

Department of the Army
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Training and Doctrine Command
Fort Eustis, VA 23604

*TRADOC Supplement 1 to Army Regulation 25-1

17 March 2021

Information Management
Army Information Technology

FOR THE COMMANDER:

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History. This publication is a new supplement to Army Regulation 25-1.

Summary. This is a new supplement 1 to Army Regulation 25-1 that prescribes the U.S. Army Training and Doctrine-specific command policy for implementing Army information technology.

Applicability. This supplement applies to all U.S. Army Training and Doctrine Command organizations and activities.

Proponent and exception to authority. The proponent of this supplement is the U.S. Army Training and Doctrine Command Deputy Chief of Staff, G-6. The proponent has the authority to approve exceptions or waivers to this supplement that are consistent with controlling law and regulations. The proponent may delegate this approval authority, in writing, to a division chief within the proponent agency or its direct reporting unit or field operating agency, in the grade of colonel or the civilian equivalent. Activities may request a waiver to this supplement by providing justification that includes a full analysis of the expected benefits and must include formal review by the activity's senior legal officer. The commander or senior leader will endorse waiver requests and forward them through higher headquarters to the senior policy proponent. Refer to Army Regulation 25-30 for exception to policy guidance.

*This supplement supersedes TRADOC Regulation 25-1, dated 16 September 2006; Change 1 to TR 25-1, dated 16 April 2008; and Supplement 1 to Army Regulations 25-22 and 25-55, dated 14 January 2019.

Supplementation statement. The Army Chief Information Officer (SAIS–PRA), 107 Army Pentagon, Washington, DC 20310–0107, approved this supplement to Army Regulation 25-1 on 8 January 2021. Further supplementation is not permitted without prior approval of the U.S. Army Training and Doctrine Command, Deputy Chief of Staff, G-6.

Suggested improvements. Users are invited to send comments and suggested improvements on Department of Army Form 2028 (Recommended Changes to Publications and Blank Forms) directly to Deputy Chief of Staff, G-6 (ATIM), 661 Sheppard Place, Fort Eustis, VA 23604-5733.

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Summary of Change

TRADOC Supplement 1 to Army Regulation 25-1
Army Information Technology

This new supplement, dated 17 March 2021, adds U.S. Army Training and Doctrine Command policy to supplement the existing Army Regulation 25-1.

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Supplement Army Regulation (AR) 25-1, as follows-

Add to paragraph **3-13. Programming and budgeting for information technology:**

U.S. Army Training and Doctrine Command (TRADOC) G-6 provides governance and oversight for the information technology (IT) investment plan 1-n priority list to include:

- a. Support to G-8 management review boards for new priorities, existing priorities, and funding.
- b. Verification and validation of the 1-n priority list requirements for new and existing priorities.
- c. IT investment plan policy, acquisition, and management in accordance with TRADOC Regulation (TR) 5-14.

Add to paragraph **3-16. Execution:**

- c. TRADOC centrally executes life cycle replacement for desktops, laptops, and notebooks.
- d. TRADOC activities will not use free software, online tools or online services (such as collaboration, office suites, storage) unless the conditions in AR 25-2 are met or there is an approved exception in accordance with AR 25-2.

Add to paragraph **3-19d. Commercial off-the-shelf products and services:**

Army Computer Hardware, Enterprise Software and Solutions (CHESS) is the mandatory source for procurement and Army ITAS waivers will be submitted via TRADOC. For requirements not available in CHESS, submit a statement of non-availability (SoNA) in conjunction with ITAS waiver.

Add to paragraph **3-19f. Commercial off-the-shelf products and services:**

All TRADOC organizations and activities will execute personal electronic device requirements through current Department of the Army (DA)-mandated contract vehicle.

Add paragraph **3-19h. Commercial off-the-shelf products and services:**

h. TRADOC G-6 provides strategic sourcing support through the consolidation of products and services to achieve efficiencies across multiple subordinate units.

