APPENDIX B.2 SURVEY OF SNAP STATE AGENCIES (ONLINE VERSION)

Note: This survey incorporates branching logic where differing section introductions and questions will be displayed depending upon whether the respondent is from a State- or County-Administered SNAP agency. In those instances of branching, the section introduction or question for State-Administered SNAP agencies appears first while the corresponding version for County-Administered SNAP agencies follows. The same question will be displayed for both agency types unless specifically identified as a "State-Administered Screenshot" or "County-Administered Screenshot".

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-XXXX. The time required to complete this information collection is estimated to average 60 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

State-Administered Screenshot



Supplemental Nutrition Assistance Program (SNAP) Personally Identifiable Information (PII) Study

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PDF VERSION OF THE SURVEY

FREQUENTLY ASKED QUESTIONS

MMID: 3001

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Thank you for participating in the survey contracted from the U.S Department of Agriculture (USDA) Food and Nutrition Service (FNS) to gain a better understanding of how States safeguard personally identifiable information (PII) of participants in the Supplemental Nutrition and Assistance Program (SNAP). The survey and other data collection efforts will document practices in SNAP State agencies (SAs) located in all 50 States, the District of Columbia, Guam, and the U.S. Virgin Islands. The ultimate purpose of the project is to identify best practices for safeguarding PII that can be shared among SNAP SAs.

This survey includes the following eight sections as they pertain to safeguarding PII:

- 1. SA Systems Context
- 2. System Security Plan Information
- 3. Personnel Policies and Procedures
- 4. Security Policies and Procedures
- 5. SNAP Application and Recertification Processes
- 6. Maintenance and Storage of PII
- 7. Data Sharing and Transfer of PII
- 8. Opportunities and Challenges

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- 8. Opportunities and Challenges

Within county-administered systems, the SNAP SAs are responsible for establishing statewide safeguarding requirements in accordance with federal policies, while county-level agencies are given discretion in how to best meet or exceed the requirements set by the SNAP SA. Accordingly, this survey is primarily focused on the statewide safeguarding requirements established by your SA as opposed to the individual requirements established by county-level agencies.

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SECTION 1. SA SYSTEMS CONTEXT

Suggested respondents for this section include: Supplemental Nutrition Assistance Program (SNAP) State Agency Director or Chief Information Security Officer from your agency or another central state agency [or an individual designated by that person].

This section asks about your SNAP State agency's (SA's) systems and organizational structure to provide context for the questions on security planning and approaches to protecting SNAP participants' Personally Identifiable Information (PII). For this survey, we define "systems" as general purpose information systems and the individual devices that connect to these systems (NIST SP 800-171r1).

Questions about your SA's organizational structure include the degree to which SNAP systems are administered at the State or county level and the integration of SNAP systems with systems from other State programs (including those required to share or receive data from SNAP).

The context for implementation includes questions regarding the numbers and positions of staff responsible for SNAP participant PII security, the age and history of the SA's data systems, and the infrastructure available for establishing data use agreements.

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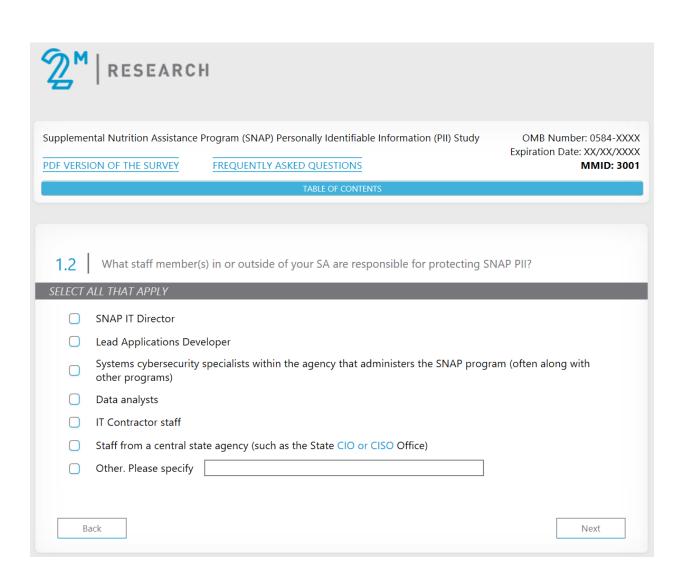
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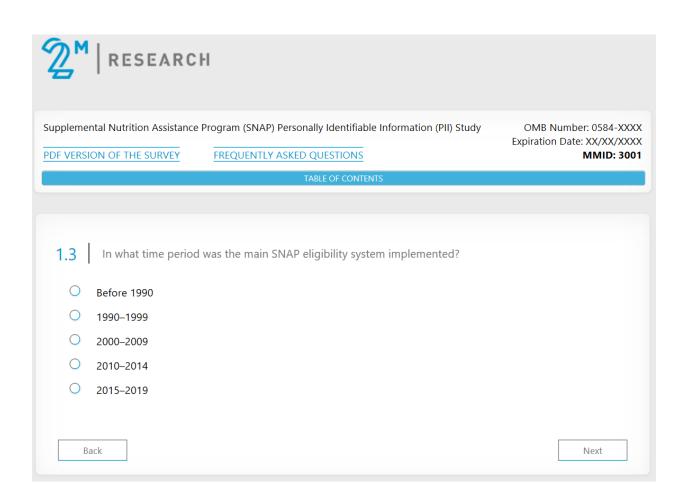
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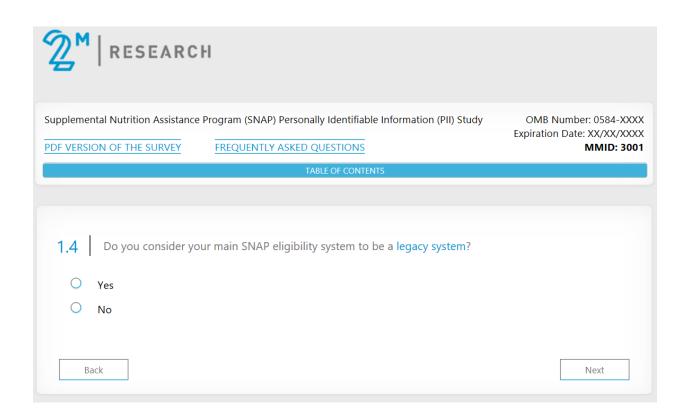
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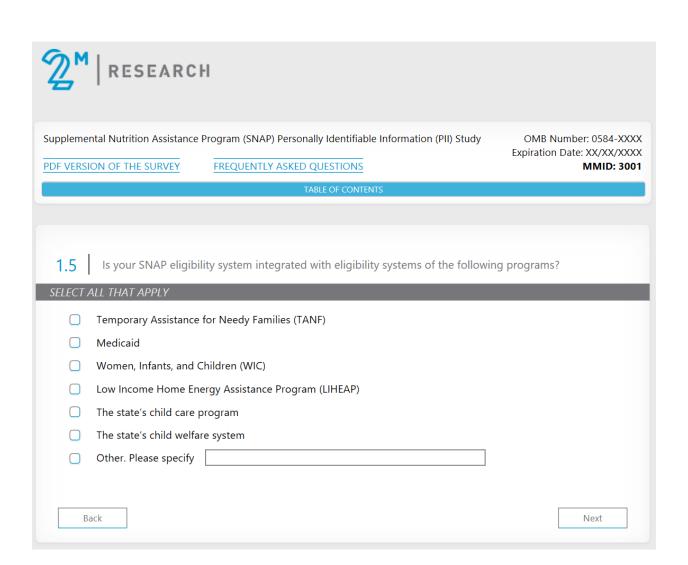
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.1	How has your agency structured its approach for using systems security professionals dedicated to protecting SNAP PII?
0	System security professionals are located within the agency that administers the SNAP program (often along with other programs)
0	Systems security professionals are located within another state agency (such as a Department of Technology Services or an Office of the Chief Information Officer)
0	Our agency utilizes a combination of system security professionals located within our agency and systems security professionals located within another state agency
0	Other. Please specify











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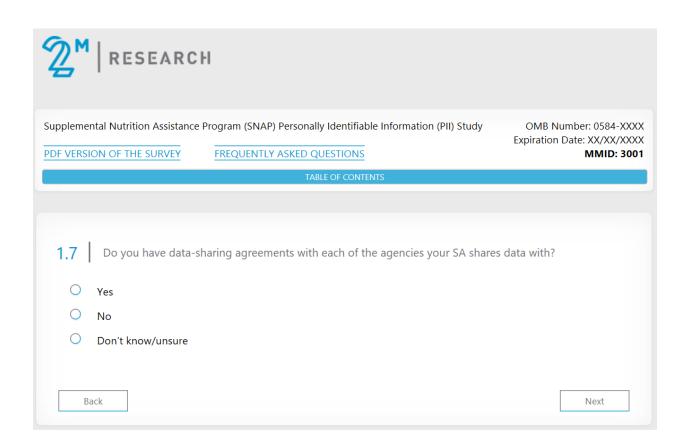
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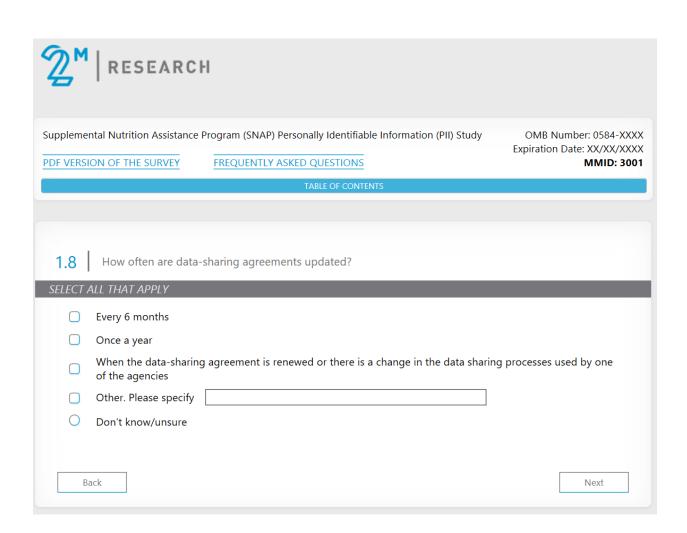
Data Matching

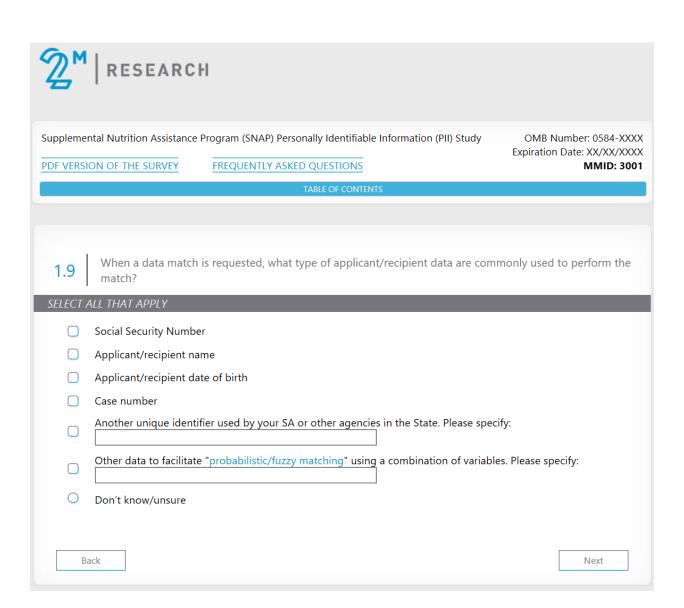
SAs are required by law and federal regulations to match or exchange data including PII with other State and federal agencies, as well as institutions such as school districts and law enforcement agencies. The next set of questions asks about your SA's data-matching activities.

