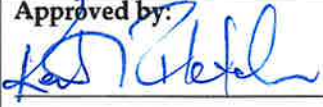



District of Columbia Department of Health <h2>Handling of Security Paper</h2>		PROCEDURE 1121.000 Implementing Office: Center for Policy Planning and Evaluation/Vital Records Division Training Required: Yes Originally Issued: Revised/Reviewed:
Approved by:  LaQuandra S. Nesbitt MD, MPH, Agency Director	Review by Legal Counsel:  Phillip Husband, Esq.; General Counsel	Effective Date: MAY 10 2024 Valid Through Date: MAY 10 2024

I. Authority	Reorganization Plan No. 4 of 1996; Mayor's Order 1997-42; Vital Records Modernization Amendment Act of 2018, D.C. Law 22-164, D.C. Official Code §§ 7-231.01 – 7-231.30.
II. Reason for the Policy	The District of Columbia Vital Records Division (DCVRD or "the Division") within the Center for Policy, Planning and Evaluation (CPPE) has jurisdiction over the District of Columbia's birth, death, fetal death, induced termination of pregnancy, and domestic partnership records. Birth, death, domestic partnership, and fetal death records may be used to produce certificates for entitled constituents. The certificates are printed on special paper, or "security paper", that contains forensic, overt and covert security features. Security paper may be targeted for misuse. Counterfeit or fraudulently obtained certificates can be used to commit crimes such as identity theft and fraud. It is essential that safeguards are in place to mitigate these risks. A policy is required for the proper handling of security paper to ensure it is used only to print authentic certificates and is secured properly at all times.
III. Applicability	This document shall apply to all District of Columbia Department of Health (DC Health) employees, vendor staff, contract employees, interns, employees of other DC government agencies temporarily assigned to DCVRD or whose assignment affords access to information in vital records. These individuals are referred to collectively herein as "employees" or "DCVRD employees."

IV. Policy Statement

The handling of security paper for vital records is part of the portfolio of DCVRD. The State Vital Records Registrar (“the Registrar”) is the manager accountable for the safeguards outlined herein. The Customer Service and Customer Operations Unit (CSCO) Supervisor is responsible for the daily management of security paper.

Security paper may only be stored in a secure vault. The vault specifications must be aligned with current National Association for Public Health Statistics and Information Systems (NAPHSIS) Security Committee standards. Security paper may only be purchased from a supplier in the United States or Canada.

Security characteristics for DCVRD security paper are defined by the Registrar and may only be shared with the CSCO Supervisor, DCVRD Compliance Specialist or Supervisor, and federal and local authorities at the Registrar’s discretion. This limited awareness is intended to mitigate risk of counterfeiting. DCVRD certificates may only be printed on vital records-specific security printers that have been approved by the Registrar for use. Vital records-specific security printers may include locked feeder drawers, special ink, and other overt and covert features intended to apply an additional layer of encryption to the security paper.

Persons who have been authorized to receive specifications for the DCVRD secure vault, security paper or security printer specifications may not redisclose this information without approval from the Registrar.

If any DCVRD employee is presented with a potentially counterfeit DCVRD certificate, they shall escalate the issue to the CSCO Supervisor to authenticate the document vis-à-vis the security features in the paper, or any other means necessary. The Registrar and the CSCO Supervisor have the authority to alert the appropriate authorities if there is reasonable suspicion of a customer having counterfeited, tampered with, or otherwise altered a DC certificate for a fraudulent purpose.

Only the authorized staff – Registrar, CSCO Supervisor or Compliance Specialist– may submit an order to replenish the Division’s supply of security paper to the vendor. Order availability is limited to the quantity and products specified in the

contract. The authorized staff ordering the paper must schedule delivery during a time when at least one of the authorized staff will be present to monitor the delivery.

