



UNITED STATES MARINE CORPS
HEADQUARTERS BATTALION
MARINE AIR GROUND TASK FORCE TRAINING COMMAND
MARINE CORPS AIR GROUND COMBAT CENTER
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BnO 5211.2B
HqBn

BATTALION 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 Headquarters Battalion (HQBN), Marine Air Ground Task Force Training Command (MAGTFTC), Marine Corps Air Ground Combat Center (MCAGCC) Privacy Act (PA) Program.

2. Cancellation. BnO 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. 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).

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(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) 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) 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 G-1 Manpower Adjutant for the PA Program.

(3) 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).

(4) 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/tagresults.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 MAGTF/TC, 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.

(e) 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 HqBn 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/Units/Headquarters-Battalion/#orders>

6. Command and Signal

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

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

N. M. ROLLINS

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