Add to paragraph **3-20c. Enterprise agreements:**

(5) TRADOC G-6 will evaluate on an annual basis, software purchases and maintenance agreements to formulate CHESS enterprise license agreements (ELA) and enterprise service agreements (ESA) recommendations.

Add subparagraph **3-30c. Army request for information technology:**

Organizations and activities will obtain approval from TRADOC Deputy Chief of Staff (DCS), G-6 before standing up any new systems or websites. DCS, G-6 will develop and inform activities of the process to be used to obtain this approval.

Add subparagraphs **3-34c through 3-34f. Records management:**

c. Records and information management (RIM) purpose and objectives. The RIM program governs the capture, maintenance and disposition of Army information and includes functions covered in Army Regulations 25-22, 25-50, 25-55, 25-58, 25-59, 25-98, 25-400-2, Executive Order 13526 (sections 3.3 and 3.4), and DA Pamphlet 25-403, established in public law and regulatory guidance. For TRADOC RIM training and best business practices visit the TRADOC G-6 RIM Portal at <https://intranet.tradoc.army.mil/sites/rm/default.aspx>.

d. Commanders, commandants, directors, deputy chiefs of staff and chiefs of special staff will:

(1) Appoint primary and alternate records managers (RMs) who will execute functions assigned in accordance with AR 25-400-2 and DA Pam 25-403. RMs will provide duty appointments and training certificates to the TRADOC records administrator. Ensure RMs are Army Records and Information Management System (ARIMS) certified within one month of appointment by completing the Records Management Training at <https://www.rmda.army.mil> and ARIMS online video tutorials at <https://www.arims.army.mil> or TRADOC's RIM Training.

(2) Ensure TRADOC personnel maintain records created and/or received in the course of doing Army business in accordance with AR 25-400-2. See DA Pam 25-403 and the ARIMS and Bulk Archive Tool (BAT) User's Guides at <https://www.arims.army.mil/arims/Login.aspx> for operational requirements to include minimum labeling requirements, office record lists, folders, and how to upload transfer records to the authoritative ARIMS Army Electronic Archive.

(a) Use the ARIMS Records Retention Schedule-Army (RRS-A) approved by the National Archive and Records Administration (NARA) that is the legal authority for when to destroy non-permanent records and when to transfer Army records.

(b) Include RIM elements in Defense Performance Management and Appraisal plans and on in- and out-processing checklists.

(3) Ensure contracts cite records management and Privacy Act (PA) contract language/clauses, when contractors provide deliverables and operate of a system of records. See NARA records management obligations at <https://www.archives.gov/records-mgmt/policy/records-mgmt-language> and Federal Acquisition Regulation Subpart 24.1, Protection of Individual Privacy.

e. Organization (office) files (or record file plan). Organization/activity RMs will keep their organization Master Records Management Spreadsheet current, scrutinize and approve ARIMS

office records lists, and codify local procedures where their organizations' records are maintained. One size does not fit all, and local procedures should fit the local business process and include:

(1) Location(s). The location(s) where office records are maintained on share drives, websites, and portals.

(2) Labeling requirements. Files and folders have the minimal labeling requirements in accordance with Department of the Army Pamphlet 25-403.

(3) Archive frequency. How often transfer records should be uploaded to ARIMS Army Electronic Archive, for example quarterly or semi-annually.

(4) Record medium. Whether records will be maintained hardcopy or electronically.

