

<b>SERVICE DELIVERY</b>	<b>PII (Personally Identifiable Information)</b>
<b>Classification:</b>	Title I Adults, Dislocated Workers, Youth
<b>Date Adopted:</b>	11/15/15 <b>MODIFIED:</b> 01/25/18
<b>Background:</b>	<p>The Privacy Act of 1974, which is the main law governing the use of SSNs, requires that state and local agencies requesting an SSN inform the individual to whom the request is made (1) whether the disclosure is mandatory or voluntary, (2) by what statutory or other authority the SSN is requested, and (3) what uses will be made of it. With very limited exceptions (none of which are applicable to WIOA), the Privacy Act also makes it illegal for government agencies to deny any rights, benefits or privileges to persons who refuse to disclose their SSN.</p> <p>Federal regulations implementing the Workforce Investment Act of 1998 (20 C.F.R. 666.150) require that states use quarterly wage records in measuring the performance of state and local WIOA agencies. In order for agencies to obtain the required performance data, the regulations authorize them to use SSNs in tracking the quarterly wage progress of WIOA participants.</p> <p>According to TDLWD memorandum 12-49: "Tennessee law prohibits the public disclosure of SSNs without valid permission [and] . . . requires the establishment of safeguards and management controls for the storage, sharing, and destruction of SSNs in an organization's electronic and paper records."</p>
<b>Policy:</b>	<ol style="list-style-type: none"> <li>I. As required by both federal and state mandates, WIOA staff may request Social Security Numbers (SSNs) from WIOA applicants and enter the SSNs in the state's Virtual One-Stop (VOS) system so that they may be used in performance measurement.</li> <li>II. Wherever practicable staff will use VOS identification numbers (SID) or other identifiers, instead of SSNs, as participants' personal identifiers in communications with other organizations, such as schools, youth program service providers, and employers.</li> <li>III. All applicants for WIOA services receive a disclosure statement that addresses (a) the authority for requesting the SSN, (b) the fact that disclosure of a SSN is voluntary, (c) the uses of the SSN, and (d) existing information safeguarding the SSN. Applicants will be asked to sign a statement either agreeing or declining to disclose their SSN.</li> <li>IV. With the approval of WIOA applicants and participants who disclose their SSN, staff may disclose individual's SSNs, when deemed necessary, to (a) federal and state agencies who provide funding, monitoring, or auditing for the WIOA program, (b) service providers from whom participants seek or receive training, testing, financial aid, or other services, (c) service providers operating under contract with LWDA2 to provide services to youth program participants, and (d) employers from whom participants seek or obtain employment.</li> <li>V. Staff will continue to seek opportunities for eliminating use of SSNs wherever possible, as allowed by federal laws and regulations, state laws and policies, and Tennessee Board of Regents and local board policies.</li> </ol>

	<p><b>VI.</b> Staff will follow Tennessee Board of Regents (TBR) and Walters State Community College policies regarding (a) the use, storage, and disposal of SSNs in both paper and electronic files and (b) related staff training. Policies include those detailed in the Information Security Program guidelines, which requires annual staff training; Policy 08:08:03, Mobile Device Data; and Policy 08.25:00, Record Retention and Disposal Policy, which requires that excess or outdated records be shredded by a state contractor.</p>
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