

WORKFORCE INVESTMENT ACT (WIA)

**NATIONAL EMERGENCY GRANTS
GRANT AGREEMENT
& Initial Notice of Obligation**

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DEPARTMENT OF
JOB & FAMILY SERVICES
DIRECTORS OFFICE

Grant Number: EM-23742-12-60-A-39

- 1. Parties.** Consistent with the Governor/Secretary Agreement, this grant agreement is entered into between the U.S. Department of Labor, Employment and Training Administration (Grantor) and the State of Ohio (Grantee).
- 2. Grant Funds.** This grant agreement applies to the approved grant project referenced in the Notice of Obligation clause below and is awarded under the National Emergency Grants (NEG) Program in accordance with the **Workforce Investment Act of 1998, Public Law No. (Pub. L.) 105-220, (codified as amended at 29 U.S.C. 2801 et seq.) (WIA or Act)**, Section 173; the NEG regulations at 20 CFR Part 671; the NEG application guidelines and subsequent policy guidance; and the funds appropriated for **Program Year (PY) 2012** (including any FY-13 Advance funds).
- 3. Applicable Authority.** Funds provided under this grant agreement must be expended in accordance with the terms and conditions of the approved grant award for the referenced NEG project and any subsequent grant modifications thereto; all applicable Federal statutes, regulations and policies or guidance, including those of the Grantor; applicable cost principles; and the terms and provisions in the applicable appropriation acts.
- 4. Award Documents.** This NEG award document (including attachments) hereby adopts the approved or conditionally approved grant application which is incorporated by reference and by attachment to this grant agreement subject also to the terms and conditions of this award. The Grantee's application will serve as the Project Plan/Budget. If there is a discrepancy between the Grantee's application and any of the items in paragraph 3 of this grant agreement, paragraph 3, except for the grant application portion of the grant award, will govern this grant agreement. The grant may be modified in accordance with applicable procedures for grant modifications. All grant modifications (financial or nonfinancial) under this grant agreement will consist of and be tracked as sequential grant modifications. The Grantee must confirm that all costs are allowable before expenditure.
- 5. Notice of Obligational Authority.** Authorization of federal expenditures is subject to the issuance of Federal obligational authority. In accordance with the Act, funds are hereby obligated to the Grantee by this grant agreement, including the Notice of Obligation (NOO) Modification 0 which is a supplement and attachment to the grant agreement. Obligations and costs may not exceed the amount obligated by the Grantor. The grant period is as indicated below unless subsequently changed by an executed grant modification but may not exceed the statutory limitation on expenditures per WIA Section 189 (g) (2) and the applicable appropriations statute(s).

The Notice of Obligation details are indicated below and in the Modification 0 attachment, in accordance with the Grantee's initial or final NEG approved award and/or funding increments thereof.

Notice of Obligation

<u>Fund Type Code</u>	<u>PY or FY Adv Funds</u>	<u>Obligation Amount</u>	<u>PMS Document Code</u>
WIA NEG (CFDA No. 17.277)	PY 12	See Modification 0 document for applicable funding PMS Doc Code and obligation amount (per Secy approval)	

NEG Project Name: 2012 Severe Storms & Straight-line Winds

NEG Project Number: OH-26

Grant Period: October 1, 2012 through September 30, 2013

6. Electronic Fund Transfers. Cash payments shall be made to the Grantee via the Department of Health and Human Services (HHS) Payment Management System (PMS).

7. Certifications and assurances. The following are incorporated by reference and are a part of this grant agreement:

o **CERTIFICATION REGARDING LOBBYING**
(29 CFR Part 93)

o **DRUG-FREE WORKPLACE REQUIREMENTS CERTIFICATION**
(29 CFR Part 98)

o **NONDISCRIMINATION AND EQUAL OPPORTUNITY ASSURANCE**
(29 CFR Part 37)

o **CERTIFICATION REGARDING DEBARMENT, SUSPENSION, AND OTHER RESPONSIBILITY MATTERS**
(29 CFR Part 98)

