

Army Regulation 25–98

Information Management

**Information
Management
Control
Requirements
Program**

**Headquarters
Department of the Army
Washington, DC
8 February 2019**

UNCLASSIFIED

SUMMARY of CHANGE

AR 25–98

Information Management Control Requirements Program

This administrative revision, dated 21 June 2023—

- o Changes proponency from the Administrative Assistant to the Secretary of the Army to the Chief Information Officer.
- o Updates “U.S. Army Headquarters Services” to “U.S. Army Enterprise Services Agency” (paras 1–9*a*(3), 1–11*c*, and 5–10*c*).
- o Adds boilerplate statements to internal controls in accordance with AR 11–2 (paras B–5 and B–6).
- o Updates website links (throughout).
- o Updates references (app A).

This administrative revision, dated 13 February 2020—

- o Corrects guidance for the Army internal survey exemptions (para 6–5*j*).

This new publication, dated 8 February 2019—

- o Changes publication title and series from AR 335–15 (Management Information Control System) to AR 25–98 (Information Management Control Requirements Program) (cover).
- o Updates guidance for the Information Management Control Requirements Program (throughout).
- o Changes the proponency of the program from Chief Information Officer/G–6 to the Office of the Administrative Assistant to the Secretary (throughout).

Information Management
Information Management Control Requirements Program

By Order of the Secretary of the Army:

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General, United States Army
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Official:


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to the Secretary of the Army

History. This publication is an administrative revision. The portions affected by this administrative revision are listed on the summary of change.

Summary. This regulation prescribes policy for the preparation, review, and approval of information requirements and the documentation and information products prepared in response to these requirements.

Applicability. This regulation applies to the Regular Army, the Army National Guard/Army National Guard of the

United States, and the U.S. Army Reserve, unless otherwise stated including Department of the Army Civilians. This regulation applies regardless of mobilization status.

Proponent and exception authority. The proponent of this regulation is the Chief Information Officer. The proponent has the authority to approve exceptions or waivers to this regulation that are consistent with controlling law and regulations. The proponent may delegate this approval authority, in writing, to the Records Management and Declassification Agency/Records Management Division, Army Records Officer. Activities may request a waiver to this regulation by providing justification that includes a full analysis of the expected benefits and must include formal review by the activity's senior legal officer. All waiver requests will be endorsed by the commander or senior leader of the requesting activity and forwarded through higher headquarters to the policy proponent. Refer to AR 25–30 for specific requirements.

Army internal control process. This regulation contains internal control

provisions in accordance with AR 11–2 and identifies key internal controls that must be evaluated (appendix B).

Supplementation. Supplementation of this regulation and establishment of command and local forms are prohibited without prior approval from Chief Information Officer.

Suggested improvements. Users are invited to send comments and suggested improvements on DA Form 2028 (Recommended Changes to Publications and Blank Forms) to the Chief Information Officer via email to usarmy.pentagon.hqda-cio.mbx.policyinbox@army.mil.

Distribution. This regulation is available in electronic media only and is intended for the Regular Army, the Army National Guard/Army National Guard of the United States, and the U.S. Army Reserve.

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Glossary

Chapter 1 Introduction

1-1. Purpose

The purpose of this guidance is to update the Information Management Control Requirements Program that reduces costly, ineffective, and redundant information collections (such as forms and surveys) and reporting requirements. Additionally, it establishes procedures for information collecting and reporting of Army internal, multi-Service, and public requirements.

1-2. References and forms

See appendix A.

1-3. Explanation of abbreviations and terms

See the glossary.

1-4. Responsibilities

Responsibilities are listed in section II of chapter 1.

1-5. Records management (recordkeeping) requirements

The records management requirement for all record numbers, associated forms, and reports required by this publication are addressed in the Records Retention Schedule–Army (RRS–A). Detailed information for all related record numbers, forms, and reports are located in Army Records Information Management System (ARIMS)/RRS–A at <https://www.arims.army.mil>. If any record numbers, forms, and reports are not current, addressed, and/or published correctly in ARIMS/RRS–A, see DA Pam 25–403 for guidance.

1-6. Statutory authority

Implements portions of Public Law 104–13 (PL 104–13, known as the Paperwork Reduction Act of 1995) to—

- a.* Minimize the Federal paperwork burden on the public, small businesses, and state and local governments.
- b.* Minimize the Federal Government's costs for collecting, maintaining, using, and disseminating information.
- c.* Maximize the usefulness of information collected, maintained, and disseminated by the Federal Government.
- d.* Coordinate, integrate, and where practical, create uniform Federal information policies and practices.
- e.* Make sufficient information available to all commanders and management personnel to achieve mission effectiveness.

1-7. Objectives

The objectives of this regulation are to—

- a.* Identify the information needs of Army organizations to reduce the burden of unnecessary collections of information.
- b.* Collect, transmit, process, and store information through the most economical use of personnel, funds, and equipment.
- c.* Comply with standard forms, terms, data elements, and source records.
- d.* Provide simple, orderly, and flexible procedures and systems that can quickly respond to mobilization.
- e.* Prevent or reduce the imposition of invalid, inefficient, or unnecessary information collections.
- f.* Provide a means for measuring the value of information against the cost of collecting it.
- g.* Improve the methods and techniques for collecting information by applying information processing technology and reducing agency cost.

1-8. Policy

a. Control and maintain Army collections of data. Requirements not specifically exempted, not approved, not assigned an Office of Management and Budget (OMB) control number, report control symbol (RCS), survey control number (SCN), or other Army information control symbol, or in any other ways not in conformance with this regulation, are unauthorized. The requests will be—

- (1) Identified by standard numbering patterns.
- (2) Approved by a designated official.

(3) Reviewed periodically by the initiating, monitoring, and preparing agencies. Periodic reviews will be made of each management information requirement at least once every 3 years for public collections and once every 5 years for Army internal collections.

(4) Revised or rescinded, when needed.

b. Cite the title and RCS in the table of contents and text for each directive that initiates an information management requirement. Each subsequent action affecting the information requirement will also state the title and RCS.

c. Conduct privacy impact assessments (PIAs) in accordance with DoDI 5400.16 for collections of information that contain personal information on individuals, which require special handling under DoD 5400.11–R. The assessments will ensure that personal information in electronic form is acquired and maintained only when necessary and that the supporting information technology being developed and used protects and preserves the privacy of individuals. Such information included in the proposed collection of information will be accessible to the public only as prescribed by DoDM 5400.07.

d. Ensure that information needs are clearly identified and reports to be generated by the system represent a cost-effective use of resources in the development and operational life cycle of an automated information system.

e. Submit requests for forms used to collect information in accordance with AR 25–30.

f. Evaluate and screen each item of data in the information collection against data in existing information collections to determine whether the existing information can satisfy the requirement.

g. Refuse to honor information collections that have not been specifically exempted or properly approved and symbolized.

h. Approve and symbolize, on a case-by-case basis, special, one-time, high priority, or time-sensitive information collections without subjecting the request to an in-depth review and analysis, provided a statement of urgency is included with the request for approval.

i. Commercial platforms, unless specifically approved by the Chief Information Officer (CIO)/Deputy Chief of Staff (DCS), G–6, are not authorized for Army conducted surveys. See chapter 6 for authorized and preferred online survey development sites.

