ADMINISTRATIVE POLICIES AND PRACTICES       WPPM #140-20

Subject: Program Integrity: Service/Information Provided by the Local Agency at the Time of Certification

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

PURPOSE:
To ensure the security and integrity of the WIC management information system (WIC MIS).

POLICY:
I. The local agency (LA) is required to have all individuals, regardless of their duties, who have access to the WIC MIS read and sign an Employee Security Affidavit (ESA) (DHS4467). The WIC MIS logon IDs serve as the staff member’s signature or “fingerprint” on all activity conducted while in WIC MIS. Each staff member whose duties require WIC MIS access must have a unique logon ID.

PROCEDURE(S):
I. All LA employees with WIC MIS 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 specified in WPPM 120-10 Access to and Security of Confidential Information to protect integrity and confidentiality.
   C. Do not share their Logon ID and password with any individual, including applicants, participants and other WIC staff.
   D. Do not create a generic WIC MIS 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 MIS.
   F. Logon to only one terminal at a time with a valid WIC MIS 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. The LA supervisor is responsible for the following.
   A. Ensuring that the ESA form is not changed, altered, or tailored.
   B. Ensuring that each ESA form contains all required information.
   C. Having a signed ESA form for each LA employee, volunteer, student, or anyone else who has any access to WIC MIS.
   D. Maintaining a file of all signed affidavits at the LA’s main site.
E. Having all signed affidavits available for federal or state audit purposes.

F. Completing a new ESA form for each LA employee, volunteer or student once every three years.

G. Retaining affidavits for three years from date of employee’s signature.

H. Having a new ESA form filled out and added to the agency’s file if:
   1. A logon ID changes (e.g. due to a name change).
   2. An employee is new to your agency, even if they come from another LA.
   3. An employee leaves your agency and is rehired.

III. The LA must ensure that no generic logon IDs are in use and conduct regular reviews and maintenance of the WIC MIS logon ID’s for the agency. The supervisor must:

A. Review the agency's WIC MIS logon ID Maintenance Report and delete any logon IDs of former employees and any other unnecessary logon IDs.

B. Review the Local Logon ID maintenance process to add, change, delete or reset staff used or logon IDs and passwords (WIC MIS Local Administration Manual, Chapter 25, Security Logon Maintenance).

D. Perform logon ID functional security within the agency (WIC MIS Local Administration Manual, Chapter 25, Security Logon Maintenance).

E. Remind staff of security requirement on a regular basis (at least annually) and document in Staff Training Log.

AUTHORITY:

7 CFR §246

RESOURCE:

Should you experience any problems with the above functions, please contact the WIC MIS Help Desk at 1-800-224-7472.