

KANKAKEE COUNTY HOUSING AUTHORITY  
185 NORTH ST. JOSEPH STREET  
KANKAKEE, IL 60901

SECURITY OF CONFIDENTIAL INFORMATION POLICY



Adopted: 6/22/10  
Resolution #: 10 - 51  
Effective Date: 7/1/10

# **Kankakee County Housing Authority Security of Confidential Information Policy**

**July 1, 2010**

The Kankakee County Housing Authority's records are considered confidential unless specifically allowed to become part of Public Record as defined by the Federal, State or local government regulations and/or laws. No employee of the Kankakee County Housing Authority may disclose information to the public without appropriate authorization of the Executive Director.

Employees of the Kankakee County Housing Authority, whether of full-time, part time, temporary or casual status, may be placed in the position of having access to personal information, whether on another employee, a current resident of the Authority or on a prospective employee, or resident of the Authority. These employees are required to maintain confidentiality in regards to this information. Any information considered confidential under Federal, State, or local laws should always be maintained in a secure place and used only for the purpose the information is gathered for. Specific information must be maintained and/or destroyed depending on the rules and regulations governing Housing Authorities and/or Federal, State, or local laws.

Any employee having access to this type of information is required to follow the appropriate laws and regulations concerning personal information and release or use of this information. Any employee who fails to adhere to this policy may result in disciplinary action up to and including termination.

All employees of the Kankakee County Housing Authority will recognize acceptance of this policy and its terms by signature (see form entitled, "User Agreement"). Any questions on this policy should be directed to the Human Resource Administrator, your immediate Supervisor and/or the Executive Director.

## **PURPOSE**

The KCHA adopts this policy to help protect employees, residents, contracted workers and the housing authority from damages rated to loss or misuse of sensitive information. This policy will:

- Define sensitive information
- Describe the physical security of data when it is printed on paper
- Describe the electronic security of data when stored and distributed

## **SCOPE**

This policy applies to employees, contracted workers, consultants, temporaries, and other workers at the housing authority, including all personnel affiliated with third parties. As deemed appropriate, all contracted workers, consultants, temporaries, and other workers at the KCHA may be requested to recognize acceptance of this policy and its terms by signature (see attached form entitled, "Contractor Acknowledgement").

The main office of the KCHA is located at 185 N. St. Joseph Avenue, Kankakee, IL 60901 and is equipped with an electronic building alarm system.

## **POLICY**

Definition of Sensitive Information – Sensitive information includes the following items whether stored in electronic or printed format:

Personal Information – Sensitive information consists of personal information including, but not limited to:

- **Credit Card Information**, including credit card number (in part or whole), credit card expiration date, cardholder name, and cardholder address.
- **Tax Identification Numbers**, including Social Security Number, Social Insurance Number, Business Identification Number, and Employer Identification Numbers.
- **Payroll information**, including among other information, Paychecks, Pay stubs, and Pay rates.
- **Check Requests** and associated paperwork.
- **Medical Information** for any Employees or Residents, including but not limited to, doctor names and claims, insurance claims, prescriptions, and any related personal medical information.
- **Other Personal Information** belonging to Employees, Residents, Applicants, and Contracted Workers, examples of which include Date of Birth, Address, Phone Numbers, Maiden Name, Names, and Resident Numbers.

Corporate (KCHA) Information – Sensitive KCHA information includes, but is not limited to:

- Housing Authority, employee, resident, vendor, supplier confidential, proprietary information or trade secrets.

- Proprietary and/or confidential information, among other things, includes: business methods, resident utilization information, retention information, sales information, marketing and other KCHA strategy, computer codes, screens, forms, information about, or received from, KCHA's current, former and prospective residents, employees or suppliers or any other non-public information.
- Proprietary and/or confidential information also includes the name and identity of any resident or vendor and the specifics of any relationship between and among them and the KCHA.
- Any document marked "Confidential," "Sensitive," "Proprietary," or any document similarly labeled.

The KCHA personnel are encouraged to use common sense judgment in securing the KCHA Confidential information to the proper extent. If an employee is uncertain of the sensitivity of a particular piece of information, he/she should contact his/her respective supervisor, the HR Administrator and/or the Executive Director.

