



# System of Records Notices (SORNS)

# System of Records Notices Agenda

- SORN Workshop
- Detailed Review of SORNs
- Reoccurring Errors
- Questions

- Things to consider:
  - What authority allows collection of PII?
  - Is each category of records collected essential?
  - Is there a requirement to collect PII from any other data sources?
  - How is PII collected in this system?
  - Are there any routine uses required?

System 1 - Covered by SORN Id 1234

System 2 – Covered by SORN ID 1234

Main System SORN ID 1234

(Receives PII from Data System 1 & 2)

#### **Government-Wide**

#### **Privacy Act Systems of Records Notices**

Some Federal agencies have responsibility for one or more systems of records which are applicable Government-wide. This negates the need for DoD to publish a system notice if it maintains a record under a Government-wide system of records notice.

### **Equal Employment Opportunity Commission**

#### EEOC/GOVT-1

Equal Employment Opportunity in the Federal Government Complaint and Appeal Records (July 30, 2002, 67 FR 49338)

Description: Records on applicants for Federal employment and current and former Federal employees who file complaints of discrimination or reprisal, or who file appeals with EEOC from agency decisions, petitions for review of decisions of the MSPB, or requests for review of final decisions in negotiated grievance actions.

**Web Site:** http://privacy.defense.gov/govwide/index.shtml



### SORN TRAINING

WORKSHOP
CAN YOU IDENTIFY THE
ERRORS?

### Narrative Statement For a New SORN

### **SORN Categories**

### **Group 1**

- 1. System identifier
- 2. System name
- 3. System location
- 4. Categories of individuals covered by the system
- 5. Categories of records in the system
- 6. Authority for maintenance of the system
- 7. Purpose(s)
- 8. Routine uses
- 9. Storage

### **Group 2**

- 10. Retrievability
- 11. Safeguards
- 12. Retention and disposal
- 13. System manager(s) and address
- 14. Notification procedures
- 15. Record access procedures
- 16. Contesting record procedures
- 17. Record source categories
- 18. Exemptions claimed for the system





# System of Records Notices (SORNs)

# Narrative Statement New SORN Errors

Do not bold or use the automated numbering format in M.S. Word.

DEPARTMENT OF DEFENSE Department of the Air Force Narrative Statement on a New System of Records Under the Privacy Act of 1974

#### **Narrative Statement**

Can you identify what's wrong with this narrative statement?

New SORNs must include a Narrative Statement and the proposed SORN as it will print in the Federal Register.

- 1. Acronyms should not be used. If acronyms are used, spell them out first.
- Make sure the phone number of the official responsible is included in this section.
- Always start new wording out with "The Department of ... is proposing to establish a new system of records ....
- 4. Verify the authorities and ensure they are cited correctly.
- 5. The purpose, authority for the maintenance, and the steps to minimize unauthorized access must match the proposed notice.
- 6. Be sure to include the name of the IT system for new or altered system.

- 1. <u>System identifier and name:</u> F065 AF FMP A, entitled, "Financial Management Workflow."
- Responsible official: Jeffrey R. Cramp, GS-13, SAF/FMP (AFFSO)1940 Allbrook Dr, Bldg 1, Dr18, WPAFBWright Patterson Air Force Base, OH 45433-5349, telephone, (937) 522-2226.
  - Alternate Responsible official: Gregory Wilson, Civ, SAF/FMP (AFFSC), 2572 Doolittle Drive, Ellsworth AFBAir Force Base, SD 57706-4853. Telephone (605) 385-8682.
- 3. Purpose of establishing the system: The Department of the Air Force is proposing to establish a new system of records that will be used to enable the implementation of centralized records management for the Air Force Financial Services community while facilitating the processing of financial transactions including Military Pay (MIPay); Travel Pay (TDY); Rretirement & and Separation; Civilian Permanent Change of Station (CivPCS); Ddebts; and Ddisbursements.
- 4. <u>Authority for the maintenance of the system:</u> 10 U.S.C. 8013, Department of Defense Secretary of the Air Force and Executive Order E.O. 9397 (SSN), as amended (SSN).
- 5. Probable or potential effects on the privacy of Individuals: None.
- 6. <u>Is the system, in whole or in part, being maintained by a contractor?</u>: No.
- 7. Steps to minimize unauthorized access: All data is stored in the Ellsworth AFB-Air Force

