

**CALIFORNIA DEPARTMENT OF CHILD SUPPORT SERVICES**

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



December 11, 2012

EBLAST

TO: IV-D DIRECTORS

SUBJECT: ANNUAL UPDATE OF THE SAFEGUARD ACTIVITY REPORT

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 Safeguard Activity Report (SAR) is due by February 28, 2013, to the Department of Child Support Services (DCSS), Information Security Office (ISO). Please update your Safeguard Activities using the attached SAR Template.

The SAR is a record of how Federal Tax Information (FTI) is processed, safeguarded, and protected from unauthorized disclosure in a manner consistent with the 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* which is located at <http://www.irs.gov/pub/irs-pdf/p1075.pdf>.

Please read and follow the instructions listed in the template to update your safeguard activities for the current year. In order to ensure that confidentiality is maintained, the use of encryption should be employed when submitting the SAR update to DCSS ISO at [info.security@dcss.ca.gov](mailto:info.security@dcss.ca.gov).

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

Sincerely,

/os/

JUDY RAMOS  
Information Security Officer  
Technology Services Department

Attachment

### Safeguard Activity Report (SAR)

<b>Report Information</b>			
<b>Agency Name:</b>	[Insert agency name]	<b>Agency Number:</b>	[Leave blank]
<b>Processing Period:</b>		<b>Date Submitted:</b>	[Insert date of SAR submission]
<b>Reviewer:</b>	[Leave blank]	<b>Reference Number and Receipt Date:</b>	[Leave blank]
<b>Comments:</b>	[Leave blank]		

## Safeguard Activity Report (SAR)

<b>Publication 1075 Requirement</b>		<b>Insert Agency SAR Content Here</b>
<b>7.4.1</b>	<p><b>Responsible Officers</b></p> <p>Instructions: Even if information has not changed since the last SAR, provide the agency Director, Executive or responsible party. Include the name, title, mailing address, phone number and e-mail address for each individual. (See Publication 1075 Section 7.4.1A)</p>	
<b>7.4.1</b>	<p><b>Functional Organizations Accessing the Data</b></p> <p>Instructions: Even if information has not changed since the last SAR, provide an organizational chart or narrative description of the receiving agency, which includes all functions within the agency where FTI will be received, processed, stored and/or maintained. The description should account for off-site storage, consolidated data centers, and contractor functions. (See Publication 1075 Section 7.4.1B).</p> <p><b>Attachments:</b> <i>Copy of Organization chart (recommended)</i></p>	
<b>7.4.1</b>	<p><b>Computer Facilities or Equipment and System Security – Hardware or Software Changes or Enhancements</b></p> <p>Instructions: Even if information has not changed since last SAR provide information or procedures previously reported impacting hardware, software, IT organizational operations (movement to run data center), or IT system security. (See Publication 1075 Section 7.4.1C)</p> <p><b>Note:</b> LCSA Option 1 counties do not complete this area.</p>	
<b>7.4.1</b>	<p><b>Physical Security (space moves; new locations)</b></p> <p>Instructions: Even if information has not changed since last SAR provide information or procedures previously reported impacting physical layout (new or enhancements to current location) changes to FTI two-barrier protection standard. (See Publication 1075 Section 7.4.1D)</p>	

## Safeguard Activity Report (SAR)

<b>Publication 1075 Requirement</b>		<b>Insert Agency SAR Content Here</b>
<b>7.4.1</b>	<p><b>Retention or Disposal Policy or Methods</b></p> <p>Instructions: Even if information has not changed since last SAR describe <u>changes or enhancements</u> to currently approved retention and disposal policy, methods or procedure (e.g. outsourced disposal to shredding company, change in shredding equipment, off-site storage procedures and changes in retention period). If changes occurred, identify the retention period policy and/or method(s) of destruction. (See Publication 1075 Section 7.4.1E)</p>	
<b>7.4.2</b>	<p><b>Agency Disclosure Awareness Program</b></p> <p>Instructions: Even if information has not changed since last SAR describe the efforts to inform all employees, including contractors, having access to child support information, including FTI of the following:</p> <ul style="list-style-type: none"> <li>• Confidentiality requirements of the DCSS and IRC</li> <li>• Agency security requirements</li> <li>• Sanctions imposed (IRC Sections 7213, 7213A and 7431) for unauthorized inspection or disclosure of return information</li> <li>• Agency incident response policy and procedures</li> </ul> <p>The description should account for any off-site storage, consolidated data centers and contractor functions. (See Publication 1075 Section 7.4.2A)</p>	
<b>7.4.2</b>	<p><b>Reports of Internal Inspections</b></p> <p>Instructions: Even if information has not changed since last SAR provide copy of a representative sampling of any internal inspections conducted (i.e. security walkthroughs, clean desk policy, etc.) and a narrative of the corrective actions taken or planned to correct any deficiencies discovered. (See Publication 1075 Section 7.4.2B).</p> <p><b>Attachments:</b> Copy of agency Internal Inspection Plan and a Sample of a completed Internal Inspection reports (required)</p>	

