



**COUNTY ADMINISTRATOR**  
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TO: Martha Kern, Chair  
Ways & Means Committee

FROM: Robert E. Guenzel  
County Administrator

DATE: October 3, 2001

SUBJECT: E-Government Policies

**BOARD ACTION REQUESTED:**

It is requested that the Board of Commissioners adopt policies to govern how the County does business through E-Government. These E-Government policies will govern the Board's intent on Advertising, Security and Privacy for E-Government practices.

**BACKGROUND:**

Washtenaw County began investigating E-Government in January of 2001 as a business tool to enhance customer service. An internal task force was developed to determine the best method for Washtenaw County to gain information on this initiative. The task force educated themselves through site visits, professional development and professional organizations that are experienced with E-Government methodologies and implementation. The task force developed a strategic plan to address the E-Government initiative. This strategic plan details the implementation of a County-wide E-Government enterprise government plan. Crucial to the deployment of the E-Government project is the development of policies to govern the implementation.

**DISCUSSION:**

Privacy, Advertising and Security are the three major issues that local units are facing regarding E-Government. In alignment with the strategic plan, the County needs to adopt policies that will protect this initiative and allow for successful implementation.

The policies were based on best practice methodologies from other governmental organizations and professional organizations throughout the United States. Based on the best practices, the task force developed focus groups to provide input, guidance and feedback. There were three scheduled focus group meetings (September 12th, 18th, 24th), Chaired by Commissioner Lawrence Kestenbaum.

The Advertising Policy states that the County will not allow outside advertising on the County website. After thorough review of other E-Government websites and policies it was determined that there was not sufficient evidence to indicate that advertising would generate enough revenue to consider it a benefit at this time.

The purpose of the Privacy Policy is to inform users of the Washtenaw County site with regard to the collection and use of personally identifiable information. Any information collected for that purpose would be only that which is necessary to provide those services and will be handled as it would be on an in-person visit to a government office. Information that is not personally identifiable such as IP (Internet Protocol) numbers, browser types and versions are collected and used for this purpose. Additionally, the County will attempt to minimize the use of cookies although they may be necessary to complete certain transactions. Password and credit card numbers shall be encrypted in a secure database located behind the "firewall". All sensitive/credit information supplied by users shall be transmitted via a Secure Socket Layer (SSL) technology and encrypted in the database. E-mail addresses obtained as a result of a request to the County site will not be sold or given to other private companies for marketing purposes.

The County Security Policy will address areas of infrastructure and technology security. All systems must include security controls that reflect the true importance of the information processed on the system and/or the government investment embodied in the components of the E-Government system. The sensitivity level of all Washtenaw County E-Government systems will be identified in one of the following categories:

- I. Secure Systems contain information, which requires protection against unauthorized disclosure
- II. Sensitive Systems include those that require some degree of protection for confidentiality, integrity or availability.
- III. Non-Sensitive Systems contain only public data, which has no protection required for confidentiality, and the services of the County can be accomplished without the system.

The County Security Policy also details how the County will address verification review, incidents and violation of our E-Government security, contingency and disaster recovery, and its relationship with a third party vendor in regards to hardware and software.

The E-Government initiatives will provide an opportunity for Washtenaw County to provide more efficient, effective and continuous access to its citizens as well as any organization attempting to gain information regarding Washtenaw County. Service delivery will be enhanced through the availability of gaining access 24 hours a day, 7 days a week. Washtenaw County strives to be a leader in the state of Michigan for E-Government. Other local units have shown an interest in this initiative and will be watching Washtenaw County closely as it implements this initiative.

**IMPACT ON HUMAN RESOURCES:**

This action has no impact on Human Resources.

**IMPACT ON BUDGET:**

This action has no impact on the County's budget.

**IMPACT ON INDIRECT COSTS:**

This action has no indirect costs applicable.

**IMPACT ON OTHER COUNTY DEPARTMENTS OR OUTSIDE AGENCIES:**

Washtenaw County has become a leader on this field in the State of Michigan and will collaborate with any unit of government on this initiative. This action provides access to Washtenaw County information 24 hours a day, 7 days of week.

**CONFORMITY TO COUNTY POLICIES:**

This action conforms to the County policies and procedures.

