

The Workforce Connection, Inc.

Policy Title: Medical Data and Information Collection

Policy Number: 2016-400-03, Change 1

Status: Active

Effective: March 19, 2024

Purpose/Introduction:

To define policies and procedures for collection and maintenance of medical data and information in files of Program applicants, registrants, eligible applicants/registrants, participants, program completers, employees, and applicants for employment.

Background:

Federal and State regulations were enacted to exclude sensitive medical data and information from case management system records.

References:

- Illinois workNet ePolicy Chapter 10 Section 10.6.3 Data Confidentiality
<https://apps.illinoisworknet.com/WIOAPolicy/Policy/Index/423>
- Workforce Innovation and Opportunity Act of 2014 Section 188;
- US Department of Labor Regulations at 29 CFR Part 3; and
- The Americans with Disabilities Act.

Policy/Procedures:

- Generally, medical records will not be maintained; therefore, a case note indicating that the “necessary medical information” was obtained should be entered in the Illinois Workforce Development System (IWDS) and the actual paperwork sent to the school or employer requiring the information.
- If drug testing or a physical is required by an employer as a condition of employment, arrangements will be made with the clinic to have the results mailed directly to the employer.
- If drug screening or physical is required by a training provider to be accepted into the training program (e.g., a CDL training provider) results will be mailed to the training provider and a case note noting that drug test results were mailed to the training provider entered into IWDS.
- If medical information/documentation is necessary to determine eligibility, a copy of documentation will be placed in their separate medical file and maintained under strict control by the program agency management.
- If medical information/documentation is necessary to determine possible accommodation for individuals for job placement and / or training, such information will be given to the participant and not maintained by the program. A case note noting that such information was verified by the Career Planner will be entered into IWDS.
- In exceptional circumstances when medical information must be maintained, a separate

file will be established and maintained under strict control by the program agency management.

This policy should be distributed to all program staff, including sub-award program staff. Participant files will be reviewed by program supervisory staff to ensure compliance. A sampling of files will be reviewed by the EO Officer periodically to ensure compliance with this policy.

Action Required:

This information is to be disseminated to all The Workforce Connection, Inc. program providers, partner agencies, sub-awardees, contractors, and One Stop Operator(s).

Inquiries:

Questions regarding any aspect of this policy should be directed to The Workforce Connection, Inc.

Effective Date: Immediately