Policy Letter #16

TO: **All Mid-Carolina Workforce Development Service Providers**

FROM: **Samantha Wullenwaber, Director**

SUBJECT: **Electronic File Storage and Protecting Personally Identifiable Policy**

PURPOSE

The purpose of this policy is to provide guidance on the proper use of electronic file storage, the protection of Personally Identifiable Information (PII), and the retention and retrieval of participant, program, and financial documentation associated with workforce development programs funded by federal and other public funds.

BACKGROUND

Local Workforce Development Areas and the North Carolina Department of Commerce, Division of Workforce Solutions (DWS), are required to maintain various forms of documentation and data to ensure compliance with federal program requirements. These records may include participant files, program documentation, financial records, eligibility verification, and other related materials that support the administration of Workforce Innovation and Opportunity Act (WIOA) programs and other federally funded workforce initiatives.

Many of these records may be stored electronically. When stored electronically, documentation must be maintained in a manner that ensures secure storage, protects confidential information, and allows for timely retrieval when required for monitoring, audits, or program oversight.

The U.S. Department of Labor (USDOL) Training and Employment Guidance Letter (TEGL) No. 39-11 provides additional guidance regarding the handling and protection of Personally Identifiable Information (PII) and establishes requirements for safeguarding sensitive information associated with workforce programs.

ACTION

The Mid-Carolina Workforce Development Board (Mid-Carolina WDB), NCWorks Career Center staff, and WIOA Service Providers must comply with the following requirements regarding electronic document storage and the protection of PII.

Electronic Document Storage Requirements

All participant and program-related documentation must be scanned and stored within NCWorks Online to ensure centralized access and proper record management. Documentation must be uploaded in accordance with established state and local procedures and must remain accessible for monitoring, audit, and compliance purposes.

Eligibility documentation and supporting records must be uploaded into NCWorks Online within fourteen (14) calendar days from the date of the action. Any exceptions to this requirement must be documented through a case note within the system.

Protection of Personally Identifiable Information
Mid-Carolina WDB staff, NCWorks Career Center staff, and WIOA Service Providers must take appropriate measures to protect Personally Identifiable Information collected from individuals and employers. These measures include safeguarding all personal data and ensuring that sensitive information is only accessed and used for authorized program purposes.

When documents are used for verification purposes, any unnecessary personal identifiable information must be properly redacted to protect individual privacy and maintain compliance with federal, state, and local policies.

At a minimum, the following information must be redacted when documents are scanned or stored:

- Driver's license numbers
- Credit card numbers
- Bank account numbers
- The first five digits of a Social Security Number (SSN)

PII stored within the NCWorks.gov system must not be copied, stored, or transferred to any portable storage device, including flash drives, external hard drives, or other removable media.

Document Scanning Requirements
All documents uploaded into NCWorks.gov ***must be*** scanned in grayscale format in accordance with North Carolina General Statute (NCGS) 20-30, which prohibits the creation of color photocopies or reproductions of a driver's license, learner's permit, or special identification card.

Redaction and Document Security
Redaction procedures must be followed for all documents uploaded into NCWorks Online to ensure compliance with federal, state, and local policies regarding the protection of sensitive information.

Attachment III of Office Guidance (OG) 17-2021 outlines the required procedures for scanning and uploading documents into the system. All staff and service providers must follow these procedures when uploading documentation.

Compliance with State and Federal Guidance
In addition to requirements for storing documentation in NCWorks Online, all workforce system partners must comply with the information protection standards outlined in:

- OG 17-2021
- TEGL No. 39-11

These guidelines provide detailed procedures for protecting consumer data and maintaining the security of personally identifiable information.

REFERENCES
TEGL 39-11: Guidance on the Handling and Protection of Personally Identifiable Information
OG 17-2021: Electronic File Storage and Protecting Personally Identifiable Information

ATTACHMENTS

Attachment A: DWS Operational Guidance: OG 17 – 2021

1: North Carolina Guidance for WIOA and Other Federal Funds Electronic Image Storage

2: North Carolina Guidance for WIOA and Other Federal Funds, Protection of Personally Identifiable Information (PII)

3: North Carolina Guidance for WIOA and Other Federal Funds, Scanning Procedures for Consumer Documents in NCWorks

Attachment B: Redaction & Document Saving Procedure

CREATION DATE

July 2022

REVISION DATES

January 2024
December 2024
March 2026