

NAVAL ACADEMY PERSONALLY IDENTIFIABLE INFORMATION SPOT CHECK

DATE OF SPOT CHECK:

DIV/DEPT AREA CHECKED:

This checklist is an internal document used by USNA privacy custodians to assess the level of compliance in the handling of Personally Identifiable Information (PII) as delineated by law and/or by other applicable DoD/DON policy guidance. Department of the Navy activities are required to conduct two PII spot check cycles per year.

PERSONALLY IDENTIFIABLE INFORMATION (PII) DEFINITION

Any information about an individual maintained by an agency, including but not limited to, education, financial transactions, medical history, and criminal or employment history, and information that can be used to distinguish or trace an individual's identity, such as name, SSN, date and place of birth, mother's maiden name, biometric records, etc., including any other personal information that is linked or linkable to an individual, alone, or when combined with other personal or identifying information.

GENERAL INSTRUCTIONS

1. If you encounter unattended PII during your spot-check, DO NOT leave it unattended. Provide the PII document(s) to your supervisor.
2. Most business-related PII (names, titles, work phone numbers, work email addresses, office codes, pay grade or rank, lineal #, DoD ID #, etc.) when lost, stolen, or compromised, and when not associated with other traceable personal information, is considered non-sensitive PII and is not cause for submission of a PII breach report; therefore, do not report these instances as a "breach."
3. Always describe what was found (e.g., Document #1 contained home phone numbers of employees in our office. Document #2 contained SSN's of three individuals. Document #3 contained the birth date of our support contractor...) and what action was taken.
4. DO NOT include any names in the spot check documentation, with the exception of the signature blocks.
5. Forward the completed documentation to the USNA Privacy Act Coordinator via your supervisory CoC for audit purposes.
6. If a PII Breach is identified, report it within one hour to your supervisory CoC and to the USNA Privacy Act Coordinator at 410-293-1550/privacy@usna.edu.
7. Contact the Privacy Act Coordinator with any questions at privacy@usna.edu.
8. This Spot Check document is an auditable record and will be kept on file for three years.

1. SPOT CHECK COPIERS, SCANNERS AND NETWORK PRINTERS LOCATED IN COMMON AREAS WITHIN YOUR SPACES FOR DOCUMENTS CONTAINING PII.

A. NUMBER OF COPIERS CHECKED:

B. NUMBER OF COPIERS WHERE PII WAS FOUND:

C. NUMBER OF PRINTERS CHECKED:

D. NUMBER OF PRINTERS WHERE PII WAS FOUND:

E. DESCRIBE WHAT WAS FOUND:

F. ACTION TAKEN IF PII WAS FOUND. DESCRIBE WHAT ACTION WAS TAKEN (*If known*):

2. SPOT CHECK ALL FAX MACHINES LOCATED IN COMMON AREAS WITHIN YOUR SPACES FOR DOCUMENTS CONTAINING PII.

A. NUMBER OF FAX MACHINES CHECKED:

B. NUMBER OF FAX MACHINES WHERE PII WAS FOUND:

C. DESCRIBE WHAT WAS FOUND:

D. ACTION TAKEN IF PII WAS FOUND. DESCRIBE WHAT ACTION WAS TAKEN (*If known*):

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3. SPOT CHECK A SAMPLING OF RECYCLE CONTAINERS WITHIN YOUR SPACES FOR RECONIZABLE PII. *(Check 1 container if your department has 5 or less. Check 2 if your department has 6 to 10 containers. Check 3 if your department has 11 to 30. Check 10% if your department has over 30 containers.)*

A. NUMBER OF CONTAINERS CHECKED:

B. NUMBER OF CONTAINERS CONTAINING PII:

C. DESCRIBE WHAT WAS FOUND:

D. ARE THEY CLEARLY LABELED CUI AND LOCKED OR LABELED UNCLASSIFIED? YES NO

E. ACTION TAKEN IF PII WAS FOUND. DESCRIBE WHAT ACTION WAS TAKEN *(If known)*:

4. SPOT CHECK A SAMPLING OF WASTE CONTAINERS WITHIN YOUR SPACES FOR RECOGNIZABLE PII. *(Check 1 container if your department has 5 or less. Check 2 if your department has 6 to 10 containers. Check 3 if your department has 11 to 30. Check 10% if your department has over 30 containers.)*

A. NUMBER OF CONTAINERS CHECKED:

B. NUMBER OF CONTAINERS CONTAINING PII:

C. DESCRIBE WHAT WAS FOUND:

D. ACTION TAKEN IF PII WAS FOUND, DESCRIBE WHAT ACTION WAS TAKEN *(If known)*:

5. SPOT CHECK YOUR WORK SPACES, KITCHENETTES AND COPY ROOMS TO ENSURE NO THIRD PARTY PII IS POSTED. *(Look for lists of birthdays, personal cell phone numbers, home addresses, and home phone numbers. Self postings are authorized, i.e. selling cars or rentals.)*

A. NUMBER OF BOARDS CHECKED:

B. "THIRD-PARTY" PII FOUND:

C. DESCRIBE WHAT WAS FOUND:

D. ACTION TAKEN IF PII WAS FOUND. DESCRIBE WHAT ACTION WAS TAKEN *(If known)*:

6. SPOT CHECK YOUR DEPARTMENT "INTRANET/INTERNET" SITES/APPLICATIONS FOR PII AND PUBLIC SITES/APPLICATIONS FOR UN-APPROVED NON-SENSITIVE PII IN ACCORDANCE WITH USNAINST 5211.3(series).