Prior to security paper delivery, the DCVRD employee shall request the serial number for the seal affixed to the truck that is scheduled to deliver security paper to DCVRD from the paper vendor. A minimum of four DCVRD employees, including one of the authorized staff, are required to participate in each security paper delivery. One DCVRD employee shall be present on the loading dock to witness the security paper being unloaded from the delivery vehicle. The authorized staff must provide a copy of the order receipt, including quantity and products ordered and the serial number for the truck seal, to the DCVRD employee who is designated to be present on the loading dock. Upon verifying that the serial number on the truck seal matches the serial number provided by the authorized staff, the DCVRD employee shall witness the unsealing of the delivery truck door, provide the broken seal to the authorized staff, and take inventory of the order to ensure it aligns exactly with the requested quantity and products on the order receipt. The DCVRD employee shall have a clear line of sight from the delivery truck to the entry door of DC Health. If the DCVRD employee does not have a clear line of sight, the authorized staff shall identify additional DCVRD employees as needed to ensure that there is uninterrupted surveillance of the security paper's chain of custody. All DCVRD employees who are assigned to monitor the security paper's chain of custody from the loading dock to the entry door of DC Health shall remain present for the entire duration of time between the unloading of the paper from the delivery vehicle and when it is stored in the secure vault.

Another DCVRD employee shall be present at the DC Health entry door to witness transfer of the paper from the DC Health entry door to the DCVRD entry door. The DCVRD employee shall have a clear line of sight from the DC Health entry door to the DCVRD entry door. If the DCVRD employee does not have a clear line of sight, the authorized staff shall identify additional DCVRD employees as needed to ensure that there is uninterrupted surveillance of the security paper's chain of custody. All DCVRD employees who are assigned to monitor the security paper's chain of custody from the DC Health entry door to the DCVRD entry door shall remain present for the entire duration of time between

the unloading of the paper from the delivery vehicle and when it is stored in the secure vault.

Another DCVRD employee shall be present at the DCVRD entry door to witness transfer of the paper from the DCVRD entry door to the secure vault door. The DCVRD employee shall have a clear line of sight from the DCVRD entry door to the secure vault door. If the DCVRD employee does not have a clear line of sight, the authorized staff shall identify additional DCVRD employees as needed to ensure that there is uninterrupted surveillance of the security paper's chain of custody. All DCVRD employees who are assigned to monitor the security paper's chain of custody from the DCVRD entry door to the secure vault door shall remain present for the entire duration of time between the unloading of the paper from the delivery vehicle and when it is stored in the secure vault.

Another DCVRD employee shall be present at the secure vault door to witness final delivery of the paper at the door of the secure vault and administer storage of the paper. The delivery driver is not permitted to enter or inspect the secure vault. Once final delivery has been completed, the DCVRD employee shall enter the vault to store the security paper. The DCVRD employee shall have a clear line of sight to each area designated for storage of the incoming security paper shipment inside the secure vault. If the DCVRD employee does not have a clear line of sight, the authorized staff shall identify additional DCVRD employees as needed to ensure that there is uninterrupted surveillance of the security paper's chain of custody. All DCVRD employees who are assigned to monitor the security paper's chain of custody within the secure vault shall remain present for the entire duration of time between the unloading of the paper from the delivery vehicle and when it is stored in the secure vault.

The DCVRD employee who was designated to monitor storage inside the secure vault shall inventory the secure paper as it is being stored in the secure vault, ensuring the shipment matches exactly with the requested quantity and product reflected on the order receipt.

Upon completion of the inventory, the authorized staff shall load the serial numbers for all security paper included in the delivery

into the Vital Information Tracking Application – Customer Service Management System (VITA-CSMS).

Security paper must be removed from the secure vault at the beginning of each business day and loaded into the designated security printers. Security paper may only be loaded into the security printers designated by the Registrar. Unused paper shall be removed from the security printers at the end of the business day, returned to the secure vault, and placed such that the serial numbering remains congruent with the established sequencing. Paper may only be removed from the secure vault or security printers for these purposes unless otherwise authorized by the Registrar. Only the authorized staff, or their designees, are permitted to carry out paper transport to and from the secure vault and security printers.

