

INDIANA DEPARTMENT OF CHILD SERVICES TITLE IV-D POLICY MANUAL

Chapter 18: Confidentiality and Security | Effective Date: 10/31/2022

Section 4: Security Awareness and Version: 1

Training Revision Date: 10/31/2022

BACKGROUND

N/A

POLICY

The Child Support Bureau (CSB) provides security awareness training to users of the statewide child support system as part of initial training for new users, annually thereafter, and any time required by system changes.¹ Role-based security training is provided to personnel with assigned security roles and responsibilities before performing these assigned duties, annually thereafter, and any time required by system changes.² An example of a role-based security training is the additional training provided to County Security Administrators (CSAs).

REFERENCES

• IRS Publication 1075: Tax Information Security Guidelines for Federal, State and Local Agencies: Safeguards for Protecting Federal Tax Returns and Return Information

PROCEDURE

Each year, based upon direction from the CSB Security Team, the Communications & Training Unit (CTU) creates, communicates, and makes available self-led training for initial certification, recertification, and role-based certification and recertification.

Prior to being given access to Federal Tax Information (FTI), any employee or contractor must certify their understanding of the Title IV-D program's security and privacy policies and procedures.³ At the county level, the CSA is responsible for ensuring all new employees and contractors complete FTI training prior to receiving access to FTI and that each user completes the annual recertification training. At CSB, unit managers are responsible for ensuring all new employees and contractors complete FTI training prior to receiving access to FTI and that each user completes the annual recertification training. The best practice is for the CSA or unit manager to be present with the new employee or contractor when taking the self-led training to answer office specific questions such as where logs are kept or where the shredder or secured shred box is located.

¹ Publication 1075. Section 4.2 AT-2

² Publication 1075, Section 4.2 AT-2

³ Publication 1075, Section 2.D.2.1

The initial and annual security awareness training must include training on the following:

- 1. Authority for receiving FTI;
- 2. Authorized uses of FTI;
- 3. Disclosure of FTI to external parties only when authorized;
- 4. Consequences, including civil and criminal penalties, of unauthorized access, use, or disclosure of FTI; and
- 5. Security incident reporting procedures.4

Employees and contractors must also be made aware during this training that disclosure restrictions and penalties apply even after the employment or contract with the Title IV-D program has terminated.

After completing the initial and annual certification, the employee or contractor must sign a confidentiality statement certifying:

- 1. Understanding of the penalty provisions;
- 2. Understanding of the security requirements; and
- 3. Understanding of the requirement to report possible improper inspections or disclosures of FTI and security incidents pursuant to the Title IV-D program's reporting procedures.⁵

The confidentiality statement may be signed either in ink on paper or electronically.6

If an employee or contractor does not complete the annual certification by the due date, the employee's or contractor's access to the statewide child support system will be revoked.

Record of the employee's or contractor's initial and annual certification must be documented and retained for five (5) years by CSB, the Title IV-D Prosecutor's Office, or the Clerk of Courts, depending on the place of work of the employee or contractor.⁷ This documentation may be retained in electronic format.

The training produced by CTU includes practical exercises simulating security and privacy incidents.⁸ This may include:

- 1. Insider threat awareness:
- 2. Simulating social engineering attempts to collect information or gain unauthorized access; and
- Simulating the adverse impacts of opening malicious email attachments or clicking malicious web links.⁹

At least once per quarter, security and privacy awareness reminders or updates will be distributed to all users. The CSB Security Team will provide topics, resources, and review the content prior to publication. CTU will then distribute the content through a variety of methods, including, but not limited to:

1. Email or other electronic messages;

⁴ Publication 1075, Sections 2.D.2.1 and 4.8 IR-2

⁵ Publication 1075, Section 2.D.2.1

⁶ Publication 1075, Section 2.D.2.1

⁷ Publication 1075. Sections 2.D.2.1 and 4.2 AT-4

⁸ Publication 1075, Section 2.D.2.1

⁹ Publication 1075, Sections 2.D.2.1, 4.2 AT-2, and 4.13 PM-12

- 2. Information distributed to managers for group meeting discussion;
- 3. Posters to be hung in work areas;4. Security articles in Title IV-D newsletters; and
- 5. Formal training sessions. 10

FORMS AND TOOLS

N/A

FREQUENTLY ASKED QUESTIONS

N/A

RELATED INFORMATION

N/A

REVISION HISTORY

| Version | Date | Description of Revision |
|-----------|------------|-------------------------------|
| Version 1 | 10/31/2022 | New section created as a |
| | | result of updated Publication |
| | | 1075 training requirements |

¹⁰ Publication 1075, Section 2.D.2.1