

System of Records Notice (SORN) Checklist

Do not use any tabs, bolding, underscoring, or italicization in the system of records notice submissions to the Defense Privacy Office.

Use this as a checklist to assist you in updating a new, altered or amended SORN. This can also be used as a checklist to determine where to put the required asterisks as place holders in those sections that will remain the same on a request to alter or amended a notice. Where there are no changes asterisks should be included as place holders.

System of Records Sections		YES	NO
<p>System identifier (Ex: DHA 07. Assigned by the Component Privacy Office if this is a new SORN.)</p> <p>Identifier is assigned by the DoD Component, is limited to 21 positions, and must include the `alpha` character assigned to the DoD Component in the first position of the identifier.</p>	Has the appropriate system identifier been include in the SORN?	<input type="checkbox"/>	<input type="checkbox"/>
Comments:			
<p>System name: The system name should reflect the categories of individuals on whom information is maintained.</p>	Does the current name adequately describe the system of records?	<input type="checkbox"/>	<input type="checkbox"/>
Comments:			
<p>System location: Provide the complete mailing address of each location/site maintaining the system of records. Be sure to include the 9-digit Zip code.</p> <p>For geographically or organizationally decentralized system locations, indicate that the official mailing addresses are published as an appendix to the Component's compilation of system of records notices. If no address directory is used, the complete mailing address of each location where a portion of the record system is maintained must appear in this caption or give the mailing address of who can provide a complete listing of locations.</p> <p>Post Office boxes are not locations. Do not use acronyms in addresses unless they are officially part of the U.S. Postal mailing address.</p>	Are all locations, and contractor sites, if applicable, identified in the attached notice?	<input type="checkbox"/>	<input type="checkbox"/>
Comments:			
<p>Categories of individuals covered by the system: This section should reflect the categories of individuals about whom record are maintained in such a manner that individuals are able to determine if there is a record about them in the system.</p>	Are all categories of individuals on whom information is maintained are adequately described?	<input type="checkbox"/>	<input type="checkbox"/>
<p>NOTE: If the categories of individuals are being expanded, a</p>			

System of Records Sections		YES	NO
major alteration may be required.			
Comments:			
<p>Categories of records in the system: This section should contain a description of the types of individually identified information which are maintained in the system, e.g., Social Security Number (SSN), DoD ID number, date of birth, patient medical history, loan applications, curriculum vitae, laboratory test results, etc.</p> <p>NOTE: The Office of Management and Budget (OMB) Memorandum 07-16, <i>Safeguarding Against and Responding to the Breach of Personally Identifiable Information</i> (May 22, 2007) has directed agencies throughout the federal government to eliminate unnecessary collection and use of Social Security Numbers.) (http://www.whitehouse.gov/omb/memoranda/fy/2007/m07-16.pdf)</p>	Are all categories of records maintained in the system adequately described?	<input type="checkbox"/>	<input type="checkbox"/>
Comments:			
<p>Authority for maintenance of the system: This section should state the specific legal authority (citation and descriptive title) for maintenance of the system. <u>Statute</u>, <u>Executive Order of the President</u>, or agency regulations may be cited as the authority for maintenance of the system.</p>	Does this section cite the proper legal authority for maintenance of the system?	<input type="checkbox"/>	<input type="checkbox"/>
Comments:			
<p>Purpose(s): This section states the purpose(s) for which the system of records was established and uses of the information which are internal to the Department.</p>	Is the information in this section is correct as currently stated?	<input type="checkbox"/>	<input type="checkbox"/>
Comments:			
<p>Routine uses of records maintained in the system, including categories of users and the purposes of such uses: This section should list each routine use of the information outside the Department which is authorized for records in the system. Each individual routine use should identify the third party, to whom disclosure is authorized, the type of information to be disclosed and the purpose for the disclosure.</p>	<p>Does this notice require the notification breach routine use language?</p> <p>Is each routine use statement needed and does the wording conform to current guidance?</p>	<input type="checkbox"/>	<input type="checkbox"/>
Comments:			
Disclosure to consumer reporting agencies: (Entry is optional)			
Comments:			
Policies and practices for storing, retrieving, accessing,			