1.6 Against which data sources does your SA match SNAP applicant and recipient data?

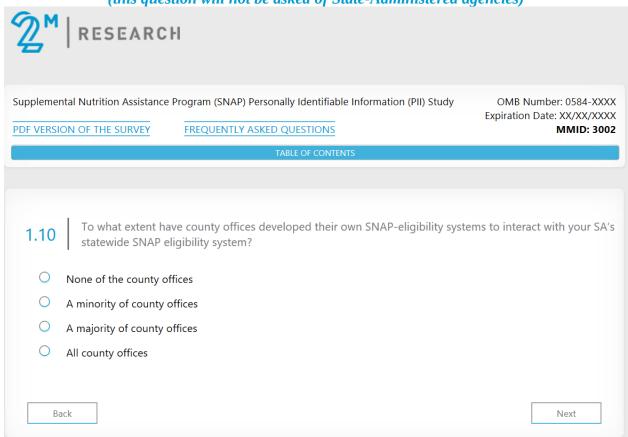
1.0	7 11 1
SELECT A	ALL THAT APPLY
NATI	ONAL DATA SOURCES
	Prisoner Verification System
	Social Security Administration Death Master File
	National Directory of New Hires (NDNH)
	Internal Revenue Service
	Veterans Administration
	Electronic Disqualified Recipient System (eDRS)
	State Data Exchange (SDX)
	Beneficiary Data Exchange (BENDEX)
	Income and Eligibility Verification System (IEVS)
	Public Assistance Reporting Information System (PARIS)
	Other. Please specify
STAT	E DATA SOURCES
	State death records
	State birth record directory
	State new hire directory
	State or local prison listings
	State warrant management directory
	State parole directory
	State lottery information
	State Department of Motor Vehicles
	State workforce data – unemployment insurance/state quarterly wage information/State employee information
	State child support payments
	State educational agencies
	State law enforcement agencies
	Other. Please specify
В	ack Next



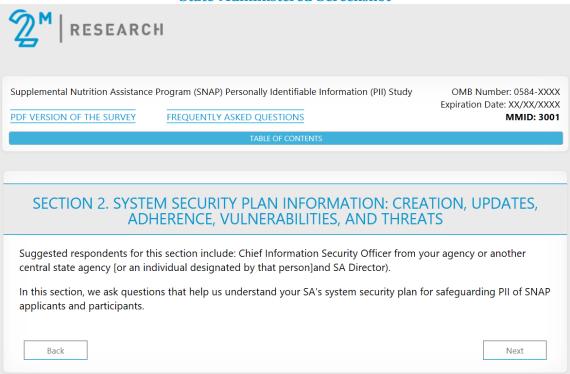




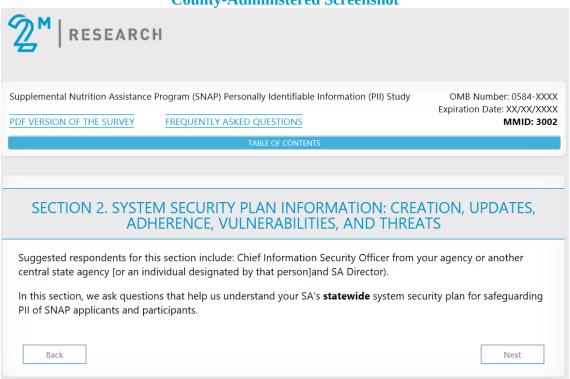
County-Administered Only Screenshot (this question will not be asked of State-Administered agencies)

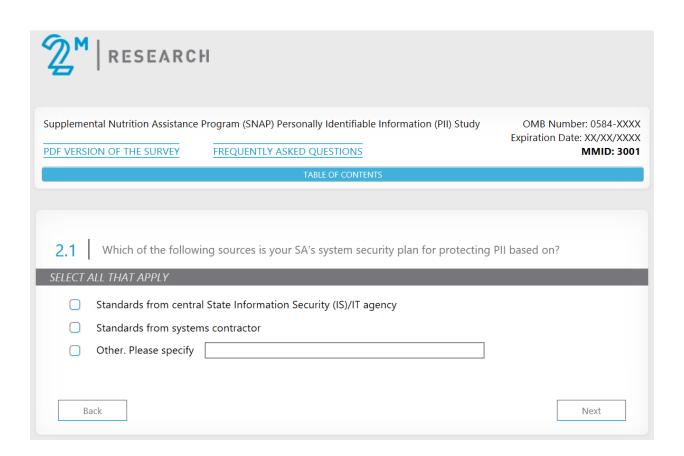


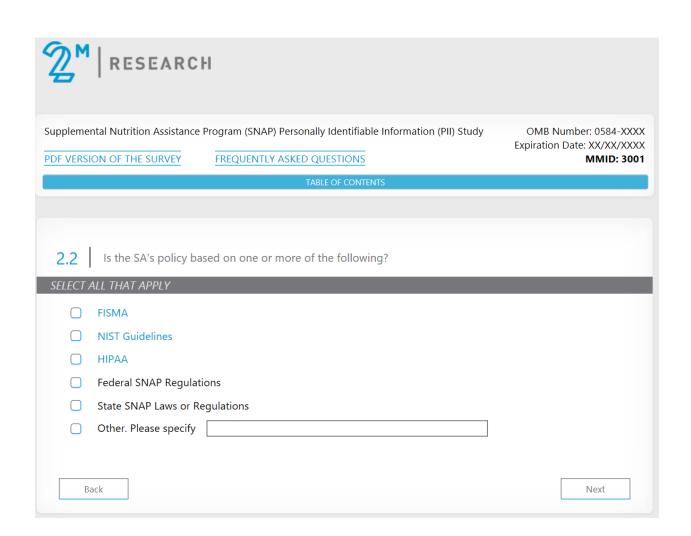
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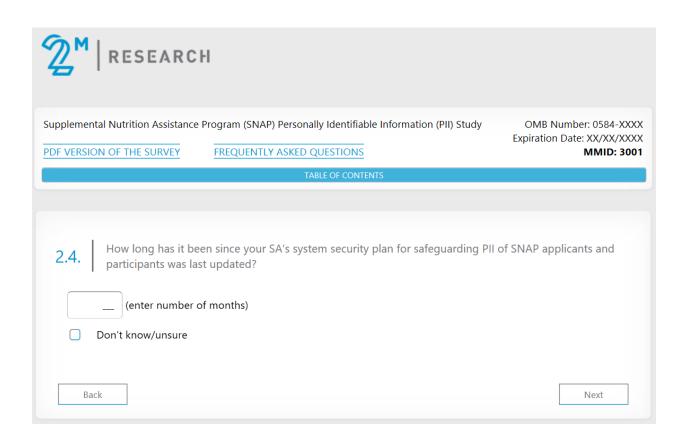
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2.3

Are you or your agency's systems security professionals familiar with the following guidance that FNS has provided to SAs on methods for protecting PII?

SELECT ONE RESPONSE PER ROW **Not Aware** Very of this Somewhat **Not Really** Familiar Familiar Familiar Resource Privacy Act of 1974 (5 U.S.C. § 552a) \bigcirc 0 0 \bigcirc FNS Handbook 901: The Advance Planning Document 0 0 0 0 **Process** \bigcirc \bigcirc 7 CFR 274.5 – Record retention and forms security \bigcirc 0 7 CFR 274.8 – Functional and technical EBT system \bigcirc 0 requirements Other guidance provided by USDA, FNS State Systems \bigcirc 0 \bigcirc \bigcirc Office NIST Guide to Protecting Confidentiality of PII Back Next





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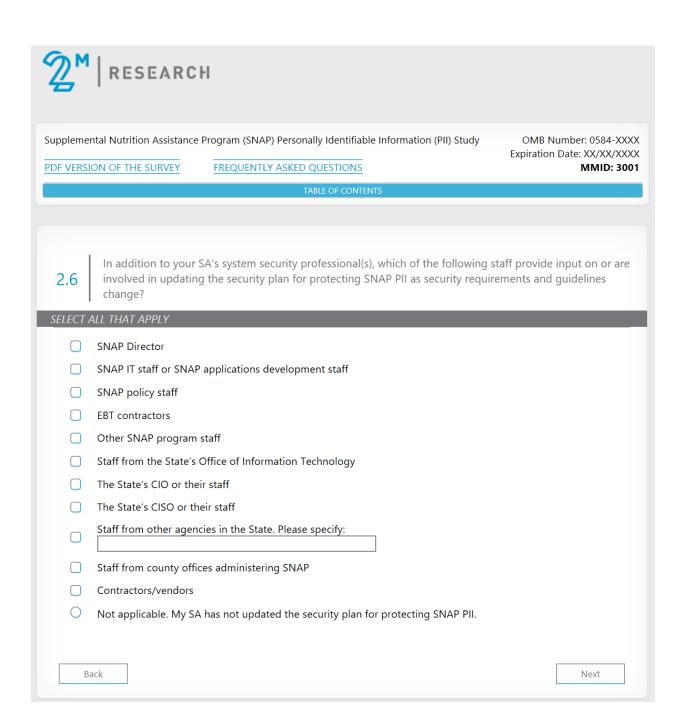
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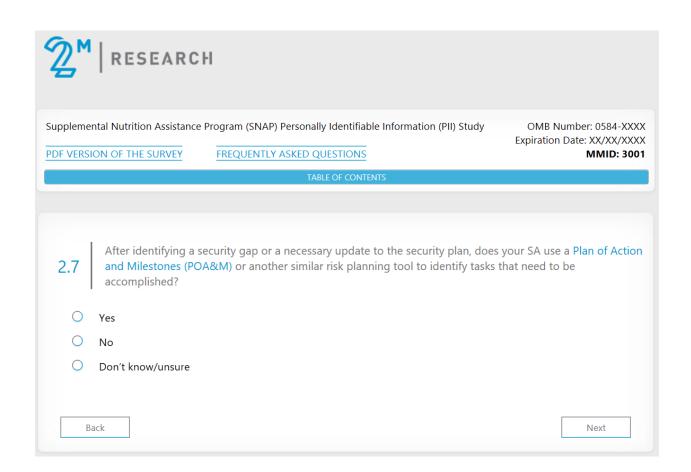
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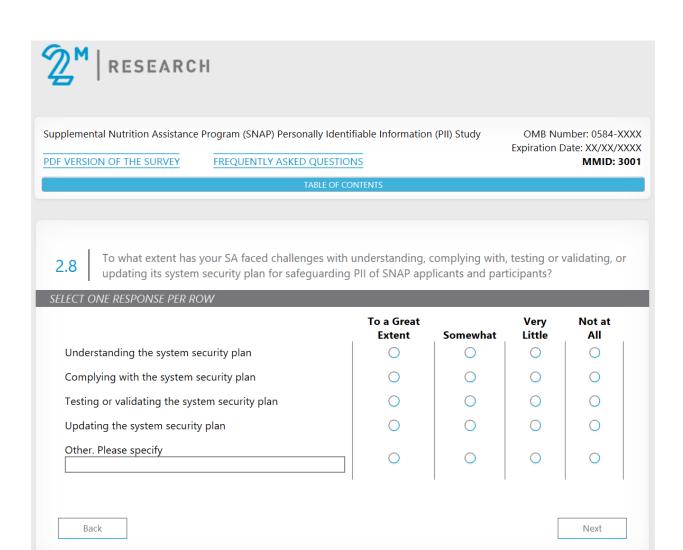
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2.5 If not already in place, in which of the following domains is your SA *likely to undertake efforts to upgrade* its formal safeguarding policies and procedures within the next 2 years?

