

*Guaynabo-Toa Baja Workforce Development Local Board
Workforce Innovation and Opportunity Act (WIOA)*

PUBLIC POLICY OF THE LOCAL BOARD FOR THE USE AND COLLECTION OF FEDERAL SOCIAL SECURITY [NUMBERS] WHILE PROVIDING SERVICES TO CLIENTS UNDER WIOA

WIOA #20-003

INTRODUCTION:

The Guaynabo-Toa Baja Workforce Development Local Board will comply with the provisions of the Workforce Innovation and Opportunity Act (WIOA) of 2014, regarding the responsibility of overseeing the proper administration of WIOA funds. Recently, a new requirement has been approved for establishing mechanisms to safeguard the confidentiality of sensitive data, such as the clients' Social Security (SS) [number]. The US Employment and Training Administration (ETA) has issued guidelines that explain the compliance required.

PURPOSE:

This public policy is established to provide guidance and reference regarding the management of a participant's sensitive personal information, such as their social security number, as well as the applicable precautions and restrictions.

LEGAL REFERENCES:

- Policy for Collection and Use of Workforce System Participants Social Security Numbers, Training and Employment Guidance Letter NO. 5-08, November 13, 2008.
- Guidance on the Handling and Training and Employment Guidance Letter NO. 39-11, June 28, 2012.
- Workforce Development Program Newsletter, June 7, 2019: Policy on the Use of Personal Identifiable Information for Workforce Innovation and Opportunity Act (WIOA) Title I Programs participants.

PUBLIC POLICY: As allowed by the applicable referenced regulation the state cannot deny access to services to any individual or participant who refuses to provide his or her Social Security Number, except in the following services, all applicable to WIOA programs:

- Determination of eligibility for basic employment or employment search assistive services.
- Training and employment services.
- Self-services at the *Centro de Gestión Única*

The applicant must receive an explanation about the purpose of this number for income calculations and after receiving the services to calculate the results of the program execution measures.

The participant will be asked to show his or her SS card to confirm the number but the card must not be copied. The following steps will be followed:

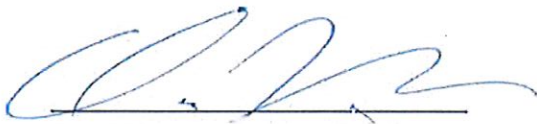
- SS information will be taken in the state data-entry system where the participant will be assigned an identification number. Through this number all the necessary data will be validated for the payments for services and execution measures.
- When this record is in the system it is protected by strict security measures to ensure confidentiality.
- The participant's social security number will not appear in any form in his or her physical record.

These requirements apply to all types of records generated for all the applicants, participants under WIOA Title I, documents generated by service providers and partners of the *Centro de Gestión Única* that will be filed in the service records. Therefore, this policy must be disclosed to all the members of the local system.

APPROVAL AND VALIDITY:

This public policy will be effective immediately after its approval.

In Guaynabo Puerto Rico, today, December 18, 2019.



Mr. Oriel Ramírez Rodríguez
President
Workforce Development Local Board