

CF OPERATING PROCEDURE
NO. 50-2

STATE OF FLORIDA
DEPARTMENT OF
CHILDREN AND FAMILIES
TALLAHASSEE, August 20, 2025

Systems Management

SECURITY OF DATA AND INFORMATION TECHNOLOGY RESOURCES

This security of data and information technology resources policy establishes the minimal controls, acceptable behaviors, and guidelines by which Department of Children and Families (Department) employees (including other personnel services [OPS] employees), community-based providers connecting to the department's network, and contractors and subcontractors to follow to ensure the security of departmental data and other information resources and the measures to follow in the reporting of a security event. This policy will be reviewed and revised annually or when a significant change occurs, whichever occurs first; refer to Appendix A: Policy Review and Revision. The review will be performed by the department's Information Security Manager.

BY DIRECTION OF THE SECRETARY:

(Signed copy on file)

COLE SOUSA
Chief Information Officer

SUMMARY OF REVISED, DELETED, OR ADDED MATERIAL

Updated the following to reflect the Department's current policy and procedures, which include, but not limited to, Chapter 2, paragraph 2-3, the Department's communication protocols regarding federated partners, and paragraph 2-6, established the Phishing Simulation and Awareness Program, and added Chapter 6, Insider Threat Program and Incident Response.

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Chapter 1 – GENERAL

1-1. Purpose. This document establishes the Department's Rules of Behavior by which all Department system users shall comply to protect the confidentiality, integrity, availability, and reliability of information technology resources used to support the needs of our clients and the missions of the Department, and to implement and enforce the level of security which will provide for the protection of data and information technology resources from accidental or intentional unauthorized disclosure, modification, or destruction by persons within or outside of the Department per laws, Executive Orders, directives, regulations, policies, standards, and guidelines.

a. Accountability.

- (1) Comply with current information security, privacy, and confidentiality practices.
- (2) Behave in an ethically, informed, and trustworthy manner.
- (3) Be accountable for all transactions associated with assigned account credentials.
- (4) Never share credentials (i.e., passwords, userid) with anyone.

b. Integrity.

- (1) Never intentionally enter unauthorized, inaccurate, or false information.
- (2) Never expose critical data or sensitive information to conditions that may compromise the data's integrity.
- (3) Review the quality of information as it is collected, or generated to ensure that it is accurate, complete, and up to date.
- (4) Take appropriate training before using a system.

c. Confidentiality.

- (1) Disclose information obtained in the performance of their duties only as permitted per paragraph 1-1.
- (2) Take precautions to eliminate access or exposure to sensitive information by unauthorized parties or devices.
- (3) Log-off or lock workstations when leaving devices unattended.

d. Sensitive Information. Protect all sensitive information whether officially on duty or not, at an official work, telework, or other non-traditional work site; refer to [CFOP 50-29, Wireless Access](#) for additional details.

1-2. Scope. This policy and processes herein apply to anyone who has access to information and data through the use of Department-owned information technology resources, including all information technology resources used to support or implement the mission of this Department and any other automated data processing systems in our custody whether owned, purchased, contracted from or to, or leased by the Department and assessable via the Department's website. In addition, any information technology resources connecting to the Department's network whether used in offices, in the field, or at telecommuting sites.

1-3. Authority.

- a. Section 282.318, Florida Statutes, *State Cybersecurity Act*.
- b. Section 501.171, F.S., *Security of Confidential Personal Information*.
- c. Rule Chapter 60GG-2, Florida Administrative Code (F.A.C.), *Florida Cybersecurity Standards*.

d. ARRA Title XIII Section 13402, "Notification in the Case of Breach."

e. 45 CFR Parts 160 and 164, Subparts A and C, Health Information Portability and Accountability Act (HIPAA) Privacy and Security Rules.

f. The Centers for Medicare & Medicaid Services (CMS) Minimum Acceptable Risk Standards for Exchanges (MARS-E) 2.2 Requirements.

g. 5 U.S.C. 552a, *Privacy Act of 1974 - Electronic Information Exchange Security Requirements and Procedures for State and Local Agencies Exchanging Electronic Information with the Social Security Administration (SSA)*.

h. National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53 r5, *"Security and Privacy Controls for Information Systems and Organizations."*

i. Internal Revenue Services (IRS), Publication 1075, Tax Information Security Guidelines for Federal, State and Local Agencies, (11-2021).

j. Federal Information Processing Standards (FIPS) 199, Standards for Security Categorization of Federal Information and Information Systems, (02-2004).

1-4. Definitions. Terms used herein are defined below:

a. Computer Security Incident. An event or unintentional action that results in compromised data confidentiality, a danger to the physical safety of technology resources or personnel, misuse of Department information technology resources, and/or electronic denial of service.

b. Computer Security Event: An observed change to the everyday operations of a network, system, environment, process, workflow, or a person indicating that a security procedure violation may have occurred, or a security control may have failed.

c. Confidential Information. Information that is exempted from disclosure requirements under the provisions of applicable state and federal law, e.g., the Florida Public Records Act, s.119.07 F.S.

d. Cross-Discipline Insider Threat Incident Handling Team: An objective team comprised of members with the technical and procedural skills and resources required to handle computer security incidents appropriately, including insider threats.

e. Data. A collection of facts; numeric, alphabetic and special characters which are processed or produced by an information technology resource.

f. Data Processing Systems. Any process that includes the use of a computer program to enter data, record data, sort data, calculate data, summarize data, disseminate data, analyze data or otherwise convert data into useful information.

g. Department. The State of Florida's Department of Children and Families.

h. Employee. Any person employed by the Department in an established position in the Senior Management Service, Selected Exempt Service, Career Service, or paid from Other Personal Services (OPS) funds. Also, for the purposes of this operating procedure, the definition of employee includes any

non-OPS temporary staff hired by the Department who have access to Department IT resources, including contracted staff and contracted vendor staff.

i. Event. An event is an observed change to the everyday operations of a network, system, environment, process, workflow or a person indicating that a security procedure may have been violated or a security control may have failed.

j. Incident. An event or unintentional action that is escalated to incident status as it results in compromised data confidentiality, a danger to the physical safety of technology resources or personnel, misuse of Department information technology resources, and/or electronic denial of technology resource services.

k. Information Security Manager. The Information Security Manager (ISM) is the person designated by the Secretary of the Department to administer the Department's information technology security program and serve as the process owner for all ongoing activities that serve to provide appropriate access to and protect the confidentiality and integrity of information in compliance with Department and statewide policies and standards and in accordance with §282.318, Florida Statutes, and Chapter 60GG-2, F.A.C.

l. Information Technology Resources. Data processing hardware (including desktop computers, laptops, tablets, smartphones and associated devices), software and services, supplies, personnel, facility resources, maintenance, training, or other related resources.

m. Insider Threat: An individual with authorized access to DCF systems or facilities who uses that access, wittingly or unwittingly, to cause harm to the Department's critical assets, information, or IT resources through unauthorized disclosure, modification, destruction, or misuse.

n. Insider Threat Program (ITP): A formal program encompassing policies, procedures, technologies, and training designed to deter, detect, and mitigate potential threats originating from within the organization.

o. Least Privilege (PoLP): The principle that each business system process, a user, or program must be able to access only the information and resources that are necessary for its legitimate business purpose.

p. Mobile Devices. Devices such as laptops, smart phones, tablets, thumb drives, CDs, DVDs, external hard drives, or flash cards designed to be portable and capable of storing large quantities of data.

q. Office of Information Technology Services (OITS). Department of Children and Families Office of Information Technology Services.

r. Office of Inspector General (OIG): A core member of the CSIRT and a key entity for reporting suspected security events and incidents.

s. Principle of Least Privilege. The requirement that each business system process, a user, or program must be able to access only the information and resources that are necessary for its business legitimate purpose.

t. Protected Health Information (PHI). Individually identifiable health information that is created by or received by the Department, including demographic information that identifies an individual, or provides a reasonable basis to believe the information can be used to identify an individual, and relates to:

- (1) Past, present or future physical or mental health or condition of an individual;
- (2) The provision of health care to an individual; or,
- (3) The past, present, or future payment for the provision of health care to an individual.

u. Separation of Duties: The principle that no user should be given enough privileges to misuse the system on their own, and the process that involves dividing critical tasks and responsibilities among different individuals to create a system of checks and balances. No single individual should have complete control or authority over a process from start to finish.

v. Subject Matter Expert (SME): A member of the Department workforce who has the expertise to determine the appropriate oversight for third-party agreements and is involved in CSIRT activities as needed.

w. System Owner(s). The entity that owns the data and that has the primary responsibility for decisions relating to a particular data processing system's specifications and usage.

x. System Users. Any person who, through State employment, contractual arrangement, charitable service or any other service arrangement, and with appropriate approvals, would have access to DCF facilities, the Department's information technology resources, or the Department's data for the purpose of conducting business or providing services.

y. United States of America. Primarily located in North America and consists of 50 states, including the District of Columbia and Puerto Rico. This term excludes the listed unincorporated territories (American Samoa, Guam, the Northern Mariana Islands, and the U.S. Virgin Islands).

1-5. Policy Statement. Department information technology resources shall not be used for any activity which adversely affects the confidentiality, integrity, or availability of information technology resources. Employees shall be held responsible for information security, especially involving the access, transport or storing of confidential information. Violations of information security may be cause for disciplinary action, up to and including dismissal as well as civil or criminal penalties.

1-6. Dissemination. A copy of this policy and the procedures herein are available online.

Chapter 2 - SECURITY OF DATA AND INFORMATION TECHNOLOGY RESOURCES

2-1. System Security and Access to Data. The Department has established a uniform access control policy, which includes, but is not limited to, acknowledgement of security requirements as well as civil and criminal penalties. Additionally, the access control policy requires system users to complete security awareness training, which emphasizes the protection of sensitive information (i.e., Personal Identifiable Information, Personal Health Information, Federal Tax Information, Social Security Numbers) before personnel acquire logical access and use of specified data within production environments.

a. Onboarding Process.

(1) Prior to using the Department's information technology resources, system users will sign form CF 114, "Security Agreement Form" (available in DCF Forms), to acknowledge receipt of and confirm agreement to abide by the minimum DCF security requirements specified therein.

(2) The Department employee's supervisors should sign and forward the original copy of CF 114 to the Office of Human Resources for placement in the employee's personnel folder. Employees will retain a duplicate copy of CF 114 and attachments. In addition, DCF employees must sign form CF 114 within ten days of employment and annually thereafter to acknowledge receipt of and confirm agreement to abide by the minimum DCF security requirements specified therein.

(3) After system users and their supervisor have completed the necessary information on the [digital Access Authorization Request \(AAR\) Form 138](#) and attach the appropriate documents before clicking the 'Submit' button to generate an IT Service Ticket request for assignment of a unique personal identifier (User ID and Password) to each person who uses information technology resources to access the Department data processing systems and Department data by means of information technology resources owned, purchased, or leased by the Department. It is the policy of this Department that system users shall complete Security Awareness Training within 24 hours of being assigned a personal identifier and within the first 10 days of employment by the Department. The Identity Access Management (IAM) and ACCESS IT staff are responsible for provisioning accounts for the agency, refer to CFOP 50-30, Identity and Access Management (IAM) for additional details.

b. Deboarding (Separation) Process. Coordination among supervisors/designees, Information Technology, and Human Resource staff is essential when deactivating system accounts to maintain the confidentiality and integrity of IT resources that support the Department's primary mission.

(1) Information Technology. Upon receipt of written or verbal notification of a system user's resignation or separation from the Department, supervisors or designees must complete a digital AAR-138 form for all separating Department employees (resignations and terminations) as soon as they are notified, regardless of the employee's last day of work.