  Base IT Center in Bidg 7510, and on the Library server inside the configuration. Records
  are accessed by users with the appropriate profiles or roles and by persons responsible
  for servicing the record system in performance of their official duties. \*\*\* This does not
  match the Safeguarding category in the notice.
- 8. Routine use compatibility: Very limited use of data outside the Department of Defense (DoD). All contractor personnel with access are considered DoD personnel. Any release of information contained in this system of records outside of DoD will be compatible with the purposes for which the information is being collected and maintained. The DoD "Blanket Routine Uses" apply to this system of records.
- 10. OMB information collection requirements: None N/A.
- 11. Supporting documentation: None.
- 12. Name of IT System:

OMB requires the name of IT systems for new and altered SORNs

# System of Records

# **Errors in New SORN Submission**

#### Proposed System of Records Notice

Can you identify what's wrong with parts of this notice?

- Acronyms should not be used in title of SORN.
- 2. Categories of individual's should be more specific.
- Categories of records should be more specific.
- 4. Information in the authorities for the maintenance should match what is in the narrative statement.
- If there is no data shared outside of DoD, then the standard routine use language should be used.

F065 AF FMP Financial Management Workflow (FMWF)

System location:

Located on servers hosted in Building 7510, Ellsworth AFBAir Force Base, SD, 57706-4853.

Air Force Financial Services Center Information Technology team and the 28<sup>th</sup> Communications Squadron, Ellsworth AFBAir Force Base, SD 57706-4853.

Categories of individuals covered by the system:

Personnel assigned to the Air Force and Combatant Commands under the auspices of the Department of the Air Force. \*\*\* Does this include civilian and military? If so, should state, see below.

#### Military and civilian personnel assigned...

Categories of records in the system:

All open travel orders and Military Pay effecting transactions, with data that includes; Social Security Number (SSN), nName, grade, address, date of birthDOB, and other demographic data. \*\*\* What other demographic data?

Authority for maintenance of the system:

10 U.S.C. 8013, Department of Defense and Executive Order E.O. 9397 (SSN), as amended (SSN). \*\*\* This should be the same as in the narrative statement.

Purpose(s):

This system will enable the Implementation of centralized records management across the Air Force Financial Service community. This system will also facilitate processing of financial transactions including Military Pay (MilPay), Travel Pay (TDY); Retirement & Separation; Civilian Permanent Change of Station (CivPCS); debts; and disbursements. The system will also be used by call center personnel to access financial services records to assist base Financial Services Offices and Air Force customers world-wide. \*\*\*The last sentence is not part of the original narrative statement.

Routine uses of records maintained in the system including categories of users and the purpose of such uses:

There is limited use of data outside the DoD at this time and no unauthorized external access. At this time only FOIA oriented information may be publicly disclosed but not directly accessed through this system.

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:

The (DoD) 'Blanket Routine Uses' published at the beginning of the Air Force's compilation of record system notices apply to this system.

#### Proposed System of Records Notice -Continued:

Can you identify what's wrong with parts of this notice?

- 1. Missing information on how records will be retrieved.
- 2. Steps to minimize unauthorized access and categories on safeguards should be the same.
- How long records are retained and how they are destroyed should be stated in this category.
- 4. Format of text should not be changed.

Policies and practices for storing, retrieving, accessing, retaining, and disposing of records in the system:

#### Storage:

All records are stored within the FM-Workflow databases physically-located behind the Elisworth AFB-firewall. \*\*\* Electronic storage media.

#### Retrievability:

Records are retrieved and accessed through a series of application specific authorization steps which include initial authentication into the application through the use of the Active Directory, for authentication and need to know. Authentication into the FM Workflow and final authorization to access specific OPR owned information \*\*\* How is the information retrieved? By SSN, name, etc.

#### Safeguards:

Data is stored in the Elisworth AFB facility designated to host the FM Workflow\*\*\* This section and Question 7 in the narrative statement should be the same.

