

## System of Records Notice (SORN) Guidance

To begin, please select and download a copy of your SORN into Microsoft Word from [www.defenselink.mil/privacy/notices/army](http://www.defenselink.mil/privacy/notices/army).

The review should be conducted with a goal of eliminating or reducing items of Personally Identifiable Information (PII), especially Social Security Numbers (SSNs). Any feasible masking, truncation, elimination should be considered. Consult the DoD Directive-Type Memorandum 07-015 USD(P&R) DoD Social Security Number (SSN) Reduction Plan.

Before making any changes, please utilize the “track changes” feature or some other method (highlight, strikethrough) in order to ensure all additions and deletions to be readily apparent.

A Narrative Statement describing changes to the SORN must be completed.

A Certification which validates the accuracy and completeness of the SORN, as well as identifies any PII that could be reduced or eliminated is also required.

Provide a copy of the SORN with changes identified along with the Narrative Statement and Certification to the Army Privacy Office  
[army\\_privacy\\_alert@conus.army.mil](mailto:army_privacy_alert@conus.army.mil).

## System of Records Notice (SORN) Guidance

These elements comprise a Privacy Act System of Records Notice (SORN):

**System Identifier:** Already assigned and indicated. If changes are necessary, The Army Privacy Office will assign the notice number. Example: A0025-55 OAA: The first letter “A” indicates “Army”, the next number “25-55” represents the publication series number related to the subject matter, and the final letter group “OAA” shows the system manager's command, in this case, Office of the Administrative Assistant.

**System Name:** Already assigned and indicated. If changes are needed please ensure that it identifies the system's general purpose. This field is limited to 55 characters.

**System Location:** Specify the address of the primary system and any decentralized elements, including automated data systems with a central computer facility and input or output terminals at separate locations. 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 maintained must appear in this caption or give the title and mailing address of the person who can provide a complete listing of locations. Post Office boxes are not locations. Provide the complete mailing address of each location/site maintaining the system of records. Use street address, 2-letter state abbreviations and 9-digit ZIP Codes. Spell out office names. Do not use office symbols.

**Categories of Individuals:** For purposes of the Privacy Act, an individual is defined as a living person who is a citizen of the U.S. or an alien lawfully admitted for permanent residence. Not covered are corporations, partnerships, sole proprietorships, professional groups, businesses; whether incorporated or unincorporated, and other commercial entities are not ‘individuals’. Describe the individuals covered by the system. Identify in clear, non-technical terms the specific individuals on whom records in the system are being maintained. If your databases or files cover individuals in other Federal agencies include that fact. Examples: “Department of the Army civilian employees”; “contractors”; “active duty Army personnel”; “civilian employees from other federal agencies”. Avoid using broad descriptions like “all Army personnel” unless that is truly accurate.

**Categories of Records in the System:** Describe in clear, plain language, all categories of records and items of PII in the system. List only documents and forms actually kept in the system. Do not identify source documents that are used to collect data and then destroyed, but ensure all items of PII on those source documents are identified. If your system of records notice covers a database, it is a good idea to get a print out of the data elements so that you can see all items of PII and records being maintained. Do not use overly broad terms or identify forms unless accompanied by a brief explanation. Remember to give the public as much detailed information about the PII as you can. NOTE: The Privacy Impact Assessment may require an update to include PII reflected in the Systems Notice.

**Authority for Maintenance of the System:** A Federal law or Executive order of the President must authorize the collection and maintenance of a system of records. Cite the specific law or Executive Order that authorizes the maintenance of the system. Whenever possible, cite the specific provisions of the statute or executive order. Cite the DOD directive/instruction or Department of the Army Regulation(s) that authorizes the Privacy Act system of records. This is especially important when using general statutory grants of authority statute ("internal housekeeping") as the primary authority.

Always include titles with the citations. Note: Executive Order 9397 authorizes using the SSN as a personal identifier. Include this in authority whenever the SSN is used to retrieve records. EO 9397 will never stand alone as an authority to collect and maintain information under the Privacy Act. NOTE: The Privacy Impact Assessment may require an update to include authority reflected in the Systems Notice.

**Purpose(s):** List the specific purposes for establishing and maintaining the system of records by your activity. Here you will explain (1) why you collect this information in the first place and (2) how the information is used in the course of DoD business.

**Routine Use(s):** List all non-DoD agencies and entities including private sector entities) that will routinely provided access to the data or be given the data upon request. List the specific activity or element within the agency/entity to which the record may be disclosed. for example: "To the Veterans Administration" or "To state and local health agencies". For each routine user identified, include a statement as to the purpose or purposes for which the record is to release to that

activity. Do not use general statements, such as “To other federal agencies as required” or “To any other appropriate federal agency”. Routine uses shall be written as follows: "To ... (user) ... to ... (uses - what they do with the information) ... for the purposes of ... (objective)." NOTE: Disclosures outside DoD must include those published in the Privacy Impact Assessment.

