

Fresno Regional Workforce Development Board

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2125 Kern Street, Suite 208 • Fresno, California 93721 • 559.490.7100 • Fax 559.490.7199 •
www.workforce-connection.com

Blake Konczal, Executive Director

OPERATIONAL DIRECTIVE

FRWDB OD # 06-18

Date Released: March 9, 2018

To: All Fresno Regional Workforce Development Board Providers of Services

From: Blake Konczal, Executive Director

Effective Date: March 9, 2018

Subject: Case File Security

Applicable Program: All

Revision History: Initial Release

In order to be in compliance with Federal, State and Local regulations, the FRWDB is required to implement Policies and Procedures to ensure the security and confidentiality of our clients' Personally Identifiable Information (PII) and disability/medical information.

All sub-recipients at all sites are required to implement the following directions as it relates to the security of all clients, whether enrolled into a WIOA funded program or FRWDB Special project.

Any process not specifically addressed below, remains in effect.

Effective immediately -

- Each Provider will identify 1 existing staff person at each site to be the File Security Specialist (FSP).
 - See Role and Responsibilities below.
- No case files are to be transported off-site unless a request is made by FRWDB management to do so.
- The case file area is to be secured at all times.
 - The FSP and their direct manager or Quality Assurance representative are the only people that are to have access to the location and files.
 - Sites may also identify a back-up person to the FSP and their direct manager or Quality Assurance representative.
- Case notes are not to be printed and placed in the files.
- CalJOBS Registration forms (if printed) are to be shredded after the information is entered into CalJOBS.
- Enrollment forms are not to be printed and placed in the files
- Retention documentation is not to be printed and placed in the files.
- ERS/ACAs will no longer use case files for typical meetings with clients.

- ERS/ACAs should be able to conduct an effective meeting without a hardcopy case file, using the case management system. All activities and notes will be done via direct data entry or note taking.
- Documents generated from the case management system during the meeting can be printed and given to the participant.
- All forms, notes or other documents as a result of a meeting with a participant (including signed documents) are to be turned into the FSP the same day.
- All SRT files must be maintained by the FSP.
 - If participant is not enrolled the file is to be destroyed after one year from the date of SRT
 - If participant is enrolled, the SRT Form & Documents are to be included in the permanent case file.
- Universal profile files (those persons who did not go to SRT) are to be destroyed immediately.

FSP Role and Responsibilities

- The FSP will be responsible for security and maintenance of all case files on their site.
 - When a case file is needed (typically for monitoring or review purposes), it will need to be signed-out and signed back-in the same day (files cannot be checked out for longer than 1 business day).
- All forms and other documents turned in to the FSP are to be filed into the appropriate case files as soon as possible. All documents not filed into the case files are to be secured until they are filed.

If any questions, please contact the FRWDB Program Manager.