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April 23, 2008

To: SETA Workforce Development Department Staff and Site Supervisors,
Sacramento Works Career Center

From: Kathy Kossick, Executive Director

RE: Confidential Handling Protocol

WIA Directive #08-03

**Workforce Development Department
Confidential Document Handling Protocol**

Purpose: To establish a standardized process for the secure retention, handling, moving, transferring, archiving, and destruction of case files and other documents/items bearing confidential client information.

Objective: To ensure that all SETA and SETA delegate agency controlled documents, file covers and other items that bear client information, history, signatures or relate in any way to a client’s contact information, hereinafter referred to as “**affected documents**,” (see EXHIBIT A) are handled, stored, archived and destroyed in a secure and confidential manner that respects all client rights to privacy in the authorized use and dissemination of their personal data.

The Secure Handling and Retention of Closed Case Files and Other Affected Documents

- On-site secure document storage of closed case files
 - Supervisors shall ensure that all closed case files are stored in a locked cabinet of sufficient size to discourage unauthorized removal for a minimum of two (2) years before archiving.
- On-site secure storage of **SMARTware Applications** and signed **Code of Conduct** documents

○ Supervisors shall ensure that all SMARTware applications and signed Code of Conduct documents are stored in a locked cabinet of sufficient size to discourage unauthorized removal for a minimum of one (1) year before shredding.

- On-site maintenance and storage
 - Supervisors shall ensure that active case files and other affected documents shall not be left unattended in work stations located in unsecured or public areas and that they are stored in a locked cabinet or secured area when not in use or under the direct control of authorized personnel.

The Secure Moving and Transfer of Affected Documents

- Temporary removal from retention site
 - All files and affected documents moved off-site by authorized staff shall be contained in some type of case or other closed container (box with a lid) during transit and must remain under the direct control of the transiting staff.
- Overnight handling of files in transit
 - With supervisory approval, authorized staff may retain case files and other affected documents overnight when necessitated by time and distance to facilitate their transit to another worksite under **both** of the following circumstances:
 - All files and documents are contained in a secured case used for the transit of files between offices
 - All files, affected documents and any secured cases they may be contained in are stored overnight in the exclusive domicile of the authorized staff in transit.
- Temporary storage in an unattended vehicle
 - Case files, other affected documents and the cases they may be stored in shall not be left unattended in the open area of an agency or private vehicle when visible from the outside, but may be stored in the trunk of sedans, or placed in a covered area within a truck, van or SUV, when temporarily left unattended.
 - Case files, other affected documents and the cases they may be contained in shall not be stored or left unattended in any vehicles overnight.

The Secure Archiving and Shredding of Affected Documents

- What to archive
 - All closed case files stored on-site for a minimum of two years past the end date of all post-exit follow-up.
- When to archive
 - On a semi-annual basis, and with a minimum of 30 days advance notice of an archiving date, all on-site case files appropriate for archiving shall be prepared (See “What to archive,” above, and “Archiving process and schedule,” below).

Files appropriate for archiving shall not be held over until the next archiving date except by the express permission of the region's Workforce Development Manager.

- Secure storage of files and other affected documents awaiting archiving
 - See “**The Secure Handling and Retention of Closed Case Files and Affected Documents,**” above.
- Archiving process and schedule
 - File Archiving will take place twice a year (January and July). Each site will be assigned an ID code for archiving and provided with a standardized archiving log. Completed logs and three copies will be distributed as follows:
 - The original log will be retained at the site in a clearly labeled binder to be made available for audit purposes
 - One copy will be inserted into the corresponding archive box
 - One Copy will be forwarded to the Archive Coordinator, Phil Nelson
 - One copy will be forwarded to the MIS Supervisor
- When to shred
 - Authorized staff, as determined by the site's supervisor, may shred any affected document immediately or on site-scheduled shredding dates, if the term of their usefulness or mandated on-site storage has ended.
- What to shred
 - All affected documents not appropriate for archiving (not part of a case file) and whose usefulness in supporting the attainment of active client goals has ended.
- Secure storage of documents awaiting shredding
 - See “**The Secure Handling and Retention of Closed Case Files and Affected Documents,**” above.