



Unemployment Insurance (UI) Benefit Operations Self-Assessment Tool: *Internal Security (IS)*

REVIEW PERIOD: **Begins**

Ends

Unless otherwise noted, all questions are applicable to the review period.

SECTION 1: Procedures, Policies, and Confidentiality

Resources may include manuals, handbooks, desk aids, computer help screens, training guides, organized collections of procedures or policies, or other readily accessible instructions that can help IS staff do their work and conduct reviews. Instructions will normally include general information such as compilations of relevant laws and regulations, as well as detailed instructions for carrying out individual jobs in the agency. Reviewers may need to look in many places besides the IS unit to examine all relevant instructions.

1. Does the state have a strategic plan or written policies and procedures for its Internal Security program?
 - 1a. If yes, does the strategic plan and/or written policies include policies and procedures regarding the following Internal Security practices related to the UI program? (*check all that apply*)
 - Security risk management
 - Critical asset identification
 - Physical security
 - System and network management
 - Authentication and authorization
 - Access control
 - Vulnerability management
 - Incident management
 - Awareness and training
 - Ethical responsibilities
 - Privacy
 - Encryption of Internet transactions and all data transmitted from remote locations

Question 1a check boxes continue on next page

Other (*explain*)

2. During the review period, did Internal Security staff verify that the state has a disaster recovery plan that covers the following areas affecting the UI program? (*check all that apply*)

The identification of possible disasters that could interrupt access to systems

Directions to off-site storage locations

Business recovery location

Disaster recovery organization chart/list – action team call tree for internal contacts and their locations

Hardware and other required inventory needed in the event of a disaster

Software application(s) and other required inventory needed in the event of a disaster

Operating system and other required inventory needed in the event of a disaster

Vendor name(s) and contact information, as appropriate

Media, records, and documentation needed for restoration

Recovery procedures and priority of servers, applications, and other dependent systems

Time frames for restoring systems to ensure required transaction processing

Critical files and work in process assessment report

Recovery status report

Other (*explain*)

Question 2 check boxes continue on next page

Other (*explain*)

2a. If yes, has the state tested the UI operations disaster recovery plan?

2b. If yes (to question 2a), what was the date of the most recent test?

2c. If yes (to question 2a), what was the result of the most recent test?

2d. If no (to question 2a), explain. (e.g., has the state planned or scheduled a test)

3. During the review period, did Internal Security staff verify that the state has a business continuity plan that covers the UI program?

3a. If yes, indicate which of the following preparedness functions are addressed in the business continuity plan. (*check all that apply*)

Procedures for response and recovery that contain predetermined prioritized actions on how to:

Respond to a disruptive event

Activate the plan

Recover critical business processes

Restore the business back to its state before the incident or disaster occurred

Alternate work locations and work procedures (if necessary) have been identified in case the primary site is unavailable

Procedures to equip the alternate work site (telecommunication systems, PCs, and other devices), and contracts with third parties

Procedures to safeguard and reconstruct the home site

Procedures to safeguard the alternate site

Reconstruction plans for the recovery of all systems resources at the original location

Critical information on continuity teams, affected staff, and suppliers

Major upstream / downstream applications that contain information system groups that may be affected, and critical contact information

Time frames for restoring systems to ensure required transaction processing times are met and disruption time is minimized

Other (*explain*)

3b. If yes, has Internal Security staff verified that the state tested the business continuity plan?

3c. If yes, what was the date of the most recent test?

3d. If yes, what was the result of the most recent test?

3e. If no, explain (e.g., has the state planned or scheduled a test).

4. Are the state agency's disaster recovery and continuity plans coordinated with or a part of a larger state government plan?

4a. If yes, does the state UI agency participate in a state government-wide plan and activities?

5. During the review period, did Internal Security staff verify whether the state conducted a threat assessment for the UI program for each of the following areas of risk? (*check all that apply*)

Fire

Floods and other water damage

Earthquakes

Tornadoes

Power outages

A/C or heating failure

Theft/Robbery/Unauthorized access

Other (*explain*)

6. During the review period, did Internal Security staff verify state policies and procedures regarding building access and the control of confidential or sensitive data and documents in its UI offices and associated offices such as Job Centers?

