

SAN DIEGO WORKFORCE PARTNERSHIP, INC.
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OPERATIONS ISSUANCE

OPERATIONS ISSUANCE NO. 2016-14

DATE: May 18, 2016

TO: Operators and Service Providers

FROM: Jacqueline S. Collins, Director of Operations

SUBJECT: Transporting Customer Information

PURPOSE

The San Diego Workforce Partnership (SDWP) requires that controls be in place to manage risk of the confidentiality, integrity and availability of sensitive customer data in any form and represent a minimum standard for protection of this data. This Operations Issuance is intended to provide guidance for the transportation of customer information between program site locations.

BACKGROUND

Additional controls required under applicable laws, regulations, or standards governing specific forms of data (e.g. health information or otherwise) may also apply.

ACTION/IMPLEMENTATION

Overview

As a general rule, program staff should not remove customer information from program site locations unless absolutely necessary. In the event that program staff requires the removal of customer information, the information (whether electronic or paper) must be protected at all times from inappropriate disclosure. SDWP's service providers must have appropriate procedures in place for protecting customer information. Customer information may be files, documents, equipment, or otherwise (electronic or paper information) that contains sensitive and/or personally identifiable data on program participants.

Removal Procedure of Customer Information

Customer information (whether paper or electronic) to be removed from the service provider's main office and/or taken to the field or another location(s) must be logged and tracked by the service provider. Any customer information removed to the field must be returned to the service providers office no later than the following business day, and logged back in by the employee and accepted as returned by the office supervisor. The office supervisor will maintain the master log of customer information removal and return activity.

Transportation of Customer Information

Customer information must be transported using secure containers. The secure containers will be transported in the trunk of the vehicle used to arrive and depart from the field site. These secure containers will be locked at all times, except for the removal of needed files and equipment. All customer information will be securely maintained while in the field. While transporting customer information NO unnecessary and/or personal stops are permitted.

Loss of Files

If at any time the information being transported is lost, stolen, damaged, or confidentiality is compromised staff shall notify their supervisor or designee and the assigned SDWP Program Specialist within 2 hours of the occurrence.

ATTACHMENTS

cc: SDWP Internal Distribution List
Simpson & Simpson