

# Attachment C: Local PA CareerLink® Branded Website Guidance

For Local Workforce Development Boards

Pennsylvania Department of Labor & Industry  
Bureau of Workforce Development Administration

DRAFT

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## Contents

Introduction .....	2
Branding and Design Consistency .....	2
PA CareerLink® Branding .....	2
Local Branding.....	2
Content Requirements.....	3
No Duplication of Services .....	3
No Job Postings.....	3
Redirecting Traffic to the <a href="http://www.pacareerlink.pa.gov">www.pacareerlink.pa.gov</a> Centralized Website .....	3
Political and Lobbying Content .....	3
Accessibility Requirements .....	3
Full Accessibility Compliance .....	3
WCAG Compliance .....	3
Mobile Responsiveness .....	4
Security Considerations .....	4
Regular Security Audits.....	4
Personally Identifiable Information (PII) and Data Collection .....	4
Personally Identifiable Information (PII).....	4
Limited Data Collection.....	4
Local Policy for Content Management .....	5
Content Approval Process .....	6
Content Update Schedule.....	6
Archival Process.....	6
Review and Local Approvals .....	6
Regular Updates .....	6
Content Approval.....	6
Monitoring and Compliance .....	7
Annual Monitoring.....	7
L&I rights To PA CareerLink® Brand.....	7
Conclusion.....	7
Contacts .....	7

## Attachment C: Local PA CareerLink® Branded Website Guidance

### Introduction

Pennsylvania permits Local Workforce Development Boards (LWDBs) to develop and maintain independent local PA CareerLink® branded websites.

The role of LWDBs is vital to supporting regional workforce development efforts across Pennsylvania. These boards are responsible for implementing employment, training, and economic development programs that meet the specific needs of their local areas. To enhance their services, LWDBs may develop local PA CareerLink® branded websites to provide information and resources to job seekers, employers, and community partners.

If LWDBs choose to create local PA CareerLink® branded website for their local area under the PA CareerLink® common identifier, they must comply with statewide standards, particularly as they relate to the branding, services, and mission of PA CareerLink® — Pennsylvania’s unified workforce development system. The PA CareerLink® website, at [pacareerlink.pa.gov](http://pacareerlink.pa.gov), is the primary state-run employment website, offering a comprehensive range of resources, including job listings, career tools, and training opportunities. Therefore, local PA CareerLink® branded websites must complement, not duplicate or replace, the primary site and its content.

To maintain consistency and uphold the integrity of the PA CareerLink® brand, the Pennsylvania Department of Labor & Industry (L&I) has developed specific guidelines for how LWDBs must design and manage local PA CareerLink® branded websites. This guidance ensures that local PA CareerLink® branded websites:

- Present a unified look and feel aligned with PA CareerLink® branding.
- Provide accessible, accurate, and relevant information without duplicating state-provided services.
- Adhere to legal, security, and ethical standards.

The following sections outline the requirements that must be followed when creating or maintaining a local PA CareerLink® branded website. All content added to locally branded websites must follow the requirements outlined in the Department’s *Common Identifier* policy and associated guidance, including *Attachment A* and *Attachment B*. By adhering to these requirements, LWDBs can effectively support their regions’ workforce development goals while maintaining compliance with statewide standards.

### Branding and Design Consistency

#### PA CareerLink® Branding

All LWDBs must adhere to the PA CareerLink® official branding standards, including logos, fonts, and color schemes, as described in the *Pennsylvania CareerLink® Common Identifier Style Guide*. Unauthorized alterations to PA CareerLink® branding are prohibited.

#### Local Branding

Pennsylvania allows local areas and one-stop partners to use their own locally developed identifiers alongside the national tagline and the Pennsylvania Workforce Delivery System Common Identifier.

All locally developed identifiers must be clearly distinct from and secondary to the primary Pennsylvania common identifier and federal tagline in every use instance. This applies to the use of the Pennsylvania common identifier on all products, programs, activities, services, facilities, property, or materials, including all electronic resources, such as social media and email communication.

## Attachment C: Local PA CareerLink® Branded Website Guidance

### Content Requirements

Local PA CareerLink® branded websites may only complement the PA CareerLink® website: [www.pacareerlink.pa.gov](http://www.pacareerlink.pa.gov). Content on local PA CareerLink® branded websites must not duplicate content on the PA CareerLink® website. Instead, local content must focus on region-specific or locally relevant information and activities (e.g., calendar of events with day/time occurring).

#### No Duplication of Services

Local PA CareerLink® branded websites must not duplicate services already available on PA CareerLink®. Instead, they must serve as a complementary resource, providing locally relevant information with links to the main PA CareerLink® site for services such as job postings, job seeker tools, event registration, and statewide programs.

