ADMINISTRATIVE POLICIES & PRACTICES WPPM #140-20

Subject: Program Integrity

Item: Employee Security Affidavit and User Identification (Logon ID)

PURPOSE:

To ensure the security and integrity of the WIC Information System Exchange (WIC WISE).

POLICY:

I. Local agencies (LA) are required to have all individuals, regardless of their duties, who have access to the WIC WISE read and sign an CDPH 4467 Employee Security Affidavit (ESA) every three years. The ESA must be signed prior to accessing WIC WISE. The WIC WISE logon ID serves as the staff member's signature or "fingerprint" on all activity conducted while in WIC WISE. Each staff member whose duties require WIC WISE access must have a unique logon ID.

PROCEDURE(S):

- I. All LA employees with WIC WISE access must read and sign an ESA form and comply with the following:
 - A. Be responsible for all information entered and functions performed.
 - B. Exercise all security requirements to protect integrity and confidentiality. Refer to WPPM 120-10.
 - C. Do not share logon ID and password with any individual, including applicants, participants, and other WIC staff.
 - D. Do not create a generic WIC WISE logon ID.
 - E. Take all precautions and efforts necessary to protect the visual observation of their Logon ID and password when they enter it into the WIC WISE.
 - F. Logon to only one terminal at a time with a valid WIC WISE Logon ID.
 - G. Understand that appropriate action (as determined by CDPH/WIC or LA) may be taken against them if they do not comply with the security requirements of this policy.
- II. LA authorized staff must:
 - A. Ensure that the ESA form is not changed, altered, or tailored.
 - B. Ensure that each ESA form contains all required information.
 - C. Have a signed ESA form for each LA employee, volunteer, student, or anyone else who has any access to WIC WISE, prior to granting access to WIC WISE.
 - i. Maintain a file of all signed ESAs.
 - ii. Have all signed ESAs available for federal or state audit purposes.

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- iii. Complete a new ESA form for each LA employee, volunteer, or student once every three years.
- iv. Retain ESAs for three years from date of employee's signature.
- v. Have a new ESA form filled out and added to the LA file if:
 - a. A logon ID changes (e.g. due to a name change).
 - b. An employee is new to the LA, even if they come from another LA.
 - c. An employee leaves a LA and is rehired.
- D. The LA must ensure that no generic logon IDs are in use and conduct regular reviews and maintenance of the WIC WISE logon IDs for the agency. The LA authorized staff must:
 - i. Review the agency's WIC WISE logon ID Maintenance Report and inactivate any logon IDs of former employees and any other unnecessary logon IDs. Frequency as stated in the Local Agency Contract.
 - ii. Review the Local Logon ID maintenance process to add, change, deactivate, or reset logon IDs and passwords.
 - iii. Perform logon ID functional security within the agency.
 - iv. Remind staff of security requirement on a regular basis, at least annually, and document in *Staff Training Log*.

AUTHORITY:

7 CFR §246.26