

DETAILED INSPECTION CHECKLIST

FA	SC	STMT	TEXT
065			PRIVACY ACT Functional Area Manager: ARSF Point of Contact: MR. LADONNE L. WHITE (DSN) 226-9042 (COML) 571-256-9042 E-mail: ladonne.white@usmc.mil Date Last Revised: 14 MAY 2012
065	01		MARINE FORCE AND MAJOR SUBORDINATE COMMAND LEVELS
065	01	001	Has the command designated a Privacy Act Coordinator in writing? Reference SECNAVINST 5211.5E, PAR 7.H
065	01	002	Does the Privacy Act Coordinator maintain a copy of SECNAVINST 5211.5E; Subject: DON PRIVACY PROGRAM (in either paper or electronic form)? Reference SECNAVINST 5211.5E
065	01	003	Has the command issued implementing instruction(s) which designates the activity's Privacy Act Coordinator, lists the Privacy Act Systems of Records collections under their cognizance, and identifies training aids for those personnel involved with Privacy Act Systems of Records? Reference SECNAVINST 5211.5E, PAR 7.H(7)
065	01	004	Does the command Privacy Act Coordinator maintain an updated listing of the Privacy Points of Contact (POC), to include name, title, and contact information, for the of its subordinate reporting units and HHQ? Reference SECNAVINST 5211.5E, PAR 7.H(17)
065	01	005	Does the command Privacy Act Coordinator conduct staff assistance visits or program evaluations within their command and at subordinate reporting units to ensure compliance with the the reference. Reference SECNAVINST 5211.5E, PAR 7.H(11)

- 065 01 006 Does the command Privacy Act Coordinator review internal directives, practices, procedures, and forms for conformity with requirements of the reference?
Reference
SECNAVINST 5211.5E, PAR 7.H(8)
- 065 01 007 Does the command Privacy Act Coordinator have knowledge of the Department of the Navy's Privacy Act On-Line website at: <http://www.doncio.navy.mil/TagResults.aspx?ID=112> and of the USMC Privacy On-Line website at: <http://www.marines.mil/unit/hqmc/pa/Pages/Default.aspx?>
Reference
SECNAVINST 5211.5E, PAR 1.D
- 065 01 008 Is the command Privacy Act Coordinator aware that the USMC inventory of Privacy Act Systems of Records collections is maintained at: <http://privacy.defense.gov/notices/index.shtml?>
Reference
SECNAVINST 5211.5E, PAR 1.D AND 8.A
- 065 01 009 Is the command Privacy Act Coordinator aware of other DON, DoD, and other federal Agency Privacy Act System of Records Notices that may be used to cover USMC records collections and that these Notices may also be accessed from <http://privacy.defense.gov/notices/index.shtml?>
Reference
SECNAVINST 5211.5E, PAR 1.D AND 8.A
- 065 01 010 Is the command Privacy Act Coordinator familiar with the records disposition for the Privacy Act System of Records collection maintained by the command?
Reference
SECNAVINST 5211.5E, PAR 7.H(7)
- 065 01 011 Does the command Privacy Act Coordinator ensure that all command Privacy Act System of Records Managers are properly trained on their responsibilities for safeguarding, handling, and disposing of personal information collected and maintained within their Privacy Act System of Records?
Reference
SECNAVINST 5211.5E, PAR 7.H(5)
- 065 01 012 Does the command Privacy Act Coordinator provide training to command personnel on the provisions of the PA?
Reference
SECNAVINST 5211.5E, PAR 7.H(6)

- 065 01 013 Does the command Privacy Act System of Records Manager maintain a copy of the Privacy Act System of Records Notice (PA SORN) that allows for him/her to maintain the records collection?
Reference
SECNAVINST 5211.5E, PAR 7.M
- 065 01 014 Does the command Privacy Act System of Records Manager ensure that all personnel authorized access to information maintained in his/her records collection/records system are trained on Privacy Act collection, safeguarding, handling, disclosure, and disposition mandates of the PA?
Reference
SECNAVINST 5211.5E, PAR 7.M(3)
- 065 01 015 Does the command Privacy Act System of Records Manager know of all systems of records for which he/she is responsible that are maintained in whole or in part by contractors?
Reference
SECNAVINST 5211.5E, PAR 7.M(16)
- 065 01 016 Does the command Privacy Act System of Records Manager ensure that he/she is maintaining no unpublished System of Records collection that collects personal information and that no new or significantly change system exists without the required pre-publication in the Federal register?
Reference
SECNAVINST 5211.5E, PAR 7.M(4)
- 065 01 017 Does the command Privacy Act System of Records Manager review his/her Privacy Act System of Records Notice on an annual basis to verify that an Agency need still exists to require maintenance of the System and that the Notice is current and accurate?
Reference
SECNAVINST 5211.5E, PAR 7.M(5)
- 065 01 018 Does the command Privacy Act System of Records Manager routinely review the records maintained in his/her System of Records to ensure that the collected information is accurate, timely, and complete?
Reference
SECNAVINST 5211.5E, PAR 7.M(5)

