

## **Protection of Personal Identifiable Information during MORs**

Maine State Housing Authority (MaineHousing)'s Asset Management Department is committed to protecting the privacy of tenant data that we may be in possession of while conducting the required management and occupancy reviews.

### **Electronic Remote Reviews**

Electronic reviews are conducting using a secure site called Sharefile. MaineHousing's IT department has done its review on the systems security and approved it for our company's use when needing to transfer sensitive files with external partners.

In order to ensure further protection of PII when the system is used by Asset Management Staff for MORs, the following protocols have been established:

The Asset Manager will coordinate with the property manager and obtain/share the following information:

- Names and contact information for each person who will need to be able to upload files to sharefile
- Date the sharefile review will begin
- Disclosure of the individuals who will have access to the files at MaineHousing

The Asset Manager will then contact the Portfolio Manager and provide the following details:

- Date of review
- Persons needing access to the system – names and contact information, for both the property and MaineHousing

The Portfolio Manager will set up the sharefile account and establish rights within that folder for both property management staff and MaineHousing staff who will need access to the files/folders. Portfolio Manager will have access to the folders at all times, but only as a means of being a security agent to ensure only authorized individuals get access to the folders. If it is requested additional people need access to the files during the review, no authorization or set up will occur until the Owner/Manager is notified and approves.

Once the review is completed and the report issued, the Portfolio Manager will set a trigger to delete the file folders based on the following:

- If no responses required – files can be deleted immediately
- If response required – set a one month notification to delete files from the secure server

Folders will not be maintained any longer than one month after the review is completed unless there are documented circumstances to warrant/require it. An instance of this would be a dispute regarding a particular finding. The file may be maintained until the issue is resolved.

**Files reviewed at MaineHousing office**

For reviews conducted at the MaineHousing facility, the lead Asset Manager and the Property Manager will establish and agree to the period of time the files will be in possession at MaineHousing which should be no longer than the period of time it is expected for the review to be completed. All files must be transported to and from MaineHousing by Property Management staff.

While files are in Asset Management's possession, the following protocols will be adhered to:

- Typically, when reviewing files, a conference room is set aside and all authorized persons go into the room to complete the tenant file review. Files shall not be left unattended without being properly secured. When the review is not in process, the files are kept in the assigned vault area which is always secured with limited access.
- Only authorized staff will be able to review these files – the individuals who will be assisting on the review and will have access to these files will be disclosed to the property manager.

**Files reviewed on site (project or Management Company)**

While on site, Property Management assigns the Asset Managers a secure location to work on the review of tenant file information. The Asset Manager(s) shall not leave the files unattended without first notifying management that they are temporarily stepping out, or needing to return the following day.