COMBAT CENTER ORDER 5211.2B

From: Commanding General
To: Distribution List

Subj: PRIVACY ACT PROGRAM

Ref: (a) Section 552a, Title 5 U.S.C., Privacy Act
(b) SECNAVINST 5211.5E
(c) U.S. Marine Corps Enterprise Cyber Security Directive 011, Personally Identifiable Information
(d) DoD Instruction 1000.30, “Reduction of Social Security Number (SSN) Use within DoD,” August 1, 2012
(e) DONCIO WASHINGTON DC 171625Z Feb 12
(f) DONCIO WASHINGTON DC 081745Z Nov 12
(g) CCO 5720.10H
(h) CCO 5213.9D

Encl: (1) System of Records Notices

1. Situation. This Order provides procedures for the implementation of the Marine Air Ground Task Force Training Command (MAGTFTC), Marine Corps Air Ground Combat Center (MCAGCC) Privacy Act (PA) Program.

2. Cancellation. CCO 5211.2A.

3. Mission. To establish procedures for the PA Program and assign responsibility for their administration, in accordance with the references.

4. Execution

   a. Commander’s Intent and Concept of Operations

      (1) Commander’s Intent. The PA Program is implemented to regulate the collection, use, and dissemination of information subject to reference (a), and ensure protection of all information containing Personally Identifiable Information (PII).

      (2) Concept of Operations

         (a) General and PA Records Management. Commanding Officers, Assistant Chiefs of Staff (ACs/S), Division Directors, Special Staff Officers, and Officers in Charge are responsible for economical and efficient management of records and compliance with the PA. Procedural guidance for the PA Program is contained in references (b) and (c).

DISTRIBUTION STATEMENT A: Approved for public release; distribution is unlimited.
(b) Social Security Number (SSN) Usage Reduction. All use of the SSN, whether full, partial, masked, encrypted, or disguised, is subject to review and justification. If not operationally necessary, it must be eliminated, per reference (d).

b. Subordinate Element Missions

(1) Commanding Officers (COs), Headquarters Battalion, Marine Corps Tactics and Operations Group, Marine Corps Logistics Operations Group, Marine Corps Mountain Warfare Training Center, ACs/S, Division Directors, Special Staff Officers, and OICs

(a) Designate a PA Program Manager (Program Manager) for the unit or staff section to perform the duties described in paragraph 4c(1). Ensure the appointed individual provides contact information to Commandant of the Marine Corps (CMC) (ARSF) in accordance with reference (b).

(b) Designate PA Systems of Records Managers (System Manager) for each system of records maintained or accessed within the unit or staff section and from which records are retrieved by personal identifier, to perform the duties described in paragraph 4c(2).

(c) Upon initial discovery of a PII breach, immediately contact the Installation System Security Manager (ISSM), and take immediate action to identify the individuals affected, determine the cause, and provide the mitigation required to reduce harm.

(2) CO, Marine Aviation Wing Tactical Squadron One. Will comply with the Marine Corps Air Station Yuma’s current Station Order 5211.1 regarding PII.

(3) AC/S Resources Management Directorate (RMD), Manpower (Mnpr) Adjutant. The RMD Mnpr Adjutant is directly responsible for implementing an active and enduring PA program. The MAGTFTC, MCAGCC PA Officer and PA Coordinator will be assigned in writing and are located in the RMD Mnpr Adjutant section. They will serve as the focal point for general assistance and training. Specific duties include:

(a) Maintain a roster of designated Program Managers and System Managers for MAGTFTC, MCAGCC activities.

(b) Work with Program Managers and System Managers to ensure that all PA systems of records have a published System of Records Notice (SORN), and transmit requests to create or revise new SORNs to Headquarters, Marine Corps, as necessary.

(c) Coordinate with subordinate units, directorates, and the ISSM to identify, report, and mitigate PII breaches.

(d) Conduct periodic staff assist visits and inspections with subordinate units and directorates to ensure compliance with the references.

(e) Provide classroom training and individual assistance to Program Managers and System Managers.

(f) Review all directives, forms, practices, and procedures to ensure compliance with the references.
(g) Maintain an updated listing of all PA points of contact to include name, title, contact information of all subordinate elements, and provide this information to CMC (ARSF).

(h) Conduct an annual review of their PA SORNs to ensure they are necessary and accurate.

(i) Process any and all PA complaints.

(j) Maintain a positive relationship with the Installation Communications Strategy and Operations Officer in order to ensure that PII is not placed on public web sites.

(4) AC/S Communications Directorate, ISSM

(a) Ensure that notifications of PII breaches to higher headquarters and affected personnel are made in accordance with reference (c), in coordination with the RMD Mnpr Adjutant and PA Coordinator.

(b) Verify, sign, and forward Privacy Impact Assessments in coordination with the RMD Mnpr Adjutant and PA Coordinator to Headquarters Marine Corps Command, Control, Communications, and Computers Cyber Security Division in accordance with reference (c).

c. Coordinating Instructions

(1) Duties for the PA Program Manager

(a) Serve as principal point of contact for PA matters for the unit or Directorate/staff section.

(b) Maintain a current list of PA systems, SORNs, and System Managers for program oversight, along with PA/PII training records for all personnel who access PA systems of records.

(c) Oversee and coordinate with System Managers to ensure compliance with all provisions of references (a) and (b). This includes an annual review of all PA SORNs to ensure that local practice is consistent with the published SORN. Direct requests to create or revise a SORN to the PA Coordinator.

(d) Stand periodic internal inspections by the RMD Mnpr Adjutant for the PA Program.

(2) Duties for the PA System of Records Manager

(a) Identify the SORN that authorizes each system of records and review it annually for discrepancies with actual practice. Contact the PA Coordinator with any recommendations for changes to a published SORN.

