



PRIVACY POLICY

- 1.0 Purpose.** To protect employees and participants of activities funded through the Workforce Investment Area from issues related to and handling of confidential information.

- 2.0 Requirements.** All employees and participants of activities funded through the Local Workforce Investment Area shall comply with:
 - 1) Section 504 of the Rehabilitation Act of 1973
 - 2) The Privacy Act of 1974

- 3.0 Scope.** Any confidential participant information which can be accessed by any RCWE and PA CareerLink staff, contractors, subrecipients, and their employees.

- 4.0 Responsibility.**
 - 1) All staff that are employed by activities funded through the Workforce Investment Area and have access to confidential information.
 - a) Must keep all medical information in a separate file, in a locked location, with access being limited to the manager at the facility where the files are stored.
 - b) Must keep all personal information, including Social Security numbers, confidential.
 - c) Shall not share or provide confidential information to any authorized user.
 - 2) All staff that are employed in activities funded through the Workforce Investment Area and are responsible for client files shall comply with The Privacy Act of 1974, by assuring that each individual's file only contains information that is specific to the individual (i.e. do not put class rosters with other participant names, Social Security numbers or other personal information in client files).
 - 3) All contractors shall not use or disclose any information about a participant receiving services under this contract except with the written consent of the participant's parent or guardian. Nothing in this clause is to be construed as a bar to the contractor's responsibility to assist with a federal or state agency in conducting an audit or an evaluation.



POLICY – 507

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- 4) All contractors will comply with the Department of Labor procedures for release of information under the Freedom of Information Act including participant characteristics, program operations, financial reporting, and other subsequent requests by individuals, community groups, organizations or the press.

5.0 **History.**

Name	Date	Rev. Level	Description of change	Effective Date
Lori Hall	6/24/2004	A	New Policy	
Jim Triplett	1/21/2005	B	Add Deb O'Neil as new EO Officer	
Jim Triplett	9/07/2005	C	Added contractor contract language	
Deb O'Neil	2/13/2009	D	Update logo, EO Officer	7/01/2009

Auxiliary aids and services are available upon request to individuals with disabilities.

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