- 065 01 019 Does the command Privacy Act System of Records Manager notify their Command Privacy Act Coordinator whenever there is a change in the collection, maintenance, handling, and/or disposition practices of data maintained within his/her System?
Reference
SECNAVINST 5211.5E, PAR 7.H(3)
- 065 01 020 When a command Privacy Act System of Records Manager has a requirement to collect personal information, is that information, to the greatest extent possible, solicited directly from individuals rather than being populated from some other record source?
Reference
SECNAVINST 5211.5E, PAR 9.A
- 065 01 021 When information is requested from an individual, does the Command Privacy Act System of Records Manager provide the individual a Privacy Act Statement (PAS) notifying the individual of the purpose for the data collection, the authority that allows for collection, describes how the collected data will be used, informs how long the information will be maintained, etc.?
Reference
SECNAVINST 5211.5E, PAR 9.D
- 065 01 022 Has the command Privacy Act System of Records Manager established appropriate administrative, technical, and physical safeguards to ensure security and confidentiality of records and information maintained in his/her System of Records?
Reference
SECNAVINST 5211.5E, PAR 18.D
- 065 01 023 Does the command Privacy Act System of Records Manager know of the procedures required for the establishment, alteration, amendment, or deletion of a System of Records Notice?
Reference
SECNAVINST 5211.5E, PAR 19 AND 20
- 065 01 024 Does the command Privacy Act System of Records Manager ensure all contractor personnel granted access to data maintained within his/her System of Records collection are properly trained and routinely inspected for PA compliance?
Reference
SECNAVINST 5211.5E, PAR 7.M(16)

- 065 01 025 Is the command Privacy Act System of Records Manager aware that there are regulations to be followed when making a disclosure and know where to find instructions for processing a request for disclosure?
Reference
SECNAVINST 5211.5E, PAR 8.C, 10 AND 13
- 065 01 026 Does the command Privacy Act System of Records Manager respond to first-party requests for access to information maintained in his/her System of Records?
Reference
SECNAVINST 5211.5E, PAR 8.C AND 10
- 065 01 027 Does the command Privacy Act System of Records Manager obtain reasonable verification of identity when an individual seeks to access information in a Privacy Act System of Records?
Reference
SECNAVINST 5211.5E, PAR 10.I
- 065 01 028 Is the command Privacy Act System of Records Manager familiar with the circumstances in which a custodial parent or legal guardian may seek access to information on behalf of a minor child or incompetent?
Reference
SECNAVINST 5211.5E, PAR 10.E AND 10.F
- 065 01 029 Is the command Privacy Act System of Records Manager aware of the procedures for denying a Privacy Act request for amendment of records?
Reference
SECNAVINST 5211.5E, PAR 11.H
- 065 01 030 Does the command Privacy Act System of Records Manager ensure that only those DOD/DON officials with a "need to know" in the official performance of their duties has access to information contained in a system of records?
Reference
SECNAVINST 5211.5E, PAR 7.M(9)
- 065 01 031 Does the command Privacy Act System of Records Manager respond to requests for access to information maintained in his/her System of Records pursuant to the 12 Conditions of Disclosure Without Consent provisions set forth by the PA?
Reference
SECNAVINST 5211.5E, PAR 13

