

Brookline Housing Authority

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Board of Commissioners

David Trietsch, Chairman
Michael Jacobs, Vice Chairman
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Joanne Sullivan, Commissioner
Judy Katz, Commissioner

Patrick Dober, Executive Director

POLICY – WAGE MATCH CONFIDENTIALITY

ACKNOWLEDGEMENT

All employees or agents of the BHA that may have access to files or documents containing Department of Revenue – **Wage Match** information must complete a confidentiality acknowledgement upon hire or promotion. The employee or agent will receive a copy of the *“Summary of Massachusetts and Federal Laws Pertaining to Confidentiality of Information of The Massachusetts Department of Revenue”* and a copy of this policy for their records. A signed acknowledgment of receipt of said information will be kept as part of the employee’s file. The *“Summary of Massachusetts and Federal Laws Pertaining to Confidentiality of Information of The Massachusetts Department of Revenue”* is attached to this document as **EXHIBIT A**.

CORI

CORIs must be completed for ALL employees before they gain access to **Wage Match** information. (A CORI completed at the time of hire is sufficient.)

GENERAL SAFEGUARDS

Employees will only access the **Wage Match** system as is required to perform the duties of their position for state housing programs only. Employees will use other public and/or private income and asset verification programs and/or methods for all other housing programs.

Each employee with access to the **Wage Match** system will keep their access passwords confidential and will use recommended best practices when entering and exiting the system.

Employees will not leave computers or paper containing **Wage Match** information unprotected at any time. Computers are set to log-off if idle for more than 3 minutes and the employee must re-enter their password to regain access to the computer.

A record of all authorized employees and copies of their signed acknowledgements will be maintained in a locked cabinet and/or secure (limited access) location on the network server. The list and signed acknowledgements will be updated upon staff turnover, by the Executive Director or his designee. Copies of the list and/or signed acknowledgements will be furnished to DHCD upon request.

Upon discovery, BHA will notify DHCD immediately, both orally and in writing, if any wage reporting information is improperly used or accessed. BHA will cooperate with DHCD to enjoin or prevent misuse of, regain possession of, and otherwise protect the data.

RECORDS RETENTION & DISTRUCTION

Wage Match information that is used to determine initial eligibility of state housing program applicants will become part of the permanent file if/when tenancy is established. **Wage Match** information that is used to determine continued eligibility of state housing program tenants/participants will become part of the permanent file until tenancy is terminated. All applicant and tenant/participant files are kept in locked cabinets with limited staff access.

Wage Match information contained within applicant or tenant/participant files will be destroyed in accordance with state records retention laws for public housing applicants and/or tenants, as applicable.