1–9. Secretary of the Army

On behalf of SECARMY, the Administrative Assistant to the Secretary of the Army (AASA) is responsible for Armywide control of information management collections and reporting requirements.

a. *The Administrative Assistant to the Secretary of the Army.* The AASA will ensure the Director, U.S. Army Records Management and Declassification Agency (RMDA) will—

(1) Establish and implement standards and procedures for initiating, identifying, reviewing, preparing, distributing, and discontinuing information collections.

(2) Establish an information requirement control activity and appoint a Department of the Army (DA) Information Management Control Officer (IMCO).

(3) Appoint DA/U.S. Army Enterprise Services Agency (ESA)/RMDA IMCO, in writing.

b. *Department of the Army Information Management Control Officer.* DA IMCO have jurisdictional control over Armywide and multi-command information management requirements. DA IMCO will—

(1) Provide guidance and technical advice for information control policy and operations.

(2) Represent DA in all matters relating to control of information management requirements, including all other DoD and Federal agencies.

(3) Provide for periodic review of approved information collections for need, adequacy, design, economy of preparation, and use.

(4) Withhold approval of any information management requirement if the suitability, coordination, essentiality, or costs have not or cannot be determined.

(5) Ensure that ARs and DA Pamphlets containing information requirements are updated in accordance with AR 25–30.

(6) Maintain an up to date Armywide index of approved recurring information collections requiring an RCS and all Army submissions under the Paperwork Reduction Act of 1995 that OMB approved.

(7) Assess ongoing public information collections every 3 years unless OMB stipulates otherwise.

(8) Submit the DA information collection budget to Washington Headquarters Services, Executive Services Directorate and Office of Information Management (OIM).

(9) Serve as the DA clearance office and office of record for Army public information collection requirements.

(10) Serve as the office of record and approval authority for Army-prescribed Army internal information collection requirements, including for multi-Service collection requirements DA imposed. May delegate Army internal survey approval authority to other Army activities, as needed.

(11) Evaluate and screen each data element in an information collection requirement against information in existing information collection requirements to determine whether the existing information can satisfy the requirement.

(12) Ensure that information collection requirements, including research involving human subjects, are reviewed in accordance with the requirements of DoDI 3216.02.

(13) Ensure alignment of Army internal and multi-Service RCSs.

c. Headquarters, Department of the Army Privacy Office. This office provides mandatory coordination for information collections, when required.

1–10. Chief Information Officer/Deputy Chief of Staff, G–6

The CIO/DCS, G–6 will exercise oversight and policy and upon request, review packages when information is collected, stored, or disseminated in an electronic form and ensure that PIAs are complete and accurate in accordance with DoDI 5400.16.

1–11. Headquarters, Department of the Army principal officials and commanders of Army commands, Army service component commands, and direct reporting units

HQDA principal officials and commanders of ACOMs, ASCCs, and DRUs will—

a. Manage and supervise the information management control requirements within their jurisdiction.

b. Ensure that compliance and enforcement of department policies and procedures governing information management requirements and data products within their organization are upheld, including at subordinate agencies and commands.

c. Designate an IMCO, in writing, and provide HQDA/ESA/RMDA with a copy of the designation memorandum. IMCOs, within their jurisdiction, will—

(1) Advise action officers (AOs) on the essentiality of proposed, revised, and amended information management collections.

(2) Promote secure electronic information collection methods and procedures.

(3) Process documentation for submission to DA to assign, extend, reinstate, and cancel Army internal, inter-component, and public information collections.

(4) Reduce the data collection burden by decreasing the frequency and amount of data requested when possible.

(5) Ensure statistical sampling techniques and the use of information technology are employed as approaches to minimizing reporting workloads. Ensure that census data collections are conducted only when sampling is not methodologically appropriate, such as when the population of interest is very small.

(6) Ensure DA Form 7799 (Request for Approval of Information Management Requirement) is completed for each nonexempt request initiated.

(7) Minimize, account for, and control information collected from the public and State and local governments in accordance with Title 5, Code of Federal Regulations, Part 1320 (5 CFR 1320).

(8) Approve or disapprove the citation of exemptions listed in paragraph 3–2 and make sure the proper exemption is cited if the information requirement is exempt.

(9) Establish goals for the reduction in number or frequency of Army internal and multi-Service prescribed information collections.

(10) Ensure prompt responses to information management controls, paying particular attention to the timeliness, accuracy, and completeness of the data submitted, to ensure full compliance with approved requirements.

(11) Ensure that violations of this regulation are corrected and reported to the initiating organization. Notification of violations will be sent to each IMCO in the chain of command.

(12) Maintain a database or list of recurring information requirements.

(13) Maintain the organization's information management control requirements files in accordance with AR 25–400–2.

(14) Make sure RCSs assigned by a higher level will not be assigned a different DoD component RCS by a lower level organization.

(15) Submit public and required information collection requests through HQDA, making sure users justify new information collections before submission for approval.

d. Designate AOs to coordinate information management controls with the IMCO within their jurisdiction. AOs are the originators of a proposed information collection. Specifically, AOs will—

(1) Submit all documents concerning the information requirement to the organization's IMCO within their jurisdiction for review and recommendation of approval before forwarding to HQDA.

(2) Review published collections a minimum of 180 days before the expiration date. Extensions must be requested a minimum 180 days before the expiration date. Information collections not approved for extension may be canceled on the date of expiration.

(3) Ensure the collection meets the requirements set by the CIO/DCS, G-6 and DoDI 5400.16.

e. Designate a privacy official in accordance with AR 25-22. To ensure compliance with privacy policies, the organization privacy official will review all information collections that contain personally identifying information.

f. Designate a records administrator in accordance with AR 25-400-2. All information collection requests must be coordinated with the records administrator to ensure that the appropriate records disposition schedule has been identified.

Chapter 2

Information Collections

2-1. General

Information is any communication or representation of knowledge such as, facts, data, or opinions in any medium or form. Information collections are written verbal reports, applications (forms), schedules, surveys (including focus groups), questionnaires, reporting or recordkeeping requirements in any format and collected through any media. Information collections must be essential to the mission of the requesting organization and the burden must be worth the benefit of the results of the collection. The burden is the total time, effort, and financial resources used to generate, maintain, retain, or provide information.

2-2. Types of information collections

Information collections may be Army internal (also known as component internal or internal), multi-Service (also known as DoD internal or cross-services), or public. In some instances, an information collection may be a combination of public and Army internal or multi-Service.

2-3. Information collection requirements

Information collection items must be constructed to obtain all information needed concisely, economically, and effectively. Prescribing directives containing information requirements should be sufficiently clear to avoid misinterpretation. Before collecting information, AOs must ensure that the information is not duplicative of information already available. Army and DoD policies require that information collections comply with the following:

a. Non duplication. Individuals requesting an information collection must ensure that the information collected does not duplicate information already available. When the information is not already available, requesters must demonstrate that they are using methods (for example, a scientific sample and a short questionnaire) to minimize the information collection burden on respondents.

b. Licensure. All information collections must be approved and assigned a SCN, RCS, OMB control number or a combination of two. All surveys administered by an Army organization will be submitted for a formal review and determination. Soldiers and DA Civilians will not respond to any type of information collection that has not been properly approved and licensed with an information collection control symbol.

c. Privacy impact assessment. When personal information about individuals is collected in an electronic form, a DD Form 2930 (Privacy Impact Assessment (PIA)) must be completed in accordance with AR 25-1 to ensure the data remains protected and private.

