

INSPECTOR’S GUIDE

FOR EVALUATING

FORCE PRESERVATION COUNCIL PROGRAM

USING THE

FUNCTIONAL AREA 1500.60

DETAILED INSPECTION CHECKLIST

Version 3

February 2022

**This guide is provided for informational use only and does not take the place of a thorough in-person inspection. Only an inspector can determine actual compliance during a thorough in-person inspection.**

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# Policy/Guidance Quick Reference

* **INSPECTORS GENERAL CHECKLIST – 1500.60 -** located at:

<https://www.hqmc.marines.mil/igmc/Units/Inspections-Division/Functional-Area-Checklists-FACs/>

* **MCO 1500.60 – 25 Jul 2016** – Force Preservation Council (FPC) Program. Establishes policy for the standard organization and conduct of the Force Preservation Council (FPC) within the Marine Corps located at:

<https://www.marines.mil/News/Publications/MCPEL/Electronic-Library-Display/Article/923010/mco-150060/>

* **MCBUL 1500 – 01 Oct 2021** – Command Individual Risk and Resiliency Assessment System (CIRRAS) Assignment as the Force Preservation Council Authorized Organizational Communication Tool located at:

<https://www.marines.mil/News/Publications/MCPEL/Electronic-Library-Display/Article/2825584/mcbul-1500-dtd-01oct21/>

* **Command Individual Risk and Resiliency Assessment System User Guide** located at:

<https://www.manpower.usmc.mil/webcenter/portal/MF/pages_page16>

# [Inspection Items Which Can Be Completed Before Inspection](#_Inspection_Items_Which)

|  |  |
| --- | --- |
| Checklist Item | How to Confirm Compliance |
| * 0104 Has the unit codified its FPC process with a written policy letter or SOP and made available to all assigned Service Members? | * Request policy/SOP from command prior to inspection. Reviewing the policy/SOP will also provide insight for other questions to include: 0102, 0106, 0107, 0108, and 0111. |
| * 0106 Does the command have procedures in place to ensure all CIRRAS users have completed annual PII and HIPAA training? | * Request command provide training certificates for all individuals who have access/roles in CIRRAS. |
| * 0108 Does the command have procedures in place to ensure individual Service Member for preservation data, to include PHI, PII, and HIPAA data, is retained and safeguarded in accordance with PHI, PII, and HIPAA regulations? | * IAW MCO 1500.60, para 3.c(1), the CO may designate in writing designated persons to receive protected health information, IAW reference (b) of the order, for purposes of determining impact of health status on readiness and military mission. * Request command provide designation letters for FPC support staff/members who receive protected health information. |
| * 0109 Does the command require and retain appointment letters for all personnel assigned to the FPC Certifier role in CIRRAS, understanding that the FPC Certifier has CO-level permissions to assist in projecting Service Member data during an FPC? | * Request command provide any FPC Certifier appointment letters. |

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# Inspector Guidance: It is highly encourage to identify an officer or senior SNCO as the responsible manager of the program. HQMC IGMC Augment Inspectors and local command CGIP Inspectors need to have extensive experience in the FPC process and be familiar with CIRRAS. For command representatives responsible for this FAC, they also need experience in FPCs, and should be currently involved in the command’s FPC process/execution. Additionally, the command representative being inspected needs CIRRAS access, and must be familiar with the system.

# Definitions:

* **Compliant** — Sufficient evidence exists validating that the inspected command meets or is in accordance with the rules or standards set forth by the FAC question(s). *Negligible or no risk is present.*
* **Discrepancy** 
  + A minor deviation, error, or failure to comply with guidance, direction, standards, or action as required in appropriate and applicable policy directives.
  + A discrepancy requires minimal corrective actions and normally is within the capability of the inspected FA manager to correct independently within a short period of time.
  + A discrepancy is of *minor risk to the command, program, or victim services/care/case management*.
* **Finding**
  + A significant problem, deviation, error, or failure to comply with appropriate and applicable policy directives and/or higher headquarters policies and procedures.
  + A finding requires involvement, guidance, corrective action, and follow-up from a commander, the commander’s higher headquarters, or an external agency.
  + A finding goes beyond the authority and purview of a FA manger to correct independently and may be indicative of a systemic or resource shortfall.
  + A finding is *greater than a minor risk to the command, program, or victim services/care/case management*.
    - If left uncorrected, a finding may have one or all of the following characteristics:
      * (a) Can negatively impact the command’s readiness
      * (b) Involve issues of health, safety, morale, or welfare of the command’s Marines, Sailors, civilians, and families
      * (c) Involve or can lead to fraud, waste, abuse of authority, or mismanagement.