o **STANDARD FORM 424b B STANDARD ASSURANCES (NON-CONSTRUCTION PROGRAMS)**

8. Intellectual Property Rights. The Federal Government reserves a paid-up, nonexclusive and irrevocable license to reproduce, publish or otherwise use, and to authorize others to use for Federal purposes: i) the copyright in all products developed under the grant, including a subgrant or contract under the grant or subgrant; and ii) any rights of copyright to which the grantee, subgrantee or a contractor purchases ownership under an award (including but not limited to curricula, training models, technical assistance products, and any related materials). Such uses include, but are not limited to, the right to modify and distribute such products worldwide by any means, electronically or otherwise. The grantee may not use federal funds to pay any royalty or license fee for use of a copyrighted work, or the cost of acquiring by purchase a copyright in a work, where the Department has a license or rights of free use in such work. If revenues are generated through selling products developed with grant funds, including intellectual property, these revenues are program income. Program income is added to the grant and must be expended for allowable grant activities. If applicable, the following needs to be on all products developed in whole or in part with grant funds:

“This workforce product was funded by a grant awarded by the U.S. Department of Labor’s Employment and Training Administration. The product was created by the grantee and does not necessarily reflect the official position of the U.S. Department of Labor. The Department of Labor makes no guarantees, warranties, or assurances of any kind, express or implied, with respect to such information, including any information on linked sites and including, but not limited to, accuracy of the information or its completeness, timeliness, usefulness, adequacy, continued availability, or ownership. This product is copyrighted by the institution that created it. Internal use by an organization and/or personal use by an individual for non-commercial purposes is permissible. All other uses require the prior authorization of the copyright owner.”

9. Veterans Priority Provisions. This grant agreement is subject to the provisions of the “Jobs for Veterans Act” (JVA), Pub. L. 107-288 (38 USC 4215). The JVA requires grantees to provide priority of service for veterans and spouses of certain veterans for the receipt of employment, training, and placement services in any job training program directly funded, in whole or in part, by DOL. The regulations implementing this priority of service can be found at 20 CFR Part 1010. In circumstances where a grant recipient must choose between two qualified candidates for a service, one of whom is a veteran or eligible spouse, the veterans priority of service provisions require that the grant recipient give the veteran or eligible spouse priority of service by first providing him or her that service. To obtain priority of service, a veteran or spouse must meet the program’s eligibility requirements. Grantees must comply with DOL guidance on veterans’ priority. ETA’s Training and Employment Guidance Letter (TEGL) No. 10-09 (issued November 10, 2009) provides guidance on implementing priority of service for veterans and eligible spouses in all qualified job training programs funded in whole or in part by DOL. TEGL No. 10-09 is available at http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2816.

10. REPORTING. Grantees will be responsible for complying with the following reporting requirements to NEG funded grants:

A. Financial Reporting: The Grantee shall report program outlays (expenditures) and program income on an accrual basis. Currently, the U.S. DOL ETA Financial Report (ETA-9130) quarterly expenditure web-based report is required no later than 45 days following the end of a calendar quarter and the Financial Reporting website link to the ETA-9130 with instructions can be found at www.doleta.gov/grants. See Financial Report –Forms and Instructions section for the ETA-9130 (Basic) report required for National Emergency Grants. See also the website section “Financial Reporting Access Document” to obtain instructions for obtaining the Grantee’s PIN and Password for online reporting for this reporting requirement.

B. Programmatic Reporting: Program reports provide data on program activities, participants, and outcomes. Local areas must work with their state counterparts to ensure that timely data is provided and conveys full and accurate information on the performance of NEG. For additional information on NEG reporting, please contact your Federal Project Officer and review the “National Emergency Grant Reporting Technical Assistance Guide” which is available at the following website: <http://www.workforce3one.org/view/2001009150254027016/info>.

Quarterly Progress Reports - Grantees must submit a Quarterly Progress Report until all participants have exited NEG-funded services. The Quarterly Progress Report provides a detailed account of activities undertaken that quarter, and serves as a regular communication vehicle between the grantees and ETA regarding the progress of the project towards meeting the specific results and deliverables outlined in the NEG application.

Quarterly WIA Performance Report - Each state administering a grant under the WIA Adult, DW, Youth and NEG programs are required to submit quarterly performance reports containing information related to levels of participation and performance measure outcomes. All participants who receive services funded by NEG, whether co-enrolled in the WIA title IB programs, or served exclusively with NEG funds, are included.