**ATTACHMENTS/APPENDICES:**

Policies

A RESOLUTION ADOPTING AN ADVERTISING POLICY FOR WASHTENAW  
COUNTY'S E-GOVERNMENT INITIATIVE

WASHTENAW COUNTY BOARD OF COMMISSIONERS

October 17, 2001

WHEREAS, Washtenaw County began investigating E-Government in January of 2001 as a business tool to enhance customer service; and

WHEREAS, an internal task force was developed to determine the best method for Washtenaw County to gain information on this initiative; and

WHEREAS, the task force educated themselves through site visits, professional organizations that are experienced with E-Government methodologies and implementation; and

WHEREAS, the task force developed a strategic plan to address the E-Government initiative, which outlines the implementation of a County-wide E-Government initiative; and


WHEREAS, Advertising is a major issue that local units are facing regarding E-Government; and

WHEREAS, the County needs to adopt policies that will protect this initiative and allow for successful implementation and provide protection to the information and security to the technology infrastructure; and

WHEREAS, the E-Government initiatives will provide information and service delivery 24 hours a day, 7 days a week; and

WHEREAS, this matter has been reviewed by Corporation Counsel, Information and Technology Services, the County Administrator's Office and the Ways & Means Committee

NOW THEREFORE BE IT RESOLVED that the Washtenaw County Board of Commissioners hereby adopts the Advertising Policy for the E-Government initiative, as attached hereto and made a part hereof

	<b>WASHTENAW COUNTY POLICY</b>	<b>GENERAL OPERATIONS - VOLUME I</b>			
<b>TITLE:</b>  <b>Advertising for E-Government Initiatives</b>	<b>RESOLUTION NUMBER</b>	<b>SUPERCEDE:</b>	<b>EFFECTIVE DATE</b>  10/17/01	<b>PAGE OF</b>  1        2	

I. APPLICATION:


This policy shall govern the County's advertising for any E-Government Initiative.

II. INTENT:

It is the intent of the Board of Commissioners to provide guidelines for the County's use on advertising through it's website and any E-Government initiative.

III. GENERAL POLICIES:

- I. As Washtenaw County makes services and information more available via the Internet, new challenges emerge. One of these challenges is advertising on county-controlled web sites. From a funding aspect, this opportunity looks very attractive. However, there are numerous legal and policy issues that surface when considering advertising on government-controlled web sites.
  
- II. The Internet has become one of Washtenaw County's most important resources for providing easy access to information, both internally and to our citizens and customers. There are many challenges, such as funding of web-based initiatives, appropriate use of the Internet, security and privacy that need to be addressed as the County moves toward providing an increasing number of services on the Internet. One such challenge is the issue of placing advertisements on government-controlled web sites in order to ease funding pressures. Because of the importance of these legal and policy issues, we must carefully research and consider them for the County to progress in a uniform manner since the actions of individual departments may set a precedent that impacts the entire County.
  
- III. Controlled web sites may have the potential to generate significant revenues; however, to date, there is no evidence that this is the case. There is a potential for legal liability and U. S. First Amendment implications for agency control and content guidelines. Advertisers may track the visitors linking to their site, there is a loss of a level of privacy control, and while some privacy requirements could be placed on advertisers, those requirements need to be clearly and comprehensively defined.

	<b>WASHTENAW COUNTY POLICY</b>	<b>GENERAL OPERATIONS - VOLUME I</b>			
<b>TITLE:</b>  <b>Advertising for E-Government Initiatives</b>	<b>RESOLUTION NUMBER</b>	<b>SUPERCEDE:</b>	<b>EFFECTIVE DATE</b>  10/17/01	<b>PAGE OF</b>  2        2	

- I. Few counties, if any, have adopted policies on advertising on their web sites, but the current lack of clear standards poses a danger that advertisements will degrade web site performance or create confusing web sites, and as such, those standards need to be comprehensively defined. Web site visitors may perceive that the County service or information delivered is controlled by or associated with the advertiser, either directly or indirectly. Advertising on County-controlled web sites has the potential appearance of favoritism or endorsement, with the ability of web sites to re-direct their visitors to other web sites. The County may lose control of providing a means for visitors to return to the County web site, and, furthermore, there is a danger that the visitors may very quickly be directed to problematic web sites. This new funding source needs to be carefully examined for its impact on funding overall, including the implications to departments receiving federal funds and, apart from any of the legal implications described above, web advertisements may entail a high-risk of litigation, the cost of which must be considered.
  