# 0101

## Are FPCs conducted on a monthly basis for the active component and not less than semi-annually for the reserve component?

## Specifics to look for

* Check command FPC log from CIRRAS for previous 12 months.
* IAW MCO 1500.60, Para 4(c), minutes or memo is required for each FPC and shall be maintained for three years. The minutes or memo shall only provide the date convened, location of FPC, and FPC attendance.
* Check a random sample of Marines’ CIRRAS profiles for FPC history, Event History, and Mitigation strategies. Recommend begin with 5 high risk, 5 medium risk, 5 elevated risk, and 5 low risk profiles. Understand there may not be that many high, medium, or elevated profiles depending on end strength. If so, sample an increased number of low risk profiles. Low risk Marines can become elevated if lower level indicators not tracked/mitigated, so it is important to consider ALL Marines during the FPC process. If the inspector finds negative trends in profile management, investigate further at the discretion of the inspection team.

## Grading

The unit is compliant with policy if:

* The FPCs were conducted IAW policy and governing directives.
* Findings or Discrepancies will be determined based on the qualitative records review by the inspector. (Frequency of FPCs if less than monthly for AC and less than semi-annually for RC)

Findings:

* Command has no evidence to support FPC completion
* Command is not using CIRRAS as the FPC tool
* The generation, collection, or distribution of PII and management of privacy information is not IAW Privacy Law and HIPAA (references (c) and (k) of MCO 1500.60). If using CIRRAS, the requirement is met.

Discrepancies:

* Minutes/memo are unclear, unsigned, or missing required information.
* Less than three years of minutes/memo document retention.
* Lack of command data inputted into CIRRAS providing incomplete force preservation picture of Marines/Sailors.

## Recommendations for Correcting

* Utilize CIRRAS as FPC tool.
* Conduct FPCs IAW policy.
* Document if deviation from policy is authorized and reason for deviation.
* Maintain records IAW statutes/directives.

# 0102

Does the command FPC process consider every member of the command and identify those Marines and Sailors requiring additional resources, risk mitigation plans, and/or mentoring?

## Specifics to look for

* Review unit policy or SOP codifying FPC processes for the command to ensure unit considers every individual in command, and has processes for referring resources and building risk mitigation plans.
* Sample unit population against records in CIRRAS. Reference the FPC profile for these Marines/Sailors, and look at the risk determination history, event history, and mitigation strategies to confirm every individual is considered (Inspector has discretion to determine sample size based on unit end strength).
* If paper records are maintained, sample those against the sample population.

## Grading

The unit is compliant with policy if:

* Written policy or SOP codifies unit FPC processes and is available to all Marines IAW with MCO 1500.60, Para 3b(5)(c).
* Sample indicates that all individuals within the command are considered on a monthly basis, and mitigation plans where required are implemented.
* Findings or Discrepancies will be determined based on the qualitative records review by the inspector.

Findings:

* No evidence in CIRRAS records that the unit has considered every individual within the command.
* No record in CIRRAS of command offering additional resources, risk mitigation strategies, and/or mentoring for individuals with identified risk (includes Low Risk Determinations).

Discrepancies:

* CIRRAS Event Histories reviewed does not show additional resources, risk mitigation plans, and/or mentoring that meets the intent of the FPC MCO.
* Mitigation strategies, resources, and/or mentoring does not align with the risk determination decision.

## Recommendations for Correcting

* Provide examples/format for SOP/policy.
* Teach/train on adding events into an individual’s FPC profile.
* Teach/train/provide examples for risk mitigation strategies/plans.
* Provide CIRRAS user guide and system access requirements.

# 0103

Does the losing command ensure the gaining command is provided the necessary and relevant force preservation information for Marines and Sailors being transferred?

## Specifics to look for

* Confirm use of CIRRAS for all unit members. If CIRRAS is utilized and profile is established, this requirement is met with the automatic transfer tool.
* Prior to CIRRAS, or if the command is not using CIRRAS, ask if paper documents are maintained and confirm that communication occurred (email, etc).
* Has the force preservation profile of the Marine/Sailor been reviewed/validated prior to transferring?

## Grading

The unit is compliant with policy if:

* CIRRAS is the FPC tool for the unit.

Findings:

* Unit is not using CIRRAS, which replaces MOL Hand-off Tool.

