SECNAV INSTRUCTION 5214.4

From: Secretary of the Navy

Subj: DEPARTMENT OF THE NAVY INFORMATION MANAGEMENT CONTROL PROGRAM

Ref: See enclosure (1)

Encl: (1) References
      (2) Definitions
      (3) Responsibilities
      (4) Sample Information Management Control Officer Appointment Letter

1. Purpose
   a. Establish policies and assign responsibilities for the management and control of Department of the Navy (DON) Information Management Control (IMC) Program, and implement references (a) through (y).

   b. Authorize development and updating of implementing guidance through reference (a). Reference (a) provides implementing procedures, criteria, rules, and terms for the DON IMC Program.

2. Cancellation. SECNAVINST 5210.16.

3. Definitions. See enclosure (2).

4. Applicability. This instruction applies to the Offices of the Secretary of the Navy (SECNAV), the Chief of Naval Operations (CNO), the Commandant of the Marine Corps (CMC), and all U.S. Navy (USN), U.S. Marine Corps (USMC) installations, commands, activities, field offices, and all other organizational entities within the DON.

5. Policy. DON organizations, defined as the Offices of the SECNAV (Secretariat), CNO, CMC, and all USN and USMC installations, commands, activities, and field offices, must
maintain an IMC Program that establishes a continuing and systematic appraisal of information collection incorporating policy and procedures of this instruction and references (a), (b), and (c). It is DON policy that:

a. All DON organizations must:

(1) Ensure information collected is not duplicative;

(2) Ensure only information essential to mission accomplishment is collected and that the cost of the collection is worth the benefit from the collected information;

(3) Ensure information collections are conducted as infrequently as feasible to meet mission accomplishment;

(4) Ensure that, pursuant to references (b), (c), and this instruction, licensing of information collections requires assignment of a control symbol or citing of the authority, which exempts the information collection from symbolization;

(a) Information collections that collect from members of the public must obtain an Office of Management and Budget (OMB) Control Symbol using procedures contained in reference (a);

(b) Information collections that collect from two or more Department of Defense (DoD) components must obtain a DoD Control Symbol using procedures contained in reference (a);

(c) Information collections that collect within the requesting DON organization must obtain that DON organization’s information control symbol using procedures contained in reference (a);

(d) Information collections that collect from other DON organizations using procedures contained in reference (a) must:

1. Obtain a SECNAV control symbol if collection is sponsored from a SECNAV code or if a DON component is collecting from both USN and USMC;
2. Obtain an Office of the Chief of Naval Operations (OPNAV) control symbol if collection is sponsored from an OPNAV code or if a Navy organization is collecting outside their command or activity;

3. Obtain a USMC control symbol if collection is sponsored by Headquarters, U.S. Marine Corps (HQMC) or if a USMC organization is collecting data across the USMC; and

(e) Interagency information collections must be processed pursuant to reference (d).

b. Information collections that require special handling, such as classified and controlled unclassified information, must be protected from unauthorized disclosure pursuant to reference (e).

c. Information collections that contain personal information on individuals require special handling pursuant to references (f) and (g). Such information included in a proposed collection of information must be accessible to the public only as prescribed by references (h) and (i). To ensure personal information in electronic form is only acquired and maintained when necessary, and that the supporting information technology that is being developed and used protects and preserves the privacy of the members of the public, a privacy impact assessment of information collections must be conducted pursuant to reference (j).

d. Information collected from approved information collections that have been licensed with an information collection control symbol, must be made visible, available, and usable only to authorized individuals.

e. Respondents will only respond to licensed information collections, to include exempt or one-time reports.

f. Information collections will be challenged if considered unnecessary or duplicative of existing information collections.

6. Responsibilities. See enclosure (3).

7. Sample Information Management Control Officer Appointment Letter. See enclosure (4).
8. Records Management

   a. Records created as a result of this instruction, regardless of format or media, must be maintained and dispositioned according to the records disposition schedules found on the Directives and Records Management Division (DRMD) portal page: https://portal.secnav.navy.mil/orgs/DUSNM/DONAA/DRM/Home.aspx.

   b. For questions concerning the management of records related to this instruction or the records disposition schedule, please contact your local Records Manager or the DRMD program office.

9. Forms. The following forms are available for download at Navy Forms Online: https://forms.documentservices.dla.mil/order/.

   a. SECNAV 5213/1 SSN Reduction Review; and

   b. SECNAV 5214/10 DON Internal Information Collection Processing Request.