(a) Separation Notification Process. Select the 'Separation' radio button on the AAR-138 and complete the required fields, including listing all system/data accounts that require deactivation, including Administrative Accounts. Click the 'Submit' button to submit the form, which shall generate an IT ServiceNow ticket request.

(b) Timely Submission. ServiceNow (SN) tickets should be received by OITS staff at a minimum of three (3) business days prior to the employee's last day of work to allow sufficient time for processing. AAR-138 submitted less than 3 business days before the employee's last workday

require immediate notification to the DCF Statewide Help Desk, but this practice should be avoided whenever possible.

(c) Immediate Action Required. The supervisor/designee must contact the DCF Statewide Help Desk directly to request immediate or schedule removal of access to Department resources (e.g., workstations, phones, keyfobs, ID Badges) and provide the IT service ticket number, including the employee's information when:

- I. The separation is involuntary or without notice,
- II. IT resources are not returned by the last day of work, and
- III. System user's access requires suspension (e.g., sanction) due to suspected inappropriate behavior or pending investigation.
- IV. AAR-138 form is submitted less than three (3) business days before the employee's last day of work.

(2) Human Resources. Coordinate with Human Resources to ensure the timely submission of the employee's separation package to the Human Resources Shared Services Center (HRSSC) for review and processing, per CFOP 60-70, Chapter 1.

c. Change Report Process (Demographic/Position Updates-Job). Supervisors or designee shall select the 'Existing' employee action option and the appropriate 'Action Requested' when either of the following circumstances exist:

- (1) A demographic (name, social security number, date of birth, location) element requires updating/revision.
- (2) The individual's access require suspension.
- (3) A DCF employee changes from one position description to another at the Department, the employee's supervisor shall evaluate the system user's access to IT resources within five days and take appropriate action to remove IT resources no longer required by that employee to perform their new job duties by completing an AAR-138 Form.

d. Unique Identifier(s). The identifier(s) will permit access to the data that the person has a need and right to know and will control inquiry and update capabilities. The system owner will determine and authorize system access according to the principle of least privilege, with no access given that is not necessary for business needs.

e. Rules of Behavior.

- (1) It is the responsibility of the employee to secure and protect his/her personal identifier and any other authentication methods used to access Department resources. Employees shall not disclose their Department accounts, passwords, personal identification numbers, security tokens, smart cards, identification badges, or other devices used for identification and authentication purposes.
- (2) System users will be held responsible for events that occur using their personal identifier. Employees are required to lock their workstations prior to leaving their work area and save work to reduce the risk of losing work. Department-owned workstations will receive scheduled patches and updates when applicable; refer to Chapter 5, Patching and Rebooting of Information Technology Resources.
- (3) The use of service accounts for interactive sessions is prohibited at DCF. Any legacy DCF systems using this methodology must have mitigating controls in place.
- (4) The use of vendor-supplied default passwords is prohibited at DCF.
- (5) User accounts shall be authenticated at a minimum by a complex password on all systems that support complex password enforcement, refer to 2-1(g). User accounts shall have inactivity timeouts in place that terminate sessions on all systems that support session timeouts.

(6) Users must not store their passwords in clear text.

(7) System users shall not share their personal identifier, Department account information, remote access account information, passwords, personal identification numbers, security tokens, smart cards, identification badges, or any other devices used for identification and authentication purposes. Information sharing should be handled through administrative methods rather than sharing passwords. Administrative methods include:

(a) Establishing individual email rules and alias assignments to permit sharing of electronic mail.

(b) Obtaining access rights to special directories (network folders) to share files with one or more people.

(c) Using mainframe security features to give supervisors appropriate access rights to their employees' cases and files, if required.

(8) System users will immediately report lost security tokens, smart cards, identification badges, or other devices used for identification and authentication purposes to their supervisor who is then responsible for reporting instances of loss to the Regional Security Officer / Administrator or the ISM.

(9) Employees shall lock their workstations (CTRL/ALT/DELETE) before leaving their work area and appropriately save work to reduce the risk of losing work. Department-owned workstation shall receive weekly scheduled patches and updates when applicable, refer to Chapter 5, Patching and Reboot policy.

(10) To prevent loss of data, system users shall ensure unique copies of Department data stored on workstations or mobile devices are backed up to network shares and ensure that all mobile devices are appropriately encrypted. Employees should contact the IT Statewide Help Desk with questions about encryption and backup options.

f. USB Encryption Exception. The DCF ISM shall permit a USB encryption exception for Department staff on a case-by-case basis. Before deactivating encryption protocols, the immediate supervisor (or designee) of the employee must submit an encryption exception request via the IT Statewide Help Desk ticketing system. The request must be reviewed and approved by the DCF ISM before any action is taken.

g. Network/Business System Settings.

(1) Systems will automatically disable user IDs that have not been used for a period of 30-60 days, depending on risk level. Business systems must force users to change their passwords every 30-90 days. Network system users must change passwords every 90 days, and configuration settings support password requirements. For non-users (e.g., staff with no initial sign-in activity) accounts, the system shall automatically deactivate user IDs for non-use after 30 days of inactivity starting from the date of creation. Network systems shall enforce a minimum password age restriction of one day, when applicable. Business systems shall enforce minimum password age restrictions based on applicable standards, best practices, and system capabilities.

(2) Network-level passwords shall adhere to complexity standards per Rule 60GG-2, federal requirements, and best practices. Business-level passwords shall adhere to complexity standards when system functionality permits.

(3) The Department shall secure workstations with a network-level password-protected screensaver with the automatic activation feature set at no more than 15 minutes. Workstations used to

access protected health information shall be placed in secure areas away from access by the public and display screens positioned to minimize unauthorized viewing and/or access.