System of Records Sections		YES	NO
retaining, and disposing of records in the system:			
<p>Storage: This section should describe the media in which the records are stored, e.g., file folders, file cabinets, disks, magnetic tapes, etc.</p> <p>NOTE: Changes that alter the computer environment (such as, changes to equipment configuration, software, or procedures) so as to create the potential for greater or easier access; or the addition of an on-line capability to a previously batch-oriented system is an alteration.</p>	Does this section adequately describe how all records in the system are currently stored?	<input type="checkbox"/>	<input type="checkbox"/>
Comments:			
<p>Retrievability: This section should state how individual records are retrieved from the system, e.g., by name or SSN or other personal identifier.</p>	Does this section correctly state how records are retrieved from the system?	<input type="checkbox"/>	<input type="checkbox"/>
Comments:			
<p>Safeguards: This section should describe all measures currently in place to minimize the risk of unauthorized access to or disclosure of records in the system, reflecting the most recent risk analysis. It should also identify the categories of employees who are authorized to have access to the records.</p>	Does this section adequately describe all safeguards which are applicable to records in the system, including the categories of employees who have access to the records?	<input type="checkbox"/>	<input type="checkbox"/>
Comments:			
<p>Retention and disposal: State the length of time records are maintained by the Component in an active status, when they are transferred to a Federal Records Center, how long they are kept at the Federal Records Center, and when they are transferred to the National Archives or destroyed. If records are eventually to be destroyed, state the method of destruction (e.g., shredding, burning, pulping, etc.). Do not cite the Component disposition schedule regulation.</p> <p>If your Agency has sent for NARA approval of the disposition scheduled, we can use the following until the Agency does get an approved disposition.</p> <p><i>Disposition pending (treat records as permanent until the National Archives and Records Administration has approved the retention and disposition schedule).</i></p>	Does this section accurately state the retention period and means of disposal of records in the system?	<input type="checkbox"/>	<input type="checkbox"/>
Comments:			

System of Records Sections		YES	NO
<p>System manager(s) and address: This section should state the title and current address (include nine digit zip code) of the agency official who is responsible for the system's policies and practices. Do not provide an individual's name.</p>	<p>Is the information for the system manager correct as currently indicated?</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p>			
<p>Notification procedure: Describe how an individual can determine if a record in the system of records pertains to them. Provide the title and complete mailing address of the official to whom the request must be directed; the information the individual must provide in order for the Component to respond to the request; and a description of any proof of identify required.</p> <p>Entry will read as follows "Individuals seeking to determine whether information about themselves is contained in this system of records should address written inquiries to the. . .</p> <p>Requests should contain individual's. . ."</p>	<p>Does this section provide complete instructions and the address is current?</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p>			
<p>Record access procedures: Describe how an individual can review the record and/or obtain a copy of it. Provide the title and complete mailing address of the official to whom the request for access must be directed; the information the individual must provide in order for the Component to respond to the request; and a description of any proof of identity required.</p> <p>Entry will read as follows "Individuals seeking access to information about themselves contained in this system of records should address written inquiries to . . .</p> <p>Requests should contain individual's. . ."</p> <p>If personal visits can be made to access the record, indicate where, when and how, and if any identification is required.</p>	<p>Does this section provide complete instructions and the address is current?</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p>			
<p>Contesting record procedures: This entry should read the same for all your Component notices. Ensure that it reads the same as published in previous notices.</p>	<p>Is this section current and up to date and include the Component's CFR?</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Comments:</p>			
<p>Record source categories: Describe where the Component obtained the information (source documents and other agencies) maintained in the system. Describe</p>	<p>Does this section describe where the information is collected from in this</p>	<input type="checkbox"/>	<input type="checkbox"/>

System of Records Sections		YES	NO
the record sources in general terms.	system?		
Comments:			
<p>Exemptions claimed for the system: If no exemption has been established for the system, indicate "None".</p> <p>If any exemption rule has been established, state under which provision(s) of the Privacy Act it was established. Also state that an exemption rule has been promulgated in accordance with the requirements of 5 U.S.C. 553(b)(1), (2), and (3), (c) and (e).</p>	<p>If exemptions are being claimed for this system did your Office of General Counsel review and approve the exemptions?</p>	<input type="checkbox"/>	<input type="checkbox"/>

These elements come from the Federal Register Document Drafting Handbook

Example of Addition (New SORN)

DoD Component provides the SORN ID and title.

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

This is required wording.

1. System identifier and name: A0600-63 G3/5/7, entitled "Soldier Fitness Tracker System."

2. Responsible official: Title, Name, HQDA, Information Management Support Center, The Army Building, 2530 Crystal Drive, Arlington, VA 22202-0400, (703) 123-4567.

Always start this section with this statement.

3. Purpose of establishing the system (New): The Department of the Army proposing to establish a new system of records that will be used to systematically collect, analyze, interpret, and report on a standardized, population based data for the purposes of self assessing, characterizing, and developing individualized profiles to guide individuals through structured self development training modules with the goal of improving mental and physical well-being, coping and strategies. The Comprehensive Soldier Fitness Program, which operates the Soldier Fitness Tracker System, routinely advises leadership of trends and anomalies in the Comprehensive Soldier Fitness Leader's Monthly Summary Report. Summarized unit level reports will be disseminated via the Leader's Decision Support Dashboard to military leaders.

4. Authority for the maintenance of the system: 5 U.S.C. 301, Departmental Regulations; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C. 3013, Secretary of the Army; DoD Instruction 1100.13, Surveys of DoD Personnel; DoD Directive 6490.2, Comprehensive Health Surveillance; DoD Directive 6490.3, Deployment Health; DoD Directive 1404.10, Civilian Expeditionary Workforce; AR 600-63, The Army Health Program and E.O. 9397(SSN), as amended.