(5) Foster authoritative data source to prevent record duplication. Which Department of Defense (DOD), Army, or organization system of records where records are uploaded to and therefore duplicates are/are not maintained after transfer is confirmed to the authoritative source.

f. Intellectual property (copyright authorizations). As a training institution, TRADOC personnel want to utilize the most effective method to meet the intent of training. Often, there are sources of intellectual property that enhance the training experience and retention. TRADOC personnel will follow AR 27-60 and AR 25-30 to ensure compliance during the creation, acquisition, use, control, transfer, and disposition of intellectual property. As a general rule, copyrighted works will not be reproduced, distributed, or performed without the permission of the copyright owner, unless such use is within an exception under United States Copyright Law, 17 USC, or such use is required to meet an immediate, mission-essential need for which non-infringing alternatives are either unavailable or unsatisfactory. Regardless of the medium or format, when TRADOC personnel are creating records, (for example, administrative, training and doctrine publications; compiling materials for programs of instruction; visual information; websites; and briefing slides), they must ensure that any use of copyright and licensed (trademarked) material is approved by the intellectual property owner; absent any grant of permission, coordination with the servicing legal office prior to any use must occur. TRADOC personnel will upload intellectual property approval records into the Army Electronic Archive.

g. Information management control (IMC). Commanders/directors will ensure information management collections benefit the Army and are in compliance with AR 25-98 and TRADOC Pamphlet 25-53. Information management collection requests (for example, to conduct surveys and interviews) will be coordinated with and reviewed by the TRADOC G-6 IMC Officer prior to submission to RMDA.

Add subparagraphs 3–35c through 3-35h. Quality of publicly disseminated information:

c. Freedom of Information Act (FOIA) and PA requests. HQs TRADOC G-6, U.S. Army Center of Military History, U.S. Army Medical Command, U.S. Army Cadet Command, and U.S. Army Recruiting Command have designated FOIA/PA officers, and all other TRADOC

organizations/activities records owners will work with the local servicing U.S. Army Installation and Management Command FOIA/PA officers.

(1) FOIA requests. The FOIA, establishes the public's right to request existing records from Federal Government agencies. A record requested by a member of the public will not be withheld unless the record is exempt from disclosure under the FOIA. FOIA officers and TRADOC record owners will forward records (or portions of records) deemed exempt to the TRADOC G-6 FOIA/Privacy Office for processing.

(2) PA requests. The PA of 1974 establishes a code of fair information practices that governs the collection, maintenance, use, and dissemination of information about individuals by federal agencies. The PA requires that agencies give the public notice of their systems of records by publication in the Federal Register. The PA prohibits the disclosure of a record about an individual from a system of records absent the written consent of the individual, unless the disclosure is pursuant to one of the PA exemptions. The Act also provides individuals with a means by which to seek access to and amendment of their records, and sets forth various agency record-keeping requirements.

d. Army delegation of TRADOC as a FOIA/PA Denial Authority. The Administrative Assistant to the Secretary of the Army designated the Commander, TRADOC, as a denial authority.

(1) Commander, TRADOC acts on requests for the records of Headquarters, TRADOC, and subordinate organizations.

(2) Commander TRADOC delegates TRADOC Deputy Chief of Staff (DCS), G-6 or Assistant DCS, G-6, to act on the TRADOC Commander's behalf as the Initial Denial Authority (IDA) on FOIA and PA requests for TRADOC records.

(3) IDA authority and use. An IDA is authorized to:

(a) Deny requests for record access and amendment of PA records contained in TRADOC systems of records.

(b) Deny requests based on the FOIA exemption(s).

(c) Deny a requester's fee category claim, expedited processing request, or waiver or reduction of fees request.

(d) Review a fee estimate and confirm that no records were located in response to a request.

(4) The Commander, TRADOC retains the authority to cancel or withdraw delegated authority at any time. Upon change of command all delegations are subject to review by the new commander who may choose to cancel or change this delegation.

e. Release of records under FOIA/PA. Commanders, commandants and directors must be knowledgeable about the potential impact of FOIA/PA releases, as some can generate significant

public interest and garner national media coverage. The TRADOC G-6 FOIA/Privacy Office will facilitate coordination, as it is imperative that requests concerning sensitive matters be thoroughly coordinated with appropriate stakeholders.