- 065 01 032 Does the command Privacy Act System of Records Manager maintain an accurate accounting of disclosures for every record in his/her system when a disclosure of information has been made outside of the DoD (other than FOIA disclosures)?
Reference
SECNAVINST 5211.5E, PAR 7.M(8) AND 14.A
- 065 01 033 Is the command Privacy Act System of Records Manager at the command aware of the purpose for the accounting disclosure requirements?
Reference
SECNAVINST 5211.5E, PAR 14
- 065 01 034 Is the command Privacy Act System of Records Manager aware of the procedures to follow when an individual seeks to amend his/her record?
Reference
SECNAVINST 5211.5E, PAR 11
- 065 01 035 Is the command Privacy Act System of Records Manager aware of the procedures that allow a record subject to include a Statement of Disagreement into his/her file when a request for amendment has been denied?
Reference
SECNAVINST 5211.5E, PAR 11.JK
- 065 002 INSPECTION ITEMS FOR MARINE CORPS UNITS SUBORDINATE TO A MAJOR SUBORDINATE COMMAND
- 065 02 001 Has the unit commanding officer designated a Privacy POC in writing?
Reference
SECNAVINST 5211.5E, PAR 7.G and 7.H
- 065 02 002 Has the unit Privacy POC established a working relationship with the Privacy POC or Privacy Act Coordinator at the next level in their reporting chain of command?
Reference
SECNAVINST 5211.5E, PAR 7.G and 7.H(17)
- 065 02 003 Does the unit Privacy POC maintain contact information for the Privacy POC or Privacy Act Coordinator at the next level in their reporting chain of command?
Reference
SECNAVINST 5211.5E, PAR 7.G AND 7.H(17)

- 065 02 004 Does the unit Privacy POC maintain a current and up-to-date listing of all unit officials (to include name, title, and contact data that are responsible for the maintenance and collection of PII data)?
Reference
SECNAVINST 5211.5E, PAR 7.G AND 7.H
- 065 02 005 Does the unit Privacy POC review unit internal directives, practices, procedures, and forms for conformity with requirements of the Privacy Act?
Reference
SECNAVINST 5211.5E, PAR 7.H(8)
- 065 02 006 Does the unit Privacy POC have knowledge of the Department of the Navy's Privacy Act On-Line website at:
<http://www.doncio.navy.mil/TagResults.aspx?ID=112> and of the USMC Privacy On-Line website at:
<http://www.marines.mil/unit/hqmc/pa/Pages/Default.aspx?>
Reference
SECNAVINST 5211.5E, PAR 7.G AND 1.D
- 065 02 007 Is the unit Privacy POC aware that the USMC inventory of Privacy Act Systems of Records collections is maintained at:
<http://privacy.defense.gov/notices/index.shtml> and that the inventory encompassed within MCO P5211.2B is no longer current?
Reference
SECNAVINST 5211.5E, PAR 7.G AND 1.D
- 065 02 008 Is the unit Privacy POC aware of other Federal Agency Privacy Act System of Records Notices that may be umbrellaed to cover USMC record collections and that these Notices may also be accessed from:
<http://privacy.defense.gov/notices/index.shtml?>
Reference
SECNAVINST 5211.5E, PAR 1.D
- 065 02 009 Is the unit Privacy POC familiar with the Records Manager for the Privacy Act System of Records collection maintained by the unit?
Reference
SECNAVINST 5211.5E, PAR 7.G AND 7.H(9)
- 065 02 010 Does the unit Privacy Act System of Records Manager maintain a copy of the PA SORN that allows for him/her to maintain the records collection?
Reference
SECNAVINST 5211.5E, PAR 7.M

- 065 02 011 Does the unit Privacy Act System of Records Manager ensure that all personnel authorized access to information maintained in his/her records collection/records system are trained on PA collection, safeguarding, handling, disclosure, and disposition mandates of the PA?
Reference
SECNAVINST 5211.5E, PAR 7.M(3)
- 065 02 012 Does the unit Privacy Act System of Records Manager know of all systems of records for which he/she is responsible that are maintained in whole or in part by contractor personnel?
Reference
SECNAVINST 5211.5E, PAR 7.M(16)
- 065 02 013 Does the unit Privacy Act System of Records Manager ensure that he/she is maintaining no unpublished System of Records collection that collects personal information and that no new or significantly changed system exists without the required pre-publication in the Federal Register?
Reference
SECNAVINST 5211.5E, PAR 7.M(4)
- 065 02 014 Does the unit Privacy Act System of Records Manager review his/her PA SORN on an annual basis to verify that an Agency need still exists to require maintenance of the System and that the Notice is current and accurate?
Reference
SECNAVINST 5211.5E, PAR 7.M(5)
- 065 02 015 Does the unit Privacy Act System of Records Manager routinely review the records maintained in his/her System of Records to ensure that the collected information is accurate, timely, and complete?
Reference
SECNAVINST 5211.5E, PAR 7.M(5)
- 065 02 016 Does the unit Privacy Act System of Records Manager notify their Command Privacy Act Coordinator whenever there is a change in the collection, maintenance, handling, and/or disposition practices of data maintained within his/her system?
Reference
SECNAVINST 5211.5E, PAR 7.H(3)