Discrepancies:

* Command/CIRRAS users not providing adequate command input into the system

## Recommendations for Correcting

* Provide CIRRAS user guide and system access requirements.
* Recommend review/validation of FPC profile of transferring Service Member prior to departure.
* Losing command is required to reach out to gaining command and provide relevant force preservation information. CIRRAS automatically transfers the data to the next command. Recommend losing command still reach out to discuss Service Member’s CIRRAS profile, and the gaining command can always reach out to the losing command to discuss the same.

# 0104

Has the unit codified its FPC process with a written policy letter or SOP and made available to all assigned Service Members?

## Specifics to look for

* Confirm existence of FPC policy letter or SOP and distribution to service members (posting in common areas is an example).
* The policy or the SOP should reflect current policies/directives and address nuances of the command’s mission and AOR.
* A policy/SOP should include:
  + Procedures to consider every member of the command
  + Procedures to identify those members requiring additional resources, risk mitigation plans, and/or additional mentoring (Enclosure 1 of MCO 1500.60 provides a best practice tool to help evaluate members)
  + Guidance on compliance with PHI and PII disclosure standards in the conduct of FPC meetings and activities (references (b) through (f) of MCO 1500.60)
  + Processes that incorporate a thorough review of risk factors for each individual member, and implement holistic risk mitigation measures
  + CIRRAS procedures/process covering training requirements, system access, and use

## Grading

The unit is compliant with policy if:

* Unit has written FPC policy letter or SOP.
* Policy or SOP is distributed/available/posted for access to all members of the unit.
* Policy or SOP contains critical elements as stated above.
* Policy or SOP provides guidance/procedures on CIRRAS access and use.

Findings:

* No written policy/SOP.
* Policy or SOP not available to all members of the unit.
* Outdated, unclear, or incomplete information, processes, or procedures that cause high risk to the command, program, or individual members.
* No guidance/procedures on use of CIRRAS as the command’s FPC tool.

Discrepancies:

* Outdated, unclear, or incomplete information, processes, or procedures that cause high risk to the command, program, or individual members.
* Outdated HHQ references.

## Recommendations for Correcting

* If no policy/SOP created, provide examples and assist with generating a policy/SOP.

# 0105

Are FPC records managed according to National Archives and Records Administration approved dispositions to ensure proper maintenance, accessibility, and preservation, regardless of medium or format?

## Specifics to look for

* If CIRRAS is used for FPC, this requirement is met. National Archives and Records Administration (NARA) dispositions are maintained by CIRRAS.
* Verify CIRRAS is used as the primary record for FPC as it meets the records management requirements. There should be no additional paperwork or electronic files (other than minutes/memo) used to track and maintain FPC information. If there are records maintained, it must be approved dispositions to ensure proper maintenance, accessibility, and preservation. Records management should be clearly stated in the command SOP/policy, or appropriately reference so unit members understand requirements.
* Paper records: Use SECNAV M-5210.1 record retention schedule – SSIC number 1000-39 – Temporary, cutoff at CY or when individual leaves the program.

## Grading

The unit is compliant with policy if:

* CIRRAS is used as the only FPC tool.
* Paper records are maintained IAW SSIC 1000-39.

Findings:

* Command does not utilize CIRRAS and/or does not have records management procedures documented in the SOP.
* Command utilizes CIRRAS, but does not adhere to records management procedures.

Discrepancies:

* Command utilizes CIRRAS but does not have records management procedures documented, or appropriately referenced.

## Recommendations for Correcting

* Reinforce use of CIRRAS for all FPC.
* Educate on record retention for SSIC 1000-39.
* Connect program manager with records management representative within unit.

# 0106

Does the command have procedures in place to ensure all CIRRAS users have completed annual PII and HIPAA training?

## Specifics to look for

* CIRRAS (MarineNet), PII, and HIPAA training certificates for CIRRAS users.
* The CIRRAS Deployment Plan outlines the CIRRAS and annual PII/HIPAA training requirements prior to users gaining access to the system.
* MCO 1500.60 Para 3.c(1) and reference (b) of the MCO 1500.60 outline guidance and access on receiving PHI.
* Unit policy/SOP should outline procedures to ensure all CIRRAS users have completed MarineNet CIRRAS training and annual PII and HIPAA training.

## Grading

The unit is compliant with policy if:

* All training for CIRRAS users is completed.

Findings:

* Command cannot provide training certificates/validation for CIRRAS users.

Discrepancies:

* Command does not have valid certificates for CIRRAS, PII, HIPAA training requirements for all users (depending on end strength of unit and number of users not validated, risk could push this to a finding).
* The command does not clearly outline training requirements/procedures in policy/SOP.

