

**STATE OF VERMONT
DEPARTMENT OF PUBLIC SERVICE**

Policy Title:	Privacy Policy	Scope:	Public Service inclusive of the Vermont Community Broadband Board Division
Section:	General	Original Issue Date:	9/28/23
Policy #:	A-GEN-001	Revision Date:	9/28/23

PURPOSE:

The Vermont Department of Public Service (the “Department”) works to protect the privacy and confidentiality requirements of the information that is collected in systems and databases belonging to the Department. Personally Identifiable Information (“PII”) is collected in a variety of electronic and manual situations and is protected by policy and law.

Department employees only have access to information which is necessary for the performance of their job duties except as otherwise approved by the Department. It is a Department expectation that employees will take all appropriate measures to safeguard PII.

DEFINITIONS:

Personally Identifiable Information (“PII”) means information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

Protected Personally Identifiable Information (“Protected PII”) means an individual’s first name or first initial and last name in combination with any one or more types of information, including, but not limited to, social security number, credit card numbers, utility account numbers, financial records including income, tax records, and educational transcripts.

REFERENCES:

Vermont Online Portal: The state-wide website privacy policy is located at the following web address:

<http://www.vermont.gov/portal/policies/privacy.php>

Office of Management and Budget (“OMB”) “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards,” Final Rule, called "Uniform Guidance"

2 CFR 200 http://finance.vermont.gov/policies_procedures/uniform_guidance (sections 200.79 & 200.82)

Vermont Statutes Online [1 V.S.A. §317](#)

Office of the Vermont Attorney General Consumer Protection website: <https://ago.vermont.gov/privacy-data-security>

GENERAL STANDARDS:

A. What PII and Protected PII is collected by the Department?

PII is collected in a variety of systems for a variety of reasons. For purposes of program evaluation, issuing grants, or to inform policy decisions, the Department may receive information from electric and gas distribution and efficiency utilities in the state. Consumer Affairs collects PII for the purposes of consumer complaints and informally resolving disputes between utilities and their customers.

B. How is the PII and Protected PII used?

PII and Protected PII are used in a variety of ways through the normal functions of government. Vermont law governs the use of this information according to Public Records Acts. The Department uses PII for evaluations such as to determine the amount of energy savings or costs associated with a utility program. The Department also may use PII to verify income to meet grant eligibility requirements. Consumer Affairs collects PII for the purposes of consumer complaints and informally resolving disputes between utilities and their customers.

C. What PII and Protected PII are shared?

PII and Protected PII is shared in accordance with Vermont Statutes, in particular 1 V.S.A. §316 and §317. Employee personnel information that may contain PII is not shared and is kept confidential in accordance with 1 V.S.A. § 317.

State law exempts from disclosure lists of names when disclosures would violate a person's right to privacy. Personal information *may be* disclosed for use in research activities and for use in producing statistical reports, *so long as the personal information is not published, or re-disclosed.*

Financial records, supporting documents, statistical records, and all other records pertinent to a federal award must be retained for a period of three years from the date of submission of the final expenditure report, or for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, or for any period required by law these records are available for inspection by any authorized representatives of the state or federal government (see 2 CFR 200.333).

The Department follows Guidance from the Attorney General as it relates to the Protection of Social Security Numbers. (See [Attorney General Guidance](#))

D. How can individuals have their PII and Protected PII corrected that is contained in the systems at the Department?

Inquiries about an individual's PII or Protected PII can be directed to the Office of the Commissioner of the Department of Public Service, 802 828-2811, and you will be directed to the Division that manages the record in which you have an inquiry.

Revision History

This policy supersedes any Department policies and practices in existence prior to its effective date. All earlier revisions of this document are superseded by this revision.

Date	Revision #	Modification

DocuSigned by:
Authorizing Authority:

June E. Tierney

10/11/2023

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June E. Tierney, Commissioner

Date