- 065 02 017 When a unit Privacy Act System of Records Manager has a requirement to collect personal information, is that information, to the greatest extent possible, solicited directly from record subject individuals rather than being populated from some other record source?
Reference
SECNAVINST 5211.5E, PAR 9.A
- 065 02 018 When information is requested from an individual, does the unit Privacy Act System of Records Manager provide the individual a PAS that notifies that individual of the purpose for the data collection, the authority that allows for collection, describes how the collected data will be used, informs how long the information will be maintained, etc.?
Reference
SECNAVINST 5211.5E, PAR 9.D(1)
- 065 02 019 Has the unit Privacy Act System of Records Manager established appropriate administrative, technical, and physical safeguards to ensure security and confidentiality of records and information maintained in his/her System of Records?
Reference
SECNAVINST 5211.5E, PAR 18.D
- 065 02 020 Does the unit Privacy Act System of Records Manager know of the procedures required for the establishment, alteration, amendment, or deletion of a System of Records Notice?
Reference
SECNAVINST 5211.5E, PAR 19 AND 20
- 065 02 021 Does the unit Privacy Act System of Records Manager know of all systems of records for which he/she is responsible that are maintained in whole or in part by contractor personnel?
Reference
SECNAVINST 5211.5E, PAR 7.M(16)
- 065 02 022 Does the unit Privacy Act System of Records Manager ensure that all contractor personnel granted access to data maintained within his/her System of Records collection are properly trained and routinely inspected for Privacy Act compliance?
Reference
SECNAVINST 5211.5E, PAR 7.M(16)

- 065 02 023 Is the unit Privacy Act System of Records Manager aware that there are regulations to be followed when making a disclosure and know where to find instructions for processing a request for disclosure?
Reference
SECNAVINST 5211.5E, PAR 8.A, 10 AND 13
- 065 02 024 Does the unit Privacy Act System of Records Manager respond to first-party requests for access to information maintained in his/her System of Records?
Reference
SECNAVINST 5211.5E, PAR 7.K AND 10
- 065 02 025 Does the unit Privacy Act System of Records Manager obtain reasonable verification of identity when an individual seeks to access information in a Privacy Act System of Records?
Reference
SECNAVINST 5211.5E, PAR 10.I
- 065 02 026 Is the unit Privacy Act System of Records Manager familiar with the circumstances in which a custodial parent or legal guardian may seek access to information on behalf of a minor child or incompetent?
Reference
SECNAVINST 5211.5E, PAR 10.E AND 10.F
- 065 02 027 Is the unit Privacy Act System of Records Manager aware of the procedures for denying a Privacy Act request for amendment of records?
Reference
SECNAVINST 5211.5E, PAR 11.H
- 065 02 028 Does the unit Privacy Act System of Records Manager ensure that only those DOD/DON officials with a "need to know" in the official performance of their duties has access to information contained in a system of records?
Reference
SECNAVINST 5211.5E, PAR 7.M(9)
- 065 02 029 Does the unit Privacy Act System of Records Manager respond to requests for access to information maintained in his/her System of Records pursuant to the 12 Conditions of Disclosure Without Consent provisions set forth by the PA?
Reference
SECNAVINST 5211.5E, PAR 13

- 065 02 030 Does the unit Privacy Act System of Records Manager maintain an accurate accounting of disclosures for every record in his/her System when a disclosure of information has been made outside of the DoD (other than FOIA disclosures)?
Reference
SECNAVINST 5211.5E, PAR 7.M(8) AND 14.A
- 065 02 031 Is the unit Privacy Act System of Records Manager at the command aware of the purpose for the accounting disclosure requirements?
Reference
SECNAVINST 5211.5E, PAR 14
- 065 02 032 Is the unit Privacy Act System of Records Manager aware of the procedures to follow when an individual seeks to amend his/her record?
Reference
SECNAVINST 5211.5E, PAR 11
- 065 02 033 Is the unit Privacy Act System of Records Manager aware of the procedures that allow a record subject to include a Statement of Disagreement into his/her file when a request for amendment has been denied?
Reference
SECNAVINST 5211.5E, PAR 11.J/K