

**PROCEDURES FOR PROCESSING REQUESTS FOR
RECORDS SUBJECT TO THE PRIVACY ACT**

- 1. REASON FOR ISSUE:** This handbook establishes the Department of Veterans Affairs (VA) agency-wide procedures that implement the policies contained in VA Directive 6300, Records and Information Management, for processing requests for records subject to the Privacy Act of 1974 (5 U.S.C. 552a) (Privacy Act).
- 2. SUMMARY OF CONTENTS/MAJOR CHANGES:** This handbook provides procedures relating to processing requests for records subject to the Privacy Act.
- 3. RESPONSIBLE OFFICE:** VA Privacy Service (005R1A), Office of Privacy and Records Management, is responsible for the material contained in this handbook.
- 4. RELATED DIRECTIVES AND HANDBOOKS:** VA Directive 6300, Records and Information Management, VA Handbooks 6300.1, Records Management Procedures, and 6300.3, Procedures for Implementing the Freedom of Information Act.
- 5. RESCISSIONS:** None

CERTIFIED BY:

**BY DIRECTION OF THE SECRETARY
OF VETERANS AFFAIRS:**

/s/

/s/

Stephen W. Warren
Acting Assistant Secretary for
Information and Technology

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CONTENTS

1. PURPOSE. 5

2. RESPONSIBILITIES..... 5

3. PROCEDURES FOR HANDLING REQUESTS FOR ACCESS TO OR AMENDMENT OF
RECORDS 6

4. PROCESSING REQUESTS FOR DISCLOSURE OF RECORDS TO THIRD PARTIES 11

5. FEES 12

6. CRIMINAL PENALTIES 13

7. APPLICATION OF THE PRIVACY ACT TO VA CONTRACTORS 13

8. UNDOCUMENTED SYSTEMS OF RECORDS 14

9. DEFINITIONS 14

PROCEDURES FOR PROCESSING REQUESTS FOR RECORDS SUBJECT TO THE PRIVACY ACT

1. PURPOSE. This handbook sets forth procedures for processing requests for access to or amendment of records under the Privacy Act of 1974 (Privacy Act). Definitions of the terms used in the Privacy Act, a discussion of criminal penalties for violating the Privacy Act, and information concerning the application of the Privacy Act to Department of Veterans Affairs (VA) contractors are provided.

2. RESPONSIBILITIES

a. The Assistant Secretary for Information and Technology Management (AS/IT). The AS/IT as the Senior Agency Official for Privacy (SAOP), delegates the following Privacy Act processing-related duties to the Chief Privacy Officer.

(1) Providing advice, assistance and recommendations (consult with each other when making recommendations. In some instances, one or the other could be designated to perform both functions on a collateral duty basis) to the AS/IT regarding policies, procedures, and other requirements governing the Privacy Act and its implementation;

(2) Publishing an annual list of employees in VA Central Office who are designated as Privacy Officers (PO); and

(3) Reviewing and transmitting Privacy Act requests to the appropriate Administration or Staff Office PO or Freedom of Information Act/Privacy Officer (FOIA/PO).

b. Under Secretaries, Assistant Secretaries, and Other Key Officials will:

(1) Designate one or more POs or FOIA/POs who will be responsible for initial action on requests for access to information from VA records under the jurisdiction of that office and for complying with the provisions of this handbook;

(2) Delegate to employees within their respective offices the responsibilities and duties of the designated POs at the discretion of the Administration head, Assistant Secretary or Staff Office director;

(3) Ensure that the designated POs and FOIA/POs and their organizational elements comply with all laws regulations and VA policies concerning access to information; and

(4) Report the names(s), title(s), and location(s) of the employee(s) designated as PO to the VA Privacy Service (005R1A) and those designated as FOIA/PO to the VA FOIA Service (005R1C), when changes occur.

(5) Maintain Systems of Records in accordance with the Privacy Act. Ensure accuracy of records before using or releasing records covered by the Privacy Act.

c. **The responsibilities of the POs and FOIA/POs are:**

- (1) Being familiar with all laws and VA policies concerning the release of information;
- (2) Reviewing all initial requests for records submitted under the Privacy Act and making a determination to grant or deny the request;
- (3) Preparing reports required or responding to Privacy Act questions, as necessary; and
- (4) Ensuring that offices collect, maintain, use and disclose records retrieved by personal identifier in the manner prescribed by the Privacy Act of 1974 and VA Handbook 6300.5, Procedures for Establishing and Managing Privacy Act System of Records.