Quarterly WIASRD – Workforce Investment Act Standardized Record Data, or WIASRD, is a collection of individual records, each of which contains information about a participant’s characteristics, activities, and outcomes. These standardized records are maintained by state workforce investment agencies for all individuals who receive services or benefits from programs funded by WIA Title I-B and National Emergency Grants. Accurate entry of NEG project information (including the applicable NEG project number) in the WIASRD is crucial for determining final outcomes for NEG participants.

11. Salary and Bonus Pay Limitations. None of the grant funds may be used by a recipient or subrecipient of such funds to pay the salary and bonuses of an individual, either as direct costs or indirect costs, at a rate in excess of Executive Level II. This limitation does not apply to vendors providing goods and services as defined in Office of Management and Budget (OMB) Circular A-133 (codified at 29 CFR Parts 96 and 99). See Public Laws 111-117 (Division D, Title I, section 107) and 112-10 (Division B, Title I), and Training and Employment Guidance Letter number 5-06 for further clarification: http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2262.

12. Other. The following are other applicable key provisions and regulations:

WIA Title I Program and Administrative Regulations: 20 CFR Part 671-- National Emergency Grants, which (subject to the exceptions specified in 20 CFR Part 671) refers to the general WIA administrative and program regulations at 20 CFR Part 667 – Administrative Provisions under Title I of WIA and to 20 CFR Part 663 -- Adult and Dislocated Worker Activities.

Uniform Administrative Requirements:

29 CFR Part 97, for State/Local Governments and Indian Tribes (subject to the exceptions at 20 CFR Part 667 -- Subpart B)

Cost Principles:

2 CFR Part 225, for State/Local Governments and Indian Tribes (OMB Circular A-87)

Audit:

29 CFR Parts 96 and 99, Audit Requirements

13. ACORN Prohibition. In accordance with Pub. L. 111-117 and 112-10, none of the funds under this grant agreement may be distributed to the Association of Community Organizations for Reform Now (“ACORN”) or its subsidiaries. TEGL No. 8-09, Change 1 (issued November 17, 2010), which provides guidance regarding Pub. L. 111-117, applies to funding under Pub. L. 112-10 and this grant agreement. http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2960.

14. Federal Funding Accountability and Transparency Act of 2006 Pub. L. 109-282 as amended by section 6202 of Pub. L. 110-252 ("FFATA"). Grantees must ensure that they have the necessary processes and systems in place to comply with the reporting requirements of FFATA. See Training and Employment Guidance Letter (TEGL) No. 11-10 (issued November 15, 2010) <http://wdr.doleta.gov/directives/attach/TEGL/TEGL11-10acc.pdf> and Attachment to this grant agreement.

15. Safeguarding Data Including Personally Identifiable Information. Grantees must recognize that confidentiality of sensitive data is of paramount importance to the Department of Labor and must be observed except where disclosure is allowed by the prior written approval of the Grant Officer or by court order. See Training and Employment Guidance Letter (TEGL) No. 39-11 (June 28, 2012) http://wdr.doleta.gov/directives/attach/TEGL/TEGL_39_11.pdf and Attachment to this grant agreement.

16. Signature Block. By signing below, the signatories agree to the terms and conditions of this grant agreement on behalf of their respective agencies indicated below. In the absence of a signature by the Grantee only, this award is nevertheless effective by virtue of the Grantee's electronic signature on the SF-424 upon which this award is based. In addition, the Grantee's expenditure of any funds properly granted hereunder constitutes acceptance of the award, including any new or additional terms and conditions as may be attached hereto.

GRANTEE:
State of Ohio

(State)

**OH Department of Job and Family
Services**

**TAX EIN# 31-6402047
DUNS# 809376072**

Grant Recipient/Agency Name

**30 E. Broad Street, 32nd Floor
Columbus, Ohio 43215**

Mailing Address

BY:

See SF-424 Signature and Clause 16 Above

Governor/Authorized Signatory
(Print Name)

Signature

Date

**GRANTOR: U.S. Department of Labor, Employment and Training Administration
200 Constitution Avenue, NW; Room N-4716; Washington DC 20210**

BY:


THOMAS C. MARTIN, Grant Officer

Signature


Date

NEG Agreement Clause No.14 ("FFATA") Attachment

This Grant is subject to the following FFATA requirements :

2 CFR Part 170

Appendix A to Part 170--Award Term

I. Reporting Subawards and Executive Compensation.

a. Reporting of first-tier subawards.

