

DSS ADMINISTRATIVE LETTER
PERFORMANCE MANAGEMENT/REPORTING AND EVALUATION MANAGEMENT
PM-REM-AL-02-2016
Additional Information for Completing Reviews of User Access to
All Information Systems (September 30, 2016)

TO: County Directors of Social Services
County Security Officers

DATE: September 30, 2016

SUBJECT: Additional Information for Completing Reviews of User Access to
All Information Systems

This letter clarifies information contained in PM-REM-AL-01-2016, dated June 27, 2016.

I. BACKGROUND

Modifications to the reporting process for system access control reviews were implemented several months ago. These modifications were required due to changes in section 020101 of the North Carolina Statewide Information Security Manual. The new requirements include:

- a) Reviewing those employees with "Administrator" rights to DSS systems on a quarterly basis;
- b) Reviewing ALL employees with standard user access rights to DSS systems on an annual basis; and
- c) Submitting verification to the Division on a quarterly basis that the reviews have been conducted. The verification submitted for the fourth Quarter should include verification of both the quarterly "Administrator" review and the annual "All User" review.

Effective immediately counties are no longer required to:

- **Review and verify the RACF and WIRM (OLV) reports on a monthly basis; or**
- **Conduct System Access Reviews (performed twice each year) as listed in Appendix 13 of the DSS Security Manual. This requirement will be removed from the DSS Security Manual at the next update expected in October 2016.**

The new requirements contained in this letter replace the need for these additional reviews.

II. ADMINISTRATOR RIGHTS REVIEWS

For the purpose of these reviews, an "Administrator" will be considered any employee whose level of access to a system allows them to take actions in the system beyond those that would be possible for a "standard" user. Such actions include, for example, deleting records, editing/altering records in a manner that would not be possible for an ordinary user, granting access to the system or similar functions.

The county's first quarterly report (April-June 2016) was due by July 29, 2016. **Subsequent quarterly reviews must be completed and documented on the Quarterly State System Access Control Memorandum** (located in the attached DSS Employee Systems Access

Review Template workbook on the Qtly Access Control Memo tab). This memorandum should be on county letterhead, and **emailed to DSS.Security.Review.Manager@dhhs.nc.gov by the 22nd of the month following the end of each quarter**. This form serves as verification that the review was completed and either all user access was correct or necessary changes to user access were completed.

ISOs must review the access for users in their county to determine employees who may have administrator rights to any systems, such as eFortes. Supervisors are responsible for reviewing the access rights of the employees they supervise to insure access to these systems is appropriate based on the employee's job responsibilities. Upon completion of the reviews, supervisors should notify their ISO as to whether each employee's access is correct or regarding any changes required. System security reports, where available, may be used to determine those employees with current access to the applicable system(s). Attached is an Excel workbook that may be helpful to track access for employees. Instructions for using this workbook are located in section IV below.

III. ANNUAL REVIEW OF ALL EMPLOYEES

The first Annual Review of ALL employees with access to any State System(s) should have been completed by July 29, 2016, as stated in PM-REM-AL-01-2016, dated June 27, 2016. For subsequent Annual Reviews, counties must submit verification that reviews have been completed **by the 22nd of July each year**. Verification that review of all employees' access rights has been completed must be documented using the **Quarterly State System Access Control Memorandum**, in the attached DSS Employee Systems Access Review Template workbook on the Qtly Access Control Memo tab. This memorandum should be on county letterhead, and emailed to DSS.Security.Review.Manager@dhhs.nc.gov. **These annual reviews replace the requirement to conduct Annual Reviews using the e-IRAAF.**

The DHHS Privacy and Security Office suggested that the reviews be accomplished by supervisors during annual performance reviews. This is the perfect time for supervisors to review all aspects of the employees' access to ensure it is appropriate for the expectations of the job role. If county annual performance reviews are not completed however, the annual review of all employees' access rights must still be performed.

As with the previous monthly reviews and in accordance with DHHS Security Policy, it is the Supervisor's responsibility to insure appropriate access to systems based on the employee's job responsibilities. Supervisors should keep verification that reviews were conducted.

Resources that may assist in conducting these reviews include the e-IRAAF system and individual security reports for the various systems, however additional methods may be required for systems not covered by these resources. The attached Excel spreadsheet may be useful for completing Annual Reviews (see below.)

IV. USING THE ATTACHED EXCEL WORKBOOK TO DOCUMENT REVIEWS

The attached Excel workbook (DSS Employee Systems Access Review Template.xlsx) is provided as a template for tracking systems access for all employees, including employees with Administrator-like rights. Counties may need to modify the document to align with their organizational structure or to add local systems not included on the form. The worksheets list relevant systems at the top and include columns for "Section" and "Employee" for each

work unit on the left. Counties should list employee names in the "Employee" column. Use of these templates is not required, but the county will need to have sufficient documentation to satisfy an audit of the Quarterly and Annual review process.

For the Quarterly Review of Administrators:

- a) Using the "Quarterly Review" worksheet in the attached workbook the ISO should list all employees in each work unit with Administrator access to any system(s) in the "employee" column and enter an "A" on the row, in the column under each system, for which each individual listed has "Administrator" rights.
- b) Supervisors should review the employees in their work unit listed on the worksheet and determine if the Administrator access shown (if applicable) is correct and still required.
- c) If the employee no longer has or requires the Administrator access, replace the "A" with an "X" if they no longer have access, or replace the "A" with an "S" if they require and have Standard access. If not done so already, you will also need to submit an e-IRAAF to remove/modify the employee's access to the system(s).
- d) If Administrator access needs to be added for an individual, enter an "A" in the appropriate cell. If not done so already, you will also need to submit an e-IRAAF to add/modify the employee's access to the system(s).

For the Annual Review of all users' access to document the Annual Review of all employees' access:

- a) All employees in each work unit should be listed on the "Annual Review" worksheet. You may want to create a separate worksheet for each work unit (Section).
- b) Follow the steps above to review the individuals who have Administrator access.
- c) For all other employees, if the employee requires and has Standard access to a system, type an "S" in the cell on their row below each system for which this is the case. If you are adding access as a result of this review, indicate with an "S" and submit an e-IRAAF to have the access added. If you determine that the employee currently has access, but no longer requires it, enter an "R" (for "Revoke") and submit an e-IRAAF to have the access revoked (if you have not done so already.)
- d) If a listed employee does not have access to any of the systems, leave the row blank for that employee.

For either review being conducted:

- a) Use the blank lines included on the sheet to add any employees who have Administrator or Standard access rights (as appropriate for the review being conducted) to any of the systems, but are not listed on the report. Type the employee's name in Column B on a blank row, and type an "A" in the column(s) corresponding to the system(s) to which the employee has Administrator rights, or an "S" in the column(s)

corresponding to the system(s) to which the employee has Standard rights. Insert additional rows if necessary.

- b) Supervisors should save the workbook with their initials or work unit (Section) name/acronym included in the file name and return to the county ISO.
- c) Once the county ISO has received all workbooks from all Supervisors, they will complete the Quarterly State System Access Control Memo and email it to DSS.Security.Review.Manager@dhhs.nc.gov by the due date for each review **(the 22nd of the month following the end of each quarter.)** Again, completion of the Annual Review of all users' access should be documented on the fourth-quarter report, due by July 22nd each year.

If you have any questions, please contact DSS Performance Management/Reporting and Evaluation Management Section at 919-527-6270.

Sincerely,



Hank Bowers, Chief
Performance Management/Reporting and
Evaluation Management Section

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Attachments:

[DSS Employee Systems Access Review Template.xlsx](#)