Records are accessed by users with the appropriate profiles or roles and by persons responsible for servicing the record system in performance of their official duties.

Data is managed per established records dispensation schedules for records and through OPR data management rules associated with each application.

#### Retention and disposal RETENTION and DISPOSAL:

The SF 115 is pending approval from NARA. Ref T65-30, R03.00, N1 AFU 90-03.

\*\*\*Do not put the NARA authority, but state what the actual retention is, i.e., destroy after 7 years by shredding..

#### System manager(s) and address:

Program Manager, SAF/FMP (AFFSO), 1940 Allbrook Dr, Bldg 1, Wright Patterson Air Force Base, OH 45433-5349.

#### Notification procedure:

Individuals seeking to determine whether information about themselves is contained in this system should address written inquiries to the SAF/FMP (AFFSO), 1940 Allbrook Dr, Bldg 1, WPAFBWright Patterson Air Force Base, OH 45433-5349.

For verification purposes, individual should provide their full name, Social Security Number (SSN), any details which may assist in locating records, and their signature.

In addition, the requester must provide a notarized statement or an unsworn declaration made in accordance with 28 U.S.C. 1746, in the following format:

#### If executed outside the United States:

'I declare (or certify, verify, or state) under penalty of perjury under the laws of the United State of America that the foregoing is true and correct. Executed on (date). (Signature)'.

### Proposed System of Records Notice -Continued:

Can you identify what's wrong with parts of this notice?

- Notification and record access "any details" not specific enough.
- Records source categories remember to identify all appropriate sources.
- 3. Remember to check spacing between categories and information listed in the system.

If executed within the United States, its territories, possessions, or commonwealths: 'I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct, Executed on (date). (Signature)'.

#### Record access procedures:

Individuals seeking access to information about themselves contained in this system should address written inquiries to the SAF/FMP (AFFSO), 1940 Allbrook Dr, Bldg 1, WPAFBWright Patterson Air Force Base, OH 45433-5349.

For verification purposes, individual should provide their full name, Social Security Number (SSN), any details which may assist in locating records, and their signature.

In addition, the requester must provide a notarized statement or an unsworn declaration made in accordance with 28 U.S.C. 1746, in the following format:

#### If executed outside the United States:

'I declare (or certify, verify, or state) under penalty of perjury under the laws of the United State of America that the foregoing is true and correct. Executed on (date). (Signature)'.

If executed within the United States, its territories, possessions, or commonwealths: 'I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct. Executed on (date). (Signature)'.

#### Contesting records procedures:

The Air Force's rules for accessing records and for contesting contents and appealing initial agency determinations are published in Air Force Instruction 37-123; 32 CFR part 806b; or may be obtained from the system manager.

#### Record source categories:

Information is obtained from the individual Airman and FM technicians. \*\*\* Does any data come from other systems, i.e., financial?

Exemptions claimed for the system: None.

**Altered SORN** 

### **SORN** –Alteration

#### **Narrative Statement**

Can you identify what's wrong with this narrative statement?

### Note: Always pull the current SORN listed on the DPCLO website.

- 1. #3 should begin with "Nature of the changes proposed for the system..."
- 2. List the specific categories that are altered.
- 3. Make sure to verify that the authorities previously list are still current and applicable.
- 4. Any routine uses listed in the current notice must be listed in the narrative statement.

#### DEPARTMENT OF DEFENSE

Defense Finance and Accounting Service Narrative Statement on a Altered System of Records Under the Privacy Act of 1974

