

CALIFORNIA DEPARTMENT OF CHILD SUPPORT SERVICES

P.O. Box 419064, Rancho Cordova, CA 95741-9064



November 12, 2010

EBLAST

TO: IV-D DIRECTORS

SUBJECT: SAFEGUARD ACTIVITY REPORT (SAR) SUBMITTALS

The purpose of this notice is to inform you that in accordance with CSS Letter 09-01 <http://www.childsup.ca.gov/Portals/0/resources/docs/policy/css/2009/css09-01.pdf>, the annual update of the SAR is due by January 31, 2011, to the DCSS Information Security Office.

The SAR is a record of how Federal Tax Information (FTI) is processed, safeguarded, and protected from unauthorized disclosure in a manner consistent with Internal Revenue Service (IRS) requirements. The IRS provides a guide to those requirements, *Publication 1075 – Tax Information Security Guidelines for Federal, State and Local Agencies and Entities* <http://www.irs.gov/pub/irs-pdf/p1075.pdf>

To facilitate this process, attached is a copy of the SAR template to capture your safeguard activities. When complete please submit via encryption to the DCSS ISO mailbox at info.security@dcss.ca.gov. This document may contain sensitive information.

If you have questions concerning the SAR update process, please contact Jesse Saenz at (916) 464-0525, or jesse.saenz@dcss.ca.gov or you may reach me directly at (916) 464-5774.

Sincerely,

LAWRENCE TROXLER
Chief Information Security Officer

Attachment

Safeguard Activity Report (SAR) Analysis

LCSA Name:

Date:

DCSS Review Date:

NOTE: Below in **GREEN** is text that provides clarification of what needs to be addressed in each of the subject areas listed below. Your LCSA responses should be placed in the center column titled, "Agency SAR". The third column does not need to be completed as this column is for IRS comments.

#	<i>Pub. 1075 Requirement</i> <i>See Section 7.4 Annual Safeguard Activity Report, pages 35-36 for additional reference information</i>	<i>Agency SAR</i> <i>(Content To Be Completed Here)</i>	(Agency does not complete this Column) <i>If Additional Information is Needed by the IRS it will be noted here</i> <ul style="list-style-type: none"> • <i>Red</i> must be submitted within 30 days • <i>Blue</i> must be submitted with next SAR
Changes to Information or Procedures Previously Reported			
7.4.1	A.) Agency Responsible Officers List the name, title, address, telephone, and email address of officials responsible for implementing the safeguard activities.		
7.4.1	B.) List Functional Units within Agency Using the FTI Data Provide a narrative description of the areas that receive, process, and maintain FTI data within your agency.		

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7.4.1	<p>C.) List Computer Facilities or Equipment & System Security</p> <p>Provide a narrative description of all automated information systems and networks that receive, process, store, or transmit FTI data within your agency. Include safeguards employed that address systemic controls, devices, virus protection, maintenance, storage, asset protection, and precautions taken if agency's computer system are connected to another system.</p> <p>NOTE: No information needed in this area if an Option 1 county.</p>		
7.4.1	<p>D.) Physical Security</p> <p>Provide a narrative description of the physical security controls, barriers and containerization used within your agency to prevent unauthorized access of FTI data. Include care taken to deny unauthorized access to areas during duty and non-duty hours.</p> <p>Such controls would include, but are not limited to badges, access cards, keys, security guards, alarms, video surveillance, file cabinets, safe and locked file rooms, etc.</p>		

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7.4.1	E.) Retention or Disposal Policy Provide a narrative description of your agency retention and confidential destruct policy for the disposal of FTI data. If applicable, include policy for electronic media sanitization and disposal.		
Current Annual Period Safeguard Activities			
7.4.2	1.) Disclosure Awareness Provide a narrative description of your awareness program and the efforts taken to ensure all employees having access to FTI understand the confidentiality requirements of the IRC, the agency's security requirements, and the civil and criminal sanctions imposed for unauthorized inspection or disclosure of return information. NOTE: Referencing the awareness training and materials provided by DCSS-ISO would be an adequate response.		

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7.4.2	2.) Reports of Internal Inspections The purpose is to ensure that adequate safeguard or security measures are maintained. To provide an objective assessment, periodic inspections should be conducted by a function other than the using function within the agency. If applicable, provide a narrative description of agency quality control procedures, reports and/or any corrective actions taken (or planned) to correct any deficiencies identified during the conduct of your inspections.		
7.4.2	3.) Disposal of FTI Provide a narrative description of your confidential destruct process and the safeguard precautions taken when FTI data is destroyed. Include how agency records the material being destroyed, the date and manner of destruction. Destruction should be witnessed by agency employee or certified by a contractor when agency participation is not present to ensure compliance.		

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7.4.2	4.) Other Information to support protection of FTI, in accordance with IRC 6103(p) (4) reqs. (NOTE: Not Applicable. Generally, will receive instructions from IRS Office of Safeguards on items to report here.)		
Actions on Review Recommendations			
7.4.3	5.) The agency should report all corrective-actions taken, or being initiated, regarding recommendations in the DCSS Safeguard Review Report issued due because of the latest safeguard review. If applicable, provide a narrative description of any corrective actions issued due from the latest Safeguard Preliminary Report issued as part of the review process conducted by the DCSS ISO.		

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Planned Actions Affecting Safeguard Procedures			
7.4.4	<p>6.) Any planned agency action that would create a major change to current procedures or safeguard considerations should be reported. Such major changes would include, but are not limited to, new agency computer equipment, facilities, or systems.</p> <p>If applicable, provide a narrative description of any significant changes to procedures or safeguards.</p> <p>These changes will be incorporated into reports that will advise the IRS of changes to the procedures or safeguards of the handling and processing of FTI within your agency.</p>		

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Agency Use of Contractors			
7.4.5	<p>7.) Agencies must account for the use of all contractors, permitted by law or regulation, to do programming, processing, or administrative services requiring access to FTI.</p> <p>If applicable, provide a listing of all contractors, their company or organization name and briefly describe the duties that require the handling of FTI for your agency.</p> <p>NOTE: Engaging a contractor who may have incidental or inadvertent access to FTI does not come under these requirements. Only those whose work will involve disclosing FTI in performing their duties are required to address these issues.</p>		