3. PROCEDURES FOR HANDLING REQUESTS FOR ACCESS TO OR AMENDMENT OF RECORDS

a. **General.** When requests are related to litigation or anticipated litigation, coordination between POs and records custodians (or any other individual designated by the Administration Head, Assistant Secretary, or other Key Official) who prepare replies to requests and the VA Office of the General Counsel is important. The policies and procedures contained in Handbook 6300.3, Procedures for Implementing the Freedom of Information Act, paragraphs 3f and 3g, apply to handling requests involving records subject to the Privacy Act that may be related to a matter in litigation as described in the handbook.

- (1) This paragraph establishes procedures whereby an individual may:
 - (a) Request notification of whether VA maintains or has disclosed, a record pertaining to him or her which is maintained in any system of records;
 - (b) Request a copy of, or other access to such record, or obtain an accounting of its disclosure;
 - (c) Request that the record be amended; and
 - (d) Appeal the initial adverse determination of any such request.
- (2) The procedures specified in this paragraph apply only for records retrieved by personal identifier from the following systems of records:
 - (a) The systems of records for which a system of records notice (SORN) has been published by VA in the *Federal Register* pursuant to section 552a(e)(4) of the Privacy Act;
 - (b) Those records contained in Government-wide personnel system of records for which a SORN has been published in the *Federal Register* by another agency such as

the Office of Personnel Management (OPM) (SORNs published by those agencies govern notification, access, and amendment of such records even though they are maintained by VA); or

(c) Those records contained in a system of records operated by or on behalf of VA by a government contractor to accomplish a VA function. For this purpose any such contractor and any employee of such contractor is considered to be an employee of VA and subject to the criminal penalties contained in 5 U.S.C. 552a(i).

b. Processing requests for access to individual records in a specific record system.

(1) This section does not apply to systems of records that have been exempted pursuant to subsections (j) and (k) of the Privacy Act (i.e., 11VA51, 66VA53, 17VA26, 55VA26 and 103VA07B). Nor does it apply to other agencies' exempt systems of records which VA may maintain, e.g., Equal Employment Opportunity Complaint and Appeals Records.

(2) An individual has the right of access, under the Privacy Act, only to his or her records which are contained in these systems of VA records, and must be given access only to that information which is retrieved by the individual's own personal identifier(s).

(3) Each SORN contains "Notification" and "Access" sections that indicate the official to whom such requests should be directed. An individual wanting notification or access, including contesting the record, should mail or deliver a request to the office identified in the SORN. If an individual does not know the "office concerned," the request may be addressed to the PO or FOIA/PO of any VA field station or the Department of Veterans Affairs Central Office, 810 Vermont Avenue, NW, Washington, DC 20420. The receiving office must promptly forward the mail request received to the office of jurisdiction clearly identifying it as "Privacy Act Request", and notify the requester of the referral. Approved VA authorization forms, may be provided to individuals for use.

(4) Individuals requesting access to VA records in a specific system of records must provide the name of the individual to whom the records pertain and the address to which a reply should be sent. Each request should state the nature of the information or action desired and should identify to the extent feasible, the record and system of records that are the subject of the request. Approved VA authorization forms, may be provided to individuals to use for requesting access to records and consenting to their release to third parties.

(5) Some individuals will inquire whether VA maintains any records about them. A request may read: "Does VA have any records on me? If so, what are they?" Requests received in field stations should be referred to the station's PO or FOIA/PO. If the individual has identified himself/herself with a VA file number, social security number, military service number or other identifying data, a search will be performed to determine whether or not records are maintained about the individual.

(a) If we have identifying information, the folder will be reviewed to determine if records are maintained on the individual. If the records are located in another office, the request should be forwarded to that office for reply.

(b) If the inquiry shows the existence of an active or inactive record, it is an indication that VA maintains a record on the individual.

(c) When there is evidence that a record other than a claims folder may exist, a copy of the request will be forwarded to the PO or FOIA/PO of the appropriate VA office.

(d) Requests lacking information sufficient to identify records will be answered using a statement similar to: "The Department of Veterans Affairs (VA) is maintaining records about you in the following system(s) of records: (list the specific system(s), using the system titles(s) as published in the *Federal Register*). If you believe VA may have records about you in any other system of records, we will be glad to check further for you. If you can identify the system that may contain the records you are seeking, it would be helpful. If you cannot, please describe the nature of contacts you have had with VA and the types of records that may have been created."

