



STATEWIDE POLICY



State of Arizona

STATEWIDE POLICY (8270): PERSONNEL SECURITY CONTROLS

DOCUMENT NUMBER:	P8270
EFFECTIVE DATE:	JANUARY 30, 2025
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1. AUTHORITY

To effectuate the mission and purposes of the Arizona Department of Homeland Security, the agency shall establish a coordinated plan and program for information security and privacy protections implemented and maintained through policies, standards and procedures (PSPs) as authorized by Arizona Revised Statutes (A.R.S.) § 41-4254 and § 41-4282.

2. PURPOSE

The purpose of this policy is to increase the ability of the Budget Unit (BU) to protect agency systems and assets containing sensitive data through personnel security controls.

3. SCOPE

3.1 Application to Budget Units (BUs) - This policy shall apply to all BUs as defined in A.R.S. § 18-101(1).

3.2 Application to Systems - This policy shall apply to all agency systems:

- a. **(P)** Policy statements preceded by "(P)" are required for agency systems categorized as protected.
- b. **(P-PCI)** Policy statements preceded by "(P-PCI)" are required for agency systems with payment card industry data (e.g., cardholder data).
- c. **(P-PHI)** Policy statements preceded by "(P-PHI)" are required for agency systems with protected healthcare information..
- d. **(P-FTI)** Policy statements preceded by "(P-FTI)" are required for agency systems with federal taxpayer information.

3.3 Federal Government Information - Information owned or under the control of the United States Government shall comply with the Federal classification authority and Federal protection requirements.

4. EXCEPTIONS

4.1 PSPs may be expanded or exceptions may be taken by following the Statewide Policy Exception Procedure.

4.1.1 Existing IT Products and Services - BU subject matter experts (SMEs) should inquire with the vendor and the state or agency procurement office to ascertain if the contract provides for additional products or services to attain compliance with PSPs prior to submitting a request for an exception in accordance with the Statewide Policy Exception Procedure.

4.1.2 IT Products and Services Procurement - Prior to selecting and procuring information technology products and services, BU SMEs shall consider statewide information security PSPs when specifying, scoping, and evaluating solutions to meet current and planned requirements.

4.2 BU has taken the following exceptions to the Statewide Policy Framework:

Section Number	Exception	Explanation / Basis

5. ROLES AND RESPONSIBILITIES

5.1 Arizona Department of Homeland Security Director shall:

- a. Be ultimately responsible for the correct and thorough completion of statewide information security PSPs throughout all state BUs.

5.2 State Chief Information Security Officer (CISO) shall:

- a. Advise the Director on the completeness and adequacy of all state BU activities and documentation provided to ensure compliance with statewide information security PSPs throughout all state BUs;
- b. Review and approve all state BU security and privacy PSPs;
- c. Request exceptions from the statewide security and privacy PSPs; and

- d. Identify and convey to the Director the risk to state systems and data based on current implementation of security controls and mitigation options to improve security.

5.3 Enterprise Security Program Advisory Council (ESPAC)

- a. Advise the State CISO on matters related to statewide information security policies and standards.

5.4 Budget Unit (BU) Director shall:

- b. Be responsible for the correct and thorough completion of BU PSPs;
- c. Ensure compliance with BU PSPs; and
- d. Promote efforts within the BU to establish and maintain effective use of agency systems and assets.

5.5 BU Chief Information Officer (CIO) shall:

- a. Work with the BU Director to ensure the correct and thorough completion of Agency Information Security PSPs within the BU; and
- b. Ensure PSPs are periodically reviewed and updated to reflect changes in requirements.

5.6 The BU Information Security Officer (ISO) shall:

- a. Advise the BU CIO on the completeness and adequacy of the BU activities and documentation provided to ensure compliance with statewide information security PSPs;
- b. Ensure the development and implementation of adequate controls enforcing the Personnel Security Policy for the BU; and
- c. Ensure all personnel understand their responsibilities with respect to the protection of agency systems and assets through personnel security controls.

5.7 Supervisors of agency employees and contractors shall:

- a. Ensure users are appropriately trained and educated on Personnel Security Policies; and
- b. Monitor employee activities to ensure compliance.

5.8 Users of agency systems shall:

- a. Familiarize themselves with this and related PSPs; and
- b. Adhere to PSPs regarding the protection of agency systems and assets through personnel security controls.

6. STATEWIDE POLICY

6.1 Position Categorization - The BU shall:

- a. Assign a sensitivity designation (e.g., Sensitive, Non-Sensitive) to all positions;
- b. Establish screening criteria for individuals filling those positions; and
- c. Review and revise position sensitivity designations annually. Sensitivity designations are based on the individual's exposure to sensitive system information and/or administrative privileges to agency systems. Examples of sensitive positions include: [NIST 800-53 PS-2] [IRS Pub 1075]
 1. Firewall administrator;
 2. Members of the incident response team; and
 3. Those with vulnerability scanning duties.