All certificates issued to the public must be printed on security paper. Renderings of certificates that are printed on white paper are considered to either be working or administrative copies, depending on their use and purpose. Administrative copies are watermarked “For Government Use Only” by VITA-CSMS and may only be provided to data consumers authorized by the Registrar via written data sharing agreement. Working copies are watermarked “Work Copy” by VITA-CSMS and shall only be accessible to authorized system users. Working copies are intended to support workflow and processing prior to registration. Reissuance or redistribution of working or administrative copies is prohibited.

Any DCVRD employee printing a certificate shall scan the security paper serial number into the VITA-CSMS request prior to issuance to the customer. If the certificate is incorrect, or unsuitable to issue to the customer for any reason, the DCVRD employee who printed the certificate shall, the DCVRD employee shall write “VOID” across the page to be destroyed, such that the lettering is large enough to extend diagonally from top to bottom. The DCVRD employee shall place the voided security paper in the designated bin for appropriate destruction. The DCVRD employee shall click the “reissue” button on the VITA-CSMS request print page and select the reason code associated with the issue that resulted in an unusable certificate.

	<p>The Registrar has the authority, to initiate audit or investigations regarding the handling of security paper at any time. An audit of security paper handling will be conducted annually at a minimum.</p> <p>Any DCVRD employee in violation of any part of this SOP may be subject to commensurate disciplinary action.</p>
<p>IV. Definitions & Acronyms</p>	<p>Authorized Staff- The Registrar, the CSCO Supervisor, and the Compliance Specialist</p> <p>CPPE- Center for Policy, Planning and Evaluation</p> <p>DCVRD- District of Columbia Vital Records Division</p> <p>CSCO- Customer Service and Certification Operations Unit</p> <p>Final delivery- The final stage of the security paper delivery process in which the delivery driver places the full order at the door of the secure vault. The driver is not permitted inside the secure vault.</p> <p>Security feature- Any technology designed to prevent tampering or duplication, and/or facilitate reliable authentication that is built into security paper.</p> <p>Security paper- Paper created with technologies designed to prevent tampering or duplication, and/or facilitate reliable authentication.</p> <p>Security printer- A printer authorized by the Registrar that includes security features to safeguard and enhance encryption of security paper.</p> <p>Unsuitable or unusable certificate- A certificate that has been deemed unsuitable or unusable due to a printer malfunction, image quality issue or discovery of potentially erroneous data values.</p> <p>VITA-CSMS- Vital Information Tracking Application – Customer Service Management System</p>