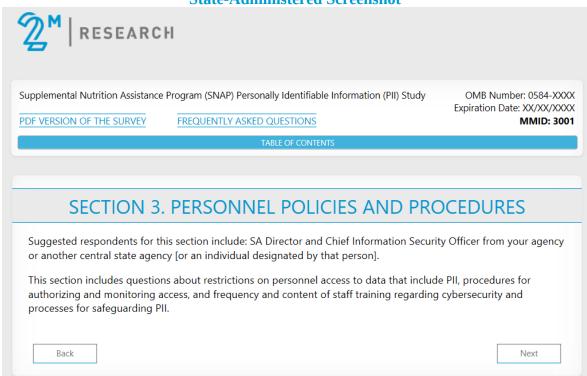
	Very Likely	Somewhat Likely	Unlikely	Very Unlikely	Already in Place	Don't know/unsure
PERSONNEL POLICIES AND PROCEDURES: ENSURING THAT STAFF WORKING WITH PII HAVE MET THE REQUISITE SECURITY REQUIREMENTS AND ARE APPROVED TO ACCESS DATA						
Using Role-Based Security Levels to provide data access	0	0	0	0	0	\circ
Delivering regular security training and education	0	0	0	0	0	\circ
Other personnel policies and procedures (Specify)	0	0	0	0	0	0
SECURITY POLICIES AND PROCEDURES: APPROACHES FOR IMPLEMENTING A ROBUST SECURITY PLAN		ı	ı			
Securing PII across hardware systems	0	0	0	0	0	0
Securing PII across software systems	0	0	0	0	0	\circ
Securing PII across network systems	0	0	0	0	0	\circ
Regularly assessing risk and vulnerabilities	0	0	0	0	0	\circ
Regularly performing security testing	0	0	0	0	0	\bigcirc
Developing emergency preparedness and contingency plans	0	0	0	0	0	0
Other security policies and procedures (Specify)	0	0	0	0	0	0
PROGRAM OPERATIONS: SAFEGUARDS ASSOCIATED WITH ADMINISTERING SNAP		ı				
Masking PII	0	0	0	0	0	0
Implementing time-out features on computer screens	0	0	0	0	0	0
Safeguarding PII during delivery of SNAP benefits via EBT	0	0	0	0	0	0
Matching PII to other data sources for eligibility determination	0	0	0	0	0	0
Matching PII to other data sources for program integrity purposes	0	0	0	0	0	0
Securely destroying PII data that are no longer used	0	0	0	0	0	\circ
Other program operations (Specify)	0	0	0	0	0	0
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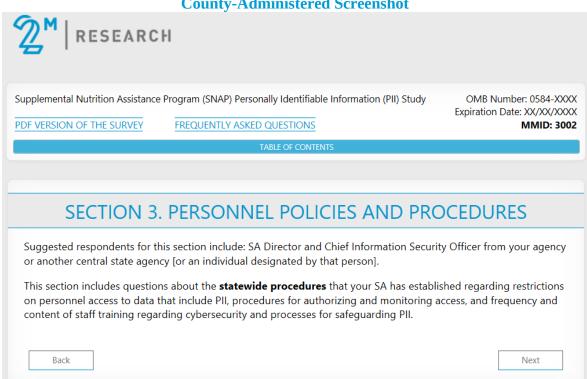


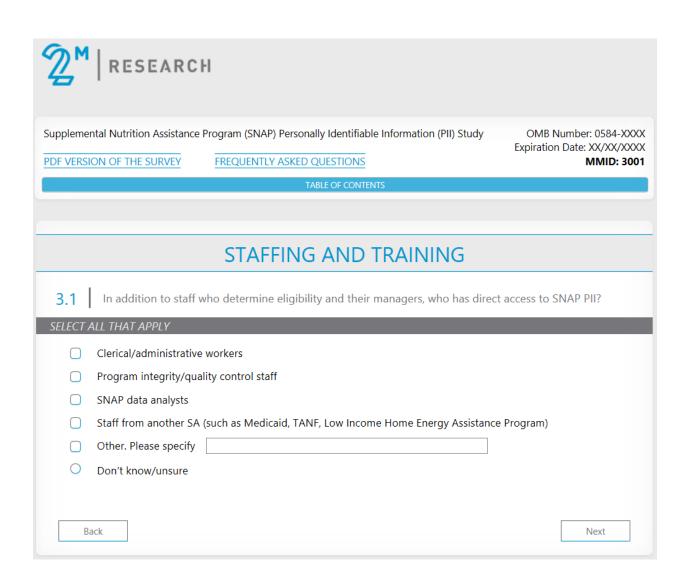


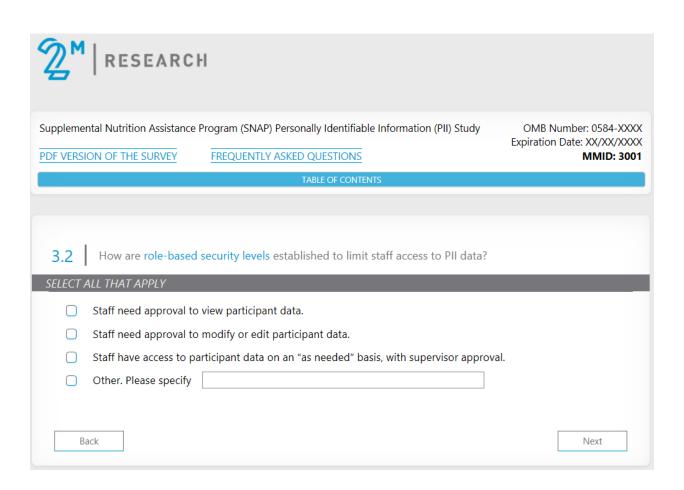
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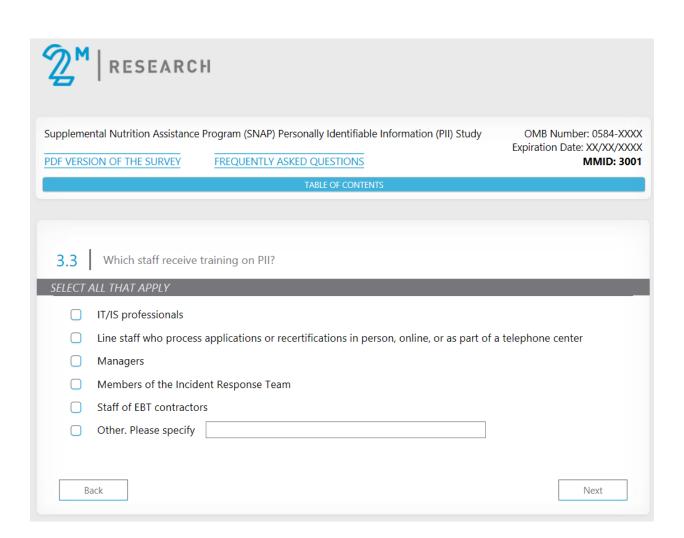


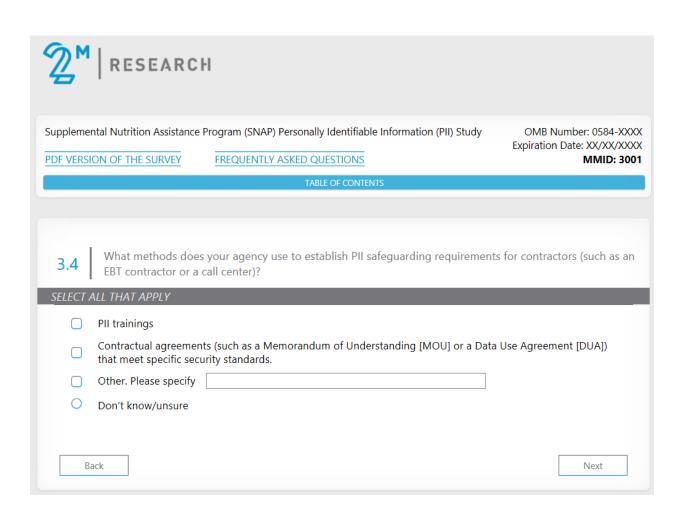
County-Administered Screenshot

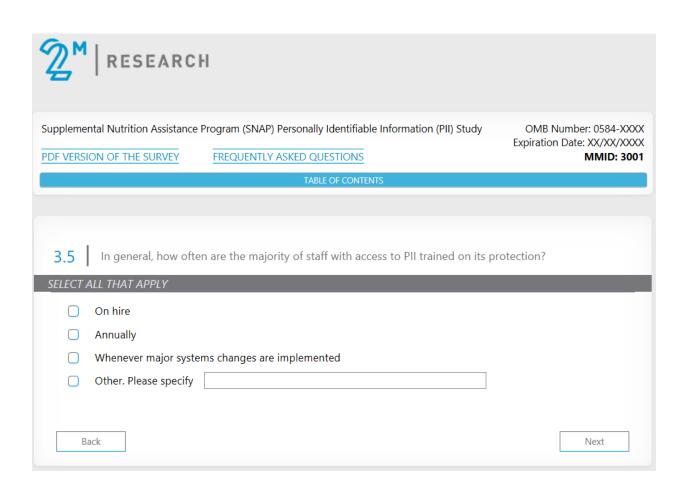


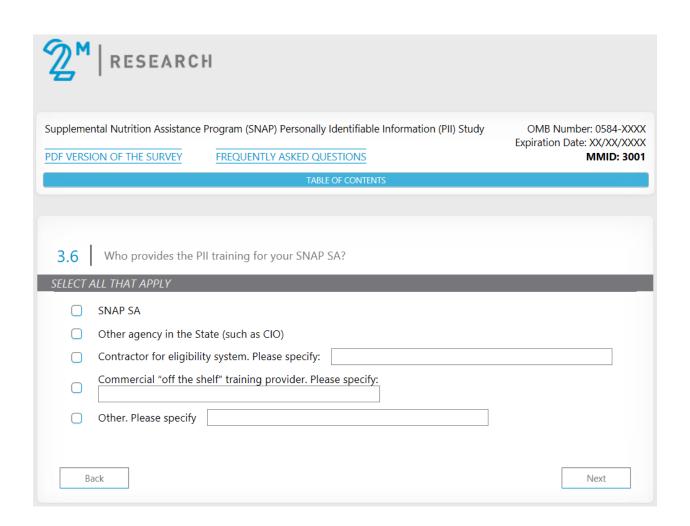


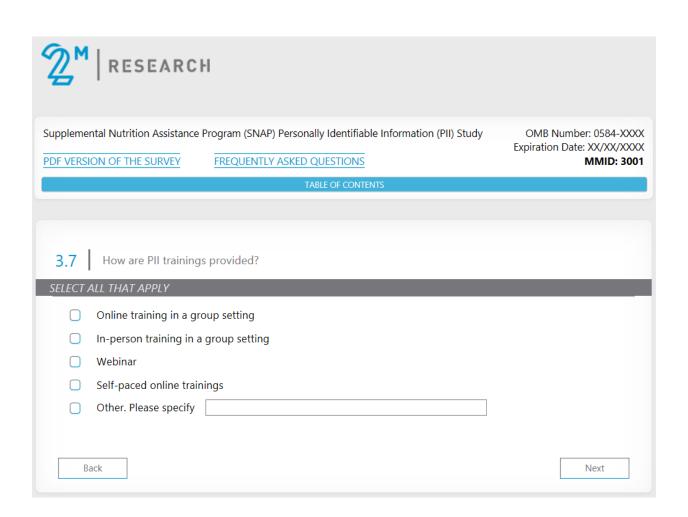
















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3.9

To what extent does your SA's security plan meet and/or exceed the safeguarding requirements for personnel that are in FNS Handbook 901 and associated FNS regulations? Please give us your best assessment of the following:

SELECT ONE RESPONSE PER ROW Meeting Requirements, Especially with Room Successful at for Meeting Meeting Requirements Improvement Requirements Ensuring that staff working with PII have met the requisite 0 0 0 security requirements and are approved to access data Conducting personnel background checks 0 0 0 Using role-based security levels to provide data access 0 0 0 Delivering regular IT security training and education 0

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SECTION 4. SECURITY POLICIES AND PROCEDURES

Suggested respondents for this section include: Chief Information Security Officer from your agency or another central state agency [or an individual designated by that person].