Distribution:

THOMAS B. MODLY
Under Secretary of the Navy
REFERENCES

(a) SECNAV M-5214.1  
(b) DoD Instruction 8910.01 of 19 May 2014  
(c) 5 CFR 1320  
(d) DoDM 8910.01, Volume 1, DoD Information Collections Manual: Procedures for DoD Internal Information Collections of 30 June 2014  
(e) DoD Instruction 5200.01 of 21 April 2016  
(f) DoD Instruction 5400.11 of 29 January 2019  
(g) SECNAVINST 5211.5F  
(h) DoD Directive 5400.07 of 5 April 2019  
(i) SECNAVINST 5720.42G  
(j) DoD Instruction 5400.16 of 14 July 2015  
(k) 44 U.S.C. Chapter 35  
(l) DoDM 8910.01, Volume 2, DoD Information Collections Manual: Procedures for DoD Public Information Collections of 30 June 2014  
(m) SECNAVIST 5430.7R  
(n) DoD Instruction 3216.02 of 8 November 2011  
(o) SECNAVINST 3900.39E  
(p) SECNAV M-5213.1  
(q) OMB Memorandum M-13-13, Open Data Policy—Managing Information as an Asset, 9 May 2013  
(s) DoD Instruction 1100.13 of 15 January 2015  
(t) DoD Instruction 8170.01 of 2 January 2019  
(u) DoD Instruction 1000.30 of 1 August 2012  
(v) SECNAVINST 5210.8F  
(w) SECNAVINST 5213.16  
(x) OPNAVINST 5300.8C  
(y) MCO 5300.18
DEFINITIONS

1. **DoD Information Collection.** A collection of information from two or more Office of the Secretary of Defense (OSD) or DoD Components that requires approval by the DoD Internal Information Collections Officer, who resides in Washington Headquarters Services (WHS). Examples include if a survey draws subjects from two or more Military Services or if a survey draws subjects from a Military Service and another OSD or DoD Component. A DoD Information Collection will be assigned a DoD control symbol by WHS Office of Information Management (OIM) via the DON Information Management Control Officer (IMCO).

2. **Information Collection.** Data or information collected for use in determining policy; planning; controlling and evaluating operations and performance; making administrative determinations; or preparing other reports. The data or information may be in narrative, statistical, graphic, or any other form and may be displayed on paper, magnetic tape, or other media.

3. **Public Information Collection.** A collection of information whereby information is collected by the DoD or DoD components from ten or more members of the public. Assigned an OMB control symbol by OMB via DoD OIM.

4. **OPNAV Control Symbol.** A symbol assigned by the OPNAV IMCO to register an information collection sponsored by an OPNAV Code, or to information collections sponsored by two or more Navy organizations. A control symbol is identified by a Report Control Symbol (RCS) designator for the originating organization, the applicable Standard Subject Identification Code (SSIC) number the collection falls under, a dash, and then the next consecutive number in that SSIC series, e.g., OPNAV 5213-2.

5. **SECNAV Control Symbol.** Symbol assigned by the SECNAV IMCO to register an information collection sponsored by a SECNAV Code, a DON organization collecting from both USN and USMC, a USN organization collecting from USMC, or a USMC organization collecting from USN. A control symbol is identified by an RCS designator for the originating organization, the applicable SSIC number the collection falls under, a dash, and then the next consecutive number in that SSIC series, e.g., SECNAV 5216-2.
6. **USMC Control Symbol.** A symbol assigned by the USMC IMCO to register an information collection sponsored by a HQMC Code, or to information collections sponsored by two or more USMC organizations. A control symbol is identified by an RCS designator for the originating organization, the applicable SSIC number the collection falls under, a dash, and then the next consecutive number in that SSIC series, e.g., MC-5214-1.
RESPONSIBILITIES

1. DON Chief Information Officer (DON CIO). The DON CIO must:
   a. Provide overall policy for the DON IMC Program as specified by references (b), (d), (k), (l), (m), and this instruction;
   b. Appoint a DON IMCO to implement the DON IMC Program across the DON. The DON CIO shall provide oversight of the DON IMCO, as required; and
   c. Develop and maintain reference (a), which contains implementation guidance and program guidelines, for the DON IMC Program.

2. DON IMCO. The DON IMCO performs DON IMCO responsibilities under the supervision and direction of the DON CIO. The DON IMCO must:
   a. Establish and manage the IMC Program for DON to implement the policy and procedures in references (a), (b), (d), (k), (l), and this instruction; and
   b. Act as liaison between the DON and the DoD IMCO and other Federal agency IMCOs on all IMC matters. As liaison, the DON IMCO must:
      1) Review and submit OMB control symbol request packages received from cognizant DON organization IMCO to DoD OIM; and
      2) Review and submit DoD control symbol request packages received from cognizant DON organization IMCO to DoD OIM.
   c. Provide guidance and assistance to DON organizations on IMC policy interpretation, procedures, criteria, and problems relating to IMC matters.
   d. Conduct reviews and studies of DON organization IMC Programs to ensure adherence to the procedures in reference (a).
e. Ensure that all information collections within the DON are registered to the highest level control symbol needed, e.g., internal DON, DoD, or OMB control symbol.

f. Develop and implement DON IMC training.

g. Maintain an accurate index of DON organization IMCOs’ Point Of Contact (POC) information. Information should include IMCO name, e-mail address, work phone number, organization name, and RCS designator(s). Echelon 1, Echelon 2, and major subordinate commands IMCOs will provide DON IMCO with a copy of the index, sending updates as they occur.

h. Maintain a file of Echelon 1, Echelon 2, and major subordinate command signed IMCO Appointment Letters.