6a. If yes, do the policies and procedures address the following areas? (*check all that apply*)

Building access

Security guards controlling entrances and exits of the building, as needed

Sign-in sheets for visitors, as appropriate

Secure area for equipment, document storage, etc.

Record retention

Documents that contain confidential information that are slated for destruction

Other (*explain*)

7. During the review period, did the state have policies and procedures that ensure Internal Security practices comply with the confidentiality provision of [20 CFR 603](#) and the state's statute?

7a. If yes, do the policies and procedures address the following areas? (*check all that apply*)

Confidentiality agreements related to sensitive data

Documents containing confidential information that must be concealed when an employee is away from his/her workstation

Storing documents that contain confidential information

Logging off computers whenever employees are away from their workstation

Computers must be logged-off by the employee at the end of each day

Security warnings at log-in screens

Security protocols for employees that work remotely

Transmission of confidential data via email

Other (*explain*)

N/A

10a. If yes, which office receive(s) these reports?

10b. How many incidents, if any, have been reported during the review period?

11. Do the state's policies and procedures require regularly scheduled Internal Security reviews of key UI program functions?

11a. If yes, what programs are covered by these Internal Security audits? (*check all that apply*)

Benefits

Benefit Payment Control

Benefit Accuracy Measurement

Appeals

Fiscal – benefits, tax accounts, and grant management

Information Technology

Other (*explain*)

N/A

11b. If yes, how often are these reviews conducted?

Quarterly Semi-annually Annually Biennially As needed
Other (*explain*)

N/A

11c. If yes, when was the last review conducted?

11d. If yes, does the review cover the following areas?

All policies, procedures, practices, and documentation related to security
Systems: hardware, software, operations systems, applications
Security tools and reported security incidents
User access methods - user identification, user authentication, account removal
Password protocols: password aging, protection and encryption methods and standards
Remote access procedures
Other (*explain*)

N/A

11e. If yes, which office/staff receives a report of the review results and findings, if any?

11f. What, if any, deficiencies were identified during the most recent review?

11g. Describe any identified deficiencies that still need to be addressed.

- 12.** During the review period, did Internal Security staff verify that the state has policies and procedures to prohibit employees from providing services (e.g., processing unemployment claims, tax payments, overpayment transactions, etc.) for relatives and acquaintances?
- 13.** During the review period, did the Internal Security staff verify that the state enforces the principle of separation of duties (e.g., making adjustments to claims, or tax functions and any handling of cash, etc.)?
- 14.** During the review period, did Internal Security staff verify that the state has confidentiality agreements with all state, Federal, and private entities with which they share or exchange data?
- 14a.** If yes, did they verify that the confidentiality agreements were up-to-date?

14b. Which office is the custodian of these agreements?

14c. Is there an established method available for these organizations to report data security issues to the agency?

15. During the review period did Internal Security staff verify the state policies and procedures for cancelling an individual's computer system access and email account?

16. During the review period did Internal Security staff verify the state policies and procedures, as appropriate, for restricting staff access to the premises upon separation from employment?

17. Does the Internal Security staff verify the state policies and procedures for cancelling computer access and email accounts and restricting access to the premises when contractors are terminated or their engagement with the agency ends?

SECTION 1: Comments

Document any issues that were identified when completing this section. This comment section may also be used to provide additional information relating to any specific question(s) in this section.

Other (*explain*)

4. How are UI staff members provided training on Internal Security matters? (*check all that apply*)

IS training provided as part of new employee orientation

IS training provided to UI staff annually

IS training provided to UI staff on an as-needed basis

Other (*explain*)

N/A

5. Does the state offer “refresher” training on Internal Security matters to UI staff?

5a. If yes, how often is the continuing training conducted?

Monthly

Quarterly

Annually

On an as-needed basis

Other (*explain*)

5b. Do internal security staff members participate in conducting this training?

SECTION 2: Comments

Document any issues that were identified when completing this section. This comment section may also be used to provide additional information relating to any specific question(s) in this section.

3b. If yes, what issues were identified but not resolved? (*explain why not*)

4. What, if any, measures does Internal Security staff take to identify potential vulnerabilities in the state's computer systems, data handling, and storage methods?

4a. During the review period, were any vulnerabilities identified that were not resolved?