Attached for reference are workflow process documents for the following departments: Public Housing, Section 8 HCV Program, Maintenance, Administration Department, and Finance. These attachments will help identify documents and who has access to the information.

### **HARD COPY DISTRIBUTION**

Every employee and contracted worker performing work for the KCHA will comply with the following policies:

- Storage rooms containing documents with sensitive information and record retention areas will be locked at the end of each workday.
- Desks, workstations, work areas, printers and fax machines, and common shared work areas, including conference rooms, will be cleared of all documents containing sensitive information when not in use.
- Whiteboards, dry-erase boards, writing tablets, etc. in common shared work areas will be erased, removed, or shredded when not in use.
- When documents containing sensitive information are discarded they will be shredded using a mechanical cross cut or Department of Defense (DOD) approved shredding device.

## **ELECTRONIC DISTRIBUTION**

Every employee and contracted worker performing work for the KCHA will comply with the following policies:

- Internally, sensitive information may be transmitted using approved KCHA email.
- Any sensitive information sent external must be sent only to approved recipients. Additionally, the following statement must be included in the email:

*“This message may contain confidential and/or proprietary information, and is intended for the person/entity to whom it was originally addressed. Any use by others is strictly prohibited”.*

## **ROLES AND RESPONSIBILITIES**

Management will have the responsibility to enforce this policy and ensure that it is followed by employees and contracted workers.

## **DEFINITIONS**

Hard Copy – A printout of data stored in a computer. It is considered *hard* because it exists physically on paper, whereas a *soft* copy exists only electronically.

## **ENFORCEMENT**

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

**End**

**Kankakee County Housing Authority  
Security of Confidential Information Policy**

**July 1, 2010**

**User Agreement**

I have received a copy of the Security of Confidential Information Policy. As an employee of KCHA, I understand that this policy applies to me. I have read KCHA's Security of Confidential Information Policy and agree to follow all of its provisions, for the duration of my employment with the KCHA.

I am aware that any violation of this policy may subject me to disciplinary action, up to and including discharge from employment. If I have any questions regarding this policy, I will request clarification from my Supervisor, the Human Resource Administrator and/or the Executive Director.

---

Employee Signature

---

Date

---

Employee Printed Name

## **DEPARTMENTAL DOCUMENT DISTRIBUTION**

### **PUBLIC HOUSING:** (Public Housing Manager, Accountant)

1. When receiving any information from tenants the information is first copied.
2. Documents are time and date stamped.
3. Documents are placed in tenant files.
4. Files are kept in filing cabinets.
5. No files are left out in open areas so that other tenants could see personal information.
6. If verifications need to be sent out, these are done at the same time as drop off and then a copy of the fax cover sheet is also placed in the file.
7. When verifications come back they are also time and date stamped and placed in file in the same manner.
8. When receiving documents from other departments (finance) the adjustments slips and copies of work orders/bills are also placed in tenant files.

### **SECTION 8 HCV PROGRAM:** (HCV Manager, Occupancy Specialist, FSS Coordinator, HCV Administrative Assistant)

1. Tenant/Landlord information is collected by the Section 8 Manager, Section 8 Occupancy Specialist(s), and Section 8 Administrative Assistant.
2. Types of Tenant/Landlord information collected include but are not limited to Social Security numbers, Birth Certificates or records, Employment, Income, Child Support, Drivers License/State ID, Police Background Reports, Credit Information, Medical Card, Utility Bills, Personal Contact Information, Property ownership information, Trust documents, and Corporation documents.
3. Tenant Information is maintained and stored in Tenant Files. Landlord information is maintained and stored in Landlord Files.
4. Information may be sent to employers, state and federal agencies, and police departments.

