

## NARRATIVE STATEMENT (ONLY required for Additions and Modifications)

### 1. System name and number:

The proposed (New SORN) or current (Modified SORN) includes the **System Name** followed by the **System Number**.

#### **Sample Format:**

“Military Spouse Employment Partnership (MSEP) Career Portal,” DPR 47 DoD.

### 2. Purpose of establishing the system:

The intent is to explain to OMB and Congress why the Component is required to collect, use, and maintain the information on individuals in its system of records. This section will also be used in the preamble, which is published in the Federal Register with the SORN. When well written, it should reduce concerns and the number of comments submitted by the public when the SORN is published. The SORN should not be a duplication of any existing systems of records or SORNs that have already been published in the Federal Register. **It should not be a repetition of the purpose stated in the SORN.** Your response should address these three questions:

1. What action is being taken?
2. Why is this action necessary?
3. What is the intended effect of this action?

#### **Sample Format:** (DPR 47 DoD )

The Office of the Secretary of Defense is proposing to establish a system of records that will be the sole web platform utilized to connect military spouses with companies seeking to hire military spouse employees. Participating companies, called MSEP Partners, are vetted and approved participants in the MSEP Program and have pledged to recruit, hire, promote and retain military spouses in portable careers. MSEP is a targeted recruitment and employment partnership that connects American businesses with military spouses who possess essential workforce skills and attributes and are seeking portable, fulfilling careers. The MSEP program is part of the overall Spouse Education and Career Opportunities (SECO) program which falls under the auspices of the office of the Deputy Assistant Secretary of Defense for Military Community & Family Policy.

### 3. (Modified SORN) Nature of proposed modifications for the system:

This should be written in the same manner as described above for New SORNs. In addition to expanding the purpose for modified SORNs, briefly explain the significant changes that are being made to the system of records. The language **MUST NOT** simply reflect a copy and paste of the language in the Purpose section. The response should generally address these three questions:

1. What changes are being made?
2. Why are the changes necessary?
3. What is the intended effect of these changes?

**Sample Format:** (DTIC 01)

This system of records registers and certifies users of Defense Technical Information Center (DTIC) products and services. It ensures that Department of Defense scientific and technological information is appropriately managed to enable scientific knowledge and technological innovations to be fully accessible to authorized recipients while applying appropriate safeguards to assure that the information is protected according to national security requirements. This modification reflects a change to the system location, categories of individuals, categories of records, authorities, purpose, routine uses, retrievability, safeguards, system manager and address, notification procedure, record access procedures, contesting record procedures, and record source categories.

**4. Authority for the maintenance of the system:**

List the applicable authorities listed in the SORN (copy and paste the Authorities section from the Proposed SORN section).

**Sample Format:**

5 U.S.C. 4103, Establishment of training programs; 10 U.S.C. 3013, Secretary of the Army; Department of Defense Directive 1322.18, Military Training; Army Regulation (AR) 350-1, Army Training and Leader Development; AR 600-20, Army Command Policy; AR 600-8-8, The Total Army Sponsorship Program; AR 690-950, Career Management; and E.O. 9397 (SSN), as amended.

**5. Evaluation of the probable or potential effect on the privacy of individuals:**

The OMB Circular A-108 states, “If the agency has conducted one or more privacy impact assessment(s) with respect to information technology that will be used to collect, maintain, or disseminate the information in the system of records, the privacy impact assessment(s) will likely provide the information necessary to meet this requirement, and may be submitted in lieu of drafting a separate evaluation.”

If there is no PIA because the records are not stored an information system (electronic maintenance), list any known or perceived adverse effects on the individual by maintaining the system of records. A risk assessment of the categories of PII can be found in Committee of National Security Systems No. 1253

[http://iassecurity.net/Resources/CNSSI\\_1253.SC%20Controls1.pdf](http://iassecurity.net/Resources/CNSSI_1253.SC%20Controls1.pdf)

**Sample Format:**

The risk of unauthorized access to records is low due to SECO being hosted on a DoD Information Assurance Certification and Accreditation Process (DIACAP) certified and accredited infrastructure. Records are maintained on a military installation in a secure building in a controlled area accessible only to authorized personnel. Records are encrypted during transmission to protect session information and at rest.

**6. Routine use compatibility:**

OMB Circular A-108 requires components to explain how each new or modified routine use satisfies the compatibility requirement of the Privacy Act. Routine uses shall be narrowly tailored to address a specific and appropriate use of the records in the system of records. A

routine use may be appropriate when the use of the record is necessary for the efficient conduct of government, and when the use is both *related to* and *compatible with* the original purpose for which the information was collected. The concept of compatibility comprises both functionally equivalent uses of the information as well as other uses of the information that are necessary and proper.

**Reference:** [OMB Circular A-108](#)

Explanations of new and modified routine uses, and how they satisfy the compatibility requirement of the Privacy Act only need to be explained in the narrative statement. List only the routine uses themselves in the SORN. This explanation is only required here in the Narrative Statement.

**Sample Format:**

Routine use compatibility: The routine uses for this system are compatible with the purpose for which there records are collected. (Specific Routine Uses): To civilian educational institutions where the participant is enrolled, for the purposes of ensuring correct enrollment and billing information. This (or the following routine uses) routine use complies with 10 U.S.C. 1784a, Education and training opportunities for military spouses to expand employment and portable career opportunities and is necessary to conduct efficient government business within DoD.

**7. OMB public information collection requirements:**

**Consult with your Component IMCO to answer these questions**

OMB collection required: Yes/No

OMB Control Number (if approved): N/A (or number if available)

Title of collection: N/A (or Title if available)

Date Approved or Submitted: N/A (or date approved or submitted)

Expiration Date (if approved): N/A (or expiration date)

**Reference:** Information collections may be searched at <http://www.reginfo.gov/public/do/PRAMain>. Select “Department of Defense” to search DoD collections, and use the “edit” or “find” functions to search by license number or keyword.

Provide titles of any information collection requests (e.g., forms and number, surveys, etc.) contained in the systems of records: (list the names of any forms or other information collection instruments).

If collecting on members of the public and no OMB approval is required, state the applicable exception(s) or provide the reason for not having an approved OMB collection.

**Reference:** DoD 8910.1-M, Vol 2

**Sample Format:**

OMB collection required: Yes

OMB Control Number (if approved): 0704-0000

Title of collection: Sample Survey

Date Approved or Submitted: N/A

Expiration Date: July 31, 2018

*Provide titles of any information collection requests (e.g., forms and number, surveys, interview scripts, etc.) contained in the system of records.*

DD Form 123, Title of the Form  
My Application Portal

**Information Required by DPCLTD (Not submitted to OMB)**

**8. Name of Information Technology (IT) System and DITPR Number:**

Answer this question with the full name of the IT system being used for the system of records.

Enter the DITPR Number.

If the system uses paper records or electronic files that are not maintained in an IT system, state "NONE."

**Sample Format:**

Defense User Registration System. DITPR Number 4300.

**9. Is the system, in whole or in part, being maintained by a contractor?**

Answer Yes or No.

A routine use must be established to permit disclosure of records to the contractor operating a system. This can be validated in the PIA as well in the routine uses as modeled later in this document.

*Reference: [OMB Circular A-108](#) (section j)*

**Sample Format:**

Yes.