4b. If yes, what issues were identified but not resolved? (*explain why*)

5. During the review period, did Internal Security staff conduct any cross matches or investigations to prevent or identify incidences of internal fraud/abuse (e.g., matching agency employee addresses against addresses in UI claim records)?

5a. If yes, were any changes recommended as a result of those activities?

5b. If yes, what (if any) changes were recommended but not made? (*explain why*)

6. Does the state have procedures that ensure compliance with the required reporting of Internal Security activities and fraud cases investigated? (Reference [UIPL No. 08 - 12](#) related to the ETA-227 Report)?

6a. Is the required reporting (i.e., ETA 227 Report) for Internal Security activities automated?

6b. During the review period, did the state UI agency report any overpayment activity due to employee fraud?

6c. During the review period, did the state fail to report any UI internal fraud case(s) on the ETA 227?

6d. If yes, explain.

6e. What unit or office is responsible for preparing the ETA 227 report, (specifically, for reporting cases of agency employee benefit fraud)?

SECTION 3: Comments

Document any issues that were identified when completing this section. This comment section may also be used to provide additional information relating to any specific question(s) in this section.

SECTION 4: Information Technology (IT)

The state's IT systems must be tested routinely to ensure data security. The reviewer will assess the state's IS activities to verify the state's delivery of programming and technical support in a secure environment. Having a disaster recovery plan as well as contingency planning to implement emergency procedures with a short lead time is vital to continued operations under extreme conditions. IS staff should not be expected to duplicate efforts by the IT staff that help implement IT security controls, but IS staff can verify that these IT controls are in place.

1. What organization is responsible for the operation of the UI agency's computer system?

(check all that apply)

State UI agency

Centralized state IT department

Other *(explain)*

1a. If the state UI agency's computer system is part of a centralized state computer system, does the Internal Security manager/staff have any authority or responsibilities for IT systems security?

1b. If not, does the Internal Security staff have a way to provide input to management staff about system vulnerabilities that may have been detected or reported?

If the answer to questions 1a. and 1b. is **No**, skip to question 10. Questions 2-9 should be addressed if the UI agency has responsibility for IT operations, or if the response to Question 1a. or 1b. is **Yes**.

2. During the review period, did the Internal Security staff verify that regularly scheduled IT security tests for the state's IT systems and operations were conducted for UI IT programs and applications?

2a. Do Internal Security staff verify the frequency of tests that are conducted?

2b. If yes, what is the frequency of such tests?

Quarterly Semi-annually Annually Biennially
Other (*explain*)

N/A

2c. If yes, which office receives a report of the test results?

2d. According to the Internal Security records, when was the last IT security test performed and what, if any, deficiencies were identified?

2e. If deficiencies or vulnerabilities were identified, did Internal Security staff verify that they have been corrected or are being addressed?

2f. If no, explain.

3. During the review period, did Internal Security staff verify that the state's IT security testing includes external security testing (from outside the organization's security perimeter) and Internal Security testing (from within the internal network)?

4. During the review period, did Internal Security staff verify the type of IT security testing the state conducts? If so, which of the following are addressed? *(check all that apply)*
 - Overt security testing (performed with the knowledge and consent of IT staff)
 - Covert security testing (taking an adversarial approach to testing without the knowledge and consent of IT staff)
 - Other *(explain)*

5. During the review period, did Internal Security staff verify that the state's IT security testing included a documentation review to ensure the technical aspects of policies and procedures are current and comprehensive for the following areas? If so, which of the following are addressed? *(check all that apply)*
 - Security policies
 - Architectures
 - Requirements
 - Standard operating procedures
 - System security plans
 - Authorization agreements
 - Memoranda of understanding
 - Agreements for system interconnections
 - Incident response plans

6. During the review period, did Internal Security staff verify that the state's IT security testing included all wired and wireless network functions to ensure security of data transmissions, including enforcement of encryption protocols?

7. During the review period, did Internal Security staff verify that the state conducted vulnerability scanning to identify hosts/host attributes and associated vulnerabilities?

8. During the review period, did Internal Security staff verify that the state's IT security testing included penetration testing (i.e., conducting real attacks using techniques most commonly used by attackers to identify vulnerabilities in applications, systems or networks)?