2-2. DCF Security Awareness Policy. Department IT system users shall complete mandatory security and privacy awareness training required defined herein and role-based privacy training per the frequency defined by the system owner. In addition, system users shall be alert to indicators of system abuse or misuse, including reporting requirements.

a. The purpose of the Department's cyber-security awareness training policy and resultant procedures is to provide, at a minimum, all employees with onboarding, annual, and ongoing security awareness education to reinforce DCF security practices and ensure employees perform their information security-related duties and responsibilities in a manner consistent with Department policies and procedures.

b. The scope of this fundamental cyber-security awareness training includes all DCF employees, third-party stakeholders, and business partners.

c. The Department's hiring procedures and processes and annual employee training procedures and processes conducted by DCF Human Resources have incorporated security awareness into their course offerings. These procedures and processes include annual course content review and revision and making the training available to DCF employees on the Department Intranet via an approved training management system (TMS). DCF Human Resources also coordinates the annual and on-going security awareness training, notifying employees as to when the training period begins and ends, tracking employee response and compliance, and working with DCF supervisors and managers to ensure full compliance.

d. The Department's Information Security Manager, in support of DCF Human Resources, is responsible for maintaining a statewide Security Awareness Training program that will ensure employees are aware of the importance of information security. At a minimum, this program must provide upon-hire and annual refresher security awareness training to all system users and monthly informational training via newsletter or the DCF Intranet. The ISM shall also ensure that DCF employees participate in monthly automated awareness testing and training and shall coordinate the development and distribution of quarterly security awareness newsletters to staff. These measures will supplement existing training and support compliance with the Department's risk management strategy.

e. All system users will be required to complete Security Awareness training within ten (10) days of hire and then annually thereafter as a refresher. The Department approved training management system used to track employee participation and compliance. DCF supervisors and managers are required to assist DCF Human Resources in ensuring their employees complete the required training within the specified time frame.

f. All DCF employees must complete Security Awareness Training before accessing Department production applications. Supervisors and security administrators are responsible for ensuring that employees receive any additional applicable program office security training and receive appropriate access according to the principle of least privilege.

g. Community Based Care agencies, vendors, providers and other DCF business partners are responsible for ensuring their employees complete this mandatory training (see DCF Standard Contract, paragraph 5.5) and are responsible for tracking compliance and documenting an audit trail.

2-3. Systems and Communications Protection for Confidential Data.

a. All media containing confidential data or Federal Tax Information (FTI) data must be encrypted during transmission of the data. This includes all types of thumb drives and other portable media.

b. The Department has established security controls that restrict access to FTI data areas. Individuals who enter FTI data areas must not bypass access controls or allow unauthorized entry of other individuals. DCF employees must report unauthorized attempts to security personnel.

c. If the business need requires the transfer of Social Security Numbers (SSNs), only then shall SSNs be copied from the system. When transferring files containing SSNs, they shall be encrypted to prevent unauthorized disclosure by typing **encrypt** as the first word in the email 'Subject' line. The Department shall monitor all SSNs that are removed from the system by logging such actions, including the name of the user and data details. The Department shall implement tools to monitor and log or encrypt such actions.

NOTE: The Department and the Social Security Administration (SSA) are federated partners and automatically encrypt communications from the @myflfamilies.com domain. Therefore, staff are exempt from entering 'encrypt' in the email 'Subject' line.

d. Transport Layer Security (TLS) Encryption. If standard encryption methods encounter challenges, the Department shall employ a forced Transport Layer Security (TLS) protocol. To prohibit unauthorized disclosure during communication with external partners. TLS acts as an additional layer of security, safeguarding sensitive and confidential information while in transit.

2-4. Destruction Methods for Confidential and Federal Tax Information (FTI) Data. Confidential or FTI data that is on paper must be destroyed by burning, mulching, pulping, shredding or disintegrating. If shredding is used, the paper must be shredded to effect 5/16 inch wide or smaller strips. Microfiche and microfilm must be shredded to affect a 1/35 inch by 3/8-inch strips. If shredding is a part of the overall destruction process, strips can be ½ inch; however, the strips must be safeguarded until it reaches the stage where it is unreadable. All shredding or destruction of paper and magnetic media must be witnessed by a DCF employee.

2-5. Prohibit System and Data Access Outside the United States of America (USA) and Canada (Geolocking). All Department system users shall only access Departmental IT systems and data from within the United States of America (USA) and Canada. The Department shall implement geographical locking (geolocking) technology that restricts access to Department system and data based upon the user's location. The geolocking scheme identifies the user's location using Internet geolocation techniques, such as but not limited to checking the user's IP address and measuring the end-to-end delay of a network connection to estimate the physical location of the user. Access is approved or denied based on the result of this check. Failure to adhere to the system and data accessing policy constitutes a security violation and may result in disciplinary action.

2-6. Phishing Simulation and Awareness Program. To reinforce the principle that 'everyone is responsible for the security of IT resources' and strengthen the Department's human firewall against phishing-based attacks through scheduled and randomized simulation training.

2-6.1. Phishing Simulations.

a. The Department shall conduct periodic phishing simulations that targets all business units and user groups with access to Department systems.

b. Simulations will mimic realistic and evolving phishing tactics relevant to Department business operations, including themes such as credential harvesting, public assistance notices, Human Resources updates, or executive impersonation.

c. Simulation design and deployment shall be management by OITS under the direction of the ISM per §282.318 to sustain employee awareness, improve real-time decision-making, and fulfill training requirements.

2-6.2. Response and Training. Employees who engage with a phishing simulation (e.g., click on a link, enter data, or otherwise interact with malicious elements) shall complete supplemental (e.g., reinforcement) training within seven (7) calendar days.

2-6.3. Reporting and Communication.

a. The Department shall log, analyze, and incorporate phishing campaign results, refer to paragraph 2-6.2 into cybersecurity performance reports issued by the ISM.

b. CSIRT staff shall review and analyze data for possible trends including but not limited to lessons learned, training material enhancements, and insider threat monitoring.

c. Department staff who are repeatedly engage with phishing simulations, the ISM shall communicate phishing campaign results with their supervisor to provide support coaching and behavior correction. The ISM shall also share the phishing campaign results with Department management.