2-4. Information collection budget

a. In accordance with DoDI 8910.01, HQDA will submit annual information collection budgets, which will project DA's information management needs from the public for the next fiscal year. The number of hours public respondents require to prepare Army data collection requests will be limited by a ceiling OMB assigns.

b. HQDA will inform AOs proposing a new or revised data collection from the public if their proposal is within the current assigned ceiling.

c. Data collection requests proposed after submission of the information collection budget that exceed the ceiling will be disapproved unless the Secretary of Defense certifies an emergency need for the data.

Chapter 3

Army Internal Information Collections

3-1. Purpose

This chapter outlines the requirements and process for Army internal collections. If the Army internal information collection is a survey, see chapter 6 for the elements required for review and approval.

3-2. General

An Army internal information collection is when the Army needs to collect information from Army personnel only. Army internal information collections are approved by HQDA. If approved, the collection will be assigned an RCS and expiration date.

3-3. Army internal exemptions

a. Nonsurvey Army internal collections may be exempt from a formal review. The exemptions align with the multi-Service collections exemptions outlined in DoDM 8910.01, Volume 1, Enclosure 3.

b. In accordance with paragraph 2-3, all surveys administered by an Army organization will be submitted for a formal review and determination.

3-4. Unauthorized requests

Requests for information will not be approved when—

- a.* The request is considered controllable and the directive does not cite an RCS.
- b.* The request cites an exemption that does not apply.
- c.* The request cites an RCS that has been rescinded.
- d.* The request cites a questionable exemption or symbol.
- e.* A request for an exempt or controlled information collection appears to duplicate or overlap another collection request, or to conflict with the objectives of the management information control system.
- f.* Repeated requests are received for one-time data collections that appear to overlap each other or indicate a need for a recurring data request.
- g.* The request does not appear to comply with this regulation.

3-5. Required documents and approval process

a. The AO will discuss new or revised data requests with the IMCO within jurisdiction for coordination. The discussion will include possible duplication of data, potential availability of data, cost estimating techniques to be used, effect on preparers, and management's need for the information.

b. If a need to request data is determined, the AO will complete the DA Form 7799. The DA Form 7799 and instrument will be sent to the IMCO with jurisdiction for review and approval.

c. The IMCO with jurisdiction will coordinate with the records administrator and privacy officer ensuring compliance with records management and privacy policies. The appointed IMCO may also serve as the records administrator and privacy officer. If that is the case, the IMCO with jurisdiction will complete and sign complete DA Form 7799, block 11.

d. The request for an RCS will be approved by a colonel and/or O-6 or DA Civilian equivalent within the office of the IMCO with jurisdiction before submission to HQDA.

e. Upon approval of the request, the IMCO with jurisdiction will submit the DA Form 7799 with all applicable signatures and the instrument to HQDA for approval of the RCS.

f. The assigned DA IMCO will review the information requirement and if approved assign an RCS number to all DA Form 7799s for Armywide use.

g. The RCS will be added on all DA Forms annotated on the approved DA Form 7799.

h. RCSs will expire when the prescribing directive requiring the collection of information is no longer applicable. Prescribing directives with a requirement to collect information that are rescinded will also rescind the approved RCS. If there is still a need to collect data Armywide then it must be outlined in a new prescribing directive and resubmitted for approval of an RCS. If there is no prescribing directive that includes the need to collect data Armywide, the AO may submit a request for an extension of the RCS.

3–6. Canceling a report control symbol reporting requirement

RCS reporting requirements that are no longer needed may be canceled before the expiration date. To cancel an RCS reporting requirement, AOs must—

- a.* Send written notification to the reporting activities if they have superseded or discontinued an RCS report.
- b.* Update the publication that prescribes the RCS report by issuing a revision or an interim change to reflect the current status of the reporting requirement. Include this information in the “Summary of Change” once the publication is rewritten.
- c.* Submit a copy of the written notification, a draft of the revised publication or interim change, and the DA Form 7799 requesting to cancel the RCS requirement to the DA IMCO.
- d.* Coordinate with servicing records administrator to effect disposition of any accumulated records and coordinate on requirement to change any report specific records disposition.

Chapter 4

Multi-Service Information Collection Requirements

4–1. Purpose

This chapter provides the necessary information for the Army to develop, review, revise, and obtain approval for multi-Service information collections. It specifies the responsibilities of the Army for responding to collections imposed on DoD.

4–2. General information

- a.* A multi-Service information collection is when information is collected from one or more DoD or Office of the Secretary of Defense (OSD) components.
- b.* Multi-Service information collections will be approved by the DoD Army internal Information Collections Officer in the Washington Headquarters Services/Executive Services Directorate/OIM. If approved, the collection will be assigned an RCS and expiration date.
- c.* There are two groups that make up a multi-Service population, they are as follows:
 - (1) Active Duty Service and/or military members from two or more DoD components.
 - (2) Federal employees from two or more DoD or OSD components.

4–3. Multi-Service exemptions

- a.* See DoDM 8910.01, Volume 1 for categories of multi-Service collections that are exempt from formal review and approval procedures.
- b.* Army organizations will notify DA of nonsurvey collections exempt from formal review. If action is needed, the implementing organization will request an RCS in accordance with this regulation.
- c.* Surveys are not exempt from formal review. All surveys will be submitted to for determination and licensure.

4–4. Approval periods and types of requests

There are several types of multi-service information collection requests. Request types may be combined; however, there will only be one expiration type and date assigned to the collection. Approval periods vary depending on the type of collection.

- a. New and/or reinstatements.*
 - (1) Approval period: 5 years.
 - (2) Reinstatements are completed when an RCS is close to expiring and there remains a need to collect the information and when the RCS has expired and the component needs to resume the collection.
 - (3) For reinstatements, copies of past results of the approved collection must be submitted to OIM.
- b. Revisions.*
 - (1) Revisions do not alter the expiration date.
 - (2) A revision is a change to an active RCS.
 - (a)* Minor revisions require approval forms, cost summaries, or coordination.
 - (b)* Major revisions may require coordination of the DD Form 2936 (Request for Approval of DoD Internal Information Collection), an updated cost summary, and updated mandatory coordination of the collection instrument.
 - (3) Revisions which increase the cost of the collection by more than \$10,000 must go through the full approval process.
- c. Extensions.*

- (1) Approval period: No more than 2 years (granted once per full renewal).
 - (2) An extension may be requested when there is no change in the cost of the collection and the RCS is still active.
- d. Emergency approvals.*

- (1) Approval period: 180 days.

(2) On an individual case-by-case basis, special one-time high priority, or time-urgent collections may be approved without being subjected to an in-depth review and analysis, provided a statement of urgency is included with the DD Form 2936 and signed at an appropriate level corresponding with the estimated cost of providing the information. An expiration date of short duration will be assigned until the additional required documentation is completed and submitted.

e. One-time collections.

- (1) Approval period: 1 year.
- (2) A one-time collection is an information collection prepared only once.

f. Collections approved in conjunction with a public collection.

- (1) Approval period: 3 years (equivalent to the expiration date of the OMB Control Number).
- (2) In some cases, there may be a requirement to collect data from multi-service and public. If this happens, the AO must complete separate cost estimates.

4-5. Elements of a multi-Service collections package

a. The following are required elements to process a multi-service collections package:

(1) *Cost assessment and program evaluation.* The cost assessment and program evaluation (CAPE) lists basic information about the collection including an analysis of labor, nonlabor, and respondent costs of the producing and participating in the collection. The CAPE cost guidance will be completed online at <https://www.cape.osd.mil/>. The AO must have a common access card to complete the cost summary online.