- II. Until the issues surrounding web advertisements on government-controlled web sites have been fully studied, Washtenaw County shall not allow advertisements, sponsorships or endorsements on County government-controlled web sites including vendor-hosted web sites. Whenever a County web site file requires the use of particular software that the web site visitor may need to download (e. g., .PDF formatted files require the Adobe Acrobat Reader software), the link to the download site may be included. A statement should accompany the link that the particular software is required.
  
- III. This policy does not apply to links to businesses and other non-governmental organizations when the link is strongly related to a County service.

A RESOLUTION ADOPTING A SECURITY POLICY FOR WASHTENAW COUNTY'S  
E-GOVERNMENT INITIATIVE

WASHTENAW COUNTY BOARD OF COMMISSIONERS

October 17, 2001

WHEREAS, Washtenaw County began investigating E-Government in January of 2001 as a business tool to enhance customer service; and

WHEREAS, an internal task force was developed to determine the best method for Washtenaw County to gain information on this initiative; and

WHEREAS, the task force educated themselves through site visits, professional organizations that are experienced with E-Government methodologies and implementation; and

WHEREAS, the task force developed a strategic plan to address the E-Government initiative, which outlines the implementation of a County-wide E-Government initiative; and


WHEREAS, Security is a major issue that local units are facing regarding E-Government; and

WHEREAS, the County needs to adopt policies that will protect this initiative and allow for successful implementation and provide protection to the information and security to the technology infrastructure; and

WHEREAS, the E-Government initiatives will provide information and service delivery 24 hours a day, 7 days a week; and

WHEREAS, this matter has been reviewed by Corporation Counsel, Information and Technology Services, the County Administrator's Office and the Ways & Means Committee

NOW THEREFORE BE IT RESOLVED that the Washtenaw County Board of Commissioners hereby adopts the Security Policy for the E-Government initiative, as attached hereto and made a part hereof

	<b>WASHTENAW COUNTY POLICY</b>	<b>GENERAL OPERATIONS - VOLUME I</b>			
<b>TITLE:</b>  <b>Security for E-Government Initiatives</b>	RESOLUTION NUMBER	SUPERCEDE:	EFFECTIVE DATE  10/17/01	PAGE OF	

I. APPLICATION:

This policy shall govern the County's security for any E-Government Initiative.

II. INTENT:

It is the intent of the Board of Commissioners to provide guidelines for the security and integrity of the information obtained and contained on it's website and any E-Government initiative.

III. GENERAL POLICIES

- I. The sensitivity level of all E-Government systems will be determined based on the sensitivity of the data processed or the importance of the system to mission accomplishment. All systems must include security controls that reflect the true importance of the information processed on the system and/or the government investment embodied in the components of the E-Government system. The sensitivity level of all Washtenaw County E-Government systems will be identified in one of the following categories:


(1) Secure Systems contain information, which requires protection against unauthorized disclosure

(2) Sensitive Systems include those that require some degree of protection for confidentiality, integrity or availability.

(3) Non-Sensitive Systems contain only public data, which has no protection required for confidentiality, and the services of the County can be accomplished without the system.

**Password Standard**

All Secure Systems will be protected by personal passwords selected by users. These passwords must contain six characters with the combination of four alphabetical letters and two numeric digits. No password will be given over the phone or listed on the web site but shall always be sent to the original e-mail of the user in highest secured format.

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### Verification Review

An E-Government Security verification review will be conducted on all E-Government systems by an evaluation team under the direction of the Washtenaw County Information & Technology Services Department(ITS). The purpose of the E-Government security verification review is to provide a level of review and evaluation, independent of the system owner, that will verify that adequate and appropriate levels of protection are being provided for the individual systems, based on their unique protection requirements.


### Incidents and Violations

All Washtenaw County departments will establish and implement, with the assistance of the Washtenaw County ITS, a process and procedures to minimize the risk associated with violations of E-Government security, and to ensure timely detection and reporting of actual or suspected incidents or violations. An E-Government security incident is any event, suspected event, or vulnerability that could pose a threat to the integrity, availability, or confidentiality of Washtenaw County systems, applications or data. Incidents may result in the possession of unauthorized knowledge, the wrongful disclosure of information, the unauthorized alteration or destruction of data or systems and violation of federal or state laws. If such violations are detected or suspected, they are to be reported immediately to the Washtenaw County ITS Customer Support.