(e) When the records are described but some or all are not in a Privacy Act system of records or are not required to be provided under the Privacy Act, the request must be processed as a FOIA request (see VA Handbook 6300.3).

(6) If no record is identified through the initial search, or if the request contains insufficient identifying information to conduct a search, the individual will be advised of the requirements for locating or his or her record. The individual must also be advised to indicate the specific program records, such as loan guaranty, insurance, education, or medical care, for which notification is requested.

c. Times, places, and requirements for identification of individuals making requests.

(1) Personal contacts should normally be made during the regular duty hours of the office concerned.

(2) Identification of the individual requesting the information may be required (except in cases where the information requested would be available to the public under FOIA, 5 U.S.C. 552) consisting of name, signature, address, and the claim, insurance, or other identifying file number, if any. Additional identifying data or documents may be required where the information involves sensitive medical, psychological, or other material. (See Paragraph 4e of this handbook and VA Regulation 38 CFR 1.577(d).)

(3) If the individual elects to inspect his or her record in person, he or she may be accompanied by not more than one other person. The individual will present to the VA official concerned, a signed statement authorizing disclosure in the presence of the accompanying person. Approved VA authorization forms may be used. One VA official

must be present at all times during the review of the record in order to ensure the integrity of the record.

d. Disclosure of requested information to individuals.

(1) Requests for access to records will be acknowledged within 10 business days if the response cannot be provided within 20 business days, as required by the Privacy Act.

(2) The response must:

(a) Indicate when and where the records will be available for personal inspection;

(b) Transmit a copy of the information requested;

(c) Indicate whether the copy will be held pending receipt of fees to cover the cost of copying documents;

(d) Advise that the system of records named by the individual does or does not contain a record pertaining to him or her; or

(e) Advise of granting or denial of a request to amend an individual's records.

(3) When an individual elects to gain access to his or her records in person, that individual will be advised of a time, location, and the personal identification requirements for the granting of access.

e. Processing requests for correction or amendment of records.

(1) An individual may request amendment of a record pertaining to him or her contained in a specific VA system of records by mailing or delivering the request to the office concerned. The request must be in writing and must conform to the requirements in paragraph 3b(4) of this handbook. It must state the nature of the information in the record the individual believes to be inaccurate, irrelevant, untimely, or incomplete; why the record should be changed; and the amendment desired. The requester must be advised of the title and address of the VA official who can assist in preparing the request to amend the record if assistance is desired.

(2) Not later than business 10 days after the date of a request to amend a record, the VA official concerned will acknowledge in writing such receipt. If a determination for correction or amendment has not been made, the acknowledgement will inform the individual of when to expect information regarding the action taken on the request. VA will complete a review of the request to amend or correct a record within 30 business days of the date of receipt.

(3) Where VA agrees with the individual's request to amend his or her record(s), the requirements of 5 U.S.C. 552a(d) will be followed. The record(s) will be corrected promptly and the individual will be advised promptly of the correction. Amendment consists of adding information to the record, altering information in the record, or deleting

information in the record. Under the Privacy Act, if information is altered or deleted, the previous version must be obliterated and illegible after amendment. The amendment should be annotated "Amended, Privacy Act, (date), (signature and title of amending official)."

(4) If the record has previously been disclosed to any person or agency, and an accounting of the disclosure was made, prior recipients of the record will be informed of the correction. An approved VA notification of amendment form letter may be used for this purpose.

(5) If it is determined not to grant all or any portion of the request to amend a record, the VA official will promptly notify the individual in writing. The individual will be advised of his or her right to file a concise statement of reasons for disagreeing with the refusal to amend. The VA notice will specify the reason(s) for denying the request, identify the VA regulations or statutes upon which the denial is based, and advise that the denial may be appealed in writing to the General Counsel (024), Department of Veterans Affairs, 810 Vermont Avenue, NW, Washington, DC 20420. An approved VA notification of refusal to amend form letter may be used for this purpose.

NOTE: The above response to a denial or partial denial only complies with the Privacy Act requirements for amendment request. The Veterans Health Administration must implement Administration-level policies that comply with both the Privacy Act and HIPAA Privacy Rule.

(6) The determination on an appeal will be made not later than 30 business days from the date the individual's appeal is received, unless the Secretary or Deputy Secretary, for good cause shown, extends such 30 business day period. If the 30 day period is extended, the individual will be notified promptly of the reasons for the extension and the date on which a final determination may be expected. The final determination in such appeals will be made by the General Counsel or Deputy General Counsel.