(2) *DD Form 2936.* The DD Form 2936 serves as a snapshot of the collection and is the primary coordination sheet of the multi-service information collection package. For new collections, when the AO completes the CAPE report online, the DD Form 2936 will automatically generate and transfer most of the data.

(3) *Copy of authority (prescribing directive).* The authority must be higher than an AR, such as a statute, USC, law, executive order (EO), or Secretary of Defense memorandum. If there is no authority, a justification statement is required. The most up-to-date justification template is available on the DoD website at <https://www.esd.whs.mil/dd/>.

(4) *Copy of the collection instrument(s).* The instrument(s) must include the RCS (or placeholder) and an RCS expiration date placeholder.

(5) *General.* Copies of all communications, such as invitations and reminders, to potential respondents.

b. In addition to the required elements, depending on the package, there may be additional elements required. They are as follows:

- (1) Memorandum of approval from Office of People Analytics (OPA) (surveys only).
- (2) System of Records Notice (SORN) (only if the information collected will become part of a System of Records).
- (3) PIA (only if personally identifiable information is being collected in electronic form).
- (4) Privacy Act statement (PAS) (or a privacy advisory; only needed if the information collected will become part of a system of records).
- (5) Social Security number (SSN) justification memorandum (only if SSNs will be collected).
- (6) Informed consent notice (only if the collection is for human subject's research).
- (7) Memo of sponsorship from a general officer (GO) or senior executive service (SES) (only if request is from outside DoD or is to fulfill an academic requirement).
- (8) A copy of the certificate of networkiness issued by the CIO/DCS, G-6 or equivalent DoD or Federal authority (only if commercial off-the-shelf survey software would be used to collect the information on an Army, DoD, or other federal information system).
- (9) A copy of the authorization to operate, interim authorization to operate, or other proof that the information system has been authorized by the Army, DoD, or other Federal Information Assurance authority to collect or host military personnel data (only if the information is collected, stored, or processed on a commercial or contractor's information system, personal computer, and/or privately-owned device).

4-6. Multi-Service approval process

There are five stages to the multi-Service collections approval process, they are as follows:

a. Stage 1. Requirement determination and initiation.

- (1) Organization IMCO with jurisdiction will review the multi-service information collection requirement.

(2) For new collections, a kick-off meeting may be required to determine the elements of the package. The kickoff meeting should include, at a minimum, the AO, organization IMCO with jurisdiction, and the DA IMCO. The OIM may attend, if requested. Some items (this is not a comprehensive list) that should be discussed during a kickoff meeting are as follows:

- (a) The process of the collection (from beginning to end).
- (b) How the information is collected.
- (c) Whether personally identifiable information will be collected (including, but not limited to, SSNs).
- (d) The prescribing directive or justification statement.
- (e) Possible exemptions.
- (f) Approximate timeframe the collection will begin.
- (g) Responsibilities of the AO. Ensure the AO understands the process and timeline.

(3) If it is determined it is a collection, then the DA IMCO will create a pending multi-service workflow in the Information Collections System (IC System).

b. Stage 2. Completing the cost estimate and/or CAPE.

- (1) AO will complete a cost estimate summary on the CAPE website.
- (2) AO inputs the cost information into the IC System.

c. Stage 3. Package preparation and coordination.

(1) AO submits, at a minimum, the CAPE report, DD Form 2936 (up to section 10), and collection instrument(s) to the applicable mandatory coordinators. Mandatory coordinators may provide an approval memorandum, a confirmation email, or directly sign the DD Form 2936 (preferred method) to show their concurrence. See table 4–1 for a list of mandatory coordinators.

- (2) Organization IMCO reviews package and confirms the coordinators required.
- (3) AO coordinates with the DA IMCO for review of the package including coordination documents.

d. Stage 4. Obtaining responding component coordination.

(1) Once all mandatory coordination is complete, the AO will send the DD Form 2936, CAPE report, and collection instrument to each of the responding components for approval.

(2) The responding components and the cost to the component, DD Form 2936, Section 12, will be automatically populated.

(a) If the cost of the collection to the responding component is less than \$500,000 annually, an SES must sign in block 12.

(b) If the cost of the collection to the responding component is more than \$500,000 annually, the DoD or OSD component head must sign in block 12.

(3) Prescribing documents/authorities.

(a) If the prescribing directive listed on the DD Form 2936 is a DoD issuance, OPA supporting statement and/or justification statement, or multi-Service memorandum and the responding component nonconcur with no solution reached, and then the nonconcurring responding component may withdraw from participating in the collection. Suggestions on how to mediate nonconcurrence are outlined in DoDI 8910.01.

(b) If the prescribing directive listed on the DD Form 2936 is a Statute, Law, EO, or Secretary of Defense Memorandum, and the responding component nonconcur, then the nonconcurring responding component is still required to participate in the collection. Mediation may be a solution; however, the responding component is authorized 15 working days to submit a response. If there is no response after 15 working days, then proof of outreach is required (for example an email sent to the responding component).

e. Stage 5. Submitting the package.

(1) Once the package is approved, OIM will assign an RCS, expiration date, conditions of approval, and future requirements for reinstatements.

(2) If the package went through the issuance process, the information collection must be approved before the issuance will be published. The license will be activated upon publishing the issuance.

Table 4–1
Mandatory coordinators for multi-Service collections

Mandatory coordinators	When are they required?
Forms manager	When the collection instrument is a form.
OPA	When the collection instrument is a survey.

Table 4–1
Mandatory coordinators for multi-Service collections—Continued

Mandatory coordinators	When are they required?
Health Research Protection Program official	When the collection involves human subject survey or focus groups.
Privacy official	Coordination with the privacy official is always required.
Records manager	Coordination with the records manager is always required.
CIO/DCS, G–6	When the information is collected through internet-based capabilities.
General counsel and/or legal	When incentives are offered as reward for participating in the collection.

4–7. Responding to a multi-Service collection requirement

When an Army organization is asked to respond as an organization to information collections from other DoD components and/or Federal agencies, the Army organization will—

- a. Reply to written requests for cost estimates concerning these existing or proposed information collections.
- b. Respond to approved information collections.
- c. Inform HQDA of any requests to respond to information collections that are not approved.

Chapter 5 **Public Information Collection Requirements**

5–1. Purpose

a. This chapter prescribes procedures for requesting OMB approval to collect data from the public. It also states policies extracted from the Paperwork Reduction Act of 1995, as amended; PL 104–13; Chapter 35, Title 44, United States Code (44 USC Chapter 35); 5 CFR 1320; and DoDI 8910.01. The Paperwork Reduction Act requires OMB approval of Federal agencies’ requests levied on the public.

b. Army agencies requesting data from the public (10 or more persons, contractors, or non-Federal agencies) must receive OMB approval. At the earliest time possible, agencies will discuss new or revised data requirements with the HQDA for coordination with OIM and OMB.

5–2. Identifying members of the public

For the purposes of this process, members of the public are individuals who are not active or Reserve Component Military or DoD Civilian employees. Examples of the members of the public include, but are not limited to, the following:

- a. Veterans.
- b. Former and/or retired Federal employees.
- c. Government contractors.
- d. Private-sector attorneys.
- e. Partnerships, associations, and corporations.
- f. Not-for-profit organizations.
- g. State, tribal, or local Government.
- h. Members of industry.
- i. Private-sector doctors and nurses.
- j. Family members (for example, spouses and dependents) of Active Duty Military members and members of the Selected Reserve. Family members can be considered “Army internal” when the information collected is relevant to proposed or existing military programs.