### Malicious Software

ITS and all Washtenaw County departments will comply with County Internet and E-mail Policies and Procedures to:

- (1) Minimize the risk of introducing viruses and other malicious software.
- (2) Ensure timely detection of viral infections.
- (3) Eliminate viral infections from the County's inventory of microcomputers (PCs).
- (4) Minimize the risk from malicious programs to larger systems, or systems where virus detection software is not yet available. If such violations are detected or suspected, they are to be reported immediately to the Washtenaw County ITS Customer Support.

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#### Contingency and Disaster Recovery Plan

Washtenaw County ITS and its third party E-Government vendor are responsible for the development and maintenance of contingency plans that address the following activities:

- (1) Backup and retention of data and software.
- (2) Selection of a backup or alternate operations strategy.
- (3) Emergency response actions to be taken to minimize the impact of the emergency.
- (4) Actions to be accomplished to initiate and effect backup or alternate site.
- (5) Resumption of normal operations in the most efficient and cost-effective manner.

The contingency plan for disaster recovery will provide reasonable assurance that critical data processing support can be continued, or resumed quickly, if normal operations of the system are interrupted.


#### Hardware Security

Washtenaw County departments, in conjunction with ITS and its third party E-Government vendor, shall assure that appropriate technical security requirements are included in specifications for the acquisition or operation of equipment intended to process secure or sensitive information. These specifications shall be reviewed and approved by the Washtenaw County ITS prior to the development. It may not be feasible or cost effective to retrofit existing, older computer hardware. However, the security requirements should be considered when acquiring or developing new systems, to ensure that they are incorporated either within the hardware or operating system software.

#### Software Applications

Prior to placing a secure or sensitive software application into operation, Washtenaw County operating units will verify that the required user functions are being performed completely and correctly, and that the specified administrative, technical and physical safeguards are adequate for the protection of the information.

Application Software - An application that processes sensitive data, or requires protection because of the risk and magnitude of loss or harm that could result from improper operation, manipulation or disclosure, must be provided protection appropriate to its sensitivity. The following will be considered as the minimum controls to be applied to sensitive applications, with additional controls or safeguards to be imposed if appropriate:

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(1) Security requirements will be defined, and security specifications approved, by the user prior to acquiring or starting development of applications, or prior to making a substantial change in existing applications.

(2) Design reviews will be conducted at periodic intervals during the developmental process to assure that the proposed design will satisfy the functional and security requirements specified by the user.


(3) New or substantially modified sensitive applications shall be thoroughly tested prior to implementation to verify that the user functions and the required administrative, technical and physical safeguards are present and are operationally adequate.

(4) Live sensitive data or files will not be used to test applications software until software integrity has been reasonably assured by testing with non-sensitive data or files.

(5) Sensitive application software will not be placed in a production status until the system tests have been successfully completed and the application has been properly certified.

### Physical Security

Adequate physical security measures must be provided for the protection of human resources, physical and logical assets and sensitive applications and data. Physical security measures must be selected and implemented in consideration of the sensitivity of the E-Government resources and their criticality to the supported functions. For the purposes of these policies, controlled areas are those which encompass or allow access to potentially sensitive information resources, resources which are essential for the processing of sensitive data, or resources essential to accomplishment of organizational missions. These areas include, but are not limited to: any spaces housing computer equipment, including PCs and file servers; data storage libraries; input/output areas; data conversion areas; programmer areas and files; documentation libraries; communication equipment areas; computer maintenance areas; mechanical equipment areas; telephone closets; environmental controls and power systems; and supply storage areas.

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A risk analysis of the physical security requirements of controlled areas will be directed by the Washtenaw County ITS Director and Risk Manager. When automation or data communications equipment are located within user areas, the user management officials in that department, in conjunction with the Washtenaw County ITS, will assess the sensitivity of the data, automated resources and functions performed and, if warranted, designate the area as a controlled area. The operational areas of major computer installations, including local area network file servers, will be designated restricted areas in which access will not be permitted unless specifically authorized or required for job performance.

