



AUG - 3 2017

DIRECTIVE: JOB CORPS INFORMATION NOTICE NO. 17-03

TO: ALL JOB CORPS NATIONAL OFFICE STAFF
ALL JOB CORPS REGIONAL OFFICE STAFF
ALL JOB CORPS CENTER DIRECTORS
ALL JOB CORPS CENTER OPERATORS
ALL NATIONAL TRAINING AND SUPPORT CONTRACTORS
ALL OUTREACH, ADMISSIONS, AND CTS CONTRACTORS
ALL CENTER USERS

FROM: FOR LENITA JACOBS-SIMMONS
National Director
Office of Job Corps

A handwritten signature in black ink, appearing to read "L. Jacobs-Simmons", written over the printed name.

SUBJECT: Strategies to Ensure the Protection of Health-Related Personally Identifiable Information

1. **Purpose.** To provide the Job Corps community with strategies and resources to ensure that Job Corps students' Health-Related Personally Identifiable Information (PHI) is protected.

2. **Background.** Personally Identifiable Information (PII) refers to information that can be used to distinguish or trace an individual's identity, such as their name, Social Security number, biometric records, etc., or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc. PII includes educational information, financial transactions, medical history, and criminal or employment history, biometric records.

PHI is individually identifiable health information transmitted by or maintained in any form or medium, including electronic. Individually identifiable health information is information created or received by a covered entity¹, including demographic data, that relates to: 1) the individual's past, present or future physical or mental health or condition; 2) the provision of health care to the individual; or 3) the past, present, or future payment for the provision of health care to the individual, which identifies the individual or for which there is a reasonable basis to believe it can be used to identify the individual. Individually identifiable health information includes any part of a patient's medical record (e.g., medical diagnoses, treatment, medical appointments, prescribed medications) or payment history, as well as many common identifiers (e.g., name, address, birth date, Social Security Number).²

¹ Includes organizations and agencies that help carry out health-care activities and functions, and must comply under Health Insurance Portability and Accountability Act of 1996 (HIPAA) to protect the privacy and security of health information. Job Corps is a covered entity.

² This definition comes from Health and Human Services' "Summary of the HIPAA Privacy Rule" available at: <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html?language=es>.

Job Corps has released several Program Instruction notices regarding PII, including:

- IN 17-01 Significant Incident Reports (SIRs) Narrative Descriptions and Frequently Asked Questions
- PI 16-26 Requirements for Shipping Personally Identifiable Information, released 12/12/2016
- PI 15-16 New Procedure for Personal Identifiable Information (PII) Incident Corrective Action Plan, released 4/19/2016
- PI 14-09 Reminder to Protect Job Corps Students' Personally Identifiable Information (PII), released 8/26/2014
- PI 12-30 Security Policy for Digital Dental X-rays Imaging Systems, released 5/8/2013
- PI 09-34 Handling Personally Identifiable Information and Properly Reporting a Loss, released 2/17/2010
- PI 06-23 Guidance on the Safekeeping of Forms, Records, and Other Hardcopy Documents Containing Personally Identifiable Information, released 3/19/2007
- PI 06-08 Use of Computer Applications Containing Job Corps Students Personally Identifiable Information, released 9/22/2006

3. Action Required. In order to protect Job Corps students' PHI, centers should take the following precautions:

- Avoid entering PHI into Case Notes in CIS. Health and Wellness staff members should instead document all pertinent health information in the Student Health Record (SHR).
- If Case Notes are utilized, information should be limited and generic (e.g., "Student seen in Health and Wellness Center"). Staff should avoid entering information about which specific provider the student visited.
- Enter limited information regarding leave categories into CIS; do not reveal reason for an off-center appointment (e.g., mental health, HIV, substance abuse).
- Avoid entering PHI in Significant Incident Reports. Health and Wellness staff members should instead document all pertinent health information in the SHR.
- Ensure the front of the SHR contains limited information. Nothing should be on the outside of the SHR except for name, date of entry, student identification number, and allergies. Insurance information may be color coded.
- Care should be taken to avoid discussing PHI in areas where others may overhear.
- Do not leave SHRs or other materials that contain PHI unattended in open areas.
- Students should not perform work-study or custodial duties in the Health and Wellness Center to avoid the possibility of unintended disclosure or the appearance of disclosure of PHI.
- Use sign-in sheets with care in the Health and Wellness Center. Do not identify which provider the student is seeing on the sign-in sheet. Consider covering up students' names as they sign in.

4. Effective Date. Immediately.

5. Inquiries. Inquires should be directed to Johnetta Davis at (202) 693-8010 or via e-mail at Davis.Johnetta@dol.gov.