## Recommendations for Correcting

* Reinforce the information in the CIRRAS Deployment Plan and MarineNet CIRRAS training requirement that outlines annual PII and HIPAA training requirements in order to have/maintain access to CIRRAS.
* BPT to show program manager how to access CIRRAS training on Marine Net, and annual PII/HIPAA training.
* Provide example on how to clearly articulate requirements in the policy/SOP.

# 0107

## Does the command have procedures in place to ensure only those who are support staff, for the FPC, have CIRRAS access and that permissions are properly assigned and unassigned?

## Specifics to look for

* Discuss with the Unit Administrator who has visibility of the roles/individuals who have access. Are those individuals in a position within the unit to have access at their level in the system?
* Transferring CIRRAS users or personnel who no longer require access shall be removed from their role. This can be completed in the Admin Module with the Unit Administrator. Command should also notify CIRRAS Account Managers when users are transferred or removed.
  + *Note:* Enhancement in development for CIRRAS to automatically remove users when they transfer. Some commands are not removing individuals from roles when they transfer so they still have access to previous unit profiles which they do not have a need to know.
* Linked to question 0106, but ensure users have the appropriate training completed.
* Policy/SOP should outline procedures for CO to assign/remove users in appropriate roles.
* Roles and permissions need to be periodically reviewed/audited by the Unit Administrator. If the Unit Administrator is unsure, show them the “Manage Roles” within the Admin Module function in CIRRAS.

## Grading

The unit is compliant with policy if:

* Sample of CIRRAS users have correct access and permissions.

Findings:

* Users who no longer require access in their official duties or have transferred out of the command have access to that unit’s CIRRAS profiles.

Discrepancies:

* Process for identifying FPC support staff and granting access to CIRRAS is not clearly defined.
* Process not clearly defined/understood on removing access to users who transfer or who no longer require access in the capacity of their official duties.

## Recommendations for Correcting

* Use the opportunity to teach/train on access and permissions.
* Teach/train Unit Administrator on managing roles and conducting periodic audits to ensure only those who are designated and required have access to CIRRAS.
* Provide CIRRAS User Guide and system access requirements.
* Provide policy/SOP examples/recommendations to ensure process are clearly articulated, and the Unit Administrator and users understand their responsibilities.

# 0108

## Does the command have procedures in place to ensure individual Service Member force preservation data, to include PHI, PII, and HIPAA data, is retained and safeguarded in accordance with PHI, PII, and HIPAA regulations?

## Specifics to look for

* If CIRRAS is used for FPC, this requirement is met.
* If paper records are maintained: support the prevention of unauthorized access to PII; use CUI cover sheet; keep locked in a desk drawer, file cabinet or office if away from work station.
* All FPC participants and CIRRAS users have completed appropriate PII and HIPAA training.
* Ensure restricted information is not inputted into the Event History of CIRRAS.
* Bottom line, ensure compliance IAW MCO 1500.60 paragraphs 3.a(2)(d) and 3.c(1), and references (b) through (f).
* IAW MCO 1500.6, para 3.c(1), and reference (b) of the order, commanding officers or other persons designated in writing by the CO may receive protected health information for the purposes of determining the impact of the Service Member’s health status on the command’s readiness and military mission. For FPC members/support staff who the command shares protected health information require a designation in writing.

## Grading

The unit is compliant with policy if:

* CIRRAS is utilized for all members of the unit.
* Force preservation documents are securely handled IAW the above references to prevent unauthorized access.
* FPC participants have completed appropriate PII and HIPAA training and have a need to know as designated by the commander.

Findings:

* CIRRAS not utilized as unit’s FPC tool.
* PHI and PII documents not protected IAW above references.
* Annual PII and HIPAA training not complete/demonstrated for FPC participants and CIRRAS users.
* FPC members/support staff who have access to protected health information are not designated in writing by the commanding officer.

Discrepancies:

* Policy/SOP does not clearly articulate/provide references or procedures on retention and safeguard of PII/HIPAA.
* Restricted information inputted into CIRRAS the Event History (dependent on the information in the system, risk may be elevated and determined a finding).

## Recommendations for Correcting

* Provide link to Secretary of the Navy guidance for handling of PII – SECNAV Instruction 5211.5F located at:

<https://www.tecom.marines.mil/Portals/90/Docs/5211.5E.pdf>

* Provide examples on policies/SOPs that clearly outline unit procedures for handling PII/HIPAA.
* Teach/train on restricted information that does not belong in the Event History, and discuss associated risk.
* BPT to demonstrate how to complete CIRRAS, PII, and HIPAA training requirements.
* Provide MCBUL, User Guide, and Deployment Plan to program manager which spell out procedures to accomplish training requirements.