Controlled and restricted areas will be protected by physical security and other means which are deemed appropriate for the sensitivity or criticality of the system as determined by the results of a risk analysis and as defined in the Washtenaw County ITS for the system. At a minimum, access to controlled areas will be limited to those individuals having an official need to be in the area. E-Government devices which are easily moved, have non-removable hard drives and are used for sensitive information will not be allowed outside of the controlled area. If the sensitive data remaining on the media has been completely erased or obliterated, the removal of these devices from the work area may be approved by the Washtenaw County ITS Director.

Media used to record and store sensitive software or data will be externally identified, protected, controlled and secured when not in actual use. Technology equipment rooms of all types will be secured with a high-quality security system.

### Environmental Safeguards

Adequate environmental safeguards must be installed and implemented to protect IT system resources as deemed appropriate for the sensitivity or criticality of the system as determined by the results of a risk analysis and as defined in the Security Plan for the system. At a minimum, the following environmental safeguards must be considered:

- I. Fire prevention, detection, suppression and protection
- II. Water hazard prevention, detection and correction
- III. Electric power supply protection
- IV. Temperature control
- V. Humidity control
- VI. Natural disaster protection from earthquake, lightning, windstorm, etc.
- VII. Magnetism protection
- VIII. Software Security



**WASHTENAW COUNTY  
POLICY**

**GENERAL OPERATIONS - VOLUME I**

<b>TITLE:</b> <b>Security for E-Government Initiatives</b>	<b>RESOLUTION NUMBER</b>	<b>SUPERCEDE:</b>	<b>EFFECTIVE DATE</b> 10/17/01	<b>PAGE OF</b>
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Washtenaw County ITS will continue its investigation in Security through ongoing research, vendors and third party partners.

Washtenaw County will be using a third party consultant to develop E-Government applications and the consultant will be responsible for application development, maintenance and hosting. Security guidelines for the third party consultant will be reviewed once the contract is signed. Establishing an E-Government security policy will be one of the first responsibilities of the E-Government policy committee working in conjunction with our E-Government vendor.

A RESOLUTION ADOPTING A PRIVACY POLICY FOR WASHTENAW COUNTY'S E-GOVERNMENT INITIATIVE

WASHTENAW COUNTY BOARD OF COMMISSIONERS

October 17, 2001

WHEREAS, Washtenaw County began investigating E-Government in January of 2001 as a business tool to enhance customer service; and

WHEREAS, an internal task force was developed to determine the best method for Washtenaw County to gain information on this initiative; and

WHEREAS, the task force educated themselves through site visits, professional organizations that are experienced with E-Government methodologies and implementation; and

WHEREAS, the task force developed a strategic plan to address the E-Government initiative, which outlines the implementation of a County-wide E-Government initiative; and


WHEREAS, Privacy is a major issue that local units are facing regarding E-Government; and

WHEREAS, the County needs to adopt policies that will protect this initiative and allow for successful implementation and provide protection to the information and security to the technology infrastructure; and

WHEREAS, the E-Government initiatives will provide information and service delivery 24 hours a day, 7 days a week; and

WHEREAS, this matter has been reviewed by Corporation Counsel, Information & Technology Services, the County Administrator's Office and the Ways & Means Committee

NOW THEREFORE BE IT RESOLVED that the Washtenaw County Board of Commissioners hereby adopts the Privacy Policy for the E-Government initiative, as attached hereto and made a part hereof

	<b>WASHTENAW COUNTY POLICY</b>	<b>GENERAL OPERATIONS - VOLUME I</b>			
<b>TITLE:</b>  <b>Privacy for E-Government Initiatives</b>	<b>RESOLUTION NUMBER</b>	<b>SUPERCEDE:</b>	<b>EFFECTIVE DATE</b>  10/17/01	<b>PAGE OF</b>	

I. APPLICATION:

This policy shall govern the County's privacy for any E-Government Initiative.

II. INTENT:

It is the intent of the Board of Commissioners to provide information to the users of the Washtenaw County site on the collection and use of personally identifiable information.

III. GENERAL POLICIES

1. Purpose

The purpose of this privacy policy is to inform users of the Washtenaw County site with regard to the collection and use of personally identifiable information.