### **MAINTENANCE DEPARTMENT:** (Public Housing Property Maintenance Manager, Maintenance personnel, Administrative Assistant)

#### Work Order Paper Flow

1. Work orders are entered into the system by the Administration Department Admin Assistant or the Public Housing Property Maintenance Manager (PHPMM).
2. PHPMM issues all work orders out to the maintenance personnel.
3. Maintenance staff completes the work order and turns it in to the PHPMM.
4. PHPMM checks work order to make sure it has been completed.
5. PHPMM closes work order out in system and bills tenant for damages, if any, and forwards charges to Finance Department for processing.
6. PHPMM files work orders in tenant files.

## MAINTENANCE DEPARTMENT (continued):

### Purchase Order Paper Flow

1. PHPMM fills out Purchase Order for supplies or services on behalf of the Maintenance department.
2. PHPMM forwards completed purchase order to the Executive Director for approval.
3. The Executive Director approves and forwards the purchase order to Finance so purchase order number is issued.
4. The Finance department issues purchase order number to purchase order and enters purchase order in system.
5. The Finance department forwards the purchase order to the PHPMM.
6. The PHPMM orders supplies and when received closes purchase order out and forwards back to Finance.

## ADMINISTRATION DEPARTMENT: (Executive Assistant, Administrative Assistant, Accountant, Accounting Clerk)

Types of work flow for the Executive Assistant include: New Hire (Payroll, Policies, Drug Screen, Background Checks, etc.); Benefits, Work Comp, Medical, RFP's/RFQ's, Trainings, Staff Minutes, Union, Board Meeting Packets, Board Resolutions / Minutes, Annual Plan, Organizational / Salary Charts, Optima Time Tracker, Computer Troubleshooting / Server Maintenance.

Types of work flow for the Administrative Assistant include: Waiting List / Applications, KCHA Mail Distribution, Letters / Reports, Work Orders, Employee Phone Lists, Utility checks, Rent collection, Rental Licenses, Newsletters / Bulletin Boards.

The distribution of the document flow includes: Payroll Vendor, KCHA Accounting staff, KCHA Public Housing Manager, KCHA Public Housing Property Maintenance Mgr., Union Representative, Central Files, HR Office Files, Personnel Files, Applicant Files, FOIA Files.

The vendors that may have access to certain information include: CIBC, Manpower, Kelly Services, AHRMA, Attorney, JH2B Architects, People Etc., Riverside, Resident Screening, Pre-Paid Legal, AFLAC, Life Associates, HUD, HABCO, Quality Concepts dba PDS, KCHA Board Members, and Code Enforcement.

## FINANCE DEPARTMENT: (Accountant, Accounting Clerk)

Types of work flow for the Accountant include:

- Print time cards for non-exempt employees
- Issue time cards to supervisor for approval of time
- Process approved time to spreadsheet

FINANCE DEPARTMENT. (continued):

- Payroll period time is processed on a spreadsheet issued from third party payroll service then e-mailed for processing.
- Accounts receivable
- Process rent payments that are received by Front Desk Administrative Assistant
- Process any payments that are received via mail or as need at front desk
- Issue swipe keys when needed and distribute to Public Housing Mgr.
- Process ID cards and give to Public Housing Mgr.
- Process month-end reports then distribute to Fee Accountant via Fed Ex and file additional copies
- Compile all reports for month end reports for mailing (HAP, Acct Recv, Inventory, Work Order misc. deposits rpt.
- Enter Request for Leave form in Optima; keep requests on file
- Remote deposit; all checks are filed after deposit is processed (misc. receipts are printed and distributed to Fee Accountant)
- File all check registers and month end reports that are received from Fee Accountant after reports are updated.

Types of work flow for the Accounting Clerk include:

- Process bills that are stamped first by Front Desk Administrative Assistant
- Purchase Orders
- Swipe key issuance and update of system
- Process checks
- Proof HAP Spreadsheet
- Process HAP Checks
- Deals with Vendors for Office supplies (Staples, Office Max, Dell Adcraft)
- Deals with other vendors when needed regarding invoice issues
- Process month end – G/L in yardi when reports are received from Fee Accountant

Other Types of work flow within Finance Department include:

- Coin collection at Midtown
- Counting coins
- Depositing at Bank
- Processing checks
- Processing invoices (given to Executive Director for approval after Finance has proofed bill).

END