

A RESOLUTION OF THE NEW YORK CITY WORKFORCE INVESTMENT
BOARD TO DEVELOP AND ADOPT LOCAL POLICIES ENSURING
PROCEDURES COMPLIANT WITH U.S. DEPARTMENT OF LABOR TRAINING
AND EMPLOYMENT GUIDANCE LETTER #39-11

(September 18, 2014)

WHEREAS, as part of their grant activities, United States Department of Labor Employment and Training Administration (USDOL/ETA) grantees may have in their possession large quantities of personally-identifiable information (PII) relating to their organization and staff; subgrantee and partner organizations and staff; and individual program participants; and,

WHEREAS, USDOL/ETA issued TEGL #39-11 to grantees to notify them of the specific requirements grantees must follow pertaining to the acquisition, handling, and transmission of PII, including the grantees duty to protect PII when transmitting information and the protection of PII and sensitive information when collecting, storing or disposing of information; and,

WHEREAS, a grantee's failure to comply with the requirements identified in TEGL #39-11, or any improper use or disclosure of PII for an unauthorized purpose, may result in the termination or suspension of the grant, the imposition of special conditions or restrictions and other civil or criminal sanctions for non-compliance with federal and state-mandated safeguards;

THEREFORE BE IT RESOLVED by the NYC Workforce Investment Board as follows:

City agencies responsible for implementing a USDOL/ETA authorized program shall review or develop policies to ensure procedures are in place to comply with PII-handling requirements provided for under USDOL/ETA TEGL #39-11.

City agencies responsible for implementing a USDOL/ETA authorized program shall periodically review their policies to ensure compliance with federal, state, and local requirements for handling PII and to mitigate the risks associated with the collection, storage, and dissemination of this sensitive information.