Definition of Personally Identifiable Information

For the purposes of this statement "personally identifiable information" means any information relating to an identified or identifiable individual who is the subject of the information. Personally identifiable information could include:

- IV. Name
- V. Address
- VI. Email address
- VII. Telephone number
- VIII. Credit/debit card information

Personally Identifiable Information on Casual Visitors Not Collected and Retained

Residents do not have to provide personal identifiable information to visit Washtenaw County's Internet Portal to read or print information. Government agencies may request personally identifiable information from visitors in order to provide specific services that they request. Any information collected for that purpose would be only that which is necessary to provide those services and will be handled, as it would be on an in-person visit to a government office.

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#### Some Unidentifiable Information Routinely Collected

In order to provide new services, design a more customer friendly site and facilitate access to it, Washtenaw County uses statistical analysis of traffic on the site and web trend software. Information that is not personally identifiable such as IP (Internet Protocol) numbers, browser types and versions are collected and used for this purpose. The site does not attempt to associate this data with information that is personally identifiable.

#### Personally Identifiable Information Available On Governmental Web Sites


Information that is not confidential and is available during an in-person visit to a government office may be posted for electronic access through Washtenaw County's Internet portal.

#### 1. Use of "Cookies"

Some Washtenaw County applications may use "cookies". A cookie is a small data file that certain web sites write to your hard drive when you visit them. A cookie file can contain information such as a user ID that the site uses to track the pages you have visited. The only personal information a cookie can contain is information you supply. A cookie is only a text file and cannot read data off your hard disk or read cookie files created by other sites. Cookies can track user traffic patterns, recognize your computer's browser when you return and could provide personalized content without requiring sign in. You can refuse cookies by turning them off on your browser. The County will attempt to minimize the use of cookies. However, they may be required to use some of the web applications on the County site.

#### Use of Constituent E-Mail Addresses

E-mail addresses obtained as a result of a request to the County site will not be sold or given to other private companies for marketing purposes. E-mail or other information requests sent to the County web site may be maintained in order to respond to the request or to forward the request to the appropriate department. Individuals may be able to receive updates on issues important to them, but only if they choose that specific service. By choosing that service they do not automatically choose other services. Should they subsequently choose not to receive such informational updates via email they can remove themselves at any time.

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#### Data Security and Quality

Washtenaw County is committed to security and accuracy of personally identifiable data that is either available from or collected by governmental web sites, and has taken reasonable precautions to protect personally identifiable information from loss, misuse or alteration. The County maintains security standards and procedures regarding unauthorized access to customer information to prevent unauthorized removal or alteration of data. The County is dedicated to the right of citizen privacy and data security on the web. The County shall provide its users with a secure online experience by using a variety of security measures to maintain the safety of personally identifiable information. All user information shall be contained behind a "firewall" and only accessible by a limited number of employees who have special access rights to production systems. Password and credit card numbers shall be encrypted in a secure database located behind the "firewall". All sensitive/credit information supplied by users shall be transmitted via a Secure Socket Layer (SSL) technology and encrypted in the database.


Any third parties responsible for this information are committed to the same principles, and also are required by contract to follow the same policies and guidelines as Washtenaw County in protecting this information. Unless otherwise prohibited by state or federal law, rule or regulation, the individual has the right to have personally identifiable information that is inaccurate corrected.

#### 1. Passwords and ID's

In some instances, the user may be required to receive or create an ID and password to access or submit personal information or to complete certain transactions.

#### Non County Web Sites

Various Web sites may be linked through the Washtenaw County Internet Portal. The links that appear on this web page are solely for the information of a reader of the page. Washtenaw County does not endorse any particular viewpoint that appears on any web page that appears as a link on this page. Washtenaw County makes every reasonable effort to assure that it does not link directly to web pages that contain obscene, scurrilous, or otherwise objectionable material. If you encounter objectionable material on this page or on any linked page, please notify the Webmaster of this site immediately.

	<p align="center"><b>WASHTENAW COUNTY POLICY</b></p>	<p align="center"><b>GENERAL OPERATIONS - VOLUME I</b></p>			
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Online Profiling

Online Profiling is the practice of aggregating information about residents' preferences and interests, gathered primarily by tracking their movements online, and using the resulting citizen profiles to create targeted content on Web sites. Washtenaw County does not conduct or participate in online profiling.