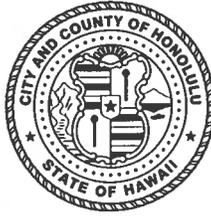


OAHU WORKFORCE DEVELOPMENT BOARD  
**CITY AND COUNTY OF HONOLULU**

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July 1, 2025

**OAHU WORKFORCE DEVELOPMENT BOARD  
WORKFORCE INNOVATION AND OPPORTUNITY ACT  
POLICY #26-25**

**SUBJECT:** PERSONALLY IDENTIFIABLE INFORMATION (PII)

**PURPOSE:**

To address the security of Personally Identifiable Information (PII), both sensitive and non-sensitive, for services offered through Title I of the Workforce Innovation and Opportunity Act.

**BACKGROUND:**

The Workforce Innovation and Opportunity Act requires that recipients of WIOA Title I funds provide Personally Identifiable Information (PII) to access WIOA services. Federal law, OMB guidance, and Federal, State, and local policies require that PII and other sensitive information be protected.

**POLICY:**

All OWDB staff, contractors, grantees, sub-grantees, partner staff, and any other individuals or entities involved in the handling of personally identifiable information (PII) as a result of WIOA activities in the Workforce Development system in the City and County of Honolulu, including wage and education records, will protect PII by the law. FERPA (as amended), WIOA, and applicable Departmental regulations will be followed. OWDB staff, contractors, grantees, sub-grantees, employees, and any other individuals or groups involved in the receipt, handling, and/or protecting of PII and sensitive data developed, obtained, or otherwise associated with grantee funding MUST:

Annually (by July 1), sign a disclosure acknowledging the confidential nature of the data and agree to comply with safe and secure management of the data by federal and state requirements. (These disclosures must be kept on file with the One-Stop Operator for monitoring review at the request of the OWDB or DLIR). The following definitions will be applied to Personally Identifiable Information in the region.

## **DEFINITIONS**

**Personal Identifiable Information (PII):** OMB defines PII 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:** Any unclassified information whose loss, misuse, or unauthorized access to or modification could adversely affect the interest or the conduct of Federal programs or the privacy to which individuals are entitled under the Privacy Act.

**Protected PII and Non-Sensitive PII:** The Department of Labor has defined two types of PII: protected PII and non-sensitive PII. The differences between protected PII and non-sensitive PII are primarily based on an analysis regarding the "risk of harm" that could result from the release of the PII.

1. **Protected PII** is information that, if disclosed, could result in harm to the individual whose name or identity is linked to that information. Examples of protected PII include but are not limited to, social security numbers (SSNs), credit card numbers, bank account numbers, home telephone numbers, ages, birthdates, marital status, spouse names, educational history, biometric identifiers (fingerprints, voiceprints, iris scans, etc.), medical history, financial information and computer passwords.
2. **Non-sensitive PII** on the other hand, is information that, if disclosed by itself, could not reasonably be expected to result in personal harm. It is stand-alone information that is not linked or closely associated with any protected or unprotected PII. Examples of non-sensitive PII include information such as first and last names, e-mail addresses, business addresses, business telephone numbers, general educational credentials, gender, or race. However, depending on the circumstances, a combination of these items could be categorized as protected or sensitive PII.

PII should only be accessible to staff who need it in an official capacity to perform their responsibilities under WIOA. Staff must not extract information from data sources for personal use or any other reason.

PII will be processed to protect the confidentiality of the record and documents and to prevent unauthorized access. PII will be retained for the required period, as per ETA guidelines or the State of Hawaii, whichever is more stringent, and then destroyed.

The American Job Centers' staff, who provide services under Title I of WIOA, shall sign a release annually acknowledging their use of PII for grant purposes only and their intent to protect all PII from unauthorized users. All partners, contracts, and other relevant parties will be notified of this policy.

As part of the WIOA orientation, applicants and participants will be asked to sign an authorization to release information to listed parties, which the participant may revoke by submitting a written request.

Contractors/partners/grantees should have standard operating procedures in place to address the protection of PII.

## **ACTION:**

This policy is effective immediately and remains in effect until such time that amendments to this policy are made or a new policy is issued.

## **REFERENCE:**

- TEGL No. 39-11; Federal Information and Security Management Act (Title III of the E-Government Act 2002); OMB M-06-15, and M-06-19; Executive Order 13402; Family Educational Rights and Privacy Act (FERPA) 20 U.S.C. § 1232g; 34 CFR Part 99

## **INQUIRIES:**

For inquiries regarding this policy, please contact Harrison Kuranishi, Executive Director, Oahu Workforce Development Board at 808-768-7790 or [h.kuranishi@honolulu.gov](mailto:h.kuranishi@honolulu.gov).



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