



SUMMARY OF COMMENTS

There were 4 comments to the draft version of this policy:

Comment #1 - Section IV(A) page 3: Will the WANB provide a standard notification form to be signed by participants acknowledging the use of PII for WIOA purposes only or is the WIOA application language satisfactory (I further understand and agree that my social security number and other information on this application will be provided to other government agencies if required by law)?

Resolution – Yes, continue to have participants sign the WIOA application with existing acknowledgements. The Alliance will not be providing a separate notification at this time. Continue to use your current release.

Comment #2 - Section IV(E) page 4: The County of Marin employees must use a proximity card to access any area where case files are located, must cabinets be locked in addition?

Resolution – Files must be stored in a secure location. In addition, confidential files are to be stored separately from the non-confidential files and secured with limited access. If non-confidential files and confidential files are stored in the same locked room, confidential files must be in a locked cabinet to facilitate the limited access.

Comment #3 - This policy indicates first and last names are non-sensitive PII which is inconsistent with our PII definition at SSSD.

Resolution – It is expected that you may have some internal policies that are different, however they must be within the requirements established in the Alliance policy. If your policies or more restrictive that is fine.

Comment #4 - Since WIOA will have these policies, especially regarding PII, should we make note of it in our SSSD Confidentiality P&P and make it an annual requirement for WIOA staff to review and sign a certification that they've read it and agree to it?

Resolution – The manner in which subrecipients implement Alliance policy and prepare their WIOA staff is understandably varied. The Alliance expects subrecipients to accomplish this in the way that is effective for their agency.