Note: Military members, to include U.S. Army Reserve and Army National Guard members, and DoD Civilian employees can be considered members of the public if the collection of information is addressed to them in their capacity as private citizens.

5-3. Public exemptions

The public records areas (PRAs) and DoDM 8910.01, Volume 2 exempt certain categories of data collections from the OMB approval process. Collections that have been determined exempt by an AO must go through the approval process. Final determination of exempt collections (including surveys) will be approved by HQDA. The categories of exemptions include but are not limited to the following:

- a. Identical information collected from nine or fewer public respondents.
- b. Affidavits, oaths, certifications, notices of change of address, and forms used as receipts for articles or services.
- c. Collection of data for identification or classification in connection with laboratory research and clinical investigations.
- d. Proceedings resulting from judicial and quasi-judicial actions, such as those before hearing examiners or judges.
- e. Requests that the OMB clearance officer has exempted that do not call for data of extensive volume or importance.
- f. Intelligence collection activities as defined in EO 12333, Section 1.4 or successor orders.
- g. Information requested outside the United States and its territories from foreign nationals, non-U.S. agencies, or businesses.
- h. Federal employees providing job-related information; however, in special cases OMB has revoked this exemption.
- i. Surveys of members of the armed forces who are on active duty, in an active status, or retired, Family members of such members, survivors of deceased retired members, and survivors of members who died while on active duty.

5-4. Consideration of utility and burden

Each organization must ensure that the results of data requests justify the burdens placed on respondents. Organizations will consider—

- a. The limited clerical, financial, management, and statistical staffs of small businesses and other organizations.
- b. The number of respondents.
- c. The frequency and difficulty of collection, and the number of information items.
- d. Whether all items of data to be provided or recorded are essential to the central purpose of the plan, report, or information system.

5-5. Elements of a public collections package

a. *60-Day Federal Register Notice.* The 60-day Federal Register notice (FRN) is published to alert the public of an information collection.

(1) This notice is standard language; AOs are only required to complete the highlighted sections.

(2) Once the notice is published, the public has 60 calendar days to comment.

(a) Comments from the public will be sent directly to the office collecting the information.

(b) The AO is responsible for responding to all comments received.

(c) Comments and responses will be submitted as part of the package to OMB.

b. *Supporting Statement, Part A.* This is required for all public collections. OMB uses this document to assess the collection and understand the purposes, scope, and benefits of the collection. Every question in the Supporting Statement, Part A must be answered in whole. OMB expects the responses to be well thought out and understandable by the average member of the public. See the DoD information collections website for the most up-to-date template: <https://www.esd.whs.mil/dd/>.

c. *Supporting Statement, Part B.* Surveys only.

d. *Office of Management and Budget Form 83-I.* For OMB Form 83-I (Paperwork Reduction Act Submission), see instructions at <https://www.esd.whs.mil/dd/>.

e. *Collection instrument.* The instrument is the tool used to collect information from the respondent. See paragraph 5-6 for additional information.

f. *Coordination supporting documentation.* All public collections require coordination. See paragraph 5-7 for additional information.

g. *Other supporting documentation.* There may be additional documentation required to support the collection. Supporting documentation will vary with each collection. Examples include, statutes or regulations, instructional information, and outreach materials.

5-6. Collection Instrument

a. OMB will not approve collection instruments for PRA unless they contain the following:

- (1) OMB control number (or placeholder).

(2) OMB expiration date (or placeholder; for example: OMB Expiration Date: XX XXX XX).
(3) See the DoD information collections website for a sample Agency Disclosure Notice available at <https://www.esd.whs.mil/directives/collections/>.

b. Depending on the type of instrument and information collection, there may be additional information required, such as—

- (1) Form number (forms only).
- (2) Instructions on how to complete the form.
- (3) PAS must include the following:
 - (a) Authority.
 - (b) Principal purpose(s).
 - (c) Routine use(s).
 - (d) Disclosure(s).
 - (e) Link(s) to SORN(s).

c. Supporting documentation may also be required depending on how the information is requested of the respondent. Supporting documentation may include the following:

- (1) *Email*. If information is requested of the respondent via email, a sample email must be included. This also includes reminder, follow-up, and thank you emails. Any email the respondent will see requires submission.
- (2) *Online*. OMB will accept a screenshot or link in the Supporting Statement, Part A.
- (3) *Invitation*. If the invitation is hardcopy (such as, flyer and business card) then a scanned copy of the invitation is acceptable (front and back).
- (4) *Memorandum*. Respondents that are invited to take a survey that is included as part of a memorandum. A scanned copy of the memorandum is acceptable.
- (5) *Phone script*. If information is received via telephone and recorded on the instrument, then a phone script is required. The phone script must include the greeting, questions, and salutation. Anything the respondent will hear during the conversation must be included in the phone script submitted to OMB.

5-7. Coordination supporting documentation

a. Coordination supporting documentation will vary based on the collection. It is mandatory for AOs to consult with the—

- (1) *Army Privacy Office*. The Army Privacy Office will assist with SORNs, PAS, and SSN justification memoranda.
- (2) *Army Records Management Division*. The Army Records Management Division will review information collection packages to ensure the records retention and disposition schedule is complete and accurate in accordance with the collection's prescribing directive.

b. Other consultations may include the following:

- (1) *Legal and/or general counsel*. Consultation and coordination with legal is required when respondents are receiving payments or gifts for responding to the information collection. Justification for payments or gifts must be outlined in the Supporting Statement, Part A and approved by General Counsel.
- (2) *Chief Information Officer/Deputy Chief of Staff, G-6*. If the information is electronically collected, then the package must include a PIA. PIAs are reviewed, approved, and tracked by CIO/DCS, G-6. A link to the PIA must be included in the PAS and the supporting statement, Part A. PIAs must be reviewed every 3 years.
- (3) *Department of Defense*. It is mandatory for DoD to review public surveys. A survey review memorandum signed by the Director, OPA and dated within 1 year of submission is required.
- (4) *Office for Human Research Protections Program*. Surveys must be reviewed by an Army institutional review board or Human Research Protections Program. This review may be concurrent with the review for licensure. It is incumbent upon the researcher(s) to share substantive changes made in response to one review with those doing the other review (see 32 CFR 219).
- (5) *Army forms manager*. It is mandatory for the Army Publishing Directorate to review all DA Forms collecting information from the public.

5-8. Approval process for public information collections

The public collections approval process requires six stages. Due to Federal Register requirements for proposed and submitted collections, the PRA process will take a minimum of four months. The timeline is dependent on the initiative of the AO, response of the coordinators, and accuracy of the elements of the package.

a. *Stage 1. Requirement determination and initiation.*

- (1) Organization IMCO with jurisdiction will review the public information collection requirements.

(2) For new collections, a kick-off meeting may be required to determine the elements of the package. The kickoff meeting should include, at a minimum, the AO, organization IMCO with jurisdiction, and the DA IMCO. The OIM may attend, if requested. List of items that should be discussed are outlined in paragraph 5–7.

(3) If it is determined it is a collection, then the DA IMCO will create a pending workflow in the IC System.

b. Stage 2. 60-Day Federal Register Notice.

(1) AO drafts the 60-Day FRN. The most up-to-date template may be found on the DoD website at <https://www.esd.whs.mil/directives/collections/>.

(2) AO uploads the 60-Day FRN into the IC System for DA IMCO review. Once complete, the DA IMCO will submit to OIM for review. OIM will not publish the 60-Day FRN until the majority of the package has been adjudicated/complete.

c. Stage 3. Package preparation and coordination.

