



# Minnesota Management & Budget Statewide Operating Policy

Minnesota Management and Budget, Statewide Systems  
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## Security and Access

### Objective

To provide employees with the appropriate access to statewide systems and data needed to perform their specific job functions and responsibilities.

To maintain an effective internal control system pursuant to [Minnesota Statutes 16A.057, Subdivision 8](https://www.revisor.mn.gov/statutes/?id=16A.057) (<https://www.revisor.mn.gov/statutes/?id=16A.057>) through adequate segregation of duties or compensating controls.

To protect not public data contained in computer system data, as required by the [Minnesota Government Data Practices Act, Minnesota Statutes 13](https://www.revisor.mn.gov/statutes/?id=13) (<https://www.revisor.mn.gov/statutes/?id=13>)

### Policy

Each agency must:

- Designate a security administrator, authorized to approve requests for access to statewide systems and perform security administration responsibilities delegated to the agency by Minnesota Management & Budget (MMB).
- Limit individual employee access to only those systems, programs, applications and data necessary for the individual to perform their job functions and responsibilities.
- Segregate incompatible job duties and responsibilities. In cases where incompatible functions cannot be segregated, the agency must implement and maintain compensating controls.
- Review and evaluate the appropriateness and reasonableness of individual employee security and access at least annually, or more frequently if circumstances or job changes dictate.
- Protect not public data contained in statewide systems. An individual granted access to private data within statewide systems must comply with the Minnesota Government Data Practices Act. [Minnesota Statutes 13.09](https://www.revisor.mn.gov/statutes/?id=13.09) (<https://www.revisor.mn.gov/statutes/?id=13.09>) specifically states:
  - "Any person who willfully violates the provisions of this chapter or any rules adopted under this chapter is guilty of a misdemeanor. Willful violation of this chapter by any public employee constitutes just cause for suspension without pay or dismissal of the public employee."
- Furthermore, [Minnesota Statutes 13.08](https://www.revisor.mn.gov/statutes/?id=13.08) (<https://www.revisor.mn.gov/statutes/?id=13.08>) puts the employing agency at risk of being sued by the person whose privacy was violated. The victim can sue for damages sustained, plus costs and reasonable attorney fees. If the violation was willful, the victim can also ask for exemplary (punitive) damages.

- Provide sufficient employee training so that all employees requesting access and supervisors approving access to statewide systems understand and will comply with the statements regarding data privacy and security.

## **Definitions**

### **Statewide Systems**

FMS (Financial Management and Procurement), SEMA4 (Human Resources and Payroll), Enterprise Learning Management, SWIFT Data Warehouse (SDW), Information Access Data Warehouse (IADW), Minnesota Accounting and Procurement System (MAPS) and Document Direct Reports System.

### **FMS – “Financial Management System”**

This refers to the financial management and procurement modules within the SWIFT application.

### **SEMA4 - “Statewide Employee Management System”**

This refers to the statewide human resource management application which includes four main features - human resources processing, payroll processing, benefits processing, and reporting.

### **Segregation of Incompatible Job Duties/Responsibilities**

Duties are divided, or segregated, among different people to reduce the risk of error or inappropriate actions. Incompatible responsibilities are combinations of duties that place one person alone in a position to create and conceal errors, frauds, or misstatements in his or her normal job. For example, when processing transactions, the duties of (1) authorizing or approving the transaction, (2) recording the transaction, (3) maintaining custody of the related assets, and (4) reconciling or comparing recorded transactions to the related assets, including error investigation and correction should be performed by different people.

### **Compensating Controls**

When adequate segregation of duties cannot be achieved, management must provide sufficient review and oversight of the incompatible activities. Compensating controls are less desirable than segregation of duties, because they generally occur after transactions are completed and take more resources. Compensating controls may include reconciliations, reviews of detailed transaction reports, reviews of individual transaction supporting documentation, or analytical procedures performed by an independent person or oversight body.

### **Related Policies and Procedures**

[MMB Statewide Operating Procedure 1101-07.1 Agency Security Administrators](http://mn.gov/mmb-stat/documents/accounting/fin-policies/1101-07-01-agency-security-admin-procedure.pdf) (http://mn.gov/mmb-stat/documents/accounting/fin-policies/1101-07-01-agency-security-admin-procedure.pdf)

[MMB Statewide Operating Procedure 1101-07.2 Compensating Controls](http://mn.gov/mmb-stat/documents/accounting/fin-policies/1101-07-02-compensating-controls-procedure.pdf) (http://mn.gov/mmb-stat/documents/accounting/fin-policies/1101-07-02-compensating-controls-procedure.pdf)

### **See also**

[Minnesota Information Technology \(MN.IT\) Security Policies](http://mn.gov/mnit/programs/policies/security/)  
(http://mn.gov/mnit/programs/policies/security/)

[Department of Administration Information Policy Analysis Division information on not public data](http://www.ipad.state.mn.us/)  
(<http://www.ipad.state.mn.us/>)