

Senior Community Service Employment Program (SCSEP) Protection of Personally Identifiable Information Tip Sheet

SCSEP subgrantees have in their possession large quantities of Personally Identifiable Information (PII) related to their grant operations and individual job seekers. Federal and state laws require that aggressive measures be taken to mitigate risks associated with the collection, storage, and dissemination of sensitive data including PII.

PII is defined as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. Sensitive information and PII include any information whose loss, misuse, or unauthorized access could adversely affect the interest of the program or individual's privacy.

Examples of Protected PII include, but are not limited to: Social Security Numbers (SSN), credit card numbers, bank account numbers, home telephone numbers, ages, birthdates, marital status, spouse names, educational histories, medical history, or financial information.

CWI Works SCSEP subgrantees must take the following measures to protect PII:

- PII data obtained through SCSEP must always be stored in an area physically safe from access by unauthorized persons.
- PII must not be transmitted to unauthorized users.
- PII and other sensitive data stored on mobile or portable devices, including thumb drives or cell phones, must be encrypted using Federal Information Processing Standards (FIPS) compliant and National Institute of Standards and Technology (NIST) validated encryption hardware and/or software.
- Unencrypted PII should never be transmitted via email.
- PII must only be processed or stored CWI or subgrantee-issued equipment.
- Accessing, processing, storing, or transmitting PII data on personally owned equipment, including laptops and cell phones is strictly prohibited.
- Access to any PII must be restricted to only CWI or subgrantee staff who need it in their official capacity to perform duties in connection with SCSEP.
- CWI and subgrantee staff must conform with all applicable Federal and state laws governing confidentiality of information and PII.