- 1. <u>System identifier and name</u>: T-7906, entitled "Automated Disbursing System." \*\*\*Verify system ID. Current notice has T7906.
- 2. <u>Responsible official(s)</u>: Nancy Bernard, System Manager, Defense Finance and Accounting Service, Information and Technology Directorate, Accounting Systems Division, 1240 East Ninth Street, Cleveland, OH 44199-8002. Telephone (216) 204-3064.
- 3. Nature of the changes proposed for the system: The Defense Finance and Accounting Service (DFAS) is proposing to establish a system of record in support of the core disbursing requirements for the Automated Disbursing System. This system will be the disbursing system of record and the single source for consolidated disbursing information for the U.S. Navy, Air Force, Army and Marine Corps. \*\*\* Need to list what categories are being updated.
- 4. <u>Authority for the maintenance of the system</u>: 5 U.S.C. 301, Departmental Regulations, Department of Defense Financial Management Regulation (DoDFMR) 7000.14-R, Vol 5, Chapter 20, Need Title; 31 U.S.C. 3511to 3513,Need title; and E.O. 9397 (SSN), as amended. \*\*\* Check authorities. Titles must be included.
- 5. Probable or potential effects on the privacy of individuals: None.
- 6. Is the system, in whole or in part, being maintained by a contractor? No.
- 7. Steps taken to minimize risk of unauthorized access: Records are stored in a building protected by guards, controlled screening, use of visitor registers, electronic access, and/or locks. Access to records is limited to individuals who are properly screened and cleared on a need-to-know basis in the performance of their duties. Passwords and user identifications are used to control access to the system data, and procedures are in place to detect and deter browsing and unauthorized access.
- 8. <u>Routine use compatibility</u>: An authorized release of information contained in this system of records outside of the DoD will be compatible with the purposes for which the information was collected and maintained.

To the U.S. Department of the Treasury, Federal Reserve Bank, to report the financial status of the U.S. Navy, Air Force, Army and Marine Corps funds.

The DoD "Blanket Routine Uses" set forth at the beginning of the DoD compilation of systems of records notices apply to this system of records.

### **SORN** – **Alteration**

#### **Narrative Statement Continued**

Can you identify what's wrong with this narrative statement?

5. Don't forget to provide the name of the IT system where the data resides.

- 9. OMB information collection requirements: None.
- 10. Supporting documentation: None.
- 11. Name of IT system: Must provide the name of the It system where data resides.

# Errors in Altered SORN Submission

### **SORN** -Alteration

Can you identify what's wrong with the proposed changes?

- 1. Make sure the system id, Federal Register date, and citation are correct and current.
- 2. Must begin with "changes" listed at the beginning of the document.
- 3. Always indicate changes to categories by beginning with "Delete entry and replace with ...
- If there are no changes to a category(ies) indicate this by placing five stars with spaces in between them.
- Don't forget to spell out acronyms first, then put them in parenthesis.

T-7906 \*\*\*See previous note. Need to verify.

System name:

Automated Disbursing System (August 15, 2007, 72 FR 46041).

Changes:

\* \* \* \* \*

Categories of individuals covered by the system:

Delete entry and replace with "Department of Defense Navy civilian employees, Department of Navy, Army, Air Force and Marine Corps Active Duty and Reserve military members."

Categories of records in the system:

Delete entry and replace with "Individuals Name, address, telephone number, Social Security Numbers (SSN), rank, grade, check and electronic fund transfer disbursements and collections, and rejected transactions."

Authority for maintenance of the system:

Delete entry and replace with "5 U.S.C. 301, Departmental Regulations, Department of Defense Financial Management Regulation (DoDFMR) 7000.14-R, Vol 5, Chapter 20, Need Title; 31 U.S.C. 3511to 3513,Need title; and E.O. 9397 (SSN), as amended."

\*\*\* Check authorities. Titles must be included.

Purpose of establishing the system:

Purpose of establishing the system:

Delete entry and replace with "The Defense Finance and Accounting Service (DFAS) is proposing to establish a system of record in support of the core disbursing requirements for the Automated Disbursing System. This system will be the disbursing system of record and the single source for consolidated disbursing information for the U.S. Navy, Air Force, Army and Marine Corps." \*\*\*This does not tell the purpose of the system. Need to rewrite.

\* \* \* \* \*

#### Storage:

Delete entry and replace with "Records are stored on electronic storage media and on paper records," \*\*\*Need to verify if this is correct.

\* \* \* \* \*

### **SORN** -Alteration

#### continued:

Can you identify what's wrong with the proposed changes?

- 1. Be sure to include information collected in the notification and record access procedures section in the categories of records.
- 2. Don't forget to list where the information is being collected.
- 3. Always incorporate the requested changes in the document as it will print in the Federal Register.