This section asks about the use of various security features that are not client-facing, including firewalls, limits on remote access, third-party testing, and emergency preparedness.

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SECTION 4. SECURITY POLICIES AND PROCEDURES

Suggested respondents for this section include: Chief Information Security Officer from your agency or another central state agency [or an individual designated by that person].

This section asks about the **statewide procedures** that your SA has established for the use of various security features that are not client-facing, including firewalls, limits on remote access, third-party testing, and emergency preparedness.

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An SA's ability to effectively safeguard SNAP PII may be hindered by a combination of internal vulnerabilities and internal and external threats. To what extent has your SA encountered the following vulnerabilities and threats to SNAP PII?

	Never	Rarely	Sometimes	Often	Very Often	Don't know/unsure
INTERNAL VULNERABILITIES						
Improper storage or disposal of physical materials that contain PII (such as printouts or other paper documents)	0	0	0	0	0	0
Improperly secured systems with access to PII	0	0	0	0	0	0
Improperly secured mobile devices with access to PII	0	0	0	0	0	0
Unauthorized use of system resources by SA employees to access PII or unauthorized manipulation of PII data by SA employees	0	0	0	0	0	0
Unauthorized disclosure of PII data by SA employees or a trusted partner	0	0	0	0	0	0
Macro-level system failures (Specify)	0	0	0	0	0	0
Failures or decreases in the reliability of hardware	0	0	0	0	0	0
Failures or decreases in the reliability of software	0	0	0	0	0	0
Other vulnerabilities (Specify)	0	0	0	0	0	0
EXTERNAL THREATS						
Denial of service attacks	0	0	0	0	0	0
Phishing, spoofing, or pharming	0	0	0	0	0	0
Introduction of malicious code (such as viruses, spyware, or malware)	0	0	0	0	0	0
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4.1

An SA's ability to effectively safeguard SNAP PII may be hindered by a combination of internal vulnerabilities and internal and external threats. To what extent has your SA encountered the following vulnerabilities and threats to SNAP PII?

0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	0	\circ	0	0
0	0	0	0	0	0





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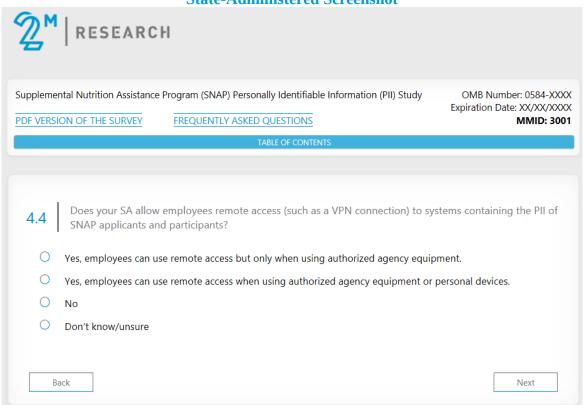
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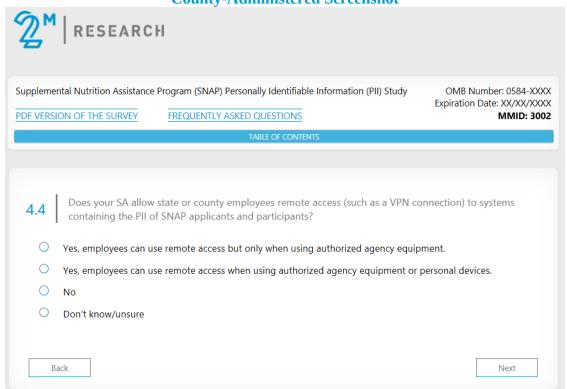
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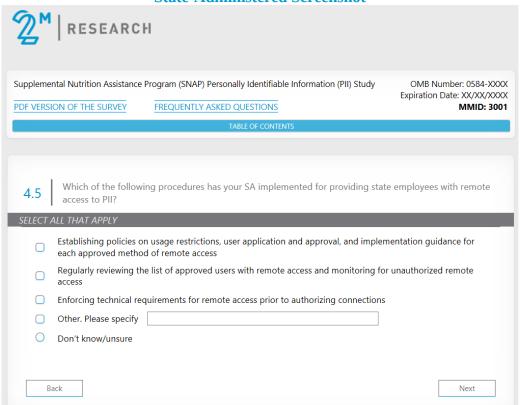
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	Yes	No	Don't know/unsure
Use of a hardware-based firewall	0	0	0
Use of a software-based firewall	0	0	0
Maintaining audit records of all security-related events	0	0	0
Limiting firewall access to network security analysts or other approved users	0	0	0
Regularly reviewing the list of approved users with access to the firewall	0	0	0
Timely installation of security-related updates, fixes, or modifications that have been tested and approved	0	0	0
Other firewall safeguards, policies, and procedures	0	0	0

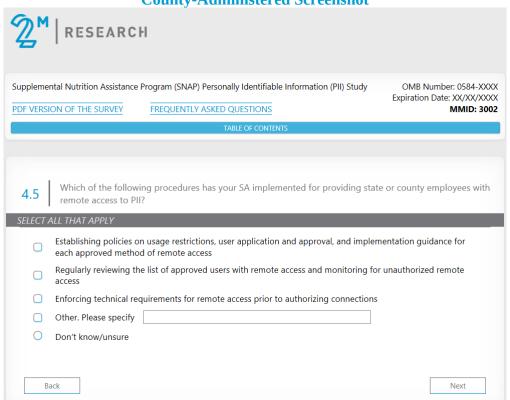


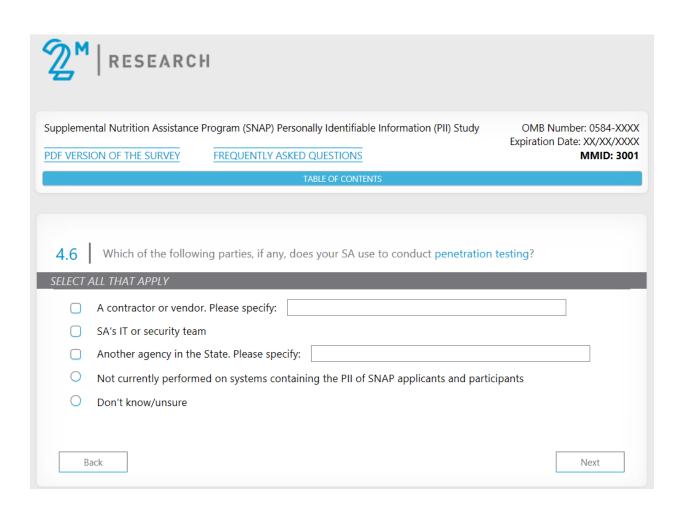
County-Administered Screenshot





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4.7

Disasters and other emergencies pose a formidable challenge to safeguarding the PII of SNAP applicants and participants. In your opinion, are the following components present within your SA's disaster recovery plan to protect PII during disasters or other emergency situations?

	Yes	No	Don't know/unsure
It effectively details how the SA will recover and restore the system to normal operations.	0	0	0
It specifies a process for protecting PII from internal and external threats until the system is restored to normal operations.	0	0	0
It is effectively integrated into the SA's security plan.	0	0	0
It provides a process for training staff in their specific response to a disaster according to their roles.	0	0	0
It specifies a process for maintaining Local Area and Wide Area Networks.	0	0	0
It specifies a process for maintaining desktops and personal computers.	0	0	0
It specifies a process for maintaining SA websites.	0	0	0
It specifies a process for maintaining distributed and mainframe systems.	0	0	0
It specifies alternative physical locations for operations in the event that original facilities are unavailable.	0	0	0
It can be activated on its own and does not require that other contingency plans be activated first.	0	0	0



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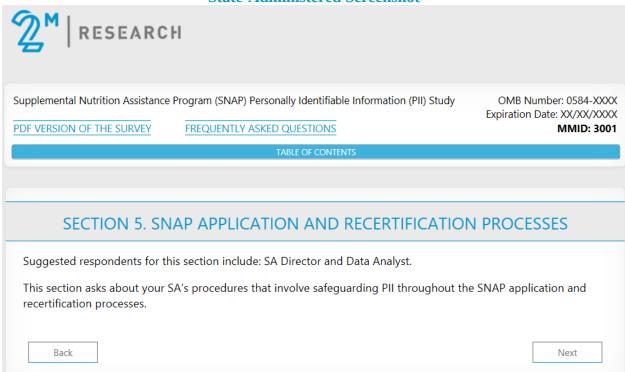
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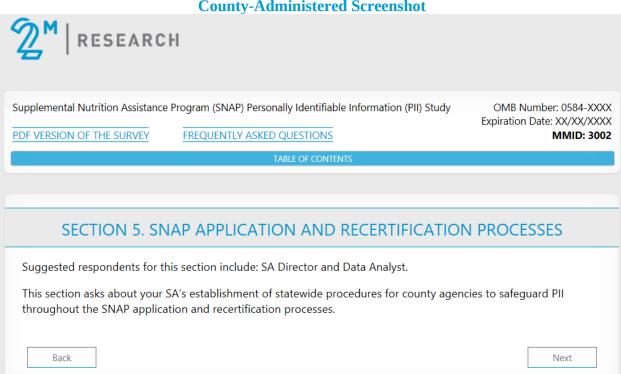
4.8

To what extent does your SA's security plan meet and/or exceed the safeguarding requirements that are in FNS Handbook 901 and associated FNS regulations? Please give us your best assessment of how your SA's security plan meets or exceeds FNS requirements for security policies and procedures used to safeguard PII.

SELECT ONE RESPONSE PER ROW			
	Meeting Requirements, with Room for Improvement	Meeting Requirements	Especially Successful at Meeting Requirements
Hardware-specific controls	0	0	0
Software-specific controls	0	0	0
Network-specific controls	0	0	0
Regularly assessing risk and vulnerabilities	0	0	0
Regularly performing security testing	0	0	0
Developing emergency preparedness and contingency plans	0	0	0
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Does your SA receive SNAP applications and recertifications in the following	ways?	
Interview with SNAP staff (either in person or on the phone)	Yes	No O
Mailing or faxing physical applications to the SA	0	
Interviews with non-SNAP staff who do eligibility determinations for multiple public	0	
	0	0
assistance programs, such as SNAP, TANF, WIC, public housing assistance, child care, and employment training programs		
assistance programs, such as SNAP, TANF, WIC, public housing assistance, child care,	0	0
assistance programs, such as SNAP, TANF, WIC, public housing assistance, child care, and employment training programs	0	0
assistance programs, such as SNAP, TANF, WIC, public housing assistance, child care, and employment training programs Online initial application	0	0 0
assistance programs, such as SNAP, TANF, WIC, public housing assistance, child care, and employment training programs Online initial application Online recertifications	0 0 0	0 0

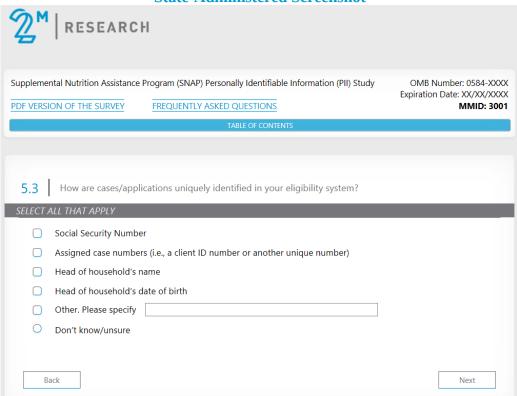
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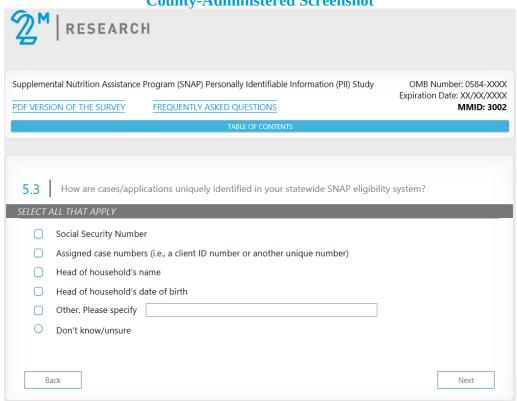
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RESEARCH		
Language I No delice Analytica Analytica of December (CNAP) Proposally Identificable Information (DIN Ct. et al.	ONE	NI: 0504
lemental Nutrition Assistance Program (SNAP) Personally Identifiable Information (PII) Study		Number: 0584- on Date: XX/XX/
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1 Do county agencies receive SNAP applications and recertifications in the foll	lowing ways?	
.1 Do county agencies receive SNAP applications and recertifications in the follows:	lowing ways?	
.1 Do county agencies receive SNAP applications and recertifications in the foll	lowing ways?	No
.1 Do county agencies receive SNAP applications and recertifications in the foll Interview with SNAP staff (either in person or on the phone)		No O
•		No O
Interview with SNAP staff (either in person or on the phone)		No O
Interview with SNAP staff (either in person or on the phone) Mailing or faxing physical applications to the county agency Interviews with non-SNAP staff who do eligibility determinations for multiple public assistance programs, such as SNAP, TANF, WIC, public housing assistance, child care,		No O
Interview with SNAP staff (either in person or on the phone) Mailing or faxing physical applications to the county agency Interviews with non-SNAP staff who do eligibility determinations for multiple public assistance programs, such as SNAP, TANF, WIC, public housing assistance, child care, and employment training programs		No
Interview with SNAP staff (either in person or on the phone) Mailing or faxing physical applications to the county agency Interviews with non-SNAP staff who do eligibility determinations for multiple public assistance programs, such as SNAP, TANF, WIC, public housing assistance, child care, and employment training programs Online initial application		No
Interview with SNAP staff (either in person or on the phone) Mailing or faxing physical applications to the county agency Interviews with non-SNAP staff who do eligibility determinations for multiple public assistance programs, such as SNAP, TANF, WIC, public housing assistance, child care, and employment training programs Online initial application Online recertifications		No
Interview with SNAP staff (either in person or on the phone) Mailing or faxing physical applications to the county agency Interviews with non-SNAP staff who do eligibility determinations for multiple public assistance programs, such as SNAP, TANF, WIC, public housing assistance, child care, and employment training programs Online initial application Online recertifications Mobile apps – initial application		No

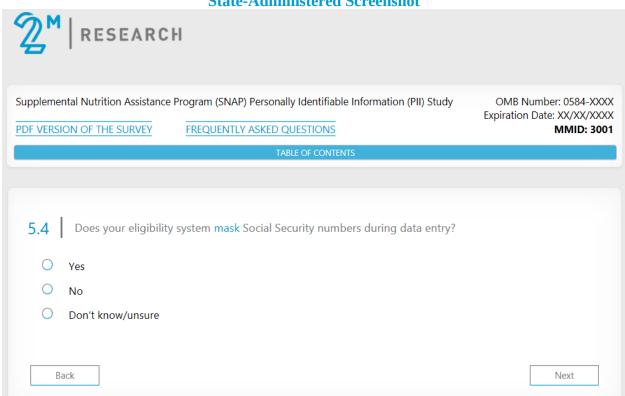
pplemental Nutrition Assistance Pr			PII) Study	OMB Number: 0584-XX Expiration Date: XX/XX/XX
F VERSION OF THE SURVEY	FREQUENTLY ASKED QUESTION TABLE OF CO			MMID: 30
	TABLE OF CC	JAILEN 13		
Does your SA conduct	t interviews for SNAP applica	ations and recertifi	cations via t	the following methods?
5.2 Does your SA conduct	t interviews for SNAP applica	ations and recertifi	cations via t	the following methods?
5.2 Does your SA conduct		ations and recertifi	cations via t	the following methods?
'				
'		Yes	cations via t	Don't know/unsure
ELECT ONE RESPONSE PER ROW Face-to-face interviews	/			
Face-to-face interviews Telephone interviews with loca	/ I office			
Face-to-face interviews Telephone interviews with loca	/ I office center			
Face-to-face interviews Telephone interviews with loca	/ I office center			

· 	e Program (SNAP) Personally Identifi	_	PII) Study	OMB Number: 0584-> Expiration Date: XX/XX/>
VERSION OF THE SURVEY	FREQUENTLY ASKED QUESTION	<u> S</u>		MMID: 3
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	es conduct interviews for SNAP ap	oplications and re	ecertification	s via the following
Do county agencie methods?	es conduct interviews for SNAP ap	oplications and re	ecertification	s via the following
methods?		oplications and re	ecertification	s via the following
		oplications and re	ecertification	s via the following
methods?				
methods? LECT ONE RESPONSE PER R		Yes	No (Don't know/unsure
methods?				
methods? LECT ONE RESPONSE PER R Face-to-face interviews	ROW			
methods? LECT ONE RESPONSE PER R Face-to-face interviews Telephone interviews with o	County agency			
methods? LECT ONE RESPONSE PER R Face-to-face interviews	County agency			
methods? LECT ONE RESPONSE PER R Face-to-face interviews Telephone interviews with control of the control of	county agency			
methods? LECT ONE RESPONSE PER R Face-to-face interviews Telephone interviews with of the company to the com	county agency			
methods? LECT ONE RESPONSE PER R Face-to-face interviews Telephone interviews with control of the control of	county agency			



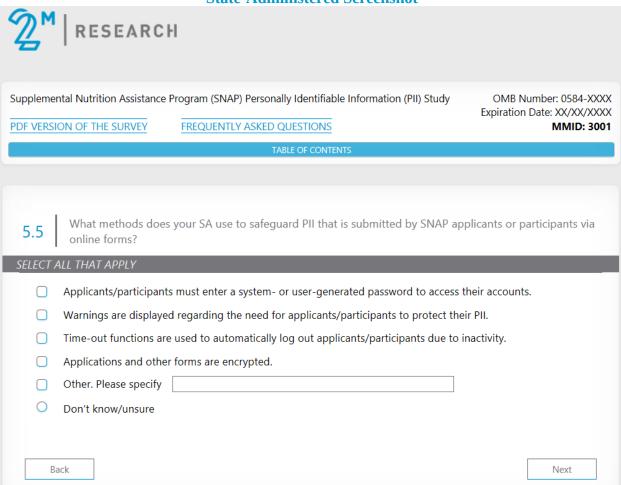
County-Administered Screenshot



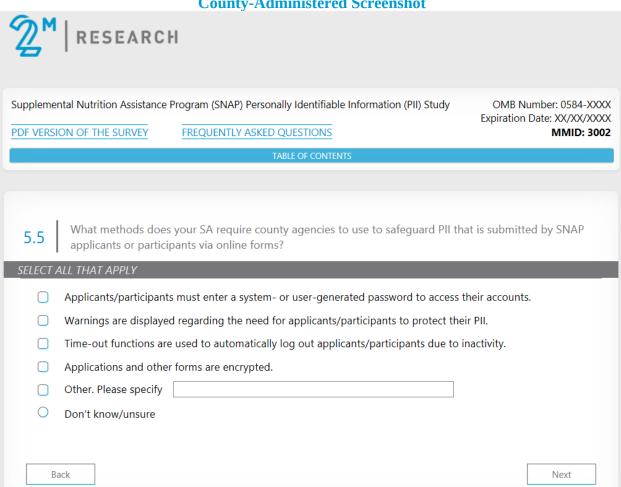


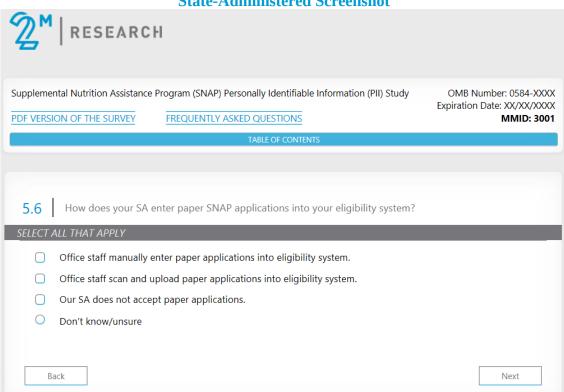
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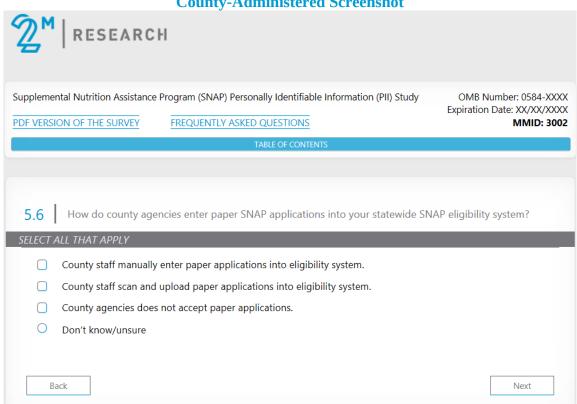


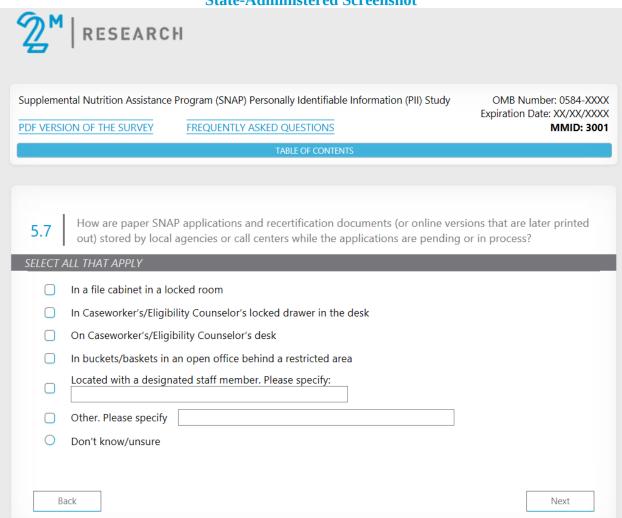
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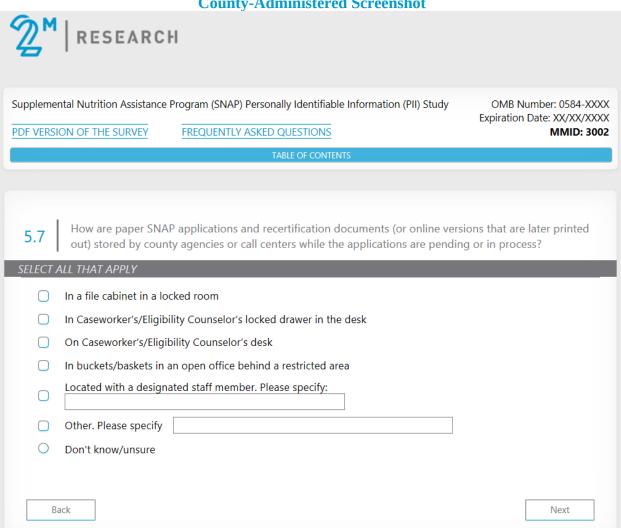