(7) The General Counsel, Deputy General Counsel, and the Assistant General Counsel for Professional Staff Group IV are authorized to make final Departmental decisions on appeals under the Privacy Act. If the General Counsel, Deputy General Counsel or the Assistant General Counsel for Staff Group IV finds that the adverse determination should be reversed, the Assistant General Counsel for Staff Group IV will notify the VA office or station of the remedial action to be taken. The VA office or station must promptly carry out that action. Additionally, the Assistant General Counsel for Staff Group IV will promptly notify the individual in writing of the corrective action. The field station or Central Office organization that provided the initial decision will inform previous recipients of the record that a correction has been made.

(8) If the General Counsel or Deputy General Counsel determines that the adverse determination will not be reversed, the individual will be notified promptly in writing of that

determination, the reasons therefore, and of his or her right to seek judicial review of the decision pursuant to section 3 of the Privacy Act (5 U.S.C. 552a(g)).

(9) If the adverse determination is sustained by the General Counsel or Deputy General Counsel, the individual will also be advised promptly of his or her right to file a concise statement of reasons for disagreeing with the refusal to amend. The statement may contain information that the individual believes should be substituted.

(10) When an individual files a statement disagreeing with VA's decision not to amend a record, the record will be clearly annotated so that the fact that the record is disputed is apparent to anyone who may subsequently access, use, or disclose it. When the disputed record is disclosed to persons or other agencies, the fact of the dispute will be clearly noted. Copies of the statement of disagreement will be provided, and, when appropriate, copies of a concise statement of VA's reasons for not making the amendment(s) requested will also be provided.

(11) A decision by either the General Counsel or Deputy General Counsel pursuant to paragraph 3e(7) of this handbook is final. It is subject to judicial review in the district court of the United States in which the complainant resides or has his or her principal place of business, where the VA records are located, or in the District of Columbia.

4. PROCESSING REQUESTS FOR DISCLOSURE OF RECORDS TO THIRD PARTIES

a. VA will not disclose any record or information from a record contained in a VA system of records by any means of communication to any person or any other agency except by written request of, or prior written consent of, the individual to whom the record pertains, unless such disclosure is permitted by statute, VA regulation, or routine use as defined within the Privacy Act. Approved VA forms, may be used to request consent.

b. VA-approved form letters disclosing the conditions under which VA will forward a letter to a Veteran may be used when advising a requester that VA cannot disclose the address of a veteran but may, under certain conditions, provide a mail forwarding service.

c. An individual may consent to the release of information using any form of written communication, for example, VAF 3288, "Request for and Consent to Release of Information from Claimant's Records", so long as there is a clearly legible signature. However, records involving alcohol, drug abuse, sickle cell anemia, or human immunodeficiency virus/AIDS are restricted from release under 38 U.S.C. 7332. A special consent to release must be obtained for these records. A VHA-authorized request for and consent to release of medical records, may be used to obtain a written consent for release of information covered by 38 U.S.C. 7332.

d. Disclosures may be made to a congressional office from the record of an individual in response to an inquiry from the congressional office made at the request of the individual to whom the record pertains. The disclosure must be within the scope of the individual's request and release of individually identifiable treatment records relating to

alcohol, drug abuse, sickle cell anemia, or human immunodeficiency virus/AIDS must be specifically addressed in the individual's request to the congressional office for assistance. In those cases, however, where the congressional inquiry indicates that the request is being made on behalf of a person other than the individual whose record is to be disclosed, the congressional office should be advised that the written consent of the subject of the record is required. The Privacy Act limitation on disclosure of personal information contained in any VA system of records shall not apply to any Chairman/Head of a committee in the House of Representatives or the United States Senate Veterans' Affairs or Appropriations Committees (including the Subcommittees on VA, HUD, and Independent Agencies) if an official request for the disclosure has been made for an oversight purpose on a matter within the jurisdiction of the Committee or Subcommittee.

e. An accounting is required for disclosures outside VA, even when such disclosure is at the request of the individual. A separate accounting in each individual record is not required in such actions as transfer of payroll or benefit check data to the Department of the Treasury, provided that the accounting information can be constructed when requested by the individual. The accounting will consist of the date, nature, purpose of each disclosure, the name and address of each person or agency to whom the disclosure is made, and the authority for release of the information. The authority for release of the information will be the individual's written consent, a statutory requirement, a routine use in a system of records, or other authorization contained in VA regulations 38 CFR 1.500 - 1.575. The accounting record may be maintained on VAF 5572, "Accounting of Records/Information Disclosure Under Privacy Act"; by creation of extra copies of the written transactions; on appropriately adapted data sheets; or in any other manner that will constitute a record. The accounting of disclosure will be retained for at least five years after the disclosure for which the accounting is made or the life of the record, whichever is longer.

f. An accounting is not required when disclosure is to VA employees who have a need for access in the performance of their official duties or when disclosure would be required under FOIA.