VI. Procedures	Procedure A: Ordering and Receiving Security Paper <ol style="list-style-type: none">1. The authorized staff - the Registrar, CSCO Supervisor or Compliance Specialist shall place an order for security paper.2. The authorized staff shall schedule the delivery, ensuring that one of the authorized staff is available to be present to monitor the delivery.3. On or before the day of the scheduled delivery, the authorized staff shall provide the order receipt to the DCVRD employee who is designated to witness the security paper unloading on the loading dock. The DCVRD employee shall print the order receipt and place it in a protective sleeve.4. The DCVRD employee shall witness the breaking of the delivery truck seal on the loading dock. Prior to authorizing the breaking of the seal, the employee shall verify that the serial number on the seal matches the serial number on the order receipt.5. If the serial number does not match, the DCVRD employee shall not authorize breaking of the seal and immediately notify the authorized staff who is monitoring the delivery. If discrepancies are reported to the authorized staff, the authorized staff shall immediately notify the Registrar and security paper vendor account manager to discuss next steps. The authorized staff shall document next steps in a memo to the security paper vendor containing the Registrar's signature. The authorized staff shall send the memo to the security paper vendor account manager immediately upon signature by the Registrar and copy the Registrar on the correspondence.6. If the serial number matches, the DCVRD employee shall authorize the security paper delivery truck driver to break the seal.7. The DCVRD employee shall place the broken seal inside the protective sleeve containing the order receipt.
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	<ol style="list-style-type: none"><li data-bbox="597 338 1338 478">8. The DCVRD employee shall witness the unloading of the security paper from the delivery vehicle. The employee shall remain at this post until all security paper has been stored in the secure vault.<li data-bbox="597 527 1365 961">9. The DCVRD employee must have a clear line of sight between the delivery truck and the DC Health entry door. If the employee does not have a clear line of sight, the authorized staff shall designate additional DCVRD employees as needed to ensure that there is uninterrupted surveillance of the security paper's chain of custody. All DCVRD employees who are assigned to monitor the security paper's chain of custody from the delivery truck to the DC Health entry door shall remain present for the entire duration of time between the unloading of the paper from the delivery vehicle and when it is stored in the secure vault.<li data-bbox="597 1010 1360 1371">10. The DCVRD employee who was designated to authorize breaking of the truck seal shall inventory the shipment as it is being unloaded from the truck, ensuring the shipment matches exactly with the requested quantity and product reflected on the order receipt. Inventorying at this step includes affirming order accuracy using handwritten notes regarding the consistency between the order packing slip and order receipt. If any discrepancies are noted, the DCVRD employee shall immediately notify the authorized staff.<li data-bbox="597 1419 1354 1749">11. If discrepancies are reported to the authorized staff, the authorized staff shall immediately notify the Registrar and security paper vendor account manager to discuss next steps. The authorized staff shall document next steps in a memo to the security paper vendor containing the Registrar's signature. The authorized staff shall send the memo to the security paper vendor account manager immediately upon signature by the Registrar and copy the Registrar on the correspondence.<li data-bbox="597 1797 1362 1856">12. If no discrepancies are detected, another DCVRD employee shall be designated by the authorized staff to monitor the
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	<p>security paper chain of custody between the DC Health entry door and the DCVRD entry door. The employee shall remain at this post until all security paper has been stored in the secure vault.</p> <p>13. The DCVRD employee must have a clear line of sight between the DC Health entry door and the DCVRD entry door. If the employee does not have a clear line of sight, the authorized staff shall designate additional DCVRD employees as needed to ensure that there is uninterrupted surveillance of the security paper's chain of custody. All DCVRD employees who are assigned to monitor the security paper's chain of custody from the DC Health entry door and the DCVRD entry door shall remain present for the entire duration of time between the unloading of the paper from the delivery vehicle and when it is stored in the secure vault.</p> <p>14. Another DCVRD employee shall be designated by the authorized staff to monitor the security paper chain of custody between the DCVRD entry door and the secure vault. The employee shall remain at this post until all security paper has been stored in the secure vault.</p> <p>15. The DCVRD employee must have a clear line of sight between the DCVRD entry door and the secure vault. If the employee does not have a clear line of sight, the authorized staff shall designate additional DCVRD employees as needed to ensure that there is uninterrupted surveillance of the security paper's chain of custody. All DCVRD employees who are assigned to monitor the security paper's chain of custody from the DCVRD entry door to the secure vault shall remain present for the entire duration of time between the unloading of the paper from the delivery vehicle and when it is stored in the secure vault.</p> <p>16. Another DCVRD employee shall be present at the secure vault door to witness final delivery of the paper and administer storage of the paper. Once final delivery has been completed, the DCVRD employee shall enter the vault. The DCVRD employee shall have a clear line of sight to each area designated for storage of the incoming security</p>