#### Notification procedure:

Delete entry and replace with "Individuals seeking to determine whether information about them is contained in this record system should address written inquiries to the Defense Finance and Accounting Service, Freedom of Information/Privacy Act Program Manager, Corporate Communications and Legislative Liaison, DFAS-HAC/IN, 8899 E. 56th Street, Indianapolis, IN 46249-0150. \*\*\*If requesting address and phone numbers it must be included in the categories of records.

Requests should contain individuals should furnish full name, Social Security Number (SSN), current address, and telephone number and provide a reasonable description of what they are seeking."

#### Record access procedures:

Delete entry and replace with "Individuals seeking access to information about them that is contained in this system should address written inquiries to Defense Finance and Accounting Service, Freedom of Information/Privacy Act Program Manager, Corporate Communications and Legislative Liaison, DFAS-HAC/IN, 8899 E. 56th Street, Indianapolis, IN 46249-0150.

Request should contain individuals should furnish full name, Social Security Number (SSN), current address, and telephone number." \*\*\*If requesting address and phone numbers it must be included in the categories of records.

#### Contesting record procedures:

Delete entry and replace with "The DFAS rules for accessing records, for contesting contents and appealing initial agency determinations are published in DFAS Regulation 5400.11-R; 32 CFR part 324; or may be obtained from the Defense Finance and Accounting Service, Freedom of Information/Privacy Act Program Manager, Corporate Communications and Legislative Liaison, DFAS-HAC/IN, 8899 E. 56th Street, Indianapolis, IN 46249-0150."

#### Record source categories:

Delete entry and replace with "From the individual and the U.S. Navy, Air Force, Army and Marine Corps." \*\*\*What about Reserves?

\* \* \* \*

### **SORN** – Alteration

#### continued:

Can you identify what's wrong with the proposed changes?

- Make sure all submissions are in Courier New font size 12. There should be 1" margins on all sides of the document.
- If changes were made to this SORN they must be incorporated into the notice as it will print in the Federal Register without the words "Delete entry and replace with...".

Note: All changes requested should be included in the SORN below in the same document as the proposed changes:

T-7906

System name:
Automated Disbursing System

System location:

Defense Information Systems Agency (DISA), Defense Enterprise Computing Center (DECC) Mechanicsburg - Bldg 308, Naval Support Activity (NSA), 5450 Carlisle Pike, Mechanicsburg, PA 17050-2411.

Categories of individuals covered by the system:

Department of Defense Navy civilian employees, Department of Navy, Army, Air Force and Marine Corps Active Duty and Reserve military members

Categories of records in the system:

Individuals' Name, address, telephone number, Social Security Numbers (SSN), rank, grade, check and electronic fund transfer disbursements and collections, and rejected transactions.

Authority for maintenance of the system:

5 U.S.C. 301, Departmental Regulations, Department of Defense Financial Management Regulation (DoDFMR) 7000.14-R, Volume 5, Chapter 20, 31 U.S.C. Sections 3511, 3512, and 3513, and E.O. 9397 (SSN), as amended.

Purpose(s):

The Defense Finance and Accounting Service (DFAS) is proposing to establish a system of record in support of the core disbursing requirements for the Automated Disbursing System. This system will be the disbursing system of record and the single source for consolidated disbursing information for the U.S. Navy, Air Force, Army and Marine Corps.

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

To the U.S. Department of the Treasury, Federal Reserve Bank, to report the financial status of the U.S. Navy, Air Force, Army and Marine Corps funds.

The DoD 'Blanket Routine Uses' published at the beginning of the DFAS compilation of systems of records notices apply to this system.

\*\*\*\*\* Corrections have not been made to this notice.

# Errors in Amended SORN Submission

### **SORN** - Amended

Can you identify what's wrong with the proposed changes?

- Categories of records be sure to be as specific as possible about the types of records maintained in the system.
- 2. Don't forget to provide titles for the authorities and E.O. 9397 should always have (SSN), as amended after it.
- 3. Always check the language in the storage category.

