

Fresno Regional Workforce Development Board

A proud member of America's Job Center of CaliforniaSM Network

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Blake Konczal, Executive Director

OPERATIONAL DIRECTIVE

FRWDB OD # 06-18, Revision B

Date Released: June 30, 2023

To: All Fresno Regional Workforce Development Board Providers of Services

From: Blake Konczal, Executive Director

Effective Date: July 3, 2023

Subject: Hard Copy Case File Security

Applicable Program: All

Revision History: Initial Release – 3/9/18

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 participants' Personally Identifiable Information (PII) and disability/medical information.

This Revision B updates the guidance as a result of the opening of the new America's Job Center of California (AJCC) offices and the continuing reduction in hardcopy participant files and records.

This Operational Directive (OD) applies to only those hardcopy files that contain PII. Case files and Medical/Disability files are examples of those types of files.

All sub-recipients at all sites are required to implement the following directions as it relates to the security of all participants' PII, whether enrolled into a WIOA funded program or a 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.
 - Case File Area (CFA) is defined as any area within an AJCC where hard copy files are stored.
 - The CFA is not required to be a locked room or area.
 - The CFA is not to be located in an area accessible by the public.
- Case files are to be kept in secure (locked) file cabinet(s) at all times.
 - The FSP and their direct manager or the site Project Manager are the only persons that are to have access to the files.
 - Sites may also identify a back-up person to the FSP and their direct manager.

- Case notes are not to be printed and placed in the files.
- CalJOBSSM Registration forms (if printed) are to be shredded after the information is entered into CalJOBSSM.
- 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 participants.
 - 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 electronic case file in the case management system.
- 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 Senior Deputy Director of Operations.