5. FEES

a. Fees for making records available under the Privacy Act will be charged in accordance with VA regulation 38 CFR 1.577(f). No fees will be charged for any search or review of the record. Duplication fees will be waived for one complete set of VA benefit records pertaining to the subject when those records are present in a system of records. See VA regulation 38 CFR 1.577(g).

b. If the request for records comes from a third party other than the personal representative of the subject beneficiary or applicant, then the request will be processed as a FOIA request, and applicable FOIA fees will be charged. These include search and review fees, based on the fee category of the requester.

c. When an individual requests such services as certification, authentication, or other special services not required under the Privacy Act, fees in addition to those required for copying will be assessed in accordance with VA regulation 38 CFR 1.526(i) or (j) or any other applicable law.

6. CRIMINAL PENALTIES

a. **Criminal penalties for unauthorized disclosure of records.** Any VA officer or employee who willfully discloses individually identifiable information in any manner to any person or agency not entitled to receive it shall be guilty of a misdemeanor and fined not more than \$5,000 (5 U.S.C. 552a(i)(1)).

b. **Criminal penalties for failure to publish a public notice.** Any VA officer or employee who willfully maintains a system of records without meeting the notice requirements of 5 U.S.C. 552a(e)(4) shall be guilty of a misdemeanor and fined not more than \$5,000 (5 U.S.C. 552a(i)(2)).

c. **Criminal penalties for obtaining records under false pretenses.** Any person who knowingly and willfully requests or obtains any record concerning an individual from VA under false pretenses shall be guilty of a misdemeanor and fined not more than \$5,000 (5U.S.C. 552a(i)(3)).

d. When a court finds that an agency has acted willfully or intentionally in violation of the Privacy Act in such a manner as to have an adverse effect upon an individual (there was injury or harm to the individual), the United States will be required to pay actual damages or \$1,000, whichever is greater, and court costs and attorney fees (5 U.S.C. 552a(g)(4)(A) and (b)).

e. In the event a VA employee is found criminally liable, a report of the incident will be provided to the Chief Privacy Officer. In incidents involving employees, the report will be prepared by the Administration or office for which the employee worked at the time of the incident. If the Department as a whole is involved, the report will be provided by the Office of the Inspector General. The report will describe the incident, identify causes, and provide suggested changes in procedures to prevent a recurrence. The Chief Privacy Officer will review the report and recommend to the Director/Office of Privacy and Records Management procedural changes that may be needed.

7. APPLICATION OF THE PRIVACY ACT TO VA CONTRACTORS

a. **General.** The Privacy Act provides that "when an agency provides by contract for the operation by or on behalf of the agency of a system of records to accomplish an agency function," the provisions of the Privacy Act must be applied to the system. To ensure compliance with the provisions of the Privacy Act, any contract between VA and a contractor must conform to the policies and procedures contained in FAR Subpart 24.1, Protection of Individual Privacy. This includes contracts for the design, development, operation, or maintenance of any system of records on individuals necessary to accomplish a Department function, or a contract which necessitates the use of a system of records. For each such contract, the Contracting Officer will ensure that the clauses in

FAR 52.224-1, Privacy Act Notification, and 52.224-2, Privacy Act, are included in the contract document, and that the name of the applicable system of records is also included. VA Contracting officers should include relevant FAR provisions in contracts that involve PII that is covered by the Privacy Act (i.e., retrieved by a personal identifier). In addition to other purposes, this language ensures that VA maintains the abilities to access, amend, and disclose records subject to the Privacy Act.

b. When responding to Privacy Act Access or Amendment Requests, the Privacy Officer must ensure that all collections of information held by a VA contractor are also appropriately addressed in the response.

8. UNDOCUMENTED SYSTEMS OF RECORDS. A new system of records may be created when information about an individual is not covered by an existing system of records notice, but is retrieved by personal identifier. However, copying information containing personal identifiers to a local storage device does not create a new, undocumented system of records.

9. DEFINITIONS

a. **Access.** The granting of permission, upon request, to review or have copies made of all or any portion thereof, in a form comprehensible to him or her, of records about the requester; permitting an individual to request amendment of a record pertaining to him or her; or permitting an individual who disagrees with the refusal of the agency to amend his or her record to request a review of such refusal. Source: 5 U.S.C. 552a

b. **Disclosure.** The provision of information to any person or other government agency pursuant to a written request by, or with the prior written consent of, the individual to whom the record pertains, or pursuant to a Privacy Act exemption. Source 5 U.S.C. 552a

c. **Individual.** A living citizen of the United States or an alien lawfully admitted for permanent residence. Source: 5 U.S.C. 552a. For Privacy Act purposes, the definition of "individual" differs from the definition of "individual" for FOIA purposes. Deceased persons, non-resident aliens (unless lawfully admitted for permanent residence), businesses, and organizations are not "individuals" under the Privacy Act. A parent or guardian may exercise Privacy Act rights for a minor or legally incompetent person.

d. **Maintain.** To collect, keep, use, disseminate, or any combination of these recordkeeping functions. Source: 5 U.S.C.552a. In VA regulations, and this handbook, this word connotes control over and, therefore, responsibility and accountability for systems of records.

e. **Mobile Device.** Portable cartridge/disk based, removable storage media (e.g., floppy disks, compact disks (CD), universal serial bus (USB) flash drives, external hard drives, and other flash memory cards/drives that contain non-volatile memory). Portable

computing and communications device with information storage capability (e.g., notebook/laptop/tablet computer, personal digital assistants (PDA), cellular telephones, digital cameras, and audio recording devices). Source: NIST SP 800-53.

f. **Privacy Act Request.** A request by an individual to gain access to, copies of, or amendment of a record about himself or herself that is contained in a system of records. Source: 5 U.S.C. 552a. The request does not have to specifically cite or otherwise show dependence on the Act to be considered a Privacy Act request.

g. **FOIA Request.** A written request that reasonably describes records maintained/ held by or on behalf of the Federal Government. Source: 5 U.S.C. 552

h. **Record.** Any item, collection, or grouping of information about an individual that is maintained by the Department, such as, but not limited to, his or her education, financial transactions, personal history, or medical history, and that contains his or her name or identifying number, symbol, or other identifying particular assigned to the individual, such as a fingerprint or voice print or a photograph. Source: (5 U.S.C. 552a). This definition does not distinguish between data and information. Both are within the scope of the definition.

i. **Statistical Record.** A record maintained for statistical research or reporting purposes only that is not used in whole or in part in making any determination about an identifiable individual. Source: 5 U.S.C. 552a.

j. **Search.** To review, manually or by automated means, agency records for the purpose of locating those records which are responsive to a request.

k. **Sensitive information.** All Department information and/or data on any storage media or in any form or format, which requires protection due to the risk of harm that could result from inadvertent or deliberate disclosure, alteration, or destruction of the information. The term includes not only information that identifies an individual but also other information whose improper use or disclosure could adversely affect the ability of an agency to accomplish its mission, proprietary information, and records about individuals requiring protection under applicable confidentiality provisions. Source: 38 U.S.C. 5727.

l. **System Manager.** For purposes of this Handbook, a System Manager is an official who is responsible for the management, operation, and release of information from a system of records subject to the Privacy Act.

m. **System of Records.** Any group of records under the control of an agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual. Source: 5 U.S.C. 552a. A record in a system of records must contain two elements: a personal identifier and at least one item of personal information. If a retrieval of personal information is possible, but not actually done, or if it depends on memory or a sequential search, the collection of records is not a system of records. However, creating a retrieval

method or cross-index arranged by personal identifier for randomly filed records makes that record collection a system subject to the provisions of the Act.

n. **Records Custodian.** For the purposes of this Handbook, a records custodian is the individual who maintains physical custody of records and who has been assigned the responsibility for the maintenance, service, access, and disposal of records for his or her office.

o. **Routine Use.** This term is unique to the Privacy Act and means the disclosure of a record for a reason that is compatible with the purpose for which it was collected. A routine use is one that is relatable and necessary to a purpose for collecting the record. To be effective, a routine use must be properly published in the *Federal Register*.