

MI-WIC POLICY

System Management

10.00 System Management

Effective Date: 11/6/14

10.03 System Security and MI-WIC Access

PURPOSE: To detail processes local agencies must follow in order to protect client confidentiality, prevent unauthorized access to the MI-WIC System and authorize access to the MI-WIC System to local agency WIC staff.

A. POLICY

1. System equipment and telecommunication resources that are purchased with WIC funds must be used for business purposes only.
2. Local agencies are responsible for maintaining security measures to safeguard all WIC system equipment.
3. Physical Security
 - a. Stationary computers will be equipped, when reasonable, with devices that secure hardware and deter theft.
 - b. Portable equipment will be under the supervision of clinic staff and will be stored securely.
 - c. If portable equipment is used by multiple staff within the agency, the local agency will be responsible for maintaining a log of users.
 - d. Local agencies will maintain current anti-virus software on all WIC computers used for MI-WIC.
 - e. Local agencies will maintain a supported operating system on all WIC computers used for MI-WIC.
 - f. All computer workstations will be positioned or located in a manner that will protect and minimize the exposure of any displayed client data.
 - g. Local agency staff will comply with state and federal laws and regulations regarding the proper acquisition, use and copying of copyrighted software and commercial software licenses.
4. Local Agency User Requirements for System Security
 - a. Only local agency staff that directly provides WIC services or supervise staff that provides WIC services will be granted access to the MI-WIC system.
 - b. Users must register at the State of Michigan's Single Sign On (SSO) website at <https://sso.state.mi.us> to obtain their own distinctive SSO account prior to subscribing to MI-WIC. See Exhibit 10.03A
 - c. User IDs and passwords must be stored in a secure manner and will not be shared with other individuals.

- d. Each MI-WIC data system user will read and electronically acknowledge the MI-WIC User Security and Confidentiality Agreement prior to accessing the MI-WIC application after they have applied for an SSO account.
 - i. All MI-WIC users will be required to read and electronically acknowledge the MI-WIC User Security and Confidentiality Agreement on an annual basis and when the MI-WIC Security and Confidentiality Agreement has been modified.
 - ii. The MI-WIC Security and Confidentiality Agreement acknowledgements are maintained in MI-WIC for as long as the agency staff member has access to MI-WIC confidential information.
 - iii. The staff must also sign and the agency retain the 9.02A
5. WIC Coordinator Roles and Responsibilities for System Security
 - a. The WIC Coordinator is responsible for the maintenance of all clinic users' access to the MI-WIC system within their local agency. This includes; approving and denying new subscribers, adding or removing roles for current WIC employees, and removing system access from employees whose employment has ended or they are on extended leave.
 - i. If a WIC Coordinator finds a user ID in the MI-WIC Staff Information that does not belong in their local agency, they must contact the WIC System Administrator to have it moved out of the local agency.

Note: "New Subscribers" whose user IDs have not been activated within six weeks of creation will be removed by the WIC System Administrator.
 - b. The WIC Coordinator will assign which clinics staff can access based on where the WIC staff member is assigned.
 - c. The WIC Coordinator will assign roles to WIC staff based on their responsibilities within the clinic, their current qualifications and WIC policy requirements.
 - d. The WIC Coordinator will ensure that staff members are not assigned full access to the system in order to maintain separation of duties at the system level.
 - e. At the time a WIC staff member permanently leaves employment with their local agency, the WIC Coordinator will immediately set their status within MI-WIC to "Inactive".
 - f. If a WIC staff member will be on extended leave for greater than 3 weeks, the WIC Coordinator will set their status within MI-WIC to "Temporarily Inactive". This removes their access to the MI-WIC system, but preserves their clinic and role assignments until reactivated.
 - g. The WIC Coordinator will review all of their staff roles quarterly to verify that the roles assigned to their staff are appropriate and necessary for the completion of their assigned duties.

References:

- 45 CFR 164.310
- State of Michigan Computer Crime Law (Public Acts 1979-No.53)

Cross-references:

- 1.03 Confidentiality

Exhibits:

- 10.03A Creating a State of Michigan Single Sign-On, Subscribing to MI-WIC