N05350-1

System name:

Navy Drug and Alcohol Program System (August 4, 2006, 71 FR 44267).

Changes:

\*\*\*\*

System location:

Delete entry and replace with "Primary location: Personal and Family Readiness (N135), Navy Personnel Command, 5720 Integrity Drive, Millington, TN 38055-6000.

Decentralized locations: Navy Alcohol Rehabilitation Centers, Navy Alcohol Rehabilitation Departments in Naval Hospitals, Counseling and Assistance Centers, Personal Responsibility and Values Education and Training Program (Prevent) Offices, Navy Drug Screening Laboratories, and local activities to which an individual is assigned. Addresses are contained in a directory which is available from the Director, Personal and Family Readiness (N135), Navy Personnel Command, 5720 Integrity Drive, Millington, TN 38055-6000."

\*\*\*\*

Categories of records in the system:

Delete entry and replace with "Documentation containing demographic data, screening and assessment information, progress notes, medical and laboratory data, results of active and reserve member's urinalysis testing, narrative summaries of treatment, aftercare plans, and other information pertaining to a member's participation in substance abuse education, counseling, and rehabilitation programs." \*\*\* What kind of demographic data? Need to be specific.

Authority for maintenance of the system:

Delete entry and replace with "10 Ú.S.C. 1090, Identifying and treating drug and alcohol dependence; 10 U.S.C. 5013, Secretary of the Navy; 42 U.S.C. 290dd-2, Confidentiality of records; and E.O. 9397 (SSN) as amended."

\* \* \* \* \*

Storage:

Delete entry and replace with "Electronic storage media and paper file folders."

Automated records may be stored on computer disks (both hard drive and floppy),
magnetic tapes, and drums,

-Manual records may be stored in paper file folders, computer printouts, microfiche, or microfilm. \*\*\*Please confirm this method of storage is still being used. If not language should be as stated above.

### **SORN** -Amended

#### continued:

Can you identify what's wrong with the proposed changes?

1. Data elements listed in the notification and records access section must be listed in the categories of records.

\*\*\*\*

System manager(s) and address:

Delete entry and replace with "Director, Personal and Family Readiness (N135), Navy Personnel Command, 5720 Integrity Drive, Millington, TN 38055-6000."

Notification procedure:

Delete entry and replace with "Individuals seeking to determine whether this system of records contains information about themselves should address written inquiries to the Director, Personal and Family Readiness (N135), Navy Personnel Command, 5720 Integrity Drive, Millington, TN 38055-6000 or to the Naval activity providing treatment. Addresses are contained in a directory which is available from the Director, Personal and Family Readiness(N135), Navy Personnel Command, 5720 Integrity Drive, Millington, TN 38055-6000.

Requests should contain full name, Social Security Number (SSN), rank/rate, military status, and signature of the requester. The system manager may require an original signature or a notarized signature as a means of proving the identity of the individual requesting access to the records."

\*\*\*These Items are not listed in categories of records.

Record access procedures:

Delete entry and replace with "Individuals seeking access to records about themselves contained in this system of records should address written inquiries to the Director, Personal and Family Readiness (N135), Navy Personnel Command, 5720 Integrity Drive, Millington, TN 38055-6000 or to the nNaval activity providing treatment. Addresses are contained in a directory which is available from the Director, Personal and Family Readiness (N135), Navy Personnel Command, 5720 Integrity Drive, Millington, TN 38055-6000.

The letter Requests-should contain full name, Social Security Number (SSN), rank/rate, military status, and signature of the requester. The system manager may require an original signature or a notarized signature as a means of proving the identity of the individual requesting access to the records."

\*\*\*See previous comment above.

\*\*\*\*

### **SORN** - Amended

#### continued:

Can you identify what's wrong with the proposed changes?

#### **General Rule:**

Review the complete SORN for accuracy to make sure it is up to date.

Note: All changes requested should be included in the SORN below in the same document as the proposed changes:

N05350-1

System name:

Navy Drug and Alcohol Program System (August 4, 2006, 71 FR 44267).

System location:

Primary location: Personal and Family Readiness (N135), Navy Personnel Command, 5720 Integrity Drive, Millington, TN 38055-6000.

