



POLICY: FILE ACCESS POLICY

EFFECTIVE DATE: 07/02/2018 POLICY NUMBER:

PURPOSE

To provide WorkSource Montgomery (WSM), Inc. staff and subrecipients with policy and procedures for maintaining files as required by the State of Maryland to ensure security of personal information.

CANCELLATIONS

This policy supersedes all pre-existing policies for File Access Policy.

ACTION REQUIRED

Within 15 days of the receipt of this policy it is the recipient's responsibility to ensure all staff are informed of the policy and to create an internal process to ensure accountability.

QUESTIONS

Questions relating to this policy should be directed to the Director, Talent Development / WIOA at policy@worksourcemontgomery.com, or 240-[283-1576](tel:283-1576).

POLICY

File Cabinet and Room (Wheaton) and File Cabinet (Germantown) Key Owners

- Wheaton: Intake and Quality Assurance Specialist
- Germantown: Business Service Manager and Intake
- WIOA Director
- One Stop Operator (has for Wheaton)

Primary File Keeper and Back-Up Designations

- Wheaton: Intake (Primary), Quality Assurance Specialist (Back-Up)
- Germantown: Intake (Primary), Business Service Manager (Back-Up)
- In the event of a staffing change, WIOA Director must designate a replacement immediately, transfer the key and modify this document.

- The primary key holder will monitor the folder check-out and check-in process. The name of the primary key holder will be noted on the daily sign-in sheet.
- The primary key holder will email WIOA Director, and copy VP of Quality, when she or he must transfer the primary folder monitoring responsibility to the designated back-up staff.

Daily WSM Participant Folder Check-In and Check-Out Process:

- All staff - Grant Associates and external staff - must request WSM participant folder(s) from the primary file keeper at each location and return the folders daily. The primary file keeper is responsible for maintaining the daily folder log and sending it weekly to One Stop Operator and storing it on the shared drive.
- No folder should be kept in a desk drawer or in an office overnight. All folders MUST be returned daily.
- All Grant Associates' staff and any external staff must follow the same procedures, specified in this document, for folder requests and folder returns.
- Anyone wishing to check-out a folder must request the folder by entering the customer name on the folder log, kept at the Front Desk.
- Pulling the folders: Twice a day, at 9 am and 12 pm, the folders will be pulled by the primary file keeper and handed to the staff requesting the folder. Both staff and the primary file keeper must sign for the folder(s) on the daily folder log.
- Returning the folders: All folders must be returned to the primary file keeper by 4:30 pm daily. The primary file keeper will confirm receipt and return the file to the file cabinet. Both staff and the primary file keeper must sign for the folder(s) on the daily folder log.
- New enrollments: After the QA enrollment review, the QA Specialist will add the folders of new participants to the file log for the primary file keeper to add to the file cabinets.
- Weekly, the completed file logs should be emailed to One Stop Operator and saved on the shared drive as a single PDF document, with the dates – example 7.16.18 to 7.20.18.

FILE KEEPER DESIGNATION LOG (to be updated by Program Director)

	Wheaton	Germantown	Date Updated
Primary	Judith Ventura	Laender Manzano	5/30/19
Back-Up	Toni-Ann Green-Clair	Clennie Murphy	5/30/19