitive personal identifying information or documents outside of the CWDS by e-mail unless encrypted.