For example, a local PA CareerLink® website may display a calendar of events; however, if participants want to attend an event, the local website must direct them to the PA CareerLink® website to register to attend the event. Another example could be the local PA CareerLink® website announcing an employer hiring event for specific positions. Participants must be directed to register for the event and apply for the positions through the PA CareerLink® website.

#### No Job Postings

Local PA CareerLink® branded websites must not host job postings. All job postings must be managed through the state-owned and state-operated PA CareerLink® platform to maintain a centralized and comprehensive job search experience for users.

#### Redirecting Traffic to the [www.pacareerlink.pa.gov](http://www.pacareerlink.pa.gov) Centralized Website

Local PA CareerLink® branded websites must prominently feature links that direct users to the official PA CareerLink® website, especially, as mentioned above, for primary services, resources, or information relevant to the brand. This ensures unified messaging and access to the most current resources.

### Political and Lobbying Content

Local PA CareerLink® branded websites must not include political content or content related to lobbying activities. Websites must focus solely on workforce development and public services, avoiding any language or posts that could be seen as political endorsements or advocacy in accordance with Byrd Anti-Lobbying Act (31 U.S.C. § 1352).

### Accessibility Requirements

#### Full Accessibility Compliance

Local PA CareerLink® branded websites must be fully accessible to individuals with disabilities in compliance with ADA standards or other relevant local accessibility regulations. This includes ensuring website features, navigation, and content are inclusive and functional for all users, regardless of ability.

#### WCAG Compliance

Local PA CareerLink® branded websites must follow the most up-to-date [Web Content Accessibility Guidelines \(WCAG\)](#), ensuring all content is accessible to individuals with disabilities, including those using screen readers or other assistive technologies.

## Attachment C: Local PA CareerLink® Branded Website Guidance

### Mobile Responsiveness

The site design must be fully functional on mobile devices, allowing all content to be visible to users who may not have access to traditional computers.

### Security Considerations

While websites that do not collect personal information don't have the same security concerns as websites that do, the security of the local PA CareerLink® branded websites is paramount. LWDBs choosing to establish local PA CareerLink® branded sites must ensure the following standards are met:

- Privacy policy: Even if you don't collect personal information, you must have a privacy policy that explains your commitment to privacy and what types of data you don't collect.
- Anti-tracking technology: Browsers have built-in anti-tracking features that can help protect users' privacy. These features can block or limit third-party sites from accessing cookies or running tracking scripts.
- Encryption: Encrypt sensitive information stored on your computer network or sent to third parties over public networks. It is recommended that Secure Sockets Layer (SSL) encryption is utilized to protect users' data, especially when personal information is entered or collected.
- Anti-malware: Run up-to-date anti-malware programs on your computers and servers.
- Vendor-approved patches: Check for alerts from expert websites and your software vendors about new vulnerabilities.
- Unauthorized software: Restrict employees' ability to download unauthorized software.
- Hypertext transfer protocol secure (HTTPS): Use HTTPS to ensure that you connect to the official website and that any information you provide is encrypted.

### Regular Security Audits

Website administrators or designees must conduct regular security audits and vulnerability scans to identify and address potential risks. Upon request, local boards must be able to provide documentation demonstrating adequate security processes, such as reviewing their security policies and procedures, monthly security scan reports, annual System and Organization Controls (SOC) and pen test reports, etc.

### Personally Identifiable Information (PII) and Data Collection

#### Personally Identifiable Information (PII)

Personally Identifiable Information (PII) is 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.

Local PA CareerLink® branded websites may not collect or store any data, especially PII.

#### Limited Data Collection

In accordance with L&I's Workforce System Policy (WSP) *Pennsylvania's Workforce System of Record*, the Commonwealth Workforce Development System (CWDS) is the official centralized platform for collecting and storing customer data. However, if a local area identifies a compelling operational need that would be significantly affected by the prohibition of data collection, they may submit a formal request to Oversight Services for an exception. The local area may not collect any information until their exemption request is approved.

## Attachment C: Local PA CareerLink® Branded Website Guidance

Requests must include an internal policy addressing the following key elements:

1. **Justification for Data Collection:** A clear rationale outlining the specific operational necessity and the benefits of collecting data.
2. **Data Usage:** A detailed explanation of how the collected data will be utilized to meet the stated operational needs.
3. **Data Storage and Security:** An overview of where and how the data will be stored, including the security measures to safeguard it from unauthorized access or breaches. When applicable, ensure administrators and staff access the website using secure login credentials to prevent unauthorized access. Ensure a user agreement document is in place with those authorized to access the website.
4. **Data Retention and Disposal:** A clear policy specifying how long the data will be retained and the procedures for securely disposing of it when no longer needed.
5. **Compliance with Legal and Regulatory Requirements:** A statement confirming that all data collection and processing will comply with relevant legal, regulatory, and privacy frameworks. All data collection and handling must comply with federal, state, and local privacy laws, including Training and Employment Letter (TEGL) No. 39-11 and the Pennsylvania Breach of Personal Information Notification Act (BPINA).
6. **User Consent and Transparency:** Procedures for ensuring that users are informed of the data being collected, the purpose for collection, and obtaining explicit consent where applicable.
7. **Data Access and Auditing:** A description of who will have access to the data and the audit mechanisms to ensure compliance with stated policies, including granting access to L&I and USDOL upon request.