9. During the review period, did Internal Security staff verify that the state's IT security testing covered the following data handling areas? If so, which of the following are addressed? (*check all that apply*)
 - Data collection
 - Data storage
 - Data transmission
 - Data destruction

10. During the review period, did Internal Security staff verify that the agency's IT department enforced the following security procedures?

10a. If N/A, explain.

- 10b.** If yes, indicate which of the following security procedures are addressed? (*check all that apply*)
- Building access
 - Sign-in sheets for visitors
 - Secure area for equipment, document storage, etc.

Question 10b check boxes continue on next page

Documents that contain confidential information that are slated for destruction must be stored in locked containers

Documents that contain confidential information must be shredded

Manage user account, including identification, authentication, and account removal

Password security, including aging, encryption methods and standards

Other (*explain*)

- 11.** During the review period, did Internal Security staff verify that the state creates an audit trail for UI transactions that contains the following? If so, which of the following are addressed?
(*check all that apply*)

Type of event

Date/time the event occurred

User ID associated with the event

Program or Command used to initiate the event

Other (*explain*)

N/A

- 12.** During the review period, did Internal Security staff verify that the state controlled staff access to confidential data through job duties, job titles, etc.?

12a. If N/A, explain.

13. During the review period, did Internal Security staff verify that the state maintained appropriate mechanisms for user authentication and authorization when using network access from inside and outside the organization?

13a. If N/A, explain.

14. If the state issues paper benefit warrants/checks, does Internal Security staff verify that the warrant stock is kept locked in a secure location?

14a. If yes, do they verify that access to the warrant stock is restricted to authorized personnel?

14b. If yes, do they verify that the restriction is enforced?

15. If the state uses a document management system (including electronic scanning), does Internal Security staff verify that controls are in place to safeguard the hard-copy documents that contain claimant and employer information from time of receipt until destruction?

16. During the review period, did Internal Security staff verify that some type of encryption is used for transmission of data outside the agency/state network?

17. During the review period, did Internal Security staff verify when the state's data encryption was last updated?

17a. If yes, how often is the state's data encryption updated?

17b. During the review period, did Internal Security staff verify that UI benefit programs used this data encryption, as needed?

17c. If yes, indicate which programs were included? (*check all that apply*)

Benefits

Benefit Payment Control

Benefit Accuracy Measurement

Appeals

Other (*explain*)

N/A

18. During the review period, did the Internal Security staff verify that the state enforced restrictions on email content, including confidential claimant and employer data?

19. During the review period, did Internal Security staff verify that the state conceals or truncates social security numbers on documents that are mailed through the U.S. Postal Service?

20. During the review period, did Internal Security staff verify that the state provided a secure access to individuals authorized to access the computer system remotely—for example via VPN, secured network, etc.?

21. During the review period did Internal Security staff verify that the computer system(s) has detection software to monitor for possible illegal activity based upon a user's id or IP address? (e.g., authorizing an inordinate number of payments, releasing large payment amounts, etc.)

22. During the review period, did Internal Security staff verify that the state generates a daily report of large benefit payments that are released?

22a. If yes, do Internal Security records indicate which office receives these reports?

23. During the review period, did Internal Security staff verify that the state's disaster recovery plan includes a full-system backup of its IT systems?

23a. If yes, what type of facility does the state use? *(check all that apply)*

State-owned backup site

Third-party vendor backup site

Question 23a check boxes continue on next page

Other (*explain*)

N/A

23b. If yes, has Internal Security staff verified that the state tested the plan?

23c. If yes, what was the date of the most recent test and results of the test?

24. During the review period, did Internal Security staff conduct security self-assessments that comply with NIST SP 800-53 and NIST SP 800-53A?

24a. If yes, when was the last self-assessment conducted?

SECTION 4: Comments

Document any issues that were identified when completing this section. This comment section may also be used to provide additional information relating to any specific question(s) in this section.

SECTION 5: Agency Staff Access & Communication

The role of Internal Security staff related to staff security and access to confidential data is reviewed. The role of Internal Security staff would generally also include receiving and acting on reported allegations of fraud/abuse.