6.2 Position Definition - The BU shall define information security and privacy responsibilities for all personnel. [HIPAA(a)(3)(ii)(A), (a)(3)(ii)(B) - Addressable] [PCI DSS 12.4, 12.5]. [NIST 800-53 PS-9] Specifically, the following information security and privacy responsibilities:

- a. Individual or team responsible for establishing, documenting, and distributing security and privacy policies and procedures; [PCI DSS 12.5.1]
- b. Individual or team responsible for monitoring and analyzing security and privacy alerts and information, and distributing to appropriate employees and contractors; [PCI DSS 12.5.2]
- c. Individual or team responsible for establishing, documenting, and distributing security and privacy incident response and escalation procedures to ensure timely and effective handling of all situations; [PCI DSS 12.5.3]
- d. Individual or team responsible for administering user accounts, including additions, deletions, and modifications; and [PCI DSS 12.5.4]
- e. Individual or team responsible for monitoring and controlling all access to data. [PCI DSS 12.5.5]

6.3 Personnel Screening - The BU shall screen individuals holding positions designated as sensitive prior to hiring or contracting; and rescreens individuals according to re-screening every five years. [NIST 800-53 PS-3] [IRS Pub 1075] [PCI DSS 12.7]

6.4 Personnel Separation - Upon separation of individual employment, the BU shall: [NIST 800-53 PS-4] [HIPAA(a)(3)(ii)(C)]

- a. Disable agency system access within 24 hours;
- b. Terminate or revoke any authenticators and credentials associated with the individual;
- c. Conduct exit interviews, if employee is available for interview;
- d. Retrieve all security-related agency system-related property;
- e. Retain access to agency information and system accounts formerly controlled by separated individual; and
- f. Allow the separated individual access to authorized services such as benefits, reimbursement, and retirement information, according to (Agency) BU or State policies.

6.5 Personnel Transfer - The BU shall: [NIST 800-53 PS-5] [IRS Pub 1075]

- a. Review logical and physical access authorization to agency systems/facilities when personnel are reassigned or transferred to other positions within the organization;
- b. initiates returning old and reissuing new keys, identification cards, and building passes within 24 hours;
- c. Close previous system accounts and establish new accounts and changes agency system access authorizations;
- d. Provide access to official records to which the employee had access at the previous work location and in the previous agency system accounts within 24 hours; and
- e. The (Agency) BU may extend limited access for special purposes on an exception basis.

6.6 Access Agreements - The BU shall: [NIST 800-53 PS-06] [IRS Pub 1075] [PCI DSS 12.3]

- a. Develop and document access agreements for agency systems;
- b. Review and update the access agreements annually;
- c. Verify that individuals requiring access to agency information and systems:
 - 1. Sign appropriate access agreements prior to being granted access; and
 - 2. Re-sign access agreements to maintain access to organizational systems when access agreements have been updated or annually.

Third-Party Personnel Security - The BU shall: [NIST 800-53 PS-7] [IRS Pub 1075] [HIPAA 164.314(a)(1)]

- a. Establish personnel security requirements including security roles and responsibilities for external providers;
- b. Require external providers to comply with personnel security policies and procedures established by the agency;
- c. Document personnel security requirements; and
- d. Require external providers to notify BU-defined personnel of any personnel transfers or terminations of external personnel who possess organizational credentials and/or badges, or who have system privileges within 24 hours; and
- e. Monitor provider compliance.

6.7 Third-Party Contracts - The BU shall ensure that third party contractors specify the third-party will: [HIPAA 164.314(a)(2)(i)]

- a. Comply with the applicable security requirements;
- b. Ensure that any subcontractors that create, receive, maintain, or transmit sensitive information on behalf of the third-party agree to comply with applicable requirements; and
- c. Report to the BU any security incident of which it becomes aware, including breaches of unsecured sensitive information.

6.8 Personnel Sanctions - The BU shall employ a formal sanctions process for personnel failing to comply with established agency information security and privacy PSPs and document the sanctions applied. [NIST 800-53 PS-8] [IRS Pub 1075] [HIPAA 164.308(a)(1)(ii)(C)] [HIPAA 164.530(e)(1),(2)]

7. DEFINITIONS AND ABBREVIATIONS

7.1 Refer to the PSP Glossary of Terms located on the [ADOA-ASET](#) and [NIST Computer Security Resource Center](#) websites.

8. REFERENCES

- 8.1** STATEWIDE POLICY FRAMEWORK P8270 Personnel Security Controls
- 8.2** Statewide Policy Exception Procedure
- 8.3** Executive Order 1403

8.4 A.R.S. 41-710

8.5 National Institute of Standards and Technology, Special Publication 800-53 Revision 5, Security and Privacy Controls for Information Systems and Organizations, September 2020.

8.6 HIPAA Administrative Simplification Regulation, Security and Privacy, CFR 45 Part 164, February 2006.

8.7 Payment Card Industry Data Security Standard (PCI DSS) v3.2.1, PCI Security Standards Council, May 2018.

8.8 IRS Publication 1075, Tax Information Security Guidelines for Federal, State, and Local Agencies: Safeguards for Protecting Federal Tax Returns and Return Information, 2021.

9. ATTACHMENTS

None.

10. REVISION HISTORY

Date	Change	Revision	Signature
9/01/2014	Initial release	Draft	Aaron Sandeen, State CIO and Deputy Director
10/11/2016	Updated all the Security Statutes	1.0	Morgan Reed, State CIO and Deputy Director
9/17/2018	Updated for PCI-DSS 3.2.1	2.0	Morgan Reed, State of Arizona CIO and Deputy Director
5/26/2021	Annual Updates	3.0	Tim Roemer, Director of Arizona Department of Homeland Security & State Chief Information Security Officer
1/16/2024	Annual Updates	4.0	Ryan Murray, Deputy Director Department of Homeland Security & State Chief Information Security Officer
1/30/2025 2/11/2025	Annual Updates	5.0	Errika Celsy, Chief Privacy and Compliance Officer; Deputy Director Department of Homeland Security & State Chief Information Security Officer