1. Applicability. Unless you are exempt as provided in paragraph d. of this award term, you must report each action that obligates \$25,000 or more in Federal funds that does not include Recovery funds (as defined in section 1512(a)(2) of the American Recovery and Reinvestment Act of 2009, Pub. L. 111-5) for a subaward to an entity (see definitions in paragraph e. of this award term).

2. Where and when to report.

i. You must report each obligating action described in paragraph a.1. of this award term to <http://www.fsrc.gov>.

ii. For subaward information, report no later than the end of the month following the month in which the obligation was made. (For example, if the obligation was made on November 7, 2010, the obligation must be reported by no later than December 31, 2010.)

3. What to report. You must report the information about each obligating action that the submission instructions posted at <http://www.fsrc.gov> specify.

b. Reporting Total Compensation of Recipient Executives.

1. Applicability and what to report. You must report total compensation for each of your five most highly compensated executives for the preceding completed fiscal year, if--

i. the total Federal funding authorized to date under this award is \$25,000 or more;

ii. in the preceding fiscal year, you received--

(A) 80 percent or more of your annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined at 2 CFR 170.320 (and subawards); and

(B) \$25,000,000 or more in annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined at 2 CFR 170.320 (and subawards); and

iii. The public does not have access to information about the compensation of the executives through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986. (To determine if the public has access to the compensation information, see the U.S. Security and Exchange Commission total compensation filings at <http://www.sec.gov/answers/execomp.htm>.)

2. Where and when to report. You must report executive total compensation described in paragraph b.1. of this award term:

i. As part of your registration profile at <http://www.ccr.gov>.

ii. By the end of the month following the month in which this award is made, and annually thereafter.

c. Reporting of Total Compensation of Subrecipient Executives.

1. Applicability and what to report. Unless you are exempt as provided in paragraph d. of this award term, for each first-tier subrecipient under this award, you shall report the names and total compensation of each of the subrecipient's five most highly compensated executives for the subrecipient's preceding completed fiscal year, if--

i. in the subrecipient's preceding fiscal year, the subrecipient received--

(A) 80 percent or more of its annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined at 2 CFR 170.320 (and subawards); and

(B) \$25,000,000 or more in annual gross revenues from Federal procurement contracts (and subcontracts), and Federal financial assistance subject to the Transparency Act (and subawards); and

ii. The public does not have access to information about the compensation of the executives through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986. (To determine if the public has access to the compensation information, see the U.S. Security and Exchange Commission total compensation filings at <http://www.sec.gov/answers/execomp.htm>.)

2. Where and when to report. You must report subrecipient executive total compensation described in paragraph c.1. of this award term:

i. To the recipient.

ii. By the end of the month following the month during which you make the subaward. For example, if a subaward is obligated on any date during the month of October of a given year (i.e., between October 1 and 31), you must report any required compensation information of the subrecipient by November 30 of that year.

d. Exemptions

If, in the previous tax year, you had gross income, from all sources, under \$300,000, you are exempt from the requirements to report:

i. Subawards, and

ii. The total compensation of the five most highly compensated executives of any subrecipient.

e. Definitions. For purposes of this award term:

1. Entity means all of the following, as defined in 2 CFR part 25:

- i. A Governmental organization, which is a State, local government, or Indian tribe;
- ii. A foreign public entity;
- iii. A domestic or foreign nonprofit organization;
- iv. A domestic or foreign for-profit organization;
- v. A Federal agency, but only as a subrecipient under an award or subaward to a non-Federal entity.

2. Executive means officers, managing partners, or any other employees in management positions.

3. Subaward:

- i. This term means a legal instrument to provide support for the performance of any portion of the substantive project or program for which you received this award and that you as the recipient award to an eligible subrecipient.
- ii. The term does not include your procurement of property and services needed to carry out the project or program (for further explanation, see Sec. --- .210 of the attachment to OMB Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations").
- iii. A subaward may be provided through any legal agreement, including an agreement that you or a subrecipient considers a contract.

4. Subrecipient means an entity that:

- i. Receives a subaward from you (the recipient) under this award; and
- ii. Is accountable to you for the use of the Federal funds provided by the subaward.