(1) Release/withholding of records under FOIA/PA. Commanders, commandants, and directors, as record owners, are responsible to ensure recommendations to release/withhold records are coordinated with subject matter experts(SMEs) and stakeholders. Record owner communication and recommendations will include:

(a) Timely notification to TRADOC G-6 of potential FOIA/PA request issues that include burdensome requests, fee waivers and expedited processing requests.

(b) Reasonable search. Documentation that a reasonable search for responsive records (e-mails, electronic and hardcopy records, etc.), including what document timeframes and search terms were used. When no records are located the searcher will complete a no record affidavit.

(c) Context of burdensome search requests. When the request is too broad to allow for a reasonable search, coordinate with the FOIA/PA officer by providing context of how the search is too broad and may be narrowed (timeframe of the request, subject, or search terms) to be reasonable and likely satisfy the requester;

(d) Awareness of FOIA requester fee categories. Record owners will notify FOIA/PA office when searches will exceed two hours using the Department of Defense Form 2086 (Record of Freedom of Information (FOI) Processing Cost). Records owners will respond to FOIA/PA office inquiries to communicate their search and processing concerns. Fees may be charged for excess search time when FOIA requests are perfected and responded to within the statutory 20 (or 30) day timeframe.

- Other fee category requesters receive two hours of search at no cost.
- Verified media/educational fee category requesters may receive records at no charge. Record owners will consult the FOIA/PA office with concerns.
- Commercial fee category requesters may be charged the full fee.

(e) FOIA does not require agencies to create new records or to conduct research, analyze data, or answer questions when responding to requests. However, it may be in the best interest of the Government to compile a record, consult with the TRADOC G-6 FOIA/PA Office.

(f) Request responsiveness determinations. A determination if the located records are responsive to the request (when in doubt include those records to allow FOIA/PA officer and legal to assist in the determination).

(g) Release/withholding justification. Record owners will complete a line-by-line review of responsive records and segregate portions recommended for withholding (yellow highlighted or electronically marked for redaction). A written justification for release/withholding (citing a SME, security and operations security (OPSEC) review), to articulate the harm that would come if

portions of the record(s) were released to the public. The TRADOC G-6 FOIA/PA Office can assist in identifying FOIA exemptions applicable to the record(s).

(h) FOIA processing cost. A DD Form 2086 to record potential fee amounts.

(i) Stakeholder identification and consultation. Identification of other stakeholders who have interest (required consultation with affected organizations).

(j) Other pertinent records/information to inform FOIA/PA processing, such as a security classification guide, background information, and statutory authorities for releasing/withholding records.

(2) Forward requests for access, and amendment of PA records contained in TRADOC systems of records to the TRADOC G-6 FOIA/Privacy Office for processing.

f. TRADOC personnel will notify the TRADOC G-6 FOIA Office of privacy complaints or violations and follow instructions in accordance with AR 25-22.

g. FOIA/PA officers will log requests into the Freedom of Information Act and Privacy Case Tracking System (FACTS), coordinate with record owners to obtain and staff complete IDA packages (to include the draft response letter referring the request to the TRADOC FOIA/PA Office) to the local office of the staff judge advocate for legal sufficiency determination, and make recommendations.

(1) Full release recommendation. After consulting with the TRADOC FOIA/PA Office, full release to the requester.

(2) Full or partial denial recommendation. Full or partial denial to TRADOC G-6 FOIA/PA Office for processing to the IDA.

(3) Request closure. Wait for an acceptance response from the TRADOC G-6 FOIA/PA Office before closing the request in FACTS.

h. TRADOC G-6 FOIA/PA officers will:

(1) Coordinate with the FOIA/PA team, process IDA packages, and submit significant/hot topic notification via the FACTS and by coordinating with DOD/Army FOIA to follow the Departmental Situational Awareness Process for FOIA responses.

(2) Conduct PA training.