(b) Coordinate with the unit or section Program Manager to ensure compliance with paragraph 7m of reference (b).

(c) Routinely review records to ensure collected information is accurate, timely, and complete.
(d) Maintain the disclosure accounting required by reference (a) in accordance with reference (b).

(3) Responsibilities for All Personnel

(a) Safeguard the privacy of individuals and the confidentiality of PII records at all times.

(b) Properly mark all documents containing PII as "FOR OFFICIAL USE ONLY - PRIVACY SENSITIVE - Any misuse or unauthorized disclosure can result in both civil and criminal penalties." If the document cannot be marked, use the DD Form 2923 as a cover sheet.

(c) Promptly report to your Program Manager or supervisor any unauthorized disclosure of PII, regardless of who is responsible.

(d) Render records containing PII that are authorized for disposal unrecognizable before placing them in a trash or recycle receptacle. Paper records must be shredded and other media (discs, hard drives, etc.) must be completely destroyed.

(4) PA Request Processing

(a) Program Managers and System Managers will respond to first-party requests to access or amend records, in accordance with references (a) and (b). Questions regarding exempt or co-mingled records should be directed to the Freedom of Information/PA Coordinator.

(b) Immediately refer all third-party requests for records to the Freedom of Information Act Coordinator, in accordance with reference (g).

(5) SSN Usage Reduction

(a) Remove SSNs and any unnecessary personal information from all rosters. Recall rosters should contain only names, addresses, and telephone numbers, per reference (e).

(b) Encrypt all emails containing SSNs in any form. Follow the guidance in reference (e).

(c) Ensure that share drive folders used for files containing SSNs or other PII are accessible only to personnel with the need to know the information. Password-protect documents or folders if necessary.

(d) Do not scan documents containing SSNs unless the destination folder is only accessible by users authorized to view the information. See reference (e) for additional guidance.

(e) Do not fax documents containing SSNs, unless the exceptions listed in reference (f) apply. Reference (e) has been modified by reference (f).

(f) Eliminate the use of the SSN in all documents unless the use meets the acceptable use criteria in reference (d). If an identifier is necessary, replace the SSN in correspondence with the electronic data interchange personal identifier (EDIPI). For example, the "To" line of a standard letter would read: Sergeant John Doe 0123456789/0111 USMC.
(g) Review all procedures, administrative processes, and directives to ensure that any prescribed use of the SSN is justified as an acceptable use per reference (d); if the use cannot be justified, the SSN must be eliminated. The procedure for developing and modifying forms is found in reference (h).

(6) Training and Guidance

(a) Reference (b) provides procedural guidance and detailed responsibilities to implement all aspects of the PA Program.

(b) All personnel must complete the annual web-based training DONPII010A, "USMC Personally Identifiable Information (PII) Annual Training" at MarineNet, which may be accessed at https://www.marinenet.usmc.mil/MarineNet/Default.aspx.

(c) The Department of the Navy PA website has comprehensive reference and training resources at http://www.doncio.navy.mil/documentation.aspx?id=36.

(d) All subordinate units and directorates may contact the RMD Mnpr Adjutant’s office for PA assistance at (760) 830-4189. Classroom training may also be arranged with the Adjutant’s Office.

(7) SORNs. Records maintained or accessed by the MAGTPTC, MCAGCC may be covered by the SORNs listed in the enclosure. Anyone who identifies or requires a PA SORN that is not included in this list should contact the PA Coordinator at (760) 830-4189. The complete text and a more comprehensive list of SORNs which may be applicable can be viewed at http://dpclo.defense.gov/privacy/SORNs/component/DOD_Component_Notices.html.

(8) PII Breach Reporting Procedures

(a) To meet the Federal, Department of Defense, Department of the Navy, and Marine Corps reporting requirements, the ISSM is to electronically submit with OPNAV 5211/13 an initial breach report within one hour of the breach discovery. Supplemental reports to add or correct the initial data will be submitted as necessary.

(b) In order to meet the statutory requirements, all personnel up to the director must immediately engage to document the facts and act to mitigate any harm caused by the breach.

(c) COs, ACs/S, Division Directors, Special Staff Officers, and OICs will send a hasty assessment of the incident to the ISSM and the RMD Mnpr Adjutant to validate the known facts.

(d) The initial assessment provided to the ISSM and RMD Mnpr Adjutant will address the following issues:

1. Date and time of breach, if known.
2. Date and time of discovery.
3. Estimated number and character of individuals affected by the breach (civilians, active, retired, reserve, public, etc.).
4. Elements of PII compromised.

5. Description of what happened, including specific items/media involved, whether government/personally/contractor owned, password-protected, encrypted, or Public Key Enabled.

6. Immediate actions in progress to mitigate the breach.

7. Possible cause of the breach, if known.

(c) After the initial assessment COs, ACs/S, Division Directors, Special Staff Officers, and OICs will continue to identify and correct any contributing factors to the breach and prepare to provide contact information for the affected individuals.

(f) Within 10 days of the breach discovery, an after action report (OPNAV 5211-14) will be submitted by the ISSM in coordination with the RMD Mnpr Adjutant. Leaders will provide corrective actions and lessons learned to be included in the after action report.

5. Administration and Logistics. Directives issued by this Headquarters are published and distributed electronically. Electronic versions of Combat Center Orders can be found at https://www.29palms.marines.mil/Staff-Offices/Adjutant-Office/Orders/.

6. Command and Signal

a. Command. This Order is applicable to all COs, ACs/S, Division Directors, Special Staff Officers, OICs, and activities that fall under the cognizance of the Commanding General, MAGTFTC, MCAGCC.

b. Signal. This Order is effective the date signed.

R. MARTINEZ
Chief of Staff

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