Chapter 3 – EVENT AND INCIDENT REPORTING

3-1. Purpose. This chapter establishes the Department's event and incident reporting policy which aims to minimize the impact of security incidents on the Department's mission and its stakeholder by providing a structure approach for reporting and monitoring security event or incident, per federal and State laws, rules, regulations, policies, and procedures governing the confidentiality of data are not superseded, abridged, or amended by this operating procedure.

3-2. Security Event and Incident Reporting and Tracking.

a. System Owners. System owners are responsible for ensuring that their business application system and the data contained therein have documented security guidelines and rules included in a user guide or application manual, and that all users of their system(s) have access to this documentation. The user guide must document what is expected of the user, what constitutes security violations, and how the supervisor will handle suspected or known violations.

b. System Users/Employees. DCF employees who know or suspect that a security event, incident, or policy violation has occurred are responsible for informing their supervisor, the IT Statewide Help Desk, or the DCF Information Security Manager immediately via ServiceNow or email. Failure by employees to report may result in disciplinary action up to and including dismissal, as well as possible legal action.

c. Supervisors/Managers. Supervisors are required to notify their manager who is to evaluate the report and confer with their Regional Security Officer/Administrator, the DCF Information Security Manager, the IT Statewide Help Desk or the DCF Office of Inspector General (OIG) and determine which to immediately notify of any suspected or known security events, incidents, or violations. Managers may also report events and incidents directly to the DCF ISM via ServiceNow and assign the ticket to 'SN Security Manager.' The DCF ISM will then take responsibility for routing the report to the correct DCF office(s). Supervisors and managers will cooperate and coordinate to immediately ensure information technology resource integrity in securing DCF business systems, including placing any affected and applicable equipment in a secure and locked location. Failure of the supervisor or manager to notify and cooperate with the above-named personnel may result in disciplinary actions up to and including dismissal. Information Technology Services personnel will follow Inspector General guidance to ensure appropriate Chain of Custody compliance. The DCF OIG will be notified at intake email address IG.Complaints@myflfamilies.com.

d. Regional Security Officers/Administrators and Information Technology Services Management. Regional Security Officers/Administrators and Information Technology Services management staff are responsible for evaluating and then reporting any security events, incidents, or violations to the DCF Information Security Manager and/or the IT Statewide Help Desk. The Regional Security Officer/Administrator is responsible for tracking and resolving or disposing of all incidents reported to or referred by the IT Statewide Help Desk for their area. The Regional Security Officer/Administrator is responsible for maintaining a log or record of all reported security events, incidents, or violations and using this information to determine actions steps that could deter or mitigate the impact from future incidents of a similar nature. The log or record should also contain a disposition for the incident and an estimate of how much damage/cost was incurred, if any. The Regional Security Officer/Administrator shall provide disposition information to the IT Statewide Help Desk so that any associated event or incident ticket can be closed. Incident log or record data collection requirements include:

- (1). Date event or incident reported;
- (2). Date event or incident occurred;
- (3). Reported by;

(4). Contact email;
(5). Contact phone;
(6). Reported to, contact information, and how contacted; and,
(7). Event or incident description and details. This description should include the approximate number of records impacted, the data classification, and descriptions of persons affected by the event or incident.

e. IT Statewide Help Desk. The DCF IT Statewide Help Desk is responsible for consolidating the reported events and incidents. The IT Statewide Help Desk is also responsible for contacting or notifying the DCF Information Security Manager (ISM) when a report or disposition is received.

3-3. External Reporting Requirements.

a. Special Requirements for Criminal Justice Information Services (CJIS) and Driver and Vehicle Information Database (DAVID) Notification. The Department must notify the Florida Department of Law Enforcement (FDLE) and the Florida Department of Management Services (DMS) within five (5) working/business days of determining that personal information has been compromised per [SOP S-2, DHSMV DAVID Related Event and Incident Reporting Required Notification Procedure](#).

b. Special Requirements for Florida Statute 501.171, "Security of Confidential Personal Information". Florida Statute 501.171 addresses the confidentiality of personal information and defines the terms "breach of security" and "breach." Covered entities, including the Department, should identify when unauthorized access of electronic data containing personal information occurs. If such an event has occurred and affects 500 or more individuals in the state, section 501.171(3)(a), F.S., requires DCF management to report the breach to the Department of Legal Affairs (DLA). Reporting must be provided as "expeditiously as practicable" but no later than 30 days (section 501.171(3)(a), F.S.) after the determination of the breach or reason to believe a breach occurred.

c. Special Requirements for Internal Revenue Service Notification. The Department must notify the IRS Office of Safeguards immediately but no later than 24-hours after identification of a possible issue involving Federal Tax Information (FTI). Any employee or contract employee who suspects a possible improper inspection or disclosure of FTI must report the event to their supervisor immediately. Supervisors and managers report these events to the Department's Information Security Manager via ServiceNow (IT ticketing process) and assign the ticket to 'SN Security Manager.' The ISM is, in turn, responsible for notifying the IRS Office of Safeguards at SafeguardReports@irs.gov and the DCF Office of Inspector General, as per DCF SOP S-4, Computer Security Incident Response Team (CSIRT) Operating Procedures.

If the supervisor is unavailable, employees or contract employees should report suspected possible improper inspection or disclosure of FTI to the IRS Office of Safeguards using the email address listed above. Then, follow up using the Department's internal notification process and complete the incident response notification to the impacted individuals.

(1) The Department shall provide written notification to the taxpayer whose FTI was subject to unauthorized access or disclosure when a response employee is subject to disciplinary or adverse action. The written notification shall contain but not limited to the following date of the unauthorized inspection or disclosure and the rights of the taxpayer under IRC § 7431.

(2) The Department shall notify the Office of Safeguards when the written notification to the taxpayer is completed.