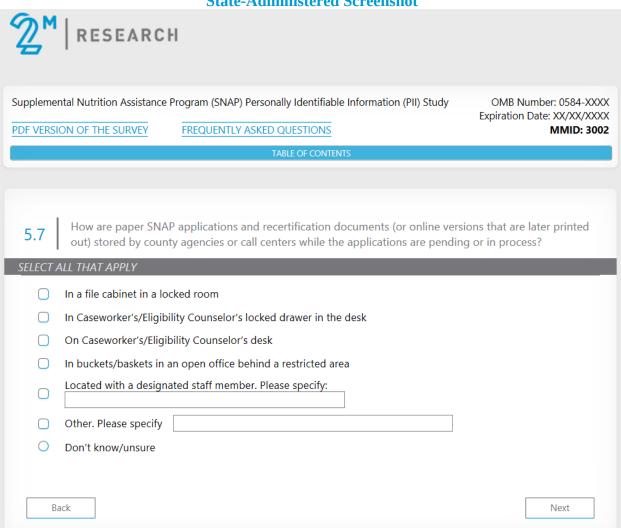
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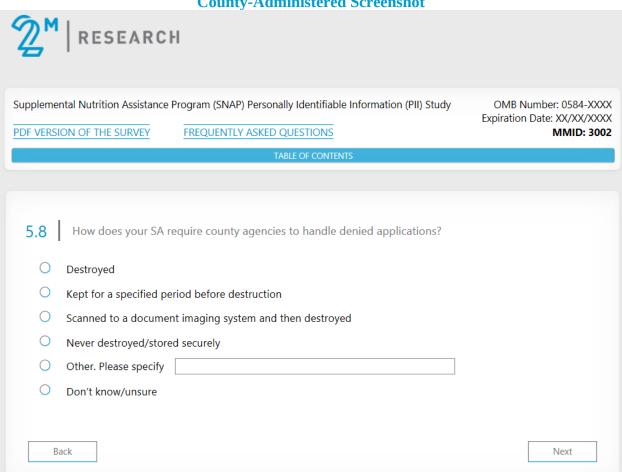


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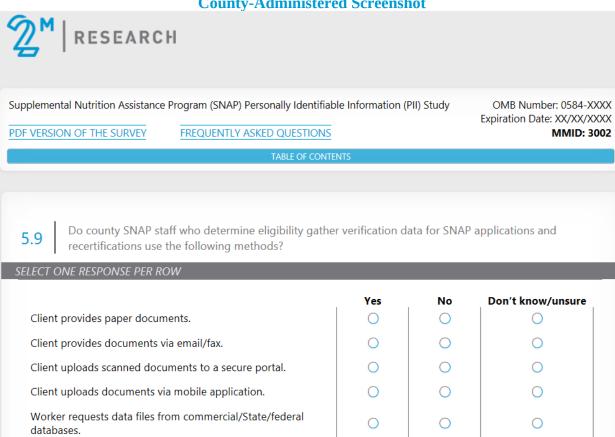


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F VERSION OF THE SURVEY FREQUENTLY ASKED QUESTIONS		PII) Study	OMB Number: 0584-XX Expiration Date: XX/XX/XX MMID: 30
TABLE OF CONTEN	TS		
Do SNAP staff who determine eligibility gather verificat use the following methods?	tion data for S	SNAP applic	ations and recertifications
ELECT ONE RESPONSE PER ROW			
LECT ONE RESTONSETER NOW			
		A1 -	Don't know/unsure
Client provides paper de suments	Yes	No	
Client provides paper documents.	Yes	O	0
Client provides paper documents. Client provides documents via email/fax.	Yes	0	0
	Yes O	O O	0 0
Client provides documents via email/fax.	Yes	0	0 0 0
Client provides documents via email/fax. Client uploads scanned documents to a secure portal.	Yes	0	0 0 0

County-Administered Screenshot



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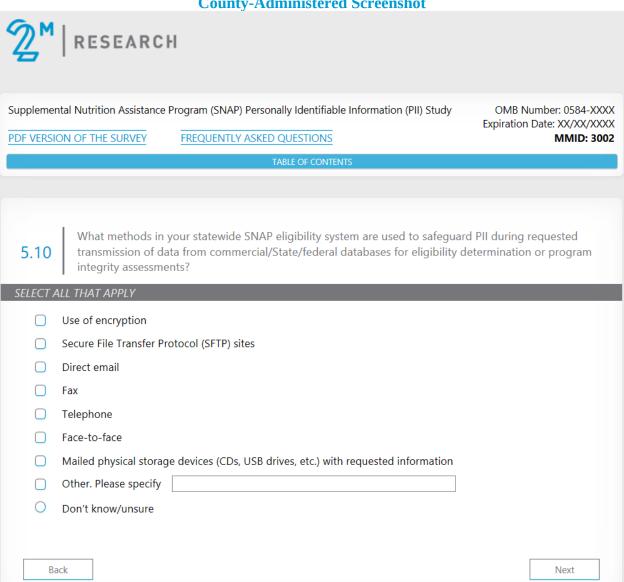
real time.

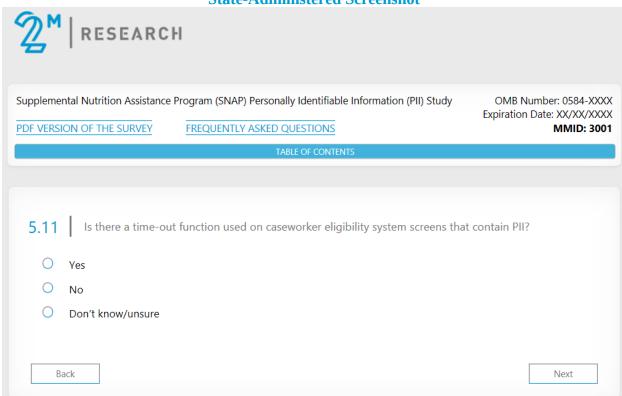
Worker directly queries commercial/State/federal databases in

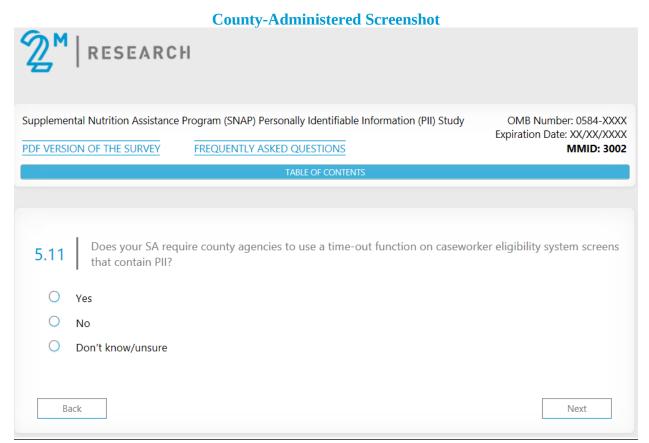
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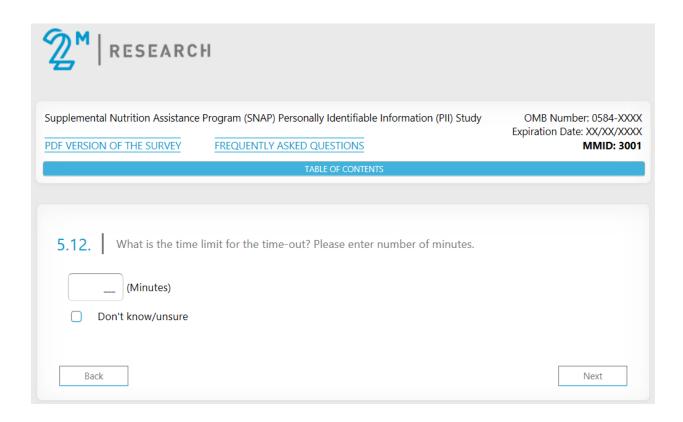
2 ^M RESEARCH	
Supplemental Nutrition Assistance Program (SNAP) Personally Identifiable Information (PII) Study PDF VERSION OF THE SURVEY FREQUENTLY ASKED QUESTIONS	OMB Number: 0584-XXXX Expiration Date: XX/XX/XXXX MMID: 3001
TABLE OF CONTENTS	
5.10 What methods are used in safeguarding PII during requested transmission of commercial/State/federal databases for eligibility determination or program	f data from integrity assessments?
SELECT ALL THAT APPLY	
Use of encryption	
☐ Secure File Transfer Protocol (SFTP) sites	
☐ Direct email	
☐ Fax	
Telephone	
☐ Face-to-face	
Mailed physical storage devices (CDs, USB drives, etc.) with requested information	
Other. Please specify	
O Don't know/unsure	
Back	Next
DUCK	IVCAC

