



Subject

Recording of Incoming Calls Policy

ARIZONA@WORK-Yuma County Approved by the Workforce Development Board 01/14/2026

I. Background

The recording of incoming telephone calls is a feature of the Council’s communication system and serves as a valuable tool for **training, quality assurance, compliance monitoring, and investigating complaints related to telephone interactions.**

Although **Arizona is a one-party consent state**, which permits the recording of conversations when at least one party has given consent, YPIC recognizes the importance of implementing safeguards to ensure the **ethical and lawful use** of this capability.

Because YPIC administers and collaborates with **multiple entities within the YPIC complex**—including the **Educational Opportunity Center Charter High School, ARIZONA@WORK One-Stop partners, service providers, YPIC employees, program participants, etc.**, it is necessary to ensure compliance with all applicable regulations, including **A.R.S. §13-3005, the U.S. Department of Labor / Workforce Innovation and Opportunity Act (WIOA), and the Family Educational Rights and Privacy Act (FERPA).**

This policy establishes procedures and responsibilities for the proper use, access, and protection of recorded calls in alignment with these federal and state requirements.

II. Purpose

The purpose of this policy is to:

- Establish clear and consistent guidelines for the **recording, access, use, retention and protection** of incoming telephone calls;
- Ensure compliance with **FERPA, WIOA, and Arizona one-party consent laws**;
- Protect sensitive and confidential information; and
- Support legitimate business functions such as **training, quality assurance, performance management, compliance verification, and complaint resolution.**
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III. Scope

This policy applies to **all employees, service providers, One-Stop Partners**, and other authorized personnel operating under the **Arizona@Work–Yuma County** umbrella who handle, access, or review recorded telephone calls associated with the **Yuma Private Industry Council, Inc. (YPIC)**.

IV. Policy Provisions


1. Recording Notification

- All incoming calls may be recorded for official business purposes, including but not limited to **quality assurance, employee training, compliance monitoring, and investigation of complaints or incidents**.
 - **Callers will be notified at the start of the call when recordings are active.**
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2. Authorized Access

- Only personnel authorized by **Directors, (Executive, Operations, Program)** or their designee(s) may access or review recorded calls.
- Access must be limited to the **minimum necessary** to perform assigned duties.
- Any unauthorized access or review is strictly prohibited.

Note: IT administrators, including SpectrumVoIP portal admins, are not authorized to access or review call content on their own; their role is limited to system maintenance and retrieving specific recordings only after a valid request is approved by an authorized person as listed above.

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3. Confidentiality

- Recorded calls may contain **sensitive, personal, or proprietary information and will be treated as confidential.**
- The **sharing, duplication, or distribution** of recordings to unauthorized persons is strictly prohibited.
- All users with access to recordings are required to maintain **strict confidentiality** and comply with applicable **privacy and data protection laws.**

4. Use of Recordings

Recordings may be used **solely for legitimate business purposes**, such as:

- Investigating complaints or reported incidents;
- Evaluating employee performance or conducting coaching sessions;
- Conducting staff training and maintaining service quality; and
- Monitoring compliance with applicable laws, policies, and standards.

FERPA Considerations for the EOC Charter High School

- **Educational Records:** Any recording that includes a student's **name, grades, or personally identifiable information (PII)** is considered an **education record** protected under **FERPA**.
- **Authentication:** Disclosure of student information over the phone is permitted only after the identity of the requester has been **reasonably authenticated**.
- **Written Consent:** Recordings containing PII may not be disclosed to external parties without **written consent**, unless permitted under FERPA exceptions.
- **Internal Access:** Access to recordings containing PII is limited to **school officials and staff** with a **legitimate educational interest**.
- **Retention and Disposal:** Such recordings must be securely stored and destroyed in accordance with **FERPA** and institutional record retention policies.



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5. Retention and Storage

- All call recordings will be securely stored in the **access-controlled telephone system**.
- **Standard retention period:** 30 days from the date of recording, unless required for an ongoing **investigation, audit, or legal proceeding**.
- Upon expiration of the retention period, recordings will be **permanently deleted** from all storage systems using secure deletion procedures.

6. Compliance and Consequences

- Any **unauthorized access, disclosure, alteration, or misuse** of call recordings constitutes a violation of this policy.
- Violations may result in **disciplinary action**, up to and including **termination of employment, suspension of contract, or legal action** where applicable.

V. Policy Review

This policy will be reviewed **annually** or as necessary to remain consistent with changes in **federal or state laws, FERPA requirements, and organizational needs**. Updates will be approved by the **Executive Director**.

VI. Employee Acknowledgment

By signing below, I acknowledge that I have received, read, and understood the **Recording of Incoming Calls Policy** and agree to comply with all provisions contained herein.

Employee Name: _____

Signature: _____

Date: _____