

POLICY ON THE MANAGEMENT AND PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION (PII)

Amendment III

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I. Introduction

Alianza Municipal de Servicios Integrados, Inc. (AMSI) establishes this policy and procedures to protect and ensure the confidentiality, appropriate use, and handling of Personally Identifiable Information (PII) related to participants, vendors, service providers, and staff.

This policy also safeguards such information from unauthorized disclosure in connection with the collection, storage, and dissemination of sensitive data, including the use and request of Social Security numbers within federally funded employment and training programs.

This policy outlines the procedures to be followed by all individuals handling such information and establishes disciplinary and/or legal actions in cases of misuse or unauthorized disclosure. This policy applies to all documents, records, filing systems, and information systems (manual or electronic) created, processed, accessed, or maintained by AMSI.

II. Legal Basis

This policy is based on the following:

- Training and Employment Guidance Letter (TEGL) No. 39-11 (June 28, 2012)
- Training and Employment Guidance Letter (TEGL) No. 5-08 (November 13, 2008)
- Puerto Rico Act No. 39 of January 24, 2012 – Privacy Policy Notification Act
- Guidelines issued by the Department of Economic Development and Commerce (DDEC) – Workforce Development Program (PDL), June 7, 2019
- WIOA Section 185 – Records, Recordkeeping, and Investigations
- Privacy Act of 1974, as amended

III. Applicability

This policy applies to all employees, applicants, participants, vendors, contractors, consultants, and any other individuals involved in AMSI operations.

All individuals are required to comply with this policy.

IV. Personally Identifiable Information (PII)

PII is information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal data.

Types of PII

1. Protected PII

Information that could result in harm if disclosed, including:

- Social Security number
- Credit card numbers
- Bank account information
- Telephone numbers
- Age and date of birth
- Marital status
- Spouse's name
- Educational history
- Biometric identifiers
- Medical records
- Financial data
- Passwords

2. Non-Sensitive PII

Information that, by itself, does not pose risk if disclosed, such as:

- Name
- Email address
- Business address or telephone
- Educational credentials
- Gender
- Race

However, combinations of these elements may constitute protected PII.

V. Applicants and Participants

At American Job Centers (AJCs) and local offices, the following procedures apply when requesting Social Security numbers:

1. Participants enter their SSN using a secure keypad system.
2. If already registered, the system retrieves and updates their information.

3. If a participant refuses to provide an SSN, they may receive self-service assistance only.
4. Participants may complete Form 9-9.94 (Customer Profile), with or without staff assistance.
5. Once entered, the system generates a unique 12-digit identifier (WIOA Participant ID), which is used for all program transactions.
6. Career Coach verifies the SSN using Form 9-9.96 (Social Security Card Certification).

VI. Vendors, Service Providers, and Staff

1. SSN and identification must be verified using official documentation;
2. Vendors are assigned a Vendor ID upon entry into the system;
3. Staff use assigned employee identification numbers;
4. Transactions must be processed using official identifiers only.

VII. Custody and Handling of Information

PII must only be used for official program purposes.

AMSI staff are responsible for ensuring confidentiality and protection of all PII, including:

1. Encryption using FIPS 140-2 standards;
2. No unencrypted PII may be transmitted via email;
3. Secure storage in restricted access areas;
4. Use of authorized equipment and systems only;
5. Prohibition of personal devices and systems (e.g. Gmail, Yahoo, etc.);
6. Files must not be left unattended;
7. Computers must be locked when not in use;
8. Records must be stored in locked cabinets;
9. Documents must be transported in locked containers;
10. SSNs must not appear on forms or correspondence.

Authorized Disclosure

PII may only be disclosed with written authorization using Form 9-9.99 and under limited conditions such as:

1. Official government requests;
2. Health or safety risk;

3. Court order;
4. Administrative or regulatory processes;
5. Service coordination.

Incident Reporting

All suspected or confirmed incidents must be reported immediately to:

1. Federal program authorities;
2. ETA Incident Reporting system;
3. Email: ETA.CSIRT@dol.gov.
4. Phone No. (202) 693-3444

VIII. Records Disposition

1. PII must be destroyed using secure methods (shredding, incineration, secure deletion);
2. Records must be retained in accordance with federal and state regulations;
3. Disposal must comply with Puerto Rico Public Records Law (Act 107-2025).