The blanket routine uses that appear at the beginning of the Army’s compilation apply to all systems notice unless the individual system notice specifically states that one or more of them do not apply to the system. Each of the Blanket Routine Uses need not be stated within this section. A statement indicating they apply is sufficient.

For example:

“In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act, these records or information 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.”

**Policies and Practices for Storing, Retrieving, Accessing, Retaining, and Disposing of Records in the System:**

**Storage:**

State the medium in which DA maintains the records; for example, in file folders, card files, microfiche, computer, or a combination of those methods. Storage does not refer to the container or facility in which the records are kept. Example: “Maintained in paper files and on electronic storage mediums”.

**Retrievability:** State how the Army retrieves the records; for example, by name, by Social Security Number, by name and Social Security Number, by fingerprints or by voiceprints. To be subject to the Privacy Act, records within a system of records must be retrieved by a personal identifier.

**Safeguards:** Identify the system safeguards; for example, storage in safes, vaults, locked cabinets or rooms, use of guards, visitor controls, personnel screening, computer systems software, and so on. Describe safeguards fully without compromising system security. Describe the facility/building safeguards, then the

room, then the computer/file cabinet. Then indicate the personnel getting access to the information. Example: "Records are maintained in a controlled facility. Physical entry is restricted by the use of locks, guards, and is accessible only to authorized personnel. Access to records is limited to person(s) with an official "need to know" who are responsible for servicing the record in performance of their official duties. Persons are properly screened and cleared for access. Access to computerized data is role-based and further restricted by passwords, which are changed periodically".

**Retention and Disposal:** State the length of time records are maintained by the activity in an active status, indicate when or if the records may be transferred to a Federal Records Center and how long the record stays there. Specify when the Records Center sends the record to the National Archives or destroys it. If records are eventually to be destroyed, state the method of destruction (e.g., shredding, burning, pulping, etc.). AR 25-400-2, the Army Records Information Management System, should be used as a reference in order to ascertain record disposition. If your activity has sent for NARA approval of the disposition scheduled, we can use the following until the Agency receives an approved disposition: "Disposition pending (treat records as permanent until the National Archives and Records Administration has approved the retention and disposition schedule."

**System Manager(s) and Address:** List the position title and duty address of the system manager. Please do not include names. For decentralized systems, show the locations, the position, or duty title of each category of officials responsible for any segment of the system.

**Notification Procedures:** List the title and duty address of the official authorized to tell requesters if their records are in the system. Specify the information a requester must submit; for example, full name, military status, SSN, date of birth, or proof of identity, and so on. Specify the information an individual must provide in order for the Component to respond to the request (address, email address, etc.).

The entry should read as follows "Individuals seeking to determine whether information about themselves is contained in this system of records should address written inquiries to...Request should contain individual's..."

**Record Access Procedures:** Explain how individuals may arrange to access their records. This is very similar to the above entry.

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 activity to respond to the request; and a description of any proof of identity required.

The entry should read as follows "Individuals seeking access to information about themselves contained in this system of records should address written inquiries to...Requests should contain individual's..."

**Contesting Records Procedures:** The standard language to use is "The Army's rules for accessing records, and for contesting contents and appealing initial agency determinations are contained in Army Regulation 25-71; 32 CFR part 505; or may be obtained from the system manager."

**Record Source Categories:** Show categories of individuals or other information sources for the system. Do not list confidential sources protected by 5 U.S.C. 552a(k)(2), (k)(5), or (k)(7). Describe where the obtained the information maintained in the system is obtained from (source documents and other agencies). Describe the record sources in general terms.

**Exemptions Claimed for the System:** In most cases, the system will claim no Exemptions. When a system has no approved exemption, write the word "None" under this heading.

If there is an Exemption, specifically list any approved exemption including the subsection in the Act.

Also, state that an exemption rule has been promulgated in accordance with the requirements of 5 U.S.C. 553 (B) (1), (2), (3), (c) and (e).

Please use the following text for stating which exemptions apply:

When establishing a (j)(2) exemption, use 'Parts of this system may be exempt pursuant to 5 U.S.C. 552a (j)(2) if the information is compiled and maintained by a component of the agency which performs as its principle function any activity pertaining to the enforcement of criminal laws.'

When establishing a (k)(1) exemption, use 'Information specifically authorized to be classified under E.O. 12958, as implemented by DoD 5200.1-R, may be exempt pursuant to 5 U.S.C. 552 a (k)(1).' Each DoD Component should have established a 'blanket' (k)(1) exemption within their respective procedural/exemption rule (see DoD 5400.11-R).

