

**GUIDELINES FOR ESTABLISHING
A NEW PRIVACY ACT SYSTEM OF RECORDS NOTICE**

March 2009

All Privacy Act system of records notice actions are transmitted electronically to HQMC, DoD, and the Federal Register, since this method is both time and cost effective. Since DoD uses special software to transmit the text to the Federal Register, please do not indent, underline, bold, double-space or center the text.

All new systems require a "Narrative Statement" for a New System of Records Notice.

Please prepare your text and the Narrative Statement using Microsoft Word and submit it electronically to the U.S. Marine Corps Privacy Act Manager, (HQMC ARSF) via email to smbhqmcprivacyact@usmc.mil.

Prior to designing a new system, however, we highly recommend that you contact ARSF to discuss the matter. Phone numbers are: (703) 614-4008/DSN 224-4008 or e-mail to smbhqmcprivacyact@usmc.mil.

It takes approximately 120 days to establish a new system, which includes approval by DoD and Congress and publication in the Federal Register.

You can view the U.S. Marine Corps' PA systems of records notices at hqinet001.hqmc.usmc.mil/usmcprivacyact/. Also downloadable from this site are the Government-wide systems for DoD, Navy and its components systems.

The format for a PA systems notice is as follows:

SYSTEM IDENTIFICATION: USMC PA Systems of Records Notices begin with the letter "M" and are numbered using the Standard Subject Identification Code (SSIC) number taken from SECNAVINST 5212.5D, Navy and Marine Corps Records Disposition Manual. If the SSIC number is 4 digits, it is preceded by a "0," (i.e., M01070), followed by a dash and then a sequence number (i.e., M01070-6 or M12610-1).

SYSTEM NAME: The system name should indicate the general nature of the system of records and, if possible, the general category of the individual(s) to whom it pertains. It may not exceed 55 character positions, which includes punctuation and spaces. Acronyms are discouraged unless there is room to spell them out completely.

SYSTEM LOCATION:

- a. For a system maintained in a single location, provide the official organizational name and complete mailing address, using the postal service's two letter state abbreviation and nine-digit zip code. For example, Headquarters, U.S. Marine Corps, Administration and Resources Division (AR), 2 Navy Annex, Washington, DC 20380-1775.
- b. For a geographically or organizationally decentralized system, list addresses for all activities that maintain a portion of the system of records.
- c. For an automated data system with a central computer facility and input or output terminals at geographically separate locations, list complete mailing addresses for each location.
- d. If multiple locations are identified, the system location may indicate that official mailing addresses are contained in the Directory of Department of the Navy Mailing Addresses.
- e. If any activity in the Navy is eligible to use the system, make the following statement: Organizational elements of the Department of the Navy. Official mailing addresses are published as an appendix to the Navy's compilation of systems of records notices."
- f. Do not use classified addresses. If necessary, state that the addresses are classified.

CATEGORIES OF INDIVIDUALS COVERED BY THE SYSTEM:

Identify the individuals from whom records are being collected.

CATEGORIES OF RECORDS IN THE SYSTEM: Describe in clear, nontechnical terms the types of records maintained in the system. Limit the description to documents actually retained in the system of records. Do not describe source documents that are used only to collect data and then destroyed. Remember to include each item of information that will be identified in the "Retrievability" paragraph discussed below. For example, if you are retrieving information based on an individual's social security number, include this item in this category.

AUTHORITY FOR MAINTENANCE OF THE SYSTEM: List the federal laws, executive orders, Marine Corps Orders, etc., that allow you to collect and maintain the information. The authorities are in numeric order beginning with the laws and followed by the Executive Orders. The basic statute used for general collection is 5 U.S.C. 301, Departmental Regulations. If we are collecting SSNs, cite to E.O. 9397.

PURPOSE: List the specific purpose(s) for which the system of records is maintained, ensuring that you cite the uses for the records within the activity and the rest of the DON.

ROUTINE USES: At the beginning of the entry, state:

"In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, these records or information contained therein may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a(b)(3) as follows:"

Then, list all disclosures of the records outside the DOD/DON, including the recipient of the disclosed information and the uses the recipient will make of it.