A. NUMBER OF SITES/APPLICATIONS CHECKED:

B. NUMBER OF RECORDS WITH UNAPPROVED PII.:

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C. ACTION TAKEN IF PII WAS FOUND. DESCRIBE WHAT ACTION WAS TAKEN (*If known*):

7. CHECK YOUR SPACES FOR UNAUTHORIZED ACCESSIBILITY TO PII, UNATTENDED PII, AND PII THAT IS NOT STORED IN A LOCKED SECURED SPACE, CABINET, FILE... WHEN NOT IN USE AND AFTER NORMAL WORKING HOURS.

A. PII STORED IN SECURED/LOCKED SPACE, CABINET, FILE...:

 YES NO

B. DESCRIBE WHAT WAS FOUND:

8. WERE THERE ANY PII BREACHES/LOSSES OR PRIVACY ACT COMPLAINTS IN YOUR DEPARTMENT IN THE LAST 6 MONTHS?

 YES NO

A. WERE THEY REPORTED TO THE PRIVACY ACT COORDINATOR?

 YES NO

B. DO YOU KNOW WHAT TO DO IF THERE IS A PII BREACH OR LOSS?

 YES NO

C. LIST ANY BREACHES OR LOSSES IN LAST 6 MONTHS:

D. ACTION TAKEN IF PII WAS FOUND. DESCRIBE WHAT ACTION WAS TAKEN (*If known*):

9. DOES YOUR DEPARTMENT USE ANY LOCAL FORMS?

 YES NO

A. DO THE FORMS COLLECT PII?

 YES NO

B. IF FORMS COLLECT PII, DO THEY HAVE A PRIVACY ACT STATEMENT?

 YES NO

C. ARE ALL THE FORMS USED TO COLLECT PII OFFICIAL FORMS?

 YES NO

D. DO FORMS COLLECTING PII FROM THE PUBLIC HAVE AN OMB#?

 YES NO

10. SPOT CHECK THE SYSTEM OF RECORDS USED BY YOUR DEPARTMENT.

A. LIST ANY SYSTEMS OF RECORDS USED:

B. ARE RECORDS KEPT IN ACCORDANCE WITH THE SYSTEM OF RECORDS NOTICE COVERING THE SYSTEM OF RECORDS?

 YES NO

C. ARE ALL THE RECORDS RETRIEVED BY NAME OR PERSONAL IDENTIFIER IN YOUR AREA OF RESPONSIBILITY COVERED BY A SYSTEM OF RECORDS NOTICE?

 YES NO

11. SPOT CHECK YOUR DEPARTMENT'S SHARED DRIVES FOR UN-LOCKED, UN-ENCRYPTED, AND UN-PROTECTED FILES WHICH ARE LIKELY TO CONTAIN PII.

A. DOES YOUR DEPARTMENT USE SHARED DRIVES?

 YES NO

B. NUMBER OF SHARED FILES CHECKED:

C. NUMBER OF FILES ACCESSIBLE TO YOU WITHOUT A LAWFUL GOVT. PURPOSE:

D. DESCRIBE WHAT WAS FOUND:

E. ACTION TAKEN IF UNPROTECTED PII WAS FOUND. DESCRIBE WHAT ACTION WAS TAKEN (*If known*):

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12. SPOT CHECK 10 OR MORE PAPER/ELECTRONIC RECORDS, REPORTS, FOLDERS, AND EMAILS CONTAINING PII FOR APPROPRIATE MARKINGS AND ENCRYPTION (EMAIL ONLY). CHECK AT LEAST 2 FROM EACH CATEGORY.

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| A. NUMBER OF PAPER RECORDS CHECKED: | B. NUMBER OF PAPER RECORDS WITH APPROPRIATE MARKINGS: | C. NUMBER OF REPORTS CHECKED: | D. NUMBER OF REPORTS CHECKED WITH APPROPRIATE MARKINGS: |
| E. NUMBER OF ROUTING FOLDERS CHECKED: | F. NUMBER OF ROUTING FOLDERS WITH APPROPRIATE MARKINGS: | G. NUMBER OF EMAILS CHECKED: | H. NUMBER OF EMAILS WITH APPROPRIATE MARKINGS/ENCRYPTION: |

I. DESCRIBE WHAT WAS FOUND:

J. ACTION TAKEN IF PII WAS FOUND, DESCRIBE WHAT ACTION WAS TAKEN (*If known*):

13. IS YOUR DEPARTMENT DISPOSING OF RECORDS CONTAINING PII IN ACCORDANCE WITH RETENTION AND DISPOSAL REQUIREMENTS SET FORTH IN SECNAVINST 5210.8F?

YES NO

A. IS ACTION TAKEN IN YOUR DEPARTMENT TO ENSURE, ON A ROUTINE BASIS, THAT RECORDS (*paper and electronic*) ARE DISPOSED OF IN ACCORDANCE WITH SECNAVINST 5210.8F?

YES NO

B. IF YES, WHAT IS THE PRACTICE AND WHAT SIZE SHRED DOES YOUR SHREDDER PRODUCE? (*Clean up day: File destruction at the end of fiscal year...*)

14. NOTES:

15. SIGNATURE:

16. PRINTED NAME:

17. DATE: