

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

1. System name and number: Academy Management System, A150-1 USMA

2. Nature of proposed modifications for the system: The United States Military Academy (USMA) requests a new System of Record Notices (SORN) to replace and consolidate other SORNs. The consolidation is driven by a new Army Regulation (AR), and the consolidation of multiple information technology (IT) systems into a single IT system of systems. The changes convey, more accurately and in a single place, the evolved status of the Academy Management System (AMS). Below is an elaboration of each change.
 - a. This request reflects an effort to consolidate multiple SORNs into a single SORN which itself represents a consolidation of formerly independent systems into an integrated system of systems. The consolidation includes the following SORNs
 - (1) A0037-104-3 USMA, USMA Cadet Account System
 - (2) A0351-17a USMA, USMA Candidate Files
 - (3) A0351-17b USMA, USMA Academy Management System
 - (4) A0614-100/200 USMA, Evaluation/Assignment of Academic Instructors
 - (5) A0351-12DAPE, Applicants/Students, USMA Prep School
 - b. Over the course of years, USMA has sought to combine the functionality of multiple disconnected and disparate automated and manual systems into a coherent information collection called the Academy Management System (AMS) that supports decision making by USMA leadership. As part of recent efforts to improve the auditable implementation of the Risk Management Framework (RMF), USMA is reducing the number of individual declarations and consolidating them into a single System of Record Notice (SORN). USMA expects to expend fewer resource to maintain a single SORN over time, than it previously expended for multiple SORNs.

3. Specific authority under which USMA maintains the system of records:
5 U.S.C. 301, Departmental Regulations, 10 U.S.C. 7013 Secretary of the Army; 10 U.S.C. 7440 Quartermaster, 10 U.S.C. 7450 Cadets: Clothing and Equipment, 10 U.S.C. 9431, Establishment: Superintendent: Faculty; 10 U.S.C. 9432 Departments and Professors: Titles: 10 U.S.C. 9434, Command and Supervision; US Army Regulation 150-1 USMA Organization, Administration, and Operation and E.O. 9397 (SSN), Title 7—Fiscal Guidance, General Accounting Office Policy and Procedures Manual for Guidance of Federal Agencies.

4. Evaluation of the probable or potential effect on the privacy of individuals: The risk of unauthorized access to records is medium due to the high impact personally identifiable information (PII) stored in AMS, the quantities of such PII, the extensive use of AMS throughout the academy. Compensatory policy and technical controls reduce the residual risk of storing and maintaining high impact PII to medium.

Individual effects will vary based on the nature of a breach and whether breached data was high, medium, or low impact PII. High impact PII breaches will create risks of identity theft and

institutional reputational harm to USMA. Low impact PII breaches will create risks of embarrassment for the leaked parties as well as USMA (e.g., grades for courses).

5. Routine use compatibility:

Routine Uses are set forth in 32 CFR Appendix C to Part 310 with procedures and sanctions set forth in 5 U.S.C. 552a(b) of the Privacy Act of 1974.

Further routine use and release of documents include:

- a. To contractors, grantees, experts, consultants, students, and others performing or working on a contract, service, grant, cooperative agreement, or other assignment for the federal government when necessary to accomplish an agency function related to this system of records.
- b. To the appropriate Federal, State, local, territorial, tribal, foreign, or international law enforcement authority or other appropriate entity where a record, either alone or in conjunction with other information, indicates a violation or potential violation of law, whether criminal, civil, or regulatory in nature.
- c. To any component of the Department of Justice for the purpose of representing the DoD, or its components, officers, employees, or members in pending or potential litigation to which the record is pertinent.
- d. In an appropriate proceeding before a court, grand jury, or administrative or adjudicative body or official, when the DoD or other Agency representing the DoD determines that the records are relevant and necessary to the proceeding; or in an appropriate proceeding before an administrative or adjudicative body when the adjudicator determines the records to be relevant to the proceeding.
- e. To the National Archives and Records Administration for the purpose of records management inspections conducted under the authority of 44 U.S.C. 2904 and 2906.
- f. To a Member of Congress or staff acting upon the Member's behalf when the Member or staff requests the information on behalf of, and at the request of, the individual who is the subject of the record.
- g. To appropriate agencies, entities, and persons when (1) the DoD suspects or confirms a breach of the system of records; (2) the DoD determines as a result of the suspected or confirmed breach there is a risk of harm to individuals, the DoD (including its information systems, programs, and operations), the Federal Government, or national security; and (3) the disclosure made to such agencies, entities, and persons is reasonably necessary to assist in connection with the DoD's efforts to respond to the suspected or confirmed breach or to prevent, minimize, or remedy such harm.
- h. To another Federal agency or Federal entity, when the DoD determines that information from this system of records is reasonably necessary to assist the recipient agency or entity in (1) responding to a suspected or confirmed breach or (2) preventing, minimizing, or remedying the risk of harm to individuals, the recipient agency or entity (including its information systems, programs and operations), the Federal Government, or national security, resulting from a suspected or confirmed breach.
- i. To such recipients and under such circumstances and procedures as are mandated by Federal statute or treaty.

- j. To educational institutions for the purpose of admissions to other educational degree programs and further educational degree programs.
- k. To transfer initial commissioning data from USMA as a commissioning source to Human Resources Command (HRC).
- l. To provide and receive data to the New York State Commission of Education in support of cadets taking the Fundamentals of Engineering (FE) exam, USMA receiving data back from NY State, and USMA recording the exam results.
- m. To provide data exchange with Defense Finance and Accounting Service (DFAS) and the Internal Review Service (IRS) in support of cadets filing taxes, especially for special pay received at USMA.
- n. To provide data exchange and analysis with HQDA G1's Office of Economic and Manpower Analysis (OEMA) and OEMA systems (SORN Registration A0680-31 DSC G-1).
- o. To provide data to NCAA for mandatory reporting and NCAA compliance assessments.
- p. To provide data to academic accreditation bodies for the College and for the various accredited academic programs.
- q. To transfer medical information documents received from applicants to the Department of Defense Health Agency (DHA) for those cadets who accept appointments to USMA and report for duty at USMA.
- r. To publish graduates' Cullum numbers in the Federal Register
- s. To communicate with USMA Field Force and Congressional Offices as part of the Admissions Process.
- t. To provide data to DoD Travel System (DTS) in support of USMA directed and/or USMA funded travel.

6. OMB public information collection requirements:

OMB Collection required: Yes

OMB Control Numbers: 0702-0060

USMA has no additional control numbers, though in accordance with Army Regulation 25-98 Information Management Control Requirements Program, will apply for such additional control numbers as necessary.

7. Name of IT system: Academy Management System, as a named sub-system to the West Point Research and Education Network (WREN) DITPR 31338.

8. Is the system, in whole or in part, being maintained, (maintained, collected, used, or disseminated) by a contractor? Yes.