3. DON/AA. DON/AA must:

a. Implement the DON IMC Program within the Office of the SECNAV (Secretariat); and

b. Appoint a Secretariat IMCO (see enclosure (4) of this instruction) to govern the DON IMC Program within the Secretariat to:

   (1) Require personnel who sponsor information collection within a SECNAV instruction to adhere to the standards set forth in this instruction and comply with applicable laws and regulations, pursuant to references (a), (b), and (k);

   (2) Implement and maintain an index for Secretariat sponsored internal information collections based on requirements in SECNAV instruction; and

   (3) Maintain an accurate index of IMCOs’ POC information from major subordinate commands and higher IMCOs from DON organizations under the cognizance of the Secretariat. Information should include IMCO name, e-mail address, work phone number, organization name, and RCS designator(s). Secretariat IMCO will provide index to DON IMCO.

4. CNO. CNO must:

a. Implement the DON IMC Program within the USN; and
b. Appoint an IMCO (see enclosure (4) of this instruction) to govern the DON IMC Program within the USN to:

(1) Require personnel who sponsor information collection to adhere to the standards set forth in this instruction and comply with applicable laws and regulations, pursuant to references (a), (b), and (k);

(2) Implement and maintain an index for OPNAV sponsored internal information collections; and

(3) Maintain an accurate index of Navy organization IMCOs’ POC information. Information should include IMCO name, e-mail address, work phone number, organization name, and RCS designator(s). Echelon 2 and major subordinate command IMCOs will provide Navy IMCO with a copy of the index, sending updates as they occur. Navy organization IMCO will provide index to DON IMCO.

5. CMC. CMC must:

a. Implement the DON IMC Program within the USMC.

b. Appoint an IMCO (see enclosure (4) of this instruction) to govern the DON IMC Program within the USMC to:

(1) Require personnel who sponsor information collections to adhere to the standards set forth in this instruction and comply with applicable laws and regulations, pursuant to references (a), (b), and (k);

(2) Implement and maintain an index for HQMC sponsored internal information management collections;

(3) Maintain an accurate index of USMC organization IMCOs’ POC information. Information should include IMCO name, e-mail address, work phone number, organization name, and RCS designator(s). All units that directly report to major subordinate commands will consolidate indexes from their subordinate commands, units, and activities and forward the indexes to the major subordinate command IMCO; sending updates as they occur. USMC IMCO will provide index to DON IMCO.
6. **Heads of DON Organizations:** Heads of DON Organizations must:

   a. Implement a DON IMC Program within their organization; and

   b. Appoint in writing (see enclosure (4) of this instruction) an individual as the organization IMCO to represent the organization’s interests. Individuals appointed should be at an organizational level of sufficient authority to efficiently and effectively implement the objectives and policies of the DON IMC Program.

   (1) Echelon 2 and higher must send signed IMCO appointment letters to the DON IMCO.

   (2) Major subordinate commands and higher that fall within the Secretariat, e.g., ONR or OCHR, will send signed IMCO appointment letters to the SECNAV IMCO.

   (3) Echelon 3 and below must send signed IMCO appointment letters to their Echelon 2 IMCO.

   (4) USMC major subordinate commands and higher must send signed IMCO appointment letters to the USMC IMCO.

   (5) USMC organizations below major subordinate commands must send signed IMCO appointment letters to their major subordinate command IMCO.

   c. Ensure personnel within their organization submit for review to determine the need for licensing all information collection, actions, or inquiries about information collections through their respective organization IMCO.

   d. Ensure that responsible officials at all levels:

   (1) Ensure that all information collections within their organization comply with applicable laws and regulations, pursuant to references (a), (b), and (k).

   (2) Promote the use of technology to facilitate the collection, distribution, control, and cancellation of
information collections, ensuring that information collections do not duplicate other information collections.

(3) Do not allow the collection of data from unlicensed information collections.