IX. Compliance

All staff handling PII must maintain strict confidentiality.

Non-compliance may result in civil and criminal penalties.

X. Non-compliance

Failure to comply may result in:

1. Loss or restriction of funds;
2. Administrative sanctions;
3. Disciplinary action under AMSI policies.

XI. Severability Clause

If any provision of this policy is declared invalid, the remaining provisions shall remain in effect.

XII. Repeal

This Policy repeals, replaces, and renders null and void any promulgated rule, circular letter, or regulation that conflicts with the provisions of this Policy. Among these are: AMSI-2018

Alianza Municipal de Servicios Integrados, Inc. (AMSI)

PPR/011 Public Policy for the Handling and Protection of Personally Identifiable Information (PII), approved on July 1, 2020, and the Procedure for the Handling and Protection of Personally Identifiable Information (PII)-Amendment II, approved on April 28, 2021.

XIII. Interpretation

In this policy, words or phrases used in masculine include feminine. This style of writing is not intended to imply the supremacy of one sex over the other.

XIV. Digital Signature

The parties hereby agree that this document may be executed electronically, and that digital signatures shall carry the same legal validity, binding effect, and evidentiary value as handwritten signatures. The parties further acknowledge their right to sign manually but voluntarily consent to the use of electronic signatures.

XV. Review

I certify that this policy has been developed and reviewed in accordance with the principles and quality standards established by our organization.



Ana G. Arias-Villasuso
Assistant Administrator of Research &
Development

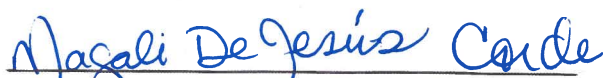
XVI. Control and Monitoring

We certify that we have reviewed this policy and are committed to ensuring compliance with the provisions of this policy and to follow up as necessary to identify and communicate any changes that need to be implemented so that it is kept up to date. In addition, we will discuss the document with the collaborators responsible for the tasks described, who will sign the form 9-9.82 Certification Orientation and Discussion that will be attached to the original in the Research and Development Division.

Alianza Municipal de Servicios Integrados, Inc. (AMSI)



José I. Pereira Hernández
Acting Assistant Administrator
Administrative Affairs Area



Magali De Jesús Cordero
Acting Assistant Administrator
Business and Special Projects Area



José I. Pereira Hernández
Technology and Information Systems
Manager



Glorimar Cardona Pagán
Assistant Manager
AMSI in Aguas Buenas



Damary González Rosario
Assistant Manager
AMSI in Aibonito



Loreana M. Rivera Dávila
Acting Manager
AMSI in Arroyo



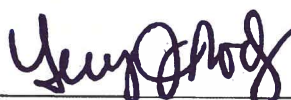
Luz C. Jiménez Cortés
Manager
AMSI in Caguas



Debbie Ann Santiago Pérez
Manager
AMSI in Cayey



Loreana M. Rivera Dávila
Manager
AMSI in Guayama



Lucy Joan Rodríguez Pomales
Acting Assistant Manager
AMSI in Gurabo



Barbara E. Machuca Seda
Manager
AMSI in Trujillo Alto

Alianza Municipal de Servicios Integrados, Inc. (AMSI)

XVII. Recommendation

I recommend the adoption of this policy and certify that it meets the operational needs of our organization.



Dr. Joaquín Santiago Santos
Executive Administrator

VIII. Effective Date

This policy will be effective upon approval and will remain in effect until process changes or new guidelines are required. At that time, it will be reviewed and updated in accordance with the procedures established for the control of documents.

XIX. Approval

This review of the Policy on the Management and Protection of Personally Identifiable Information (PII) is approved today June 30, 2026.



Jorge L. Cosme Oyola
Secretary
AMSI, Inc.



Alberto R. Costa Berríos
President
AMSI, Inc.