1. During the review period did Internal Security staff have a role in setting and/or enforcing UI agency practices for the following security controls? *(check all that apply)*
 - Configuration requirements for strong passwords
 - Password expiration
 - Remote access to confidential data
 - Identity validation protocols
 - Workstation security
 - Personal Identification Number (PIN) reset requirements
 - System access levels
2. Does the UI staff have access to appropriate management or Internal Security staff or other resources, as needed, to answer questions related to Internal Security procedures, policies, laws and regulations?
3. Does the UI staff have access to appropriate management or Internal Security staff or other staff to report suspected fraud or abuse?
 - 3a. If no, explain.

SECTION 5: Comments

Document any issues that were identified when completing this section. This comment section may also be used to provide additional information relating to any specific question(s) in this section.

SECTION 6: Operational Efficiency / Resource Allocation

The reviewer will document how the state conducts security inspections, monitors IT system usage, and handles internal investigations regarding suspicious staff activities and potential breaches of security.

1. During the review period, did the Internal Security unit use automated systems for monitoring UI staff computer transactions?

1a. If yes, what automated processes are being used?

2. During the review period, did Internal Security staff receive reports of routine audits or tests of the IT system?

3. During the review period, did the Internal Security staff conduct regular security inspections of all UI facilities?

3a. If no, explain.

3b. If yes, how often are these inspections conducted?

Quarterly Semi-annually Annually

Other (*explain*)

N/A

3c. Are written reports available after the security inspections?

3d. If yes, what office receives copies of the reports?

4. Does the Internal Security manager/staff lead internal investigations regarding suspicious staff activities and potential breaches of computer security?

4a. If no, how are these investigations handled?

5. During the review period, did the state conduct any business process analysis efforts to identify issues and recommend improvements of Internal Security processes to increase efficiency?

5a. If yes, what changes have been made and what was the result of those changes?

5b. If yes, what (if any) changes were recommended but not made? (*explain why not*)

SECTION 6: Comments

Document any issues that were identified when completing this section. This comment section may also be used to provide additional information relating to any specific question(s) in this section.

SECTION 7: Staffing

Staffing levels and organizational changes all can affect the state's ability to manage its Internal Security operations.

1. Does the state have a full-time Internal Security manager?
 - 1a. If no, does a staff person(s) have Internal Security managerial or other duties in addition to other responsibilities?
 - 1b. If N/A, explain.

2. What is the percentage of the state UI staff that is allotted (FTE allocation) for Internal Security?
%

3. How many FTEs were budgeted for Internal Security during the review period?

4. How many FTEs were dedicated to Internal Security during the review period?

5. What security clearance is required for Internal Security staff?

9b. What negative impact, if any, did the hiring freeze have on Internal Security operations?

9c. If the state underwent temporary or permanent staff reductions, how many Internal Security program staff were affected, when did the action occur, and how long did it last?

9d. If the state experienced retirements in Internal Security or had a retirement buyout during the review period, provide the number of Internal Security staff that left due to retirement.

9e. What percentage of the overall Internal Security staff was impacted as a result of a temporary or permanent staff reduction and/or retirement? %

9f. If the state experienced turnover, what percentage of the Internal Security positions remain vacant? %

10. During the review period, did the state follow the Federal cost allocation principles if/when Internal Security staff reviewed other programs besides UI, ensuring costs were allocated by program?

SECTION 7: Comments

Document any issues that were identified when completing this section. This comment section may also be used to provide additional information relating to any specific question(s) in this section.

SECTION 8: Concluding Summary Comments for Internal Security

For the following sets of questions, consider the overall operations related to Internal Security. This is an opportunity to identify successful practices and/or any needed corrective action measures along with any other general comments or observations concerning this functional area of UI Benefits. Additional space for comments and reviewer notes is available on pages [43](#) and [44](#).

1. Provide any observations of good and/or exemplary performance in the state's Internal Security policies, procedures, or operations that would constitute successful practices to share with other states.

2. Document any issues detected in Internal Security that adversely affects the state's operations. Identify any corrective action measures that should be taken to improve the state's performance regarding any weaknesses identified.

3. Add any additional comments or observations regarding the state's performance or operations in this area that have not been addressed elsewhere and should be noted.

Additional Comments and Reviewer Notes:

Reviewer Information:

REVIEWER

Name:

Title:

Email:

Phone No.:

ADDITIONAL REVIEW TEAM MEMBER

Name:

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