When establishing a (k)(2) exemption, use 'Investigatory material compiled for law enforcement purposes, other than material within the scope of subsection 5 U.S.C. 552a(j)(2), may be exempt pursuant to 5 U.S.C. 552a(k)(2). However, if an individual is denied any right, privilege, or benefit for which he would otherwise be entitled by Federal law or for which he would otherwise be eligible, as a result of the maintenance of the information, the individual will be provided access to the information exempt to the extent that disclosure would reveal the identify of a confidential source. NOTE: When claimed, this exemption allows limited protection of investigative reports maintained in a system of records used in personnel or administrative actions.'

When establishing a (k)(3) exemption, use 'Records maintained in connection with providing protective services to the President and other individuals under 18 U.S.C. 3506, may be exempt pursuant to 5 U.S.C. 552a(k)(3).'

When establishing a (k)(4) exemption, use 'Records maintained solely for statistical research or program evaluation purposes and which are not used to make decisions on the rights, benefits, or entitlement of an individual except for census records which may be disclosed under 13 U.S.C. 8, may be exempt pursuant to 5 U.S.C. 552a(k)(4).'

When establishing a (k)(5) exemption, use 'Investigatory material compiled solely for the purpose of determining suitability, eligibility, or qualifications for federal civilian employment, military service, federal contracts, or access to classified information may be exempt pursuant to 5 U.S.C. 552a(k)(5), but only to the extent that such material would reveal the identity of a confidential source.'

When establishing a (k)(6) exemption, use 'Testing or examination material used solely to determine individual qualifications for appointment or promotion in the Federal service may be exempt pursuant to 5 U.S.C. 552a(k)(6), if the disclosure would compromise the objectivity or fairness of the test or examination process.'

When establishing a (k)(7) exemption, use 'Evaluation material used to determine potential for promotion in the Military Services may be exempt pursuant to 5 U.S.C. 552a(k)(7), but only to the extent that the disclosure of such material would reveal the identity of a confidential source.'

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

1. System Identifier and name: A0680-31 DSC G-1, Economic and Manpower Analysis (OEMA) Database
2. Responsible official: MAJ John Smith, Deputy Director, Office of Economic and Manpower Analysis, United States Army, Department of Social Sciences, 607 Cullum Road, West Point, NY 10996-1798, Telephone (845) 938-1234.
3. Purpose of establishing the system: The Department of the Army (DA) is proposing to establish a system of records that will provide a central data repository to facilitate the conduct of manpower and personnel studies for the DoD and DA senior leadership.
4. Authority for the maintenance of the system: 5 U.S.C. 301, Departmental Regulations; 10 U.S.C. 3013, Secretary of the Army; 10 U.S.C. 2358, Research and Development Projects; and E.O. 9397 (SSN).
5. Probable or potential effects on the privacy of individuals:  
None.
6. Is this system, in whole or in part, being maintained by a contractor? Yes.
7. Steps taken to minimize risk of unauthorized access: All records are maintained in a controlled area accessible only to authorized personnel. Entry to these areas is restricted to those personnel with a valid requirement and authorization to enter. Physical entry is restricted by the use of locks, guards, and administrative procedures. Access to personal information is restricted to those who require the records in the performance of their official duties. Access to personal information is further restricted by the use of user identification codes and passwords, which are changed periodically.
8. Routine uses 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 N/A
10. Supporting Documentation: None.

## Certification for System of Records Notice (SORN)

System Name: \_\_\_\_\_

The officials below certify that this SORN has been reviewed for completeness, accuracy, relevance and timeliness.

\_\_\_\_\_ The SORN as currently published is fully descriptive of business practices, types and uses of Personally Identifiable Information (PII). No changes are necessary at this time.

OR

\_\_\_\_\_ An updated SORN with changes identified is provided for publication. Once changes have been made, the SORN will be fully descriptive of business practices, types and uses of PII.

The following items of PII (and/or portions thereof) are no longer necessary and are recommended for elimination from the system:

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All remaining items of PII contained in the system are fully identified in the SORN and are essential and necessary in order to conduct official business.

Information Technology systems operating under the authority of this SORN:

Title	APMS number	DITPR number
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**Certification for System of Records Notice (SORN)**

SIGNATURE PAGE

PREPARING OFFICIAL: \_\_\_\_\_  
(Signature) (Date)

Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Organization: \_\_\_\_\_  
Work Phone: \_\_\_\_\_  
Email: \_\_\_\_\_

PRIVACY OFFICIAL: \_\_\_\_\_  
(Signature) (Date)

Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Organization: \_\_\_\_\_  
Work Phone: \_\_\_\_\_  
Email: \_\_\_\_\_

MANAGERIAL OVERSIGHT

REVIEWING OFFICIAL: \_\_\_\_\_  
(Signature) (Date)

Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Organization: \_\_\_\_\_  
Work Phone: \_\_\_\_\_  
Email: \_\_\_\_\_