5. Total compensation means the cash and noncash dollar value earned by the executive during the recipient's or subrecipient's preceding fiscal year and includes the following (for more information see 17 CFR 229.402(c)(2)):

- i. Salary and bonus.
- ii. Awards of stock, stock options, and stock appreciation rights. Use the dollar amount recognized for financial statement reporting purposes with respect to the fiscal year in accordance with the Statement of Financial Accounting Standards No. 123 (Revised 2004) (FAS 123R), Shared Based Payments.
- iii. Earnings for services under non-equity incentive plans. This does not include group life, health, hospitalization or medical reimbursement plans that do not discriminate in favor of executives, and are available generally to all salaried employees.
- iv. Change in pension value. This is the change in present value of defined benefit and actuarial pension plans.
- v. Above-market earnings on deferred compensation which is not tax-qualified.
- vi. Other compensation, if the aggregate value of all such other compensation (e.g. severance, termination payments, value of life insurance paid on behalf of the employee, perquisites or property) for the executive exceeds \$10,000.

2 CFR Subtitle A, Chapter I and Part 25

Appendix A to Part 25--Award Term

I. Central Contractor Registration and Universal Identifier Requirements

A. Requirement for Central Contractor Registration (CCR)

Unless you are exempted from this requirement under 2 CFR 25.110, you as the recipient must maintain the currency of your information in the CCR until you submit the final financial report required under this award or receive the final payment, whichever is later. This requires that you review and update the information at least annually after the initial registration, and more frequently if required by changes in your information or another award term.

B. Requirement for Data Universal Numbering System (DUNS) Numbers

If you are authorized to make subawards under this award, you:

1. Must notify potential subrecipients that no entity (see definition in paragraph C of this award term) may receive a subaward from you unless the entity has provided its DUNS number to you.
2. May not make a subaward to an entity unless the entity has provided its DUNS number to you.

C. Definitions

For purposes of this award term:

1. Central Contractor Registration (CCR) means the Federal repository into which an entity must provide information required for the conduct of business as a recipient. Additional information about registration procedures may be found at the CCR Internet site (currently at <http://www.ccr.gov>).

2. Data Universal Numbering System (DUNS) number means the nine-digit number established and assigned by Dun and Bradstreet, Inc. (D&B) to uniquely identify business entities. A DUNS number may be obtained from D&B by telephone (currently 866-705-5711) or the Internet (currently at <http://fedgov.dnb.com/webform>).

3. Entity, as it is used in this award term, means all of the following, as defined at 2 CFR part 25, subpart C:
- a. A Governmental organization, which is a State, local government, or Indian Tribe;
 - b. A foreign public entity;
 - c. A domestic or foreign nonprofit organization;
 - d. A domestic or foreign for-profit organization; and
 - e. A Federal agency, but only as a subrecipient under an award or subaward to a non-Federal entity.

4. Subaward:

- a. This term means a legal instrument to provide support for the performance of any portion of the substantive project or program for which you received this award and that you as the recipient award to an eligible subrecipient.
- b. The term does not include your procurement of property and services needed to carry out the project or program (for further explanation, see Sec. —.210 of the attachment to OMB Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations").
- c. A subaward may be provided through any legal agreement, including an agreement that you consider a contract.

5. Subrecipient means an entity that:

- a. Receives a subaward from you under this award; and
- b. Is accountable to you for the use of the Federal funds provided by the subaward.

NEG Agreement Clause No. 15 ("Personally Identifiable Information") Attachment

This Grant is subject to Training and Employment Guidance Letter (TEGL) No. 39-11 (Guidance on the Handling of Personally Identifiable Information (PII)), and the following requirements:

By submitting your application, your organization agrees to take all necessary steps to protect PII (defined 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"), and Sensitive Information (defined as "any unclassified information whose loss, misuse, or unauthorized access to or modification of could adversely affect the interest or the conduct of Federal programs, or the privacy to which individuals are entitled under the Privacy Act"). These steps include the following:

1. Grantees must secure transmission of PII and sensitive data developed, obtained, or otherwise associated with DOL/ETA funded grants.
2. To ensure that such PII is not transmitted to unauthorized users, all PII and other sensitive data transmitted via email or stored on CDs, DVDs, thumb drives, etc., must be encrypted using a Federal Information Processing Standards (FIPS) 140-2 compliant and National Institute of Standards and Technology (NIST) validated cryptographic module. Grantees must not e-mail unencrypted sensitive PII to any entity, including ETA or contractors.
3. Grantees must take the steps necessary to ensure the privacy of all PII obtained from participants and/or other individuals and to protect such information from unauthorized disclosure. Grantees must maintain such PII in accordance with the DOL/ETA standards for information security provided in TEGL No. 39-11, and any updates to such standards provided to the Grantee by DOL/ETA. Grantees who wish to obtain more information on data security should contact their Federal Project Officer.
4. Grantees must ensure that any PII used during the performance of this Grant has been obtained in conformity with applicable Federal and state laws governing the confidentiality of information.
5. Grantees further acknowledge that all PII data obtained through their DOL/ETA grant must be stored in an area that is physically safe from access by unauthorized persons at all times and the data will be processed using grantee-issued equipment, managed information technology (IT) services, and designated locations approved by DOL/ETA. Accessing, processing, and storing of DOL/ETA grant PII data on personally owned equipment, at off-site locations (e.g., employee's home), and non-Grantee-managed IT services (e.g., Yahoo mail), is strictly prohibited unless approved by DOL/ETA.
6. Grantee employees and other personnel who will have access to sensitive/confidential/proprietary/private data must be advised of the confidential nature of the information, the safeguards required to protect the information, and that there are civil and criminal sanctions for noncompliance with such safeguards that are contained in Federal and state laws.
7. Grantees must have their policies and procedures in place under which grantee employees and other personnel, before being granted access to PII, acknowledge their understanding of the confidential nature of the data and the safeguards with which they must comply in their handling of such data as well as the fact that they may be liable to civil and criminal sanctions for improper disclosure.
8. Grantees must not extract information from data supplied by DOL/ETA for any purpose not stated in the grant agreement.
9. Access to any PII created by the DOL/ETA grant must be restricted to only those employees of the Grant recipient who need it in their official capacity to perform duties in connection with the Scope of Work in the grant agreement.
10. All PII data must be processed in a manner that will protect the confidentiality of the records/documents and is designed to prevent unauthorized persons from retrieving such records by computer, remote terminal, or any other means. Data may be downloaded to, or maintained on, mobile or portable devices only if the data are encrypted using NIST validated software products based on FIPS 140-2 encryption. In addition, wage data may only be accessed from secure locations.
11. PII data obtained by the Grantee through a request from DOL/ETA must not be disclosed to anyone but the individual requestor except as permitted by the Grant Officer.
12. Grantees must permit ETA to make onsite inspections during regular business hours for the purpose of conducting audits and/or conducting other investigations to assure that the Grantee is complying with the confidentiality requirements described above. In accordance with this responsibility, Grantees must make records applicable to this Agreement available to authorized persons for the purpose of inspection, review, and/or audit.
13. Grantees must retain data received from DOL/ETA only for the period of time required to use it for assessment and other purposes, or to satisfy applicable Federal records retention requirements, if any. Thereafter, the Grantee agrees that all data will be destroyed, including the degaussing of magnetic tape files and permanent deletion of electronic data.

Recommendations

Grantees are required to protect PII when transmitting information, but are also required to protect PII and sensitive information when collecting, storing and/or disposing of information as well. Outlined below are some recommendations to help protect PII:

- Before collecting PII or sensitive information from participants, have participants sign releases acknowledging the use of PII for grant purposes only.
- Whenever possible, ETA recommends the use of unique identifiers for participant tracking instead of SSNs. While SSNs may initially be required for performance tracking purposes, a unique identifier could be linked to the each individual record. Once the SSN is entered for performance tracking, the unique identifier would be used in place of the SSN for tracking purposes. If SSNs are to be used for tracking purposes, they must be stored or displayed in a way that is not attributable to a particular individual, such as using a truncated SSN.
- Use appropriate methods for destroying sensitive PII in paper files (i.e. shredding or using a burn bag) and securely deleting sensitive electronic PII.
- Do not leave records containing PII open and unattended.
- Store documents containing PII in locked cabinets when not in use.
- Immediately report any breach or suspected breach of PII to the FPO responsible for the grant, and to ETA Information Security at ETA.CSIRT@dol.gov, (202) 693-3444, and follow any instructions received from officials of the Department of Labor.