(3) In addition, the Department shall inform the Office of Safeguards of any pending media releases, including sharing a draft of the release, prior to distribution.

d. Special Requirements for Social Security Administration Data. Any employee or contract employee that experiences or suspects a breach or loss of Personally Identifiable Information must report the event to their supervisor immediately. Supervisors and managers are responsible for notifying the Department's Information Security Manager who is in turn responsible for notifying the United States Computer Emergency Readiness Team (www.us.cert.gov), the Social Security Administration's System Security contact named in the CMPPA agreement, and the DCF OIG.

e. Special Requirements for Centers for Medicare and Medicaid Services Data. Any employee or contract employee that experiences or suspects a breach or loss of CMS data must report the event to their supervisor immediately. Supervisors and managers are responsible for notifying the Department's Information Security Manager who is in turn responsible for notifying the CMS IT Service Desk and the DCF OIG.

Chapter 4 – USE OF WIRELESS TECHNOLOGY AND MOBILE DEVICES

4-1. Purpose. This chapter states the Department's policy concerning the use of mobile devices and the minimum-security responsibilities regarding the use of mobile wireless technology when accessing Department data.

4-2. Mobile Devices and Wireless Networks. Mobile devices can present a significant risk to information security and data security as, if the appropriate security applications and procedures are not applied, they could present an opportunity for unauthorized access to Department data and IT infrastructure. The Department's minimum-security requirements for use of this technology are listed below. Other State or Federal data security standards may be required beyond those listed here.

a. Mobile devices, such as smartphones and tablets, are important tools for the organization and their use is supported to achieve business goals. Employees issued mobile devices by the Department are responsible for ensuring the physical security of the mobile device and the security of any data or information stored on the mobile device.

b. Technical Requirements.

(1) DCF mobile devices must store all user-saved passwords in an encrypted password store.

(2) Mobile devices must be configured with a secure password that complies with DCF password requirements.

(3) With the exception of those mobile devices managed by DCF, devices are not allowed to be connected directly to the myflfamilies-staff DCF network.

(4) All Department provided mobile devices must be encrypted.

(5) Devices must be kept up to date with manufacturer or network provided patches. DCF OITS will regularly provide all appropriate patches to DCF mobile devices.

(6) Mobile devices (except smart phones) for Department employees must be purchased and approved through MyFloridaMarketPlace. The MyFloridaMarketPlace requisition for mobile devices (except smart phone) must include proper justification, have supervisory approval, and require proper encryption configuration. The purchase of smart phones must be done through the appropriate Headquarters or Region staff designated to purchase phones.

c. Only department-owned information technology resources may be used by DCF employees to access DCF applications and data, with the exception of email over the internet. Those who access email from a personal computer must continue to abide by department security policies and procedures. Contractors with DCF may be approved to use contractor-owned resources to access DCF applications and data, provided that these resources meet DCF minimum security policies and procedures and that the requirement to meet these standards is included in the Department contract with these entities. As appropriate, evaluation of the ability to meet these standards may be part of the procurement process. Such evaluations shall include the DCF Information Security Manager.

d. System users must always physically secure Department-assigned mobile devices when not in their possession. A mobile device left in the passenger compartment of a van or sports utility vehicle must be concealed and the vehicle must be locked. A mobile device left in a passenger vehicle must be secured in the trunk.

e. System users must report any lost or stolen devices immediately to their supervisor, their Regional Security Officer/Administrator and the IT Statewide Help Desk. The Regional Security

Officer/Administrator must notify the DCF Information Security Manager and affected employees must file a police report. The DCF Information Security Manager is responsible for notifying the DCF OIG about confirmed incidents of this type via the DCF OIG intake email IG.Complaints@myflfamilies.com. Each report of a lost or stolen device must contain:

- (1) Date reported;
- (2) Employee making the report (including email address and phone);
- (3) Lost or stolen device property custodian name/employee name (include email address and phone);
- (4) Region/location of lost or stolen device;
- (5) Associated program office;
- (6) Make/model of device;
- (7) Property tag number;
- (8) Device serial number;
- (9) How lost/stolen (vehicle, home, office);
- (10) Name of law enforcement agency notified;
- (11) Police report number (or other unique identifying criteria);
- (12) Encryption enforced (Y/N);
- (13) Confidential data (Y/N); and,
- (14) Recovery efforts and results.

f. Mobile Device User Requirements. The following procedures must be followed:

- (1) DCF devices must not be connected to non-DCF devices or PCs.
- (2) Data, including confidential data, may not be stored on unencrypted devices. Department employees may only use DCF purchased, encrypted devices on Department-owned information technology resources.
- (3) Users must only load data essential to their job duties onto their mobile device(s). Users should not use DCF mobile devices for document archival and should make sure all appropriate work records are backed up to the DCF network.
- (4) Modifying the Department device operating system (e.g., “jailbreaking” or “rooting” devices, etc.), or having any software/firmware installed which is designed to gain access to functionality not intended to be exposed to the user, is prohibited.
- (5) Users must not load pirated software or illegal content onto their devices.
- (6) Applications must only be installed from official platform-owner approved sources. Installation of code from un-trusted sources is forbidden. If a user is unsure if an application is from an approved source, the user must contact their supervisor and their Regional Security Officer/Administrator.
- (7) Users must be cautious about the use of email on their devices. Users must ensure that DCF data is only sent through the Department email system. If a user suspects that company data has been sent from a personal email account, either in body text or as an attachment, the user must notify their supervisor and their Regional Security Officer/Administrator immediately.

g. Personal Home Wireless Network. When connecting Department-owned information technology resources to a home wireless network, compliance with the following criteria is required to ensure wireless network security. Employees should contact their Regional Security Officer /Administrator with any questions about these criteria.

- (1) Change Default Administrator Passwords (and Usernames) on the personal access point or router.
- (2) Turn on and configure wireless encryption (WEP or preferably WPA or WPA2). To operate properly, all devices on a personal wireless network must share identical encryption settings; therefore, “lowest common denominator” settings may be required.

(3) Additional wireless security precautions to consider:

(a) Change the default network name (SSID).

(b) Enable MAC address filtering. Each piece of hardware that connects to a home wireless network possesses a unique identifier called the “physical address” or “MAC address.” Many access point and router products offer the owner an option to input the MAC addresses of their home equipment in order to restrict access to the home wireless network to only those devices.