# 0109

Does the command require and retain appointment letters for all personnel assigned to the FPC Certifier role in CIRRAS, understanding that the FPC Certifier has CO-level permissions to assist in projecting Service Member data during an FPC?

## Specifics to look for

* Ensure the FPC Certifier(s) is appointed in writing IAW MCBUL 1500, para 3a(2)(a)8. Template provided in enclosure (2) of the MCBUL.
* Review copies of appointment letters.

## Grading

The unit is compliant with policy if:

* Copies of appointment letters are available for review.

Findings:

* FPC Certifier(s) are not designated in writing by the command.

Discrepancies:

## Recommendations for Correcting

* If appointment letters do not exist for current personnel assigned to FPC certifier role, assist with completion of the appointment letters.
* Educate command that the appointment letters are maintained IAW SECNAV M-5210.1 record retention schedule – SSIC number 1000-36 – Temporary, cutoff at CY. Destroy 3 years after cutoff.
* Template/example provided in enclosure (2) of MCBUL 1500.

# 0110

Does the command utilize CIRRAS for its FPC data management processes, eliminating other unsecure and unauthorized data management methods?

**Specifics to look for**

* Ensure utilization of CIRRAS for 100% of FPC data management.
* Review FPC to verify use of CIRRAS as FPC data management tool/system.
* Outside of CIRRAS, there should be no additional paperwork or electronic files to track and maintain FPC information/data. Only minutes or memos documenting the completion of FPC completion are authorized IAW MCO 1500.60, para 4.c.
* If paper records are used for FPC: Use SECNAV M-5210.1 record retention schedule – SSIC number 1000-39 – Temporary, cutoff at CY or when individual leaves the program.

**Grading**

The unit is compliant with policy if:

* CIRRAS is used for 100% of FPC data management.

Findings:

* CIRRAS is not utilized as the unit’s FPC tool.
* FPC records/data outside of CIRRAS retained, other than minutes/memos.

Discrepancies:

**Recommendations for Correcting:**

* If paper copies are maintained for FPC, support transition to CIRRAS and provide HQMC Functional Advocate with POC information for additional follow-up and support.
* Discuss risk associated with proper retention/maintenance of FPC sensitive information outside of CIRRAS.

# 0111

Does the command demonstrate consistent use and effort in populating relevant FPC data for Service Member profiles within their unit?

**Specifics to look for**

* Intent/guidance for CIRRAS is not to use the system once per month for the FPC. The intent is to assist commands to establish more of a continuous FPC process for their members. Frequency of review/updates to a member’s profile is dependent upon end strength, unit’s FPC processes, and associated risk with each individual. As inspectors, use judgment to determine if users/leaders are maintaining an informative/holistic force preservation picture of each member of the unit. MCO 1500.61, Marine Leader Development Order, provides guidance/requirements on mentorship of Marines.
* Check a random sample of Marines’ CIRRAS profiles for FPC history, Event History, and Mitigation strategies. Recommend begin with 5 high risk, 5 medium risk, 5 elevated risk, and 5 low risk profiles. Understand there may not be that many high, medium, or elevated profiles depending on end strength. If so, sample an increased number of low risk profiles. Low risk Marines can become elevated if lower level indicators not tracked/mitigated, so it is important to consider ALL Marines during the FPC process. If the inspector finds negative trends in profile management, investigate further at the discretion of the inspection team.
* Verify command is populating relevant FPC info/data to enhance the FPC profile of individuals to the commander for a risk determination.
* During sampling, check status/population of each of the 10 pages of FPC information for completeness/accuracy.

**Grading**

The unit is compliant with policy if:

* CIRRAS profiles are populated consistently and accurately. This does contain some subjectivity based on inspector. Inspector needs to assess if information within CIRRAS provides a holistic force preservation picture to the commander to make a risk determination decision, and implement a risk strategy/plan.

Findings:

* Information in CIRRAS only contains authoritative data from MCTFS, and no command input.
* No evidence from command that leaders/users are consistently/accurately updated individual profiles for members of the unit and creates significant risk to command and individual Marine/Sailor.

Discrepancies:

* No evidence from command that leaders/users are consistently/accurately updated individual profiles for members of the unit and creates minimum risk to command and individual Marine/Sailor.
* Policy/SOP does not clearly articulate to command procedures for FPC profile management/update requirements. Understand that not all units have CIRRAS procedures in place yet, so this can be a teach/train opportunity on what to include in the FPC policy.

**Recommendations for Correcting:**

* If profiles are incomplete, use the opportunity to teach and train including a review of the CIRRAS User Guide.