Decentralized locations: Navy Alcohol Rehabilitation Centers, Navy Alcohol Rehabilitation Departments in Naval Hospitals, Counseling and Assistance Centers, Personal Responsibility and Values Education and Training Program (Prevent) Offices, Navy Drug Screening Laboratories, and local activities to which an individual is assigned. Addresses are contained in a directory which is available from the Director, Personal and Family Readiness (N135), Navy Personnel Command, 5720 Integrity Drive, Millington, TN 38055-6000.

Categories of individuals covered by the system:

Navy personnel (officers and enlisted) who have been identified as drug or alcohol abusers and who are subsequently screened or referred for remedial education, outpatient counseling, or residential rehabilitation; counselors, counselor interns, and counselor applicants; Navy personnel who attend the Prevent Program for preventive education; dependents and civilian employees, where authorized, who participate in preventive and remedial education programs, outpatient counseling, and residential rehabilitation; and officer, enlisted, and civilian staff members of facilities providing drug and alcohol education, screening, counseling, rehabilitation, and drug testing.

\*\*\*Need to add SSN, rank/rate and military status.

Categories of records in the system:

Documentation containing demographic data, screening and assessment information, progress notes, medical and laboratory data, results of active and reserve member's urinalysis testing, narrative summaries of treatment, aftercare plans, and other information pertaining to a member's participation in substance abuse education, counseling, and rehabilitation programs.

Authority for maintenance of the system:

10 U.S.C. 1090, Identifying and treating drug and alcohol dependence; 10 U.S.C. 5013, Secretary of the Navy; 42 U.S.C. 290dd-2, Confidentiality of records; and E.O. 9397 (SSN) as amended.

\*\*\*\*\* Corrections have not been made to this notice.

### **SORN** -Amended

Can you identify what's wrong with the proposed changes?

Note: All changes requested should be included in the SORN below in the same document as the proposed changes:

Purpose(s):

To train, educate, identify, screen, counsel, rehabilitate, and monitor the progress of individuals in drug and alcohol abuse programs.

Information is used to screen and evaluate the certified counselors, counselor interns, and counselor applicants throughout the course of their duties.

Routine uses of records maintained in the system, including categories of users and the purposes of such uses:

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:

In order to comply with the provisions of 42 U.S.C. 290dd-2, the Navy's 'Blanket Routine Uses' do not apply to this system of records.

Specifically, records of the identity, diagnosis, prognosis, or treatment of any client/patient, irrespective of whether or when he/she ceases to be client/patient, maintained in connection with the performance of any alcohol or drug abuse, education, training, treatment, rehabilitation, or research which is conducted, regulated, or directly or indirectly assisted by any department or agency of the United States, shall, except as provided therein, be confidential and be disclosed only for the purposes and under the circumstances expressly authorized in 42 U.S.C. 290dd-2. This statute takes precedence over the Privacy Act of 1974 in regard to accessibility of such records, except to the individual to whom the record pertains.

The content of any record may be disclosed in accordance with prior written consent of the patient with respect to whom such record is maintained, but only to such extent, under such circumstances, and for purposes as may be allowed under such prescribed regulations.

Information from records may be released without the member's consent in the following situations:

To medical personnel to the extent necessary to meet a bona fide medical emergency.

To qualified personnel for the purpose of conducting scientific research, management audits, or program evaluation, but such personnel may not identify, directly or indirectly, any individual patient in any report of such research, audit or evaluation, or otherwise disclose patient identities in any manner.

\*\*\*\* Corrections have not been made to this notice.

### **SORN** -Amended

Can you identify what's wrong with the proposed changes?

Note: All changes requested should be included in the SORN below in the same document as the proposed changes:

#### Storage:

Electronic storage media and paper file folders. See previous comment.

#### Retrievability:

Name and Social Security Number (SSN).

\*\*\*If you are not collecting SSN why are you requiring it for retrieval purposes? How is the SSN collected?

#### Safeguards:

Computer facilities are located in restricted areas accessible only to authorized persons that are properly screened, cleared and trained.

Manual records and computer printouts are available only to authorized personnel having a need-to-know.