(c) Disable SSID broadcast.

(d) Assign static IP addresses to devices.

(e) Position the router or access point safely near the center of the home and away from windows.

4-3. Access Control Measures.

a. Least Privilege. The Department shall implement access control measures that appropriately limit access to information technology resources to only those individuals authorized to see or use the information based on a legitimate business purpose.

b. Remote Access. DCF has implemented Virtual Private Networks (VPNs) for even greater added security for data transmission. Department employees must use a DCF VPN secure encrypted tunnel from their mobile device to the Department’s network. All DCF employees must utilized DCF approved technology when remotely accessing the network either through VPN or other means.

Chapter 5 - PATCHING AND REBOOT OF INFORMATION TECHNOLOGY RESOURCES

5-1. Purpose. This chapter states the Department's policy and operating procedures to ensure Department-owned IT resources are proactively management and patched with appropriate security updates.

5-2. Scope. This policy applies to all IT resources which are owned by the Department. It also applies to Department-issued Windows endpoints bound to Active Directory (AD).

5-3. Scheduling and Deployment. Software vendors release security patches on a regular schedule. Applicable patches will be tested and validated by OITS before deployment. Once validated, OITS will schedule and deploy validated patches to end points during off peak hours, every third Sunday. Communication to Department resource users will be done through DCF Statewide Help Desk announcements.

5-4. Installation and Validation. A system reboot is required to successfully install most security patches.

5-5. Exceptions. There are no exceptions to this policy.

CHAPTER 6 - INSIDER THREAT PROGRAM and INCIDENT HANDLING POLICY

6-1. Purpose. The purpose of this operating procedure is to establish a comprehensive Insider Threat Program (ITP) and specialized incident response team for the Department. The ITP aims to deter, detect, and mitigate threats posed by insiders to protect the confidentiality, integrity, and availability (CIA) of Department data and information technology (IT) resources by establishing the framework for insider threat incident handling and a cross-disciplinary insider threat incident response team.

6-2. Scope. This operating procedure applies to all Department employees, contractors, vendors, and other personnel who have physical and/or logical access to Department facilities, IT resources, or data. It applies to all Department information and infrastructure resources, regardless of criticality level, including those owned or operated by the Department or contracted entities on the Department's behalf.

6-3. Authority. Refer to Authority paragraph in the Policy on Virus Protection, Control, Reporting, and Recovery.

6-4. Policy Statement. The Department shall establish and maintain an ITP designed to proactively deter, detect, and respond to insider threats that could compromise the Department's mission, data, or IT resources. The core security principles serve as the cornerstone of the ITP: least privilege, separation of duties, continuous monitoring, and mandatory security awareness training.

A cross-discipline Computer Security Incident Response Team (CSIRT), refer to SOP S-4 for details, is the designated insider threat incident handling team responsible for managing and responding to all confirmed insider threat incidents affecting DCF IT resources and data. All personnel are obligated to adhere to this policy and report any suspected insider threat activities.

6.5. Roles and Responsibilities.

a. Secretary: Holds ultimate responsibility for the collection, maintenance, and dissemination of Department data and is the overall mission and business owner.

b. Chief Information Officer (CIO): Provides oversight, guidance, final review, and final approval for IT security programs and policies. The CIO confirms incidents and tasks the ISM with coordinating response activities.

c. Information Security Manager (ISM): Is the designated administrator of the Department's information technology security program. The ISM is responsible for coordinating incident response activities, leading insider threat recognition training content, reviewing security awareness training, and ensuring compliance with applicable security standards. The ISM is a core member of the CSIRT.

d. Deputy CIO: Provides oversight and guidance for enterprise infrastructure compliance and manages specific SOPs.

e. Office of Inspector General (OIG): A core member of the CSIRT and a key point of contact for reporting suspected or known security events, incidents, or violations.

f. DCF HIPAA Privacy Official: A core member of the CSIRT.

g. Computer Security Incident Response Team (CSIRT): Comprised of the ISM, CIO, OIG, HIPAA Privacy Official, and relevant Subject Matter Experts (SMEs). The CSIRT is responsible for

executing the Identify, Protect, Detect, Respond, and Recover functions for computer security incidents, including insider threats.

h. Hiring Managers and Supervisors: Are responsible for ensuring employees complete required security awareness training, managing initial and ongoing access requests based on job duties, reviewing and modifying IT resource access for reassigned employees, and promptly removing/disabling access for separated employees. They are also required to report any suspected security events, incidents, or policy violations to appropriate channels.

i. OITS Directors and Managers: Develop and implement continuous monitoring procedures for systems/applications under their scope. They are responsible for implementing corrective actions identified through continuous monitoring and ensuring staff adherence to relevant SOPs. They also assist in developing System Security Plans (SSPs) and Security Concepts of Operations (CONOPS).

j. Human Resources: Coordinates the annual and ongoing security awareness training for all employees, tracks compliance, and maintains employee personnel folders including signed security agreements.

k. Identity & Access Management (IAM) Team/Officers: Responsible for provisioning, managing, monitoring, and deactivating user accounts in accordance with established policies.

l. All Employees/System Users: Are responsible for adhering to all Department security policies and procedures, completing all required security training, safeguarding Department information and IT resources, and promptly reporting any suspicious activity, security events, incidents, or policy violations.