(1) Once the 60-Day FRN has been adjudicated, the AO will prepare the package for DA IMCO review. See paragraph 5–5 for all elements of a public collection package.

(2) AO obtains and uploads elements of the package to the IC System for DA IMCO review. Once complete the DA IMCO will submit to OIM for review. Depending on the complexity of the package, this stage may include some back and forth between the AO and OIM.

d. Stage 4. 30-Day Federal Register Notice.

(1) A Senior OIM Analyst will review the entire package.

(2) Upon final review and approval, OIM will draft and submit the 30-Day FRN then upload package for OMB review and approval.

e. Stage 5. Office of Management and Budget Review.

(1) During the 30-Day comment period, OMB will review the package.

(2) OMB will send any questions or comments back during this period through OIM.

f. Stage 6. Office of Management and Budget Determination and License Activation.

(1) The OMB Desk Officer will submit the determination via a notice of action to OIM.

(2) If approved, OIM provides the notice of action to the HQDA IMCO and AO then activates the OMB control number in the IC System.

5–9. Public generic surveys

a. Generic surveys are used when the intent and process is fully developed but the specific questions or surveys may not be. Generic surveys may not be used for complex survey research projects and must be—

(1) Low burden to the public.

(2) Low cost.

(3) Voluntary.

(4) Noncontroversial.

(5) Not permitted if policy or funding decisions will be made from the collection.

b. There are two types of generic surveys, they are—

(1) *Normal generic.* A normal generic must fit the constraints in paragraph 5–5a.

(2) *Fast track generic.* A fast track generic must be qualitative and simple in design (for example comment cards).

c. There are two stages to the approval process.

(1) *Standard approval.* The overall concept must go through the normal PRA process outlined in this chapter. OMB approves the collection's concept and scope then grants a 3 year approval.

(2) *One-pager submission.* Once the standard approval is complete, survey instruments developed over the approved 3 year period, the one-pager along with the survey and correspondence are submitted to OMB for review. There is a 10 day turnaround for a normal generic survey and a 5 day turnaround for a fast track survey.

d. See the DoD information collections website for the most up-to-date template <https://www.esd.whs.mil/directives/collections/>.

5–10. Evidence of approval

a. Information collections requested from nine or fewer respondents, and not otherwise exempt, will contain the following statement: This data request is to nine or fewer respondents; therefore, OMB approval under 44 USC 3507 is not required.

b. Each form, questionnaire, manual, or other implementing directive requesting data from 10 or more members of the public, and not otherwise exempt from control, will display a current OMB approval number and expiration date in the upper right-hand corner of the first page.

c. Upon receipt of the OMB approval numbers and expiration dates, the AO will update forms and instructions to indicate the current OMB approval number and expiration date. The AO will provide updates to HQDA/ESA/RMDA electronically, along with the final version of the data collection request or reporting requirement and instructions.

5–11. Termination of approval and use

No OMB-approved data requests will be used after the expiration date. Extensions must be resubmitted for OMB approval using the same process as new requests. If OMB withdraws the approval, the collection request will be discontinued.

5–12. Failure to comply

Failure to gain approval or to properly protect the information collected can lead to notification of senior leadership, a “cease and desist” order against the collection, and destruction of all previously collected information or information systems.

Chapter 6 Army Internal Surveys

6–1. Purpose

As information collections, surveys are generally subject to the policies described in the other chapters of this publication. This chapter prescribes particular policies and procedures for the approval and licensing of Army internal surveys. Requests to survey Army personnel can come from Army organizations or from external organizations, including State, local, or tribal governments; other Federal agencies; academic institutions, private individuals or organizations, or public organizations or individuals, or that are called for by law with no direct response to Congress required.

6–2. Policy

a. To avoid overburdening Soldiers and DA Civilians, it is required that Army organizations obtain approval before administering an Army internal survey.

b. Army internal surveys should only be used when the information being collected is mission critical.

c. The use of online survey forums, such as milSurvey (preferred) and MAX Survey, is allowed. milSurvey is accessed at <https://www.milsuite.mil/> and MAX Survey is accessed via <https://www.max.gov>.

d. Commercial platforms, unless specifically approved by CIO/DCS, G–6, are not authorized forums for conducting Army internal surveys.

6–3. Applicability

This policy applies to surveys requesting the participation of Soldiers, Soldiers’ spouses, Family members eligible for DA benefits, DA Civilians, students at the U.S. Military Academy, Army Reserve Officers’ Training Corps (ROTC) cadets, and survivors of deceased Soldiers.

6–4. Army internal survey requirements

a. *Institutional Review Board.* Surveys must be reviewed by an Army institutional review board or Human Research Protections Office. This review may be concurrent with the review for licensure. It is incumbent upon the researcher(s) to share substantive changes made in response to one review with those doing the other review (see 32 CFR 219).

b. *Army sponsorship.* The sponsor for surveys initiated within the Army (including by U.S. Military Academy cadets) must be at least a colonel or a general schedule (GS)–15. The sponsor for surveys conducted by parties external to the Army or by students (including ROTC cadets and students at nonmilitary institutions) fulfilling an academic requirement must be a GO and/or SES or above. Responsibilities of sponsors are outlined in paragraph 6–7.

c. *Information security.* The information collected, and any Army information used to collect that information, must be stored, processed, or transmitted only on information systems that have obtained information assurance approval to operate in accordance with Army processes for the confidentiality level of their information.

d. *Cost analysis.* A cost analysis must be conducted, preferably using the DoD Cost Guidance Portal available at <https://www.cape.osd.mil/>.

e. Operations security. Army personnel conducting or sponsoring a survey that contains questions that may be considered sensitive must ensure that all publications and presentations containing Army survey data are reviewed by an Operations Security Level II Certified Officer.

f. Public release clearance. Publications and presentations intended for public release and containing Army survey data must be reviewed by a public affairs officer prior to release to non-DoD persons (including, but not limited to, ghostwriters, literary agents, editors, and publishers).

6–5. Army internal survey exemptions

The following categories of Army internal surveys are exempt from formal review and licensure:

- a.* Presidential.
- b.* Legislative branch.
- c.* Judicial branch.
- d.* OMB budgetary.
- e.* Information collected during the conduct of a Federal criminal investigation or prosecution, or during the disposition of a particular criminal matter in accordance with 44 USC 3518(c)(1).
- f.* Information collected during the conduct of a civil action to which the United States or any official or agency thereof is a party, or an administrative action or investigation involving an agency against specific individuals or entities in accordance with 44 USC.
- g.* Information collected during intelligence activities authorized pursuant to EO 12333, Section 3–5(g) as amended or successor orders, or during the conduct of cryptologic activities that are communications security activities pursuant to 44 USC.
- h.* Information collected by operationally deployed units or forces supporting a contingency operation for the purpose of directly assisting frontline operations.
- i.* Information collected during Army support of domestic and international emergency operations and incidents.
- j.* Information the DA or DoD Office of the Inspector General collected under its authority to conduct official investigations, inspections, and inquiries.
- k.* Reports of audit.
- l.* Information collected during internal review, personnel security investigations, investigation of charges, a complaint, a claim, or a violation of law or regulation, including questionable intelligence activities.
- m.* Comments, concurrence, coordination, or PIAs that are part of the routine coordination or clearance of proposed actions or publications, and recommendations or evaluations as to proposed plans, policies, procedures, organizations, missions, publications, agenda, curriculums, or courses of action.
- n.* Cost estimate solicitations, routine budget requests, independent cost estimates, or independent cost assessments that are part of routine acquisition program management, as well as all data, documents, and exhibits submitted as part of the planning, budgeting, and execution process in support of developing budgets.
- o.* Financial disclosure statements.
- p.* Nominations or recommendations for awards or positions.
- q.* Personnel records and requests for personnel records, including employment, medical, and dental records or documents.
- r.* Facts or opinions from individuals (including individuals in control groups) under treatment or clinical examination.
- s.* On-site evaluations, summaries, or assessments concerning a conference, convention, symposium, meeting, seminar, class, working group, or workshop.
- t.* Copies of previously established information collections, or records or data generated automatically that do not impose cost on responding Army organizations or other DoD components.
- u.* Surveys and focus groups where information is collected from 99 or fewer potential respondents in one calendar year, none of these potential respondents is a senior leader or member of a vulnerable population, and no sensitive questions are asked.
- v.* Examinations designed to test the aptitude, abilities, or knowledge of the persons tested and the collection of information for selection, identification, or classification in connection with such examinations.
- w.* One-time special, time urgent, high-priority data collection with minor respondent burden.
- x.* Other types of collections, as determined at the discretion of RMDA, the DA approval authority, including surveys with a very narrow programmatic focus (such as equipment surveys, customer feedback surveys, on-site training and/or course evaluations), surveys administered to select or classify individuals into occupations, and health assessments for clinical purposes.

6–6. Required documents and approval process

Surveys distributed only to Army personnel (military or DA Civilians) on broad beliefs, attitudes, or opinions, with sample sizes of more than 99 Army personnel, and surveys with any sample size that ask about sensitive topics or would be sent to flag officers, senior executives, or vulnerable populations, should be sent to the DA IMCO or to the delegated authority for review and licensure. The DA IMCO may forward the request to another review and licensure authority, depending upon the topic, scope, sensitivity, and requirements of the survey. The proponent of the survey should apply for review and approval by completing a supporting statement (available from the DA IMCO) with the following supporting documentation:

- a.* Final (or nearly final) copies of the survey instrument and all sample member communications.
- b.* Human-subjects-protection determination letter(s) and/or application(s).
- c.* Statement of government sponsorship (see para 6–5).
- d.* Informed consent, PAS, SORN, and PIA, if applicable (see paras 2–3 and 4–5).
- e.* A copy of the authority to operate, interim authority to operate, or other proof of information system authorization, if applicable (see para 6–5).
- f.* Certificate of Net worthiness, if applicable (see para 6–5).

6–7. Sponsoring an Army internal survey

Army internal surveys being conducted to meet an academic requirement or by someone outside of the Army must be sponsored by a GO and/or SES or above.

- a.* The sponsor will—
 - (1) Provide general survey oversight.
 - (2) Determine the sensitivity of survey findings and ensure that all documents are marked with the appropriate distribution/release statement.
 - (3) Monitor any release of survey data.
 - (4) Provide certification that they accept the responsibilities outlined in this paragraph.
- b.* Additionally, the sponsor must state that they—
 - (1) Have read the draft instrument(s) and understand how the survey will be administered and analyzed.
 - (2) Believe the survey is mission critical.
 - (3) Give permission for both the researcher (if Army personnel) and the survey respondents to engage in the survey during official duty hours.
 - (4) Plan either to take action as a result of the survey's findings or to take the survey's findings into account when deciding whether to take action.
 - (5) Share responsibility for meeting the survey requirements.
 - (6) Share responsibility for any negative publicity that could result from the survey's administration and/or release of findings.
- c.* Neither the sponsor nor the designee of a sponsor can be the researcher or a relative/subordinate of the researcher.

Appendix A

References

Section I

Required Publications

Unless otherwise indicated, DA publications are available on the Army Publishing Directorate website at <https://armypubs.army.mil/>. DoD issuances are available at <https://www.esd.whs.mil/dd/>. The CFR is available at <https://www.ecfr.gov/>. The USC is available at <https://uscode.house.gov/>.

AR 25–30

Army Publishing Program (Cited in title page.)

AR 25–400–2

Army Records Management Program (Cited in para 1–11c(13).)

DoD 5400.11–R

Department of Defense Privacy Program (Cited in para 1–8c.)

DoDM 5400.07

DoD Freedom of Information Act (FOIA) Program (Cited in para 1–8c.)

DoDM 8910.01, Volume 1

DoD Information Collections Manual: Procedures for DoD Army Internal Information Collections (Cited in para 3–3a.)

DoDM 8910.01, Volume 2

DoD Information Collections Manual: Procedures for DoD Public Information Collections (Cited in para 5–3.)

EO 12333

United States Intelligence Activities (Cited in para 5–3f.)

5 CFR 1320

Controlling Paperwork Burdens on the Public (Cited in para 1–11c(7).)

32 CFR 219

Protection of Human Subjects (Cited in para 5–7b(4).)

44 USC Chapter 35

Coordination of Federal Information Policy (Cited in para 5–1a.)

44 USC 3507

Public information collection activities; submission to Director; approval and delegation (Cited in para 5–10a.)

44 USC 3518

Effect on existing laws and regulations (Cited in para 6–5e.)

Section II

Related Publications

A related publication is a source of additional information. The user does not have to read a related reference to understand this publication. Unless otherwise indicated, DA publications are available on the Army Publishing Directorate website at <https://armypubs.army.mil/>. DoD issuances are available at <https://www.esd.whs.mil/dd/>. The CFR is available at <https://www.ecfr.gov/>. The USC is available at <https://uscode.house.gov/>.

Acting Under Secretary of Defense (Personnel and Readiness) Memorandum

Implementation of Department of Defense Survey Burden Action Plan Reducing Survey Burden, Cost, and Duplication, Dated 8 September 2016 (Available at <https://www.dmdc.osd.mil/appj/dwp/documents.jsp>.)

AR 11–2

Manager's Internal Control Program

AR 11–18

The Cost and Economic Analysis Program

AR 25-1

Army Information Technology

AR 25-2

Army Cybersecurity

AR 25-22

The Army Privacy and Civil Liberties Program

AR 25-55

The Department of the Army Freedom of Information Act Program

AR 25-58

Publishing in the Federal Register

DA Pam 25-403

Army Guide to Recordkeeping

DoDI 1100.13

DoD Surveys

DoDI 1215.06

Uniform Reserve, Training, and Retirement Categories for the Reserve

DoDI 3216.02

Protection of Human Subjects and Adherence to Ethical Standards in DoD-Conducted and -Supported Research

DoDI 5400.16

DoD Privacy Impact Assessment (PIA) Guidance

DoDI 7750.07

DoD Forms Management Program

DoDI 8910.01

DoD Implementation of the Paperwork Reduction Act

PL 104-13

Paperwork Reduction Act of 1995 (Available at <https://www.congress.gov/>.)

5 USC 552

Public information; agency rules, opinions, orders, records, and proceedings

10 USC 1782

Surveys of military families

44 USC

Public Printing and Documents

44 USC Chapter 21

National Archives and Records Administration

44 USC Chapter 29

Records Management by the Archivist of the United States and by the Administrator of General Services

44 USC Chapter 31

Records Management by Federal Agencies

44 USC Chapter 33

Disposal of Records

Section III**Prescribed Forms**

Unless otherwise indicated, DA Forms are available on the Army Publishing Directorate website at <https://armypubs.army.mil>.