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	<p>paper shipment inside the secure vault. If the DCVRD employee does not have a clear line of sight, the authorized staff shall identify additional DCVRD employees as needed to ensure that there is uninterrupted surveillance of the security paper's chain of custody. All DCVRD employees who are assigned to monitor the security paper's chain of custody within the secure vault shall remain present for the entire duration of time between the unloading of the paper from the delivery vehicle and when it is stored in the secure vault.</p> <p>17. The DCVRD employee who was designated to monitor storage inside the secure vault shall inventory the security paper as it is being stored in the secure vault, ensuring the shipment matches exactly with the requested quantity and product reflected on the order receipt. Inventorying at this step includes affirming order accuracy using handwritten notes regarding the consistency between the actual box numbers and certificate serial number ranges and the order receipt. If any discrepancies are noted, the DCVRD employee shall immediately notify the authorized staff.</p> <p>18. If discrepancies are reported to the authorized staff, the authorized staff shall immediately notify the Registrar and security paper vendor account manager to discuss next steps. The authorized staff shall document next steps in a memo to the security paper vendor containing the Registrar's signature. The authorized staff shall send the memo to the security paper vendor account manager immediately upon signature by the Registrar and copy the Registrar on the correspondence.</p> <p>19. Once the security paper shipment has been stored in the secure vault, the DCVRD employee who was designated to authorize the breaking of the delivery truck seal shall deliver the protective sleeve containing the order receipt, including their notations regarding consistency of the delivery with the quantity and product ordered, and broken truck seal to the authorized staff monitoring the delivery.</p>
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	<ol style="list-style-type: none">20. Once the security paper shipment has been stored in the secure vault, the DCVRD employee who was designated to administer storage of the security paper inside the secure vault shall deliver the order receipt, including their notations regarding consistency of the delivery with the quantity and product ordered, to the authorized staff monitoring the delivery.21. The authorized staff shall review both notated order receipts prior to signing off on the delivery with the security paper truck driver. If discrepancies are observed, the authorized staff shall immediately contact the Registrar and the security paper vendor account manager to discuss next steps. The authorized staff shall document next steps in a memo to the security paper vendor containing the Registrar's signature. The authorized staff shall send the memo to the security paper vendor account manager immediately upon signature by the Registrar and copy the Registrar on the correspondence.22. If there are no discrepancies, the authorized staff shall load the serial numbers for all security paper included in the delivery into the Vital Information Tracking Application – Customer Service Management System (VITA-CSMS).23. The authorized staff shall store both annotated order receipts and the broken delivery truck seal inside the protective sleeve and store inside the secure vault. <p>Procedure B: Handling Security Paper During Fulfillment</p> <ol style="list-style-type: none">1. At the beginning of the business day, the CSCO Supervisor, or designee, shall remove security paper from the secure vault and load it into the designated security printers.2. The DCVRD employee assigned to the print or third-party remote order queues shall issue certificates using VITA-CSMS, which is configured to transfer print jobs to the security printers.3. Once the print job has been executed, the DCVRD employee shall determine whether the resulting certificate
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	<p>is suitable for issuance as defined within this SOP. If the certificate is suitable for issuance, the DCVRD employee shall scan the security paper barcode into the VITA-CSMS request.</p> <ol style="list-style-type: none">4. If the certificate is not suitable for issuance, the DCVRD employee shall write "VOID" across the page to be destroyed, such that the lettering is large enough to extend diagonally from top to bottom. The DCVRD employee shall place the voided security paper in the designated bin to be stored inside the secure vault for appropriate destruction. The DCVRD employee shall click "reissue" in the VITA-CSMS request print page and select the appropriate reason code to generate a new print job.5. If the outcome of the print job results in a failure by the security printer to spool the job and no erroneous certificate was produced or if a second attempt results in an erroneous certificate, the DCVRD employee shall record the outcome of the print job in the VITA-CSMS request and attempt to reissue the certificate. If the problem persists and a minimum of three attempts has been made, the DCVRD employee shall notify the CSCO Supervisor, or their designee, to troubleshoot the issue.6. At the conclusion of the business day, the CSCO Supervisor, or their designee, shall remove any unused paper from the security printers, return the security paper to the secure vault and store the paper such that the serial numbering remains congruent with the established sequencing.7. At the end of each week, the CSCO Supervisor, or their designee, shall remove the designated mail bin containing voided records from the secure vault. The employee shall reconcile the voided paper with the VITA-CSMS void report. If there is a discrepancy between the voided paper and the VITA-CSMS void report, the employee shall not destroy any paper in the mail bin and escalate the finding to the DCVRD Compliance Specialist for investigation. If no discrepancy is found, the employee shall provide verification via email to the CSCO Supervisor and
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	<p>Compliance Specialist attesting to a successful reconciliation and destroy the voided paper using a destruction method approved by the Registrar.</p> <p>8. The CSCO Supervisor, or their designee, shall ensure that the secure vault is closed and locked prior to leaving the immediate area.</p>
<p>VII. Contacts</p>	<p>State Vital Records Registrar</p> <p>CSCO Supervisor</p>
<p>VIII. Related Documents, Forms and Tools</p>	<p>NAPHSIS Security Committee Guidelines</p>