6.6. Procedures.

6-6.1. Insider Threat Recognition and Prevention.

a. Mandatory Security Awareness Training. All system users shall complete DCF Security Awareness training within ten (10) calendars of hire and annually thereafter which includes acknowledgement and confirmation to abide by minimum Department security requirements; refer to Chapter 2, paragraph 2-2 for additional details.

b. Role-Based Training. When applicable, system users shall complete role-based training before accessing information systems or performing assigned duties, particularly for accessing Federal Tax Information (FTI) data or Criminal Justice Information (CJI).

c. Access Control and Management. The Department utilizes a central access provisioning mechanism to establish and decommission network (shell) accounts (e.g., Active Directory, @myflfamilies.com addresses) and other IT resources; refer to Chapter 2, paragraph 2-1 for additional details.

d. Multi-Factor Authentication (MFA) is required for access to Department networks categorized as moderate or high risk, or that contain exempt or confidential information, and for privileged accounts.

e. Data Protection. All confidential data and Federal Tax Information (FTI) must be encrypted during transmission and Department policy prohibit storage on removable and portable media devices.

f. Rules of Behavior: All DCF information system users shall adhere to established rules of behavior regarding information and IT system usage, understanding that use constitutes consent to monitoring activities with or without warning. Disabling or modifying security features like encryption, anti-virus, or firewalls without authorization is prohibited; refer to Chapter 2, subsection 2-1(e).

6-6.2. Insider Threat Detection and Reporting.

a. Continuous Monitoring. OITS shall conduct continuous monitoring of the enterprise network, systems, and applications to detect weak or missing security controls, functionality issues, and potential cybersecurity events, including but not limited to unauthorized access, resource connections, personnel, devices, software, and malicious code.

b. Audit and Accountability. Systems will log significant and relevant events for security and privacy, such as password changes, failed logons, security attribute changes, administrative privilege usage, credential usage, and data action changes. Audit records are retained for a minimum of seven (7) years. Automated and manual analysis of audit records is performed to identify suspicious or unusual activity.

c. Vulnerability Management and Threat Hunting. The Department will perform annual system risk assessments and implement a proactive threat hunting program to search for advanced threats. Regular vulnerability scans are conducted, and identified vulnerabilities are analyzed, assigned risk levels (using CVSS), prioritized, and addressed through corrective action plans.

d. Reporting Suspected Incidents (Events).

(1) Department employees who know or suspect that a security event, incident, or policy violation has occurred are responsible for informing their supervisor or the Department ISM via ServiceNow and assigning the IT Statewide Help Desk immediately. Failure to report may result in disciplinary action.

(2) Supervisors are required to notify their manager, who will then confer with their Regional Security Officer/Administrator, the DCF Information Security Manager, the IT Statewide Help Desk, or the DCF Office of Inspector General (OIG) to determine immediate notification procedures.

(3) Misuse of Criminal Justice Information Systems (CJIS) or Judicial Inquiry System (JIS) information must also be reported to the Local Agency Security Officer (LASO) and FCIC Coordinator.

(4) Any employee or contract employee who experiences or suspects a breach or loss of Centers for Medicare and Medicaid Services (CMS) data must report the event to their supervisor immediately, who then notifies the ISM, CMS IT Service Desk, and the DCF OIG.

6-6.3. Insider Threat Incident Response and Management.

a. Incident Classification. A computer security event officially becomes a computer security incident once the CIO has confirmed a compromise has occurred. Incidents are classified based on their effect rating (e.g., Class 1: Low, Class 2: Medium, Class 3: High/Critical) which determines initial notification timelines; refer to Chapter 3, paragraph 3-3 for external reporting requirements to federal partners.

b. CSIRT Activation and Composition. For confirmed incidents, the Computer Security Incident Response Team (CSIRT) will be activated. The DCF CSIRT is required to include the agency's ISM, CIO, OIG, and the DCF HIPAA Privacy Official. This core membership will confer with and involve DCF Subject Matter Experts (SMEs) as needed on an incident-by-incident basis. For incidents impacting or

involving Federal data, the CSIRT will work with DCF's Federal Partners as per respective agreement and contract.

c. Incident Response Functions. The CSIRT is responsible for response functions consistent with the Florida Cybersecurity Standards (FCS) and NIST SP 800-61, Revision 2, "Computer Security Incident Handling Guide":

(1) Preparation. Includes annual CSIRT member training on cybersecurity threats, trends, and evolving practices

(2) Detection & Analysis. OITS staff with security and monitoring duties continuously monitor systems and use the DCF Statewide Help Desk ticketing system for suspected events

(3) Containment, Eradication & Recovery. Implementing mitigation and containment steps, gathering associated evidence (screenshots, logs), and facilitating recovery by identifying needed resources

(4) Post-Incident Activity. The ISM is responsible for completing the DCF Incident Handling Checklist (CF Form 128) and a final post-incident report (CF Form 139). This report must include plans for incorporating lessons learned into improving DCF response activities and plans, including updating DCF written response procedures.

d. Communications. CSIRT members shall follow the chain of command and order of operations during events, conferring with the Office of General Counsel, Human Resources, and Office of Communications as appropriate, and notifying Executive Management and the DCF Secretary as appropriate.

APPENDIX A: POLICY REVIEW AND REVISION

DATE	VERSION	ACTION	DESCRIPTION
10/02/2022	1.0	Annual Review and Revision	Revised section 2-3, Systems and Communications Protection for Confidential Data and section 3-2, Security Event, Incident, Reporting and Tracking in response to 2022 IRS Safeguard Security Review.
06/22/2023	2.0	Policy Change	Revised section 2-5, Prohibit System and Data Access Outside the United States and Canada.
09/19/2023	3.0	Policy Change	Revised section 2-5, removed geofencing exception and added Chapter 5, Patching and Reboot of Information Technology Resources.
05/17/2024	4.0	Policy and Procedure Change	Updated Chapter 2, sections 2-3.c, including Exception Encryption using Transfer Layer Security (TLS) protocols.
09/20/2024	5.0	Policy and Procedure Change	Revised Chapter 2, section 2-3 (e)(6) removed the automate pre-fill language.
05/05/2025	6.0	Policy and Procedure Change	Revised Chapter 2, section 2-1 to reflect the current access control processes (i.e., provisioning, changes, deprovisioning).
08/20/2025	7.0	Policy and Procedure Update	Revised Chapter 2 and 3 throughout to comply with SSA regulations referenced in paragraph 1-3, and established the Department's Insider Threat Program and Incident Response policy refer to Chapter 6.