Each request will be subject to review and approval based on these criteria to ensure minimal data collection and adherence to privacy best practices. If permitted, local PA CareerLink® branded websites must limit data collection to only that which is included in the formal request. When collecting the permitted information, the following requirements must be met:

- Provide a clear message that the information will not be shared with outside entities.
- Allow the customer to opt out or unsubscribe in a clear and straightforward manner.
- May not house or store PII on the website.

Refer to Local Policy for Content Management for additional direction.

### Local Policy for Content Management

Local boards may delegate the responsibility of creating and operating local PA CareerLink® branded websites to other entities or service providers. However, the responsibility of ensuring compliance with relevant standards, policies, and guidance remains with the local boards.

## Attachment C: Local PA CareerLink® Branded Website Guidance

Each LWDB choosing to create and operate a local PA CareerLink® branded site must establish and maintain a local content management policy. LWDBs operating or responsible for a currently active local PA CareerLink® branded site must have a local content management policy in place no later than 120 days after the publication date of the Common Identifier policy package.

Local boards developing a new PA CareerLink® branded site must have a local content management policy in place prior to the site activation date or go live date.

This policy must include:

### Content Approval Process

Defining roles for who is responsible for drafting, reviewing, and approving content.

### Content Update Schedule

A regular schedule for content updates to ensure information remains relevant and accurate.

### Archival Process

Requirements for archiving outdated content and ensuring that old information is inaccessible to the public.

### Review and Local Approvals

Each LWDB must describe the process for reviewing and approving all website content and updates, ensuring that:

- Content is accurate, up-to-date, and relevant to local audiences.
- All materials align with state guidelines and the overall mission of PA CareerLink®.
- Political or lobbying content is strictly prohibited.

### Regular Updates

Each LWDB must outline how often the website will be reviewed and updated. At a minimum, websites must be reviewed quarterly to ensure the accuracy and relevance of content and annually to ensure alignment with brand standards and compliance with accessibility regulations.

### Content Approval

Local PA CareerLink® branded websites must have an established internal process to review and approve all content. This process must ensure that all content aligns with PA CareerLink® mission and branding guidelines.

After following a LWDB's internal policy for review and approval, if the content was not previously approved by the state or if the content was not retrieved from the Toolbox, the LWDB must follow the guidance in Common Identifier Approval Process (Attachment B).

L&I advises all partners to follow internal policies and procedures before submitting content through the approval process, if applicable.

## Attachment C: Local PA CareerLink® Branded Website Guidance

### Monitoring and Compliance

#### Annual Monitoring

In accordance with L&I's Workforce System Policy (WSP) Oversight and Monitoring, L&I will conduct annual reviews of all LWDB's local PA CareerLink® branded websites to ensure compliance with this guidance and other applicable branding, accessibility, and content standards. Subrecipients are expected to cooperate with any feedback or necessary changes identified during these reviews. Non-compliance may result in corrective actions.

#### L&I rights To PA CareerLink® Brand

The use of branding, including trademarks, logos, or any other brand elements, is granted as a privilege, not a right. L&I retains the authority to grant or revoke this privilege at any time. If L&I determines that continued use is no longer appropriate or aligns with the agency's interests, L&I reserves the right to require the immediate removal of any branded website, content, or data collection. Compliance with such requests must be prompt and without contest. Non-compliance may result in corrective actions.

#### Conclusion

By adhering to these requirements, LWDBs will ensure that their local PA CareerLink® branded websites are effective, compliant, and aligned with the broader goals of PA CareerLink®. Proper branding, content management, security, and accessibility are critical to maintaining the integrity of the services offered to the public. Annual monitoring by L&I will help ensure continuous improvement and compliance across the state.

#### Contacts

For questions or technical assistance, please contact the appropriate resource account regarding:

- **Content:** Department of Labor & Industry Press Office [dlipress@pa.gov](mailto:dlipress@pa.gov)
- **Compliance and Monitoring:** Oversight Services [RA-LI-BWDA-OS@pa.gov](mailto:RA-LI-BWDA-OS@pa.gov)
- **Policy and Guidance:** Policy & Planning Coordination Services [RA-LI-BWDA-POLICY@pa.gov](mailto:RA-LI-BWDA-POLICY@pa.gov)