5. Provide the agency's evaluation on the probable or potential affect on the privacy of individuals:
None.

6. Is the system, in whole or in part, being maintained by a contractor? Yes/No

7. Steps taken to minimize risk of unauthorized access:
Electronically and optically stored records are maintained in 'fail-safe' system software with password-protected access. Records are accessible only to authorized persons with a need-

to-know who are properly screened, cleared, and trained. The system will maintain 128-bit data encryption, role based access, Common Access Card access, and authentication through the Army Knowledge Online Portal through secure socket protocols.

8. Routine use compatibility:

Any release of information contained in this system of records outside of the DOD will be compatible with purposes for which the information is collected and maintained. The DOD "Blanket Routine Uses" apply to this system of records.

9. OMB information collection requirements:

OMB collection required: Yes/No

OMB Control Number (if approved):

Expiration Date (if approved) or Date Submitted to OMB:

Provide titles of any information collection requests (e.g., forms and number, surveys, etc.) contained in the system of records:

10. Name of IT system (state NONE if paper records only):

Soldier Fitness Tracker System.

Example of Addition (New SORN)

A0600-63 G3/5/7

This is how the new SORN will look published in the FR.

System name:
Soldier Fitness Tracker System

System location:
HQDA, Information Management Support Center, The Army Building,
2530 Crystal Drive, Arlington, VA 22202-0400.

Categories of individuals covered by the system:
Current Army military personnel (Active Duty, Reserve, and National Guard), family members of Army service members, and Army civilian employees.

Categories of records in the system:
The Soldier Fitness Tracker System contains up-to-date and historical data related to family, emotional, spiritual, social, and physical fitness. It will include names, Social Security Numbers (SSN), dates of birth, gender, race, ethnic category, rank/grade, service, service component, occupation, education level, marital status, dependent quantities, home and unit location data including 5 digit zip codes, and various other information elements. In addition, the system will contain data on periodic and deployment health appraisal information and historical data on personnel and deployments. It includes medical encounter information including periodic health and wellness survey information, readiness status information, and longitudinal demographic and occupational information, assignment and deployment information, and results of aptitude tests. It also includes information related to enrollment and completion of programs to improve employee physical and mental functioning.

Authority for maintenance of the system:
5 U.S.C. 301, Departmental Regulations; 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C. 3013, Secretary of the Army; DoD Instruction 1100.13, Surveys of DoD Personnel; DoD Directive 6490.2, Comprehensive Health Surveillance; DoD Directive 6490.3, Deployment Health; DoD Directive 1404.10, Civilian Expeditionary Workforce; AR 600-63, The Army Health Program and E.O. 9397(SSN), as amended.

Purpose(s):

The Soldier Fitness Tracker System supports a systematic collection, analysis, interpretation, and reporting of standardized, population based data for the purposes of self assessing, characterizing, and developing individualized profiles to guide individuals through structured self development training modules with the goal of improving mental and physical well-being, coping skills and strategies. The Comprehensive Soldier Fitness Program, which operates the Soldier Fitness Tracker System, routinely advises leadership of trends and anomalies in the Comprehensive Soldier Fitness Leader's Monthly Summary Report. Summarized unit level reports will be disseminated via the Leader's Decision Support Dashboard to military leaders.

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, as amended, 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:

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

Note: This system of records contains Personal Identifiable Information. The DoD Health Information Privacy Regulation (DoD 6025.18-R) issued pursuant to the Health Insurance Portability and Accountability Act of 1996, applies to most such health information. DoD 6025.18-R may place additional procedural requirements on the uses and disclosures of such information beyond those found in the Privacy Act of 1974 or mentioned in this system of records notice.

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

Storage:

Electronic storage media.

Retrievability:

By individual Social Security Number (SSN), Service Number, and name.

Safeguards:

Electronic records are maintained within secured buildings in areas accessible only to persons having official need to know, and who are properly trained and screened. In addition, the system will be a controlled system with passwords, and Common Access Card (CAC) governing access to data.

Retention and disposal:

Records are destroyed when no longer needed for reference and/or for conducting business. Records are destroyed by erasing.

System manager(s) and address:

Program Manager, Soldier Fitness Tracker System, HQDA, Army Main Building, 2530 Crystal Drive, Arlington, VA 22202-0400.

Notification procedure:

Individuals seeking to determine whether information about themselves is contained in this system should address written inquiries to the HQDA, Director, Army Main Building, 2530 Crystal Drive, Arlington, VA 22202-0400.

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).'

Record access procedures:

Individuals seeking access to information about themselves contained in this system should address written inquiries to the HQDA, Director, Army Main Building, 2530 Crystal Drive, Arlington, VA 22202-0400.

For verification purposes, individual should provide their full name, Social Security Number, 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

Text highlighted is appropriate language if notarized documentation is required from individuals seeking information from the system.

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 States 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 record procedures:

The Army's rules for accessing records, and for contesting contents and appealing initial agency determinations are contained in Army Regulation 340-21; 32 CFR part 505; or may be obtained from the system manager. Denial to amend records in this system can be made only by the Deputy Chief of Staff for Personnel in coordination with the Director of Comprehensive Soldier Fitness.

Record source categories:

From personnel, healthcare, training, and financial information systems. From individuals by interview and health assessment surveys. From abstracts of medical records and results of tests.

Exemptions claimed for the system:

None.