## Safeguard Activity Report (SAR)

<b>Publication 1075 Requirement</b>		<b>Insert Agency SAR Content Here</b>
<p><b>7.4.2</b></p>	<p><b>Disposal of FTI</b></p> <p>Instructions: Even if information has not changed since last SAR describe the amount and method of destruction of child support information, including FTI (paper and/or electronic, including backup tapes) disposed during the processing period. The description may be a summary from logs which track FTI from receipt through destruction. . (See Publication 1075 Section 7.4.2C).</p> <p>Note: Copies of logs should not be submitted, a copy of the log template would suffice.</p> <p><b>Attachments:</b> <i>Copy of confidential destruction log template (required)</i></p>	
<p><b>7.4.3</b></p>	<p><b>Corrective Action Plan</b></p> <p>Instructions: The agency must attach a Corrective Action Plan (CAP) to report all corrective actions taken, completed or planned to address findings arising from the last on-site safeguard review conducted by DCSS Information Security Office. (See Publication 1075 Section 7.4.3).</p> <p><b>Note:</b> If a DCSS safeguard review has not been scheduled or conducted, please leave blank.</p> <p><b>Attachments:</b> <i>CAP (required)</i></p>	
<p><b>7.4.4</b></p>	<p><b>Planned Actions</b></p> <p>Instructions: Even if information has not changed since last SAR provide any planned agency action that would create a major change to current procedures or safeguard considerations should be reported.</p> <p>Such major changes would include, but are not limited to, new facilities, new off-site storage facility, new computer equipment or systems, or organizational changes. (See Publication 1075 Section 7.4.4).</p>	

**Safeguard Activity Report (SAR)**

<b>Publication 1075 Requirement</b>		<b>Insert Agency SAR Content Here</b>
<p><b>7.4.5</b></p>	<p><b>Agency Use of Contractors</b></p> <p>Instructions: The agency must identify all contractors (i.e off-site storage facility, destruct vendor, IT technology support personnel, janitorial, security guard) with access or the potential access to FTI and the purpose for which access was granted. The agency must provide the following for <u>each</u> contractor. (See Publication 1075 Section 7.4.5).</p> <p>For <u>each</u> contractor(s), specify:</p> <ul style="list-style-type: none"> <li>• Name of each Contractor</li> <li>• Contractor Work Location (Address)</li> <li>• Describe support contractor provides for the agency</li> <li>• Identify the FTI the contractor has access or potential access to (data files, data elements, IT systems, applications)</li> <li>• Has the contractor's employees completed required disclosure awareness training and signed confidentiality agreements? If no, explain</li> <li>• Does the legal contract between the agency and the contractor include the <b>Publication 1075, Exhibit 7 language</b>? If no, explain</li> <li>• Is any FTI provided to contractors or contractor IT information systems off-shore? If yes, explain.</li> <li>• If IT support is provided by county run data center, is there a service level agreement (SLA) in place between the agency and data center operations? If no, explain</li> </ul>	
<p><b>7.4.6</b></p>	<p><b>FTI Data Received</b></p> <p>Instructions: Even if information has not changed since last SAR the agency must summarize the FTI received both paper and electronic (if applicable), during the reporting period, including source, name of file or extract, and volume.</p> <p>Note: A summary and copy the record keeping logs required in Publication 1075 Section 3 for paper and electronic (if applicable), data would meet this requirement.</p>	