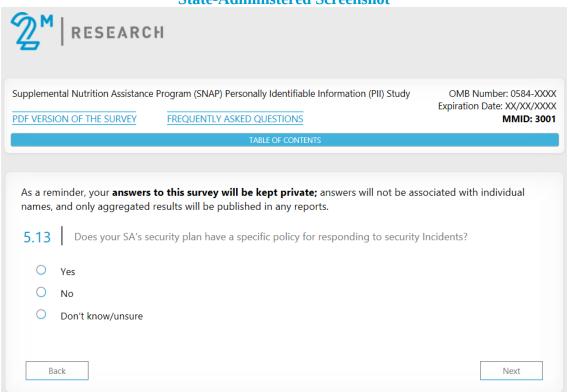
County-Administered Screenshot



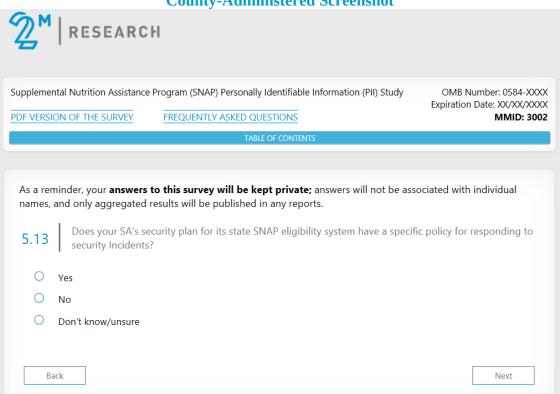


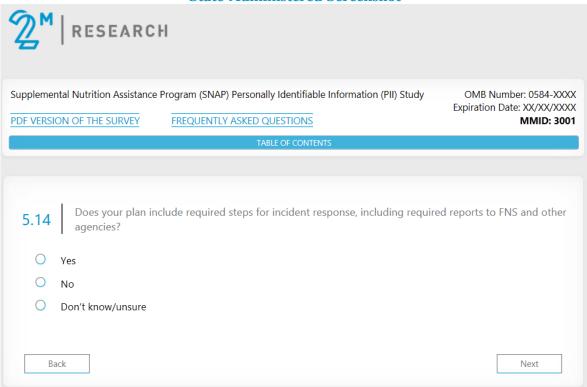


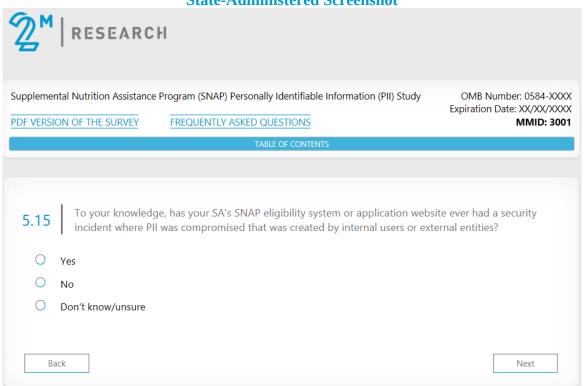




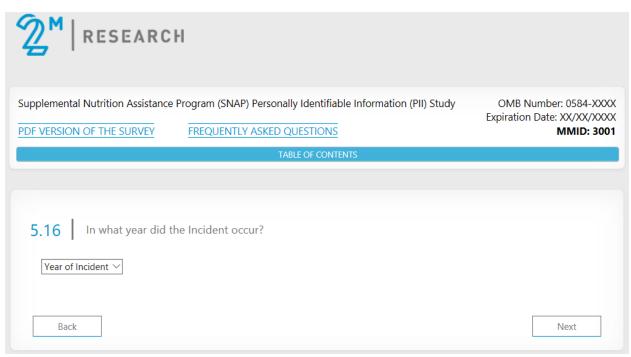
County-Administered Screenshot



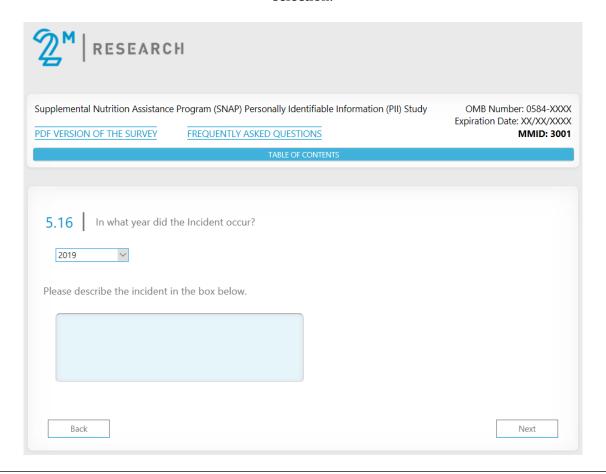


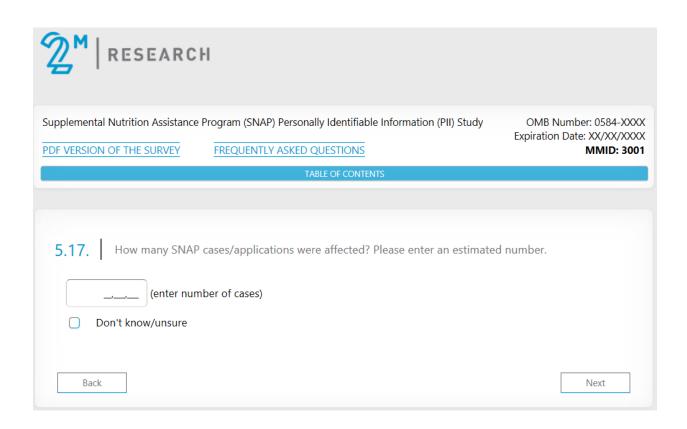


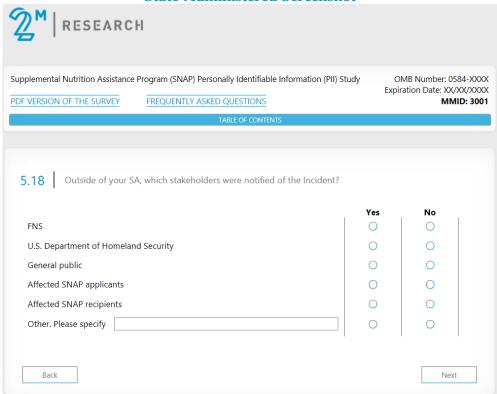
County-Administered Screenshot MRESEARCH Supplemental Nutrition Assistance Program (SNAP) Personally Identifiable Information (PII) Study OMB Number: 0584-XXXX Expiration Date: XX/XX/XXXX PDF VERSION OF THE SURVEY FREQUENTLY ASKED QUESTIONS MMID: 3002 TABLE OF CONTENTS To your knowledge, has your SA's statewide SNAP eligibility system or application website ever had a security incident where PII was compromised that was created by internal users or external entities? Yes No Don't know/unsure



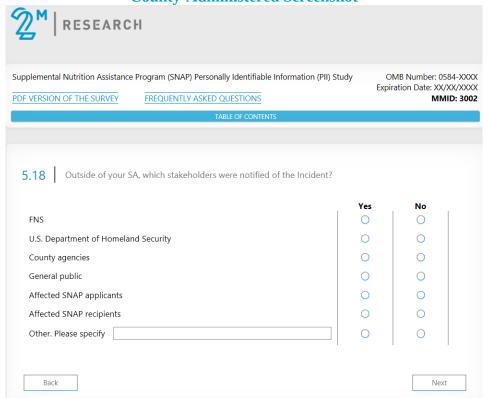
Note: The screenshots below illustrate how the text box will appear after a respondent makes a selection.

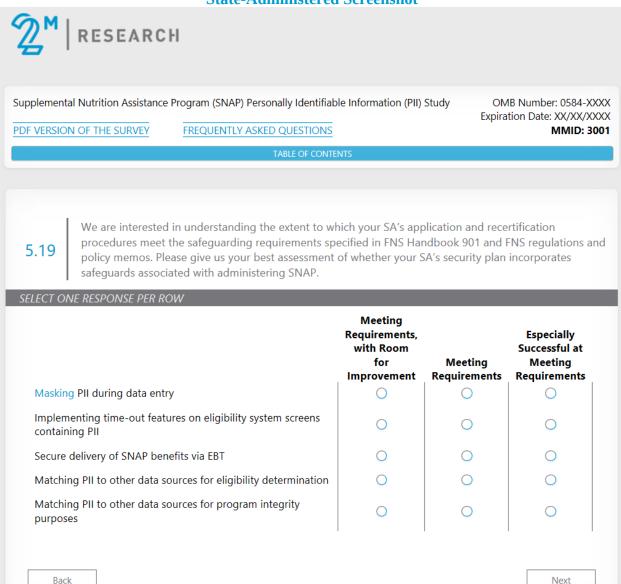






County-Administered Screenshot





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County-Administered Screenshot



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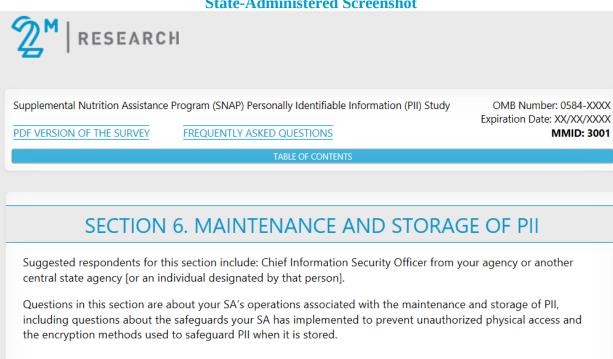
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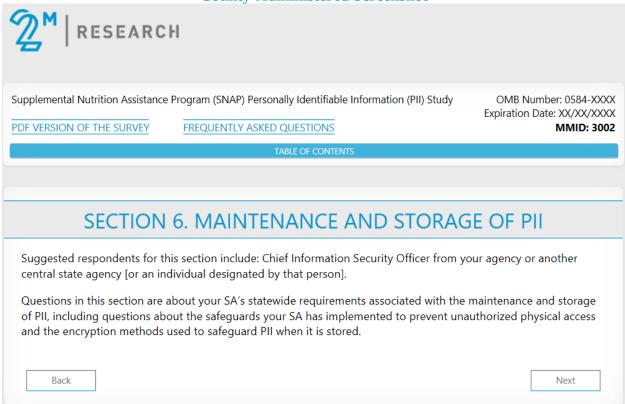
5.19

We are interested in understanding the extent to which your SA's application and recertification procedures meet the safeguarding requirements specified in FNS Handbook 901 and FNS regulations and policy memos. Please give us your best assessment of whether your SA's statewide security plan incorporates safeguards associated with administering SNAP.

SELECT ONE RESPONSE PER ROW Meeting Requirements, Especially with Room Successful at Meeting for Meeting Improvement Requirements Requirements Masking PII during data entry 0 0 0 Implementing time-out features on eligibility system screens containing PII Secure delivery of SNAP benefits via EBT 0 0 0 Matching PII to other data sources for eligibility determination Matching PII to other data sources for program integrity 0 0 0 purposes Next



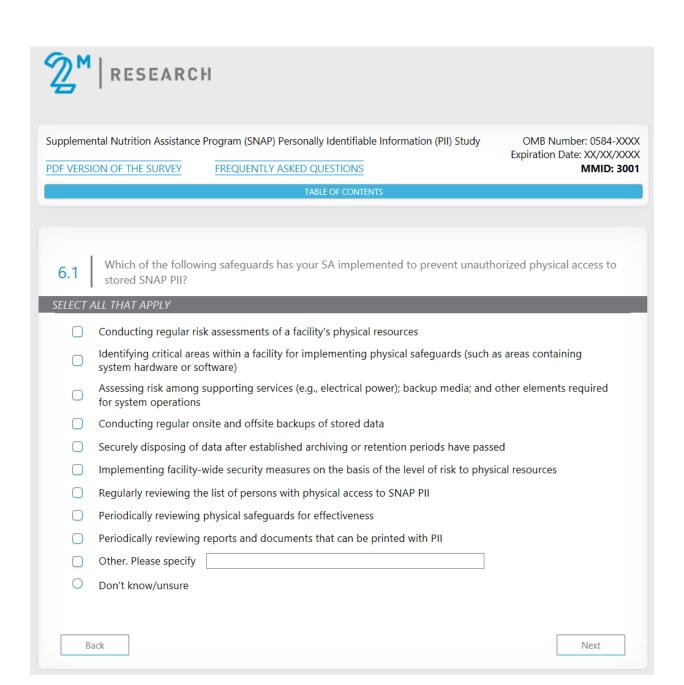
County-Administered Screenshot

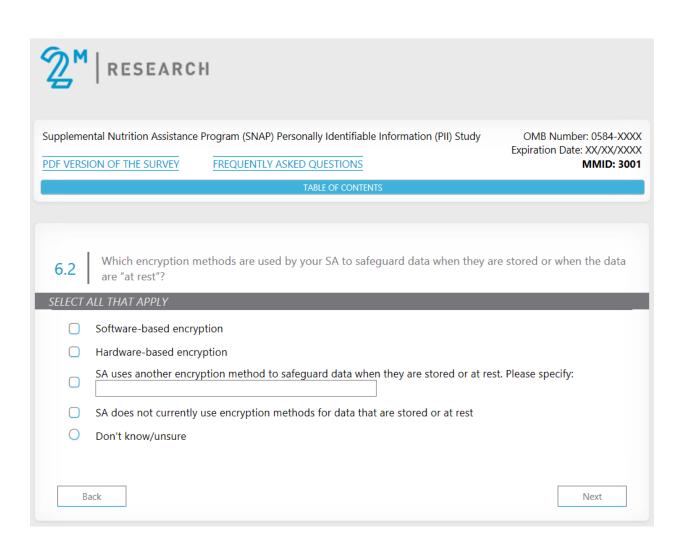


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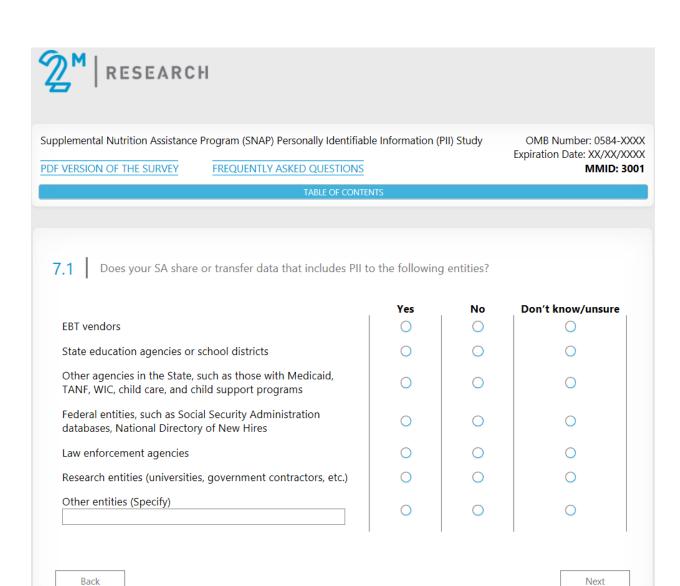
SECTION 7. DATA SHARING AND TRANSFER OF PII

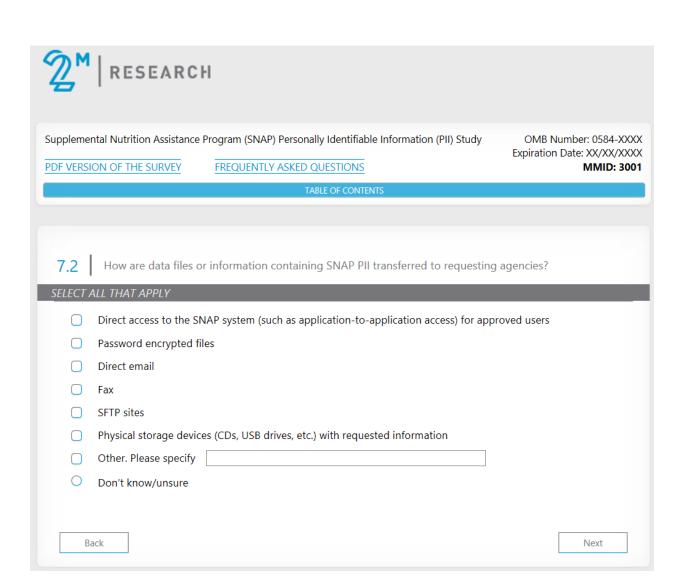
Suggested respondents for this section include: Data Analyst.

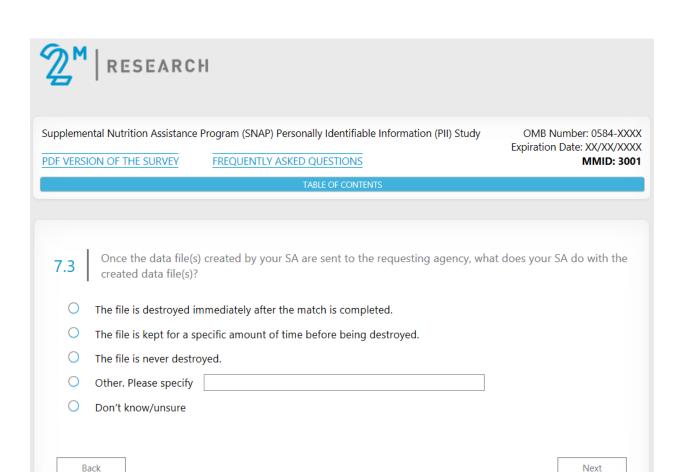
Questions in this section ask about your SA's operations associated with sharing and transferring PII. The following questions ask about the entities that PII is shared with and the processes your SA uses to facilitate data sharing.

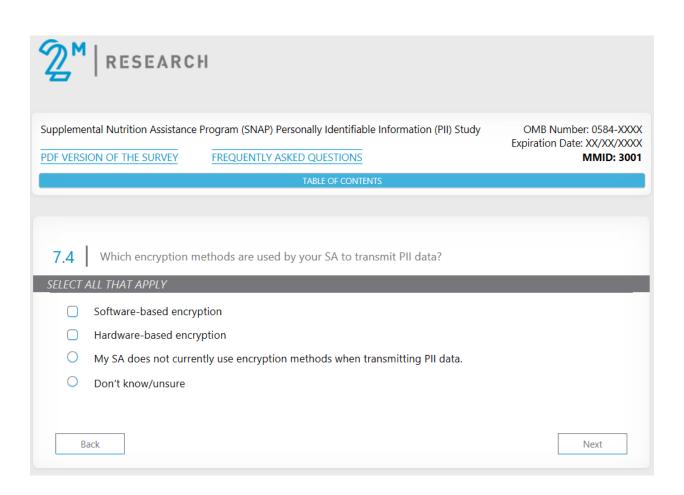
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7.5		On occasion, SAs may need to share SNAP PII with law enforcement agencies. How does your SA respond to law enforcement requests for PII?	
	0	SNAP PII is shared after law enforcement agencies provide the name of a SNAP recipient.	
	0	SNAP PII is shared after law enforcement agencies provide the name of a SNAP recipient and the recipient appears to be evading law enforcement.	
	SNAP PII is shared after law enforcement agencies provide other information. Please specify:		pecify:
	0	We do not share data with law enforcement (unless directed to do so via a court orde	r)
	\circ	Don't know/unsure	
	В	ack	Next



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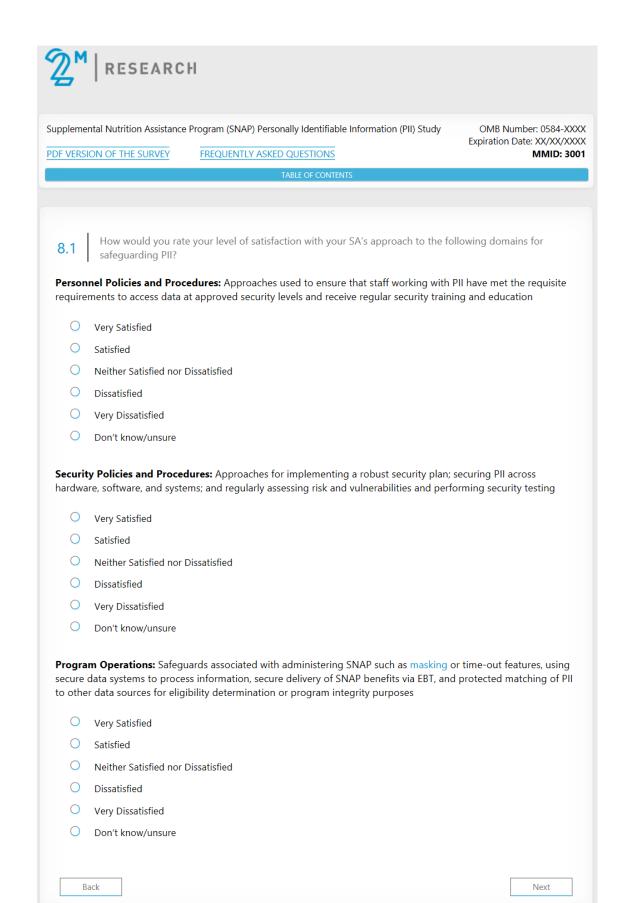
SECTION 8. OPPORTUNITIES AND CHALLENGES

Suggested respondents for this section include: SA Director, Chief Information Security Officer from your agency or another central state agency [or an individual designated by that person] and Data Analyst.

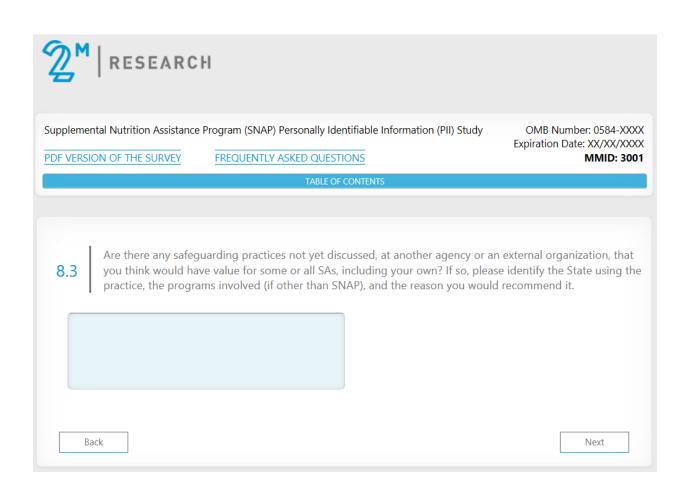
Questions in this final section ask about your SA's opportunities and challenges for safeguarding PII. The following questions ask about your level of satisfaction with your SA's approach to safeguarding PII, possible gaps in its approach, and safeguarding practices at another agency or an external organization that you think would have value for other SAs.

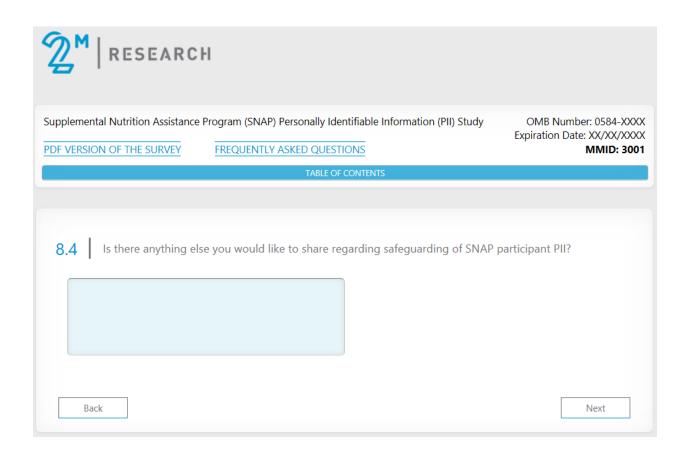
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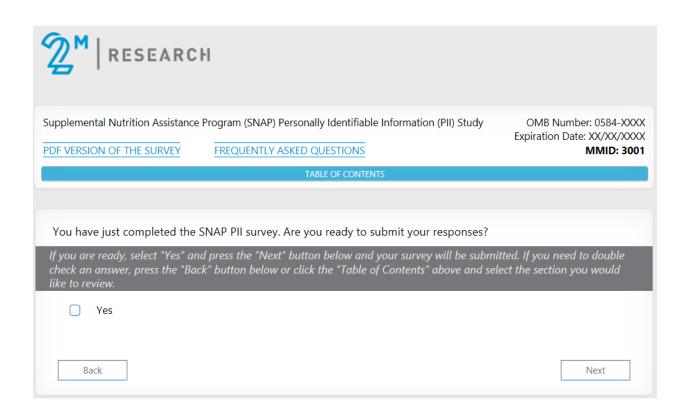
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Thank you for completing this survey! Your survey has been submitted. If you have any questions about this survey, please email SNAPPII@2MRESEARCH.COM or call 1-877-230-3035 (toll-free).

You may now close your survey window by clicking the "X" on the top right of your page