



Missouri Department of Higher Education and Workforce Development

OWD Issuance 19-2019

Release Number—Program Year

Release Date:
April 08, 2020

Effective Date:
April 08, 2020

Expiration Date:
Continuous, until further notice

SUBJECT:

Statewide Confidentiality and Information Security Plan Policy

ATTACHMENTS: (1)—“Workforce Development System Confidentiality and Information Security Plan”

This Issuance is Official Policy of the Missouri Department of Higher Education and Workforce Development

ISSUING AUTHORITY:

Mardy Leathers, Director
Missouri Office of
Workforce Development

THIS ISSUANCE MAY REQUIRE CREATION OR ALTERATION OF A CORRESPONDING LOCAL POLICY

KEYWORDS:

Confidential, Information, Personal, PPI, Security

THIS ISSUANCE AFFECTS:

- Missouri One-Stop Delivery System (MJC/AJCs)
- WIOA Title I Local Areas/Local Boards/Local Plans
- WIOA Title I In-State Funding
- WIOA Title I Performance/Accountability
- WIOA Title I One-Stop Delivery/Service Providers
- WIOA Adult Employment/Training
- WIOA Dislocated Worker Employment/Training
- WIOA Youth Workforce Investment Activities
- WIOA Title III Wagner-Peyser Act Services
- WIOA Section 188 Nondiscrimination Issues National/Statewide Programs/Grants
- WIOA Fiscal/Administrative Procedures
- Trade Adjustment Assistance
- State of Missouri Workforce System Procedures

FOR THE ATTENTION OF:

- OWD State Professional Staff
- One-Stop frontline staff
- Chief Elected Officials
- Local Fiscal Agents
- Local WDB Chairpersons
- Local WDB Directors
- Local WDB Members
- One-Stop Operators
- One-Stop Functional Leaders
- Service Providers
- Local Equal Opportunity Officers
- Local Quality Assurance Monitors
- Local JVSG Veterans Reps
- Local Trade Act Reps

RESCISSIONS:

DWD Issuance 13-2016 “Confidentiality and Information Security Plan for the Workforce Development Statewide Electronic Case Management System,” March 13, 2017.

REFERENCES:

U.S. Department of Labor, Employment and Training Administration, Training and Employment Guidance Letter [\(TEGL\) No. 39-11](#), “Guidance on the Handling and Protection of Personally Identifiable Information (PII),” June 28, 2012.

SUMMARY:

This Issuance communicates the Office of Workforce Development’s (OWD) updated Confidentiality and Information Security Plan for the Statewide Electronic Case Management System, including protocols for breaches of data, to all appropriate data users and their supervisors. The attached Plan includes a required user attestation form that all staff must sign prior to becoming statewide electronic case management system authorized users.

BACKGROUND:

This update of OWD’s “Workforce Development System Confidentiality and Information Security Plan (Attachment 1) reflects new language and contact information related to the merge with the Missouri Department of Higher Education and Workforce Development (DHEWD).

SUBSTANCE:

OWD’s updated “Workforce Development System Confidentiality and Information Security Plan” describes:

- Sources of confidential information and user authorization;
- Privacy obligations and training requirements for authorized users, as well as attestation requirements before authorization is given;
- Procedures for the storage and sharing of confidential information;
- Data breach reporting, assessment, and mitigation procedures;
- Proportional responses and corrective actions for internal breaches;
- Procedures for permissible disclosures to third parties; and
- Legal references affecting privacy, confidentiality, disclosure, and security. Any corrective actions affecting employment described in this Plan specifically refer to actions taken by the State regarding State employees. Nevertheless, the decision to grant access or to suspend access, for any user on any system administered by the State, is reserved to the State

ROLES, RESPONSIBILITIES, and REQUIRED ACTIONS:

This Issuance is effective immediately. It remains applicable to any future Statewide Electronic Case Management System administered by the Office of Workforce Development. Distribute the “Workforce Development System Confidentiality and Information Security Plan” to all potential data users and supervisors among Local Workforce Development Boards (WDB), their staffs, subrecipients, and partner agencies. All recipients of this distribution must familiarize themselves with the Plan contents. Any WDB that maintains its own local-level confidentiality plan must ensure that its plan is in concurrence with OWD’s “Workforce Development System Confidentiality and Information Security Plan.” WDBs are also responsible for ensuring their subrecipients’ data confidentiality plans are in concurrence with both the State and local plans. WDBs must make provisions in Local Plans and in Memoranda of Understanding to designate an individual as the local custodian of the Local Workforce Development Area Confidential Information Authorized Users List. That custodian will establish local procedures for list maintenance and synchronize updates to that list with the OWD Customer Support Unit (CSU).

TIMELINE:

All Missouri Workforce System Staff – Implementation of these rules is immediate and continuous.

INQUIRIES:

Direct questions or comments regarding this Issuance to dwdsupport@dhewd.mo.gov or dwdpolicy@dhewd.mo.gov All active Issuances are available at jobs.mo.gov/dwdissuances. Expired/rescinded Issuances are available on request.

*For information about [Workforce Development](#) services, contact a [Missouri Job Center](#) near you.
Locations and additional information are available at jobs.mo.gov or 1-(888)-728-JOBS (5627).*

*Missouri Department of Higher Education and Workforce Development is an [equal opportunity](#) employer/program.
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[Missouri Relay Services](#) at 711.*