#### Retention and disposal:

Manual records are maintained for two years (Level I/II) or three years (Level III) and then retired to the nearest Federal Records Center. Automated records are maintained indefinitely.

\*\*\*Is this still the official records disposition for these records.

#### System manager(s) and address:

Director, Personal and Family Readiness (N135), Navy Personnel Command, 5720 Integrity Drive, Millington, TN 38055-6000.

#### Notification procedure:

Individuals seeking to determine whether this system of records contains information about themselves should address written inquiries to the Director, Personal and Family Readiness (N135), Navy Personnel Command, 5720 Integrity Drive, Millington, TN 38055-6000 or to the naval activity providing treatment.

Addresses are contained in a directory which is available from the Director, Personal and Family Readiness (N135), Navy Personnel Command, 5720 Integrity Drive, Millington, TN 38055-6000.

The letter Requests should contain full name, Social Security Number (SSN), rank/rate, military status, and signature of the requester. The system manager may require an original signature or a notarized signature as a means of proving the identity of the individual requesting access to the records.

\*\*\*See previous comments.

\*\*\*\* Corrections have not been made to this notice.

### **SORN** - Amended

Note: All changes requested should be included in the SORN below in the same document as the proposed changes:

#### Record access procedures:

ndividuals seeking access to records about themselves contained in this system of records should address written inquiries to the Director, Personal and Family Readiness (N135), Navy Personnel Command, 5720 Integrity Drive, Millington, TN 38055-6000 or to the naval activity providing treatment. Addresses are contained in a directory which is available from the Director, Personal and Family Readiness (N135), Navy Personnel Command, 5720 Integrity Drive, Millington, TN 38055-6000.

The letter should contain full name, Social Security Number (SSN), rank/rate, military status, and signature of the requester. The system manager may require an original signature or a notarized signature as a means of proving the identity of the individual requesting access to the records.

#### \*\*\*See previous comments

#### Contesting record procedures:

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

#### Record source categories:

DoD/Department of Navy officials; notes and documents from Service Jackets and Mmedical Rrecords; and general correspondence concerning the Individual.

Exemptions claimed for the system: None.

\*\*\*\* Corrections have not been made to this notice.

### **Reoccurring Errors**

- Missing narrative statement for new or altered SORNs.
- Narrative statement for "new" vs. "altered" SORNs.
- Check the authorities for the system, ensure the titles are included.
- The <u>steps to minimize unauthorized access</u>, #7 in the <u>narrative</u>
   <u>statement</u>, should have the same <u>language as the safeguards</u> listed in the proposed notice.
- Routine uses if there is no data being shared outside of DoD, use the standard routine use language as stated in the narrative statement.

### **Reoccurring Errors (Cont):**

- Notification Procedures vs. Record Access Procedures:
  - Ensure you verify who the individual is that is requesting the information before it is provided even for the Notification section. We want to be good stewards of the information and the Privacy afforded each individual.
- Retrievability:
  - If something is listed in the retrievability category make sure it is listed in the category of records.
- Category of individuals:
  - If the purpose mentions specific individuals ensure they are also listed in the category of individuals; and vice versa.

### **Reoccurring Errors (Cont):**

- Do not use "not limited to" or "may include".
- System location and system manager address must have complete (street) mailing addresses including 9 digit zip codes.
   Do not use post office boxes.
- When submitting an alteration or amendment, in the changes section, each category that is changed should begin with "Delete entry and replace with..." then include the changed verbiage in quotes.

### **Reoccurring Errors (Cont):**

- Ensure you include how the notice will print in the Federal Register with the requested/ incorporated changes.
- Ensure you have the approved NARA retention and disposition schedule and list how the records will be destroyed, if applicable.
- For alterations and amendments, be sure to pull the current SORN from the DPCLO web site to review and compare the changes that are being requested.



### **Formatting Requirements**

- Check the formatting! SORNs must be in Courier New, font size 12, with 1" margins all around. This saves time and helps move the request along quicker. There should be two spaces after a period.
- Do not bold, underline or change the notice category wording. Do not put a space between the category heading and the paragraph provided.

### **Questions?**