7. Echelon 1, Echelon 2, and Major Subordinate Command IMCOs must:

   a. Establish and manage DON IMC Programs for their respective organization to implement the policy in references (a), (b), and (k). Assist the DON IMCO in conducting reviews and studies of their respective IMC Programs;

   b. Conduct periodic review and study of their lower echelon IMC Programs;

   c. Act as liaison between their organization and the DON IMCO on all information collections matters and provide guidance and assistance to their organizational users on all information collection matters;

   d. Maintain an accurate index of lower echelon IMCOs’ POC information. Information should include IMCO name, e-mail address, work phone number, organization name, and RCS designator. Provide DON IMCO with a copy of the index, sending updates as they occur; and

   e. Maintain a file of lower echelon IMCO appointment letters.

8. DON Organization IMCOs. The DON organization IMCOs must:

   a. Ensure procedures in references (a), (b), and (k) are followed and establish internal procedures for collection, distribution, control, and cancellation of information collections. Ensure that information collections do not duplicate other information collection;

   b. Ensure organization information collections are properly licensed and assigned appropriate level control symbol pursuant to reference (a):
(1) Work with sponsors of internal information collections. Assign internal control symbol identified by organization designation, control symbol number, and expiration date;

(2) Work with sponsor of DoD control symbol requests packages. Ensure all compliance reviews and paperwork are complete. Submit completed request packages to DON IMCO for processing and submission to DoD; and

(3) Work with sponsor of OMB control symbol request packages. Ensure all compliance reviews and paperwork is complete. Submit packages to the DON IMCO via the DoD Information Control System for processing and submission to DoD.

c. Ensure information collections requiring the collection of Personally Identifiable Information (PII) are reviewed pursuant to reference (g).

d. Ensure electronic information collections that include PII are covered by a Privacy Impact Assessment pursuant to reference (g).

e. Ensure information collections that include research involving human subjects are reviewed pursuant to the requirements of references (n) and (o).

f. Ensure Social Security Number (SSN) reduction review is completed on organization information collections that collect full or truncated SSNs. SSN justification is done using SECNAV 5213/1 SSN Reduction Review. Each completed SECNAV 5213/1 must be included in the OMB package.

g. Review draft requiring documents, e.g., directives, manuals, official Standard Operating Procedures, for compliance with policy and procedures pursuant to references (a), (b), and (k).

h. Maintain an accurate electronic index of all current, expired, and cancelled organization information collections. Electronic index must contain organization control symbol, information collection title, expiration date, sponsor name, code, contact information, number and title of requiring document(s), if information collection collects the SSN (full or
truncated), date of SSN reduction justification, cancellation date, and cancellation reason.

i. Maintain program files and information collection case files (either paper files or electronic files) on all information collections sponsored by the organization. A case file must contain:

(1) Control Symbol request package;

(2) Copy of the collection device(s), e.g., forms, surveys, website screen shots, etc., and copy of cost analysis (if applicable);

(3) First page of the requiring document and pages within the requiring document that call for the information collection;

(4) Copy of SSN justification package (if applicable);

(5) Any other material relating to the information collection; and

(6) Cancellation documentation when the information collection is cancelled.

j. Arrange information collection folders in sequence by control symbol.

9. Sponsors of Information Collections. DON personnel creating or renewing information collections must:

a. Ensure the information collection is needed, the information requested is essential, and the new or renewed information collections do not duplicate existing information collections. Sponsors, with assistance from their organization’s IMCO, must review existing DON information collections, as well as higher level information collections, to ensure no duplication of existing information collections before requesting the licensing of a new information collection be authorized;

b. Provide organization IMCO with complete information control symbol package and copy of collection device(s). If a
collection device is a form, the organization’s Forms Management Officer must review to ensure compliance with reference (p); and

c. Notify the cognizant IMCO in using the procedures contained in reference (a).
SAMPLE INFORMATION MANAGEMENT CONTROL OFFICER APPOINTMENT LETTER
(Command Letterhead)

From: Commander, (Command Name)
To: (Name of Designee)

Subj: APPOINTMENT OF INFORMATION MANAGEMENT CONTROL OFFICER (IMCO)

Ref: (a) SECNAVINST 5214.4
     (b) SECNAV M-5214.1

1. Pursuant to reference (a), you are hereby appointed Information Management Control Officer (IMCO) for (activity and field office code).

2. As IMCO, you will be responsible for the implementation, maintenance, management, and administration of the (activity and field office code) Information Management Control Program. You are to provide continuing analysis, review and control of all command information to ensure that they are effective, efficient, and necessary in serving their intended purpose. You are required to read and become thoroughly familiar with references (a) and (b) in the performance of your duties. You are required to send a copy of this designation letter, and the following information to your higher echelon IMCO:

   IMCO’s Name:
   IMCO’s E-mail Address:
   IMCO’s Phone Number:
   IMCO’s Supervisor:
   Supervisor E-mail Address:
   Supervisor Phone Number:

3. This appointment will remain in effect until cancelled or revoked.

   L. M. ROLFES
   By direction

Copy to:
Echelon 1 or 2 IMCO

Enclosure (4)