For example, "To state and local agencies in the performance of their official duties related to verification of status for determination of eligibility for Veterans Bonuses and other benefits and entitlements, including Department of Labor and state unemployment agencies for unemployment compensation for ex-service members."

Do not use general statements such as "to other Federal Agencies as required."

Finally, conclude this section with: " The `Blanket Routine Uses' that appear at the beginning of the Navy's compilation of system of record notices also apply to this system" if they in fact apply. The Blanket Routine Uses appear at <http://hqinet001.hqmc.usmc.mil/usmcprivacyact/>.

POLICIES AND PRACTICES FOR STORING, RETRIEVING, ACCESSING, RETAINING, AND DISPOSING OF RECORDS:

STORAGE: State the method(s) used to store the information in the system. For example: Automated and manual records; computerized data base; microform.

RETRIEVABILITY: Indicate how records are retrieved. For example, "Name and Social Security Number." [Note: this information should be included under "Categories of Records in the System."

SAFEGUARDS: Generally identify the methods used to protect the records from unauthorized disclosure or tampering. But, do not describe the safeguards in such detail as to compromise system security.

For example, "Access is restricted only by authorized persons who are properly screened. This system is password and/or System software uses Primary Key Infrastructure (PKI)/Common Access Card (CAC) protected. Based on user profiles, there are different levels of access. Full access to information maintained in the database is available only to authorized Agency personnel with established official need-to-know. Records are maintained in secure, limited access, or monitored work areas accessible only to authorized personnel."

SYSTEM MANAGER(S) AND ADDRESS(ES): Provide the organization title and a complete mailing address of the activity responsible for maintaining the system. If the record holder is different than the policy official, then list both. For example: Policy Official: Personal and Family Readiness Division (MRR), Headquarters, U.S. Marine Corps, 3280 Russell Road, MCB Quantico, VA 22134-5009. Record Holder: Commanding Officer of the activity in question. Official mailing addresses are published as an appendix to the Navy's compilation of systems of records notices.

NOTIFICATION PROCEDURE: This describes how the individual can determine if a record in the system pertains to him/her. Standard language is as follows: "Individuals seeking to determine whether this system of records contains information about themselves should address written inquiries to [Note: list title and mailing address of naval activity holding the records]. The request should be signed and include [insert items of information listed under the Retrieval paragraph above (i.e., dates of service, social security number, etc.) and a complete mailing address.]"

RECORD ACCESS PROCEDURE:

This describes how an individual can review the record and obtain a copy of it. Standard language is as follows: "Individuals seeking access to records about themselves contained in this system of records should address written inquiries to [Note: list title and mailing address of naval activity holding the records]. The request should be signed and include [insert items of information listed under the Retrieval paragraph above (i.e., dates of service, social security number, etc.) and a complete mailing address.]"

CONTESTING RECORD PROCEDURE: The standard caption reads: "The Navy's rules for accessing records, and for contesting contents and appealing initial agency determinations are published in Secretary of the Navy Instruction 5211.5E; 32 CFR part 701; or may be obtained from the system manager."

RECORD SOURCE CATEGORIES: This caption describes who, where, or what the information is usually taken from. For example: "The individual; correspondence; educational institutions; federal, state, and local court documents; civilian and military investigatory reports; general correspondence concerning the individual; official records of professional qualifications; Navy Relief and American Red Cross requests for verification of status."

EXEMPTIONS CLAIMED FOR THE SYSTEM:

If no exemption has been established for the system, indicate "None."

If an exemption has been established, then cite the exemption. For example: "Parts of this system may be exempt pursuant to 5 U.S.C. 552a(j)(2) if the information is compiled and maintained by a component of the agency which performs as its principle function any activity pertaining to the enforcement of criminal laws. An exemption rule for this system has been promulgated in accordance with requirements of 5 U.S.C. 553(b) (1), (2), and (3), (c) and (e) and published in 32 CFR part 701, subpart G. For additional information contact the system manager."