DA Form 7799

Request for Approval of Information Management Requirement (Prescribed in para 1-11c(6).)

Section IV

Referenced Forms

Unless otherwise indicated, DA Forms are available on the Army Publishing Directorate website at <https://armypubs.army.mil>. DD Forms are available at <https://www.esd.whs.mil/directives/forms/>.

DA Form 11-2

Internal Control Evaluation Certification

DA Form 2028

Recommended Changes to Publications and Blank Forms

DD Form 2930

Privacy Impact Assessment (PIA)

DD Form 2936

Request for Approval of DoD Internal Information Collection

OMB Form 83-I

Paperwork Reduction Act Submission (Available at <https://www.usaid.gov/forms/>.)

Appendix B

Internal Control Evaluation

B-1. Function

This Army internal control evaluation assesses the execution of the Management Information Control Requirements Program, including key controls in the following areas:

B-2. Purpose

The purpose of this evaluation is to assist Army personnel responsible for evaluating the key Army internal controls listed in paragraph B-4. It is intended as a guide and does not cover all controls.

B-3. Instructions

Answers must be based on the actual testing of Army internal controls (for example, document analysis, direct observation, sampling, simulation, or other). Answers that indicate deficiencies must be explained and the corrective action indicated in supporting documentation. These key Army internal controls must be evaluated at least once every 5 years. Certification that this evaluation has been conducted must be accomplished on DA Form 11-2 (Internal Control Evaluation Certification).

B-4. Test questions

- a. Have IMCOs been appointed at the ACOM, ASCC, and DRU level in writing and has a copy of the orders been provided to DA?
- b. Do IMCOs promote electronic information collection methods and procedures?
- c. Is DA Form 7799 completed for each nonexempt Army internal request their organization initiated?
- d. Are goals established for the reduction in number or frequency of the Army internal and Multi-service prescribed information collections?
- e. Are notifications of violations corrected and/or reported to each IMCO in the chain of command?
- f. Does the IMCO maintain a database or list of recurring information requirements within their jurisdiction?
- g. Are information management control requirements files maintained in accordance with AR 25-400-2?
- h. Are RCSs that are assigned by a higher level assigned a different DoD component RCS by a lower level?
- i. Does each directive initiating an information management requirement cite the title and RCS in the table of contents and text?
- j. Are collections of information containing personal information on individuals handled in accordance with DoD 5400.11-R?
- k. Is the jurisdictional IMCO familiar with all exemptions outlined in AR 25-98?
- l. Are Army requests for the collection of management data that are not exempted controlled and maintained? Are they approved by the appropriate designated official?
- m. Are Army requests for collection of management data not exempted reviewed every 3 years for public collections? Every 5 years for Army internal collections?
- n. Does the organization ensure that the results of data requests justify the burdens placed on respondents?
- o. Are data requests used after the expiration date?
- p. Are all surveys submitted to DA and processed in accordance with AR 25-98?
- q. Are PIAs completed when personal information about individuals is collected?

B-5. Supersession

Not applicable.

B-6. Comments

Help make this a better tool for evaluating internal controls. Submit comments to the Chief Information Officer via email to usarmy.pentagon.hqda-cio.mbx.policyinbox@army.mil.

Glossary

Section I

Abbreviations

AASA

Administrative Assistant to the Secretary of the Army

ACOM

Army command

AO

action officer

ARIMS

Army Records Information Management System

ASCC

Army service component command

CAPE

cost assessment and program evaluation

CFR

Code of Federal Regulation

CIO

Chief Information Officer

DA

Department of the Army

DA Form

Department of the Army form

DA Pam

Department of the Army pamphlet

DCS

Deputy Chief of Staff

DD Form

Department of Defense form

DoD

Department of Defense

DoDM

Department of Defense manual

DRU

direct reporting unit

EO

executive order

ESA

U.S. Army Enterprise Services Agency

FRN

Federal Register notice

GO

General Officer

HQDA

Headquarters, Department of the Army

IC System

Information Collections System

IMCO

information management control officer

OIM

Office of Information Management

OMB

Office of Management and Budget

OPA

Office of People Analytics

OSD

Office of the Secretary of Defense

PAS

Privacy Act statement

PIA

privacy impact assessment

PRA

public records area

RCS

report control symbol

RMDA

U.S. Army Records Management and Declassification Agency

ROTC

Reserve Officers' Training Corps

RRS-A

Records Retention Schedule-Army

SCN

survey control number

SECARMY

Secretary of the Army

SES

senior executive service

SORN

System of Records Notice

SSN

Social Security number

USC

United States Code

Section II**Terms****Agency**

An organizational element.

a. Directing agency. The agency that provides the basic directive, oral or written, the management information requirement is created for. This agency may also be the initiating agency.

b. Initiating agency (functional proponent). The agency that creates the management information requirement and is responsible for the information system.

c. Monitoring agency. The Army agency assigned responsibility for the Army action on a management information requirement from a non-Army agency. If the monitoring agency sets up a supporting request, it becomes the initiating agency for that part of the data collection.

d. Preparing agency. An agency listed by the management information requirement directive to compile, process, reproduce, convert (for example, tape to digital video disk), and submit all or part of the required data or any summary or extract of it.

e. Using agency. An agency responsible for receiving and taking action (other than to review, approve, or forward) on data submitted in response to the management information requirement. The initiating agency is usually, but not always, a using agency. At an intermediate state in the flow of the data, an agency may be both a preparing and using agency.

Data element

A basic unit of identifiable and definable information. A data element occupies the space provided by fields in a record or blocks on a form. It has an identifying name and value(s) for expressing a specific fact.

Directive

Management information requirement or implementing directive. A directive that—

a. Creates or changes a management information requirement.

b. States who will submit the data.

c. Provides procedures, definitions, forms, and information sources.

Extensive compilation of research over and above normal operations

This phrase provides a basis for the preparer to appeal what it considers to be “unreasonable” information requirements. Whether a request is “unreasonable” is a matter of judgment. It involves consideration of the mission and the preparer’s resources, not simply the absolute workload. These factors bear on whether a request is unreasonable:

a. Preparation would require extensive overtime or keep other important work from being completed on time.

b. The existing operating records and information systems do not provide the data required or such data cannot be readily produced from the system (for example, retroactive data requests that would need extensive research of records or files).

c. The purpose of the request might be served by data already available to the requester.

d. An exemption that certifies the request does not require “extensive compilation or research over and above normal operations” permits the flow of data among agencies whose staff and operating relationships require a day-to-day exchange of spot data. Although these exemptions generally cover nonrecurring data exchanges that arise out of oral discussions, they are not limited to such exchanges and include written requests for one-time data requests.

Information management

Information required in planning, organizing, directing, coordinating, and controlling an organization and its assigned mission tasks.

Information management product

Products generated in response to an approved requirement for information. The information product may be in narrative, tabular, or graphic form. A product can be transmitted in different ways. It may be an oral statement, a manual report, or an automated data processing product.

Information management requirement workload

The total workload (and costs) at all levels that would end if the request were discontinued.

Report control symbol

A symbol the IMCO with jurisdiction assigns to an information management requirement to show it has been approved under this regulation.

Surveys

DoD defines surveys as systematic data collections, using personal or telephone interviews, or self-administered questionnaires, in paper or digital format, from a sample or census of 10 or more persons as individuals or representatives of agencies that elicit attitudes, opinions, behavior, and related demographic, social, and economic data to identical questions that are to be used for statistical compilations for research or policy assessment purposes.

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