(3) Coordinate TRADOC PA system of records notices (SORNs) to be published in the Federal Register.

(4) Coordinate TRADOC collections of 10 or more members of the public to obtain Office of Management and Budget approval in accordance with The Paperwork Reduction Act of 1995.

(5) Coordinate and conduct personally identifiable information breach reporting in accordance with TR 1-8.

(6) Coordinate social security number reduction and elimination plans.

(7) Complete PA and civil liberties reporting.

Add to paragraph **4-4d. Enterprise hosting:**

Organizations seeking a cloud hosting solution to migrate systems and applications will send requirements to the TRADOC G-6. TRADOC organizations migrating to the cloud will follow TRADOC G-6 procedures.

Add to paragraph **4-5b. Collaboration tools standards:**

TRADOC organizations will use DOD and Army enterprise collaboration tools as their primary means for collaboration requirements. Only when these tools cannot be adapted to a mission requirement may a TRADOC activity request use of a non-standard collaboration tool via an ITAS request.

Add to paragraph **4-6b. Websites and services, web domain registration:**

All TRADOC organizations will complete social media training and site registration with the HQ TRADOC Communication Directorate (formerly PAO) Command Information team prior to establishing official social media accounts for units/organizations or leaders. All official, publicly available websites must be hosted on a DOD certified website host (the American Forces Public Information Management System is the DOD program of record), must have periodic review from public affairs/Communication Directorate personnel, and must have an appointed content manager.

Add to paragraph **4-6d. Websites and services, use of Army.mil domain:**

TRADOC organizations will submit non-.mil domain names to the TRADOC Command Webmaster for approval and endorsement prior to submission to the Army CIO/G-6.

Add to paragraph **4-6e. Websites and services, web domain authorizations:**

TRADOC organizations will coordinate new website requirements with their parent organization and the TRADOC Command Webmaster (usarmy.jble.tradoc.mbx.tradoc-atim-webmaster1@mail.mil) to ensure the new site is properly documented.

Add to paragraph **4-6f. Websites and services, web management policy:**

(7) TRADOC Mission Webmasters/Portal administrators will familiarize themselves with the content on the TRADOC Command Webmaster portal. This portal provides TRADOC-specific guidance for training, site requirements, and other duty-related content.

Add to paragraph **4-6f. Websites and services, web management policy:**

(8) The TRADOC Command Webmaster will:

- Perform all the duties of mission webmaster for sites for which the Command Webmaster serves as mission webmaster.
- Maintain the TRADOC Command Webmaster portal at <https://intranet.tradoc.army.mil/sites/hq/Webmaster/SitePages/Home.aspx>, which will include the following information:
 - Mandatory training list and links to the online courses.
 - TRADOC public-facing websites and their POCs.
 - Quarterly website review tracker.
 - Vulnerability disclosure program information.

Add to paragraph **4-6g. Websites and services, website reviews:**

The TRADOC Webmaster will establish a quarterly review for TRADOC organizations public web sites that includes currency of information, site functionality, security risks, and mandatory content and links. Upon request, TRADOC PAO and OPSEC officer will assist in public site reviews.

Add to paragraph **4-6h. Websites and services, Assignment of webmaster and maintainer:**

TRADOC organizations will maintain an accurate list of public-facing websites and their POCs. The list will be updated in the quarterly review and maintained on the TRADOC Command Webmaster portal. TRADOC organizations will report the assignment/change of personnel responsible for maintaining public-facing websites to the TRADOC Command Webmaster at usarmy.jble.tradoc.mbx.tradoc-atim-webmaster1@mail.mil.

Add to paragraph **4-10. Email services:**

g. Use of digital signatures. In addition to the guidance in paragraph 4-10c, (use of encryption), TRADOC personnel will digitally sign with an approved DOD PKI certificate all official emails from an Army-owned, Army-operated, or Army-controlled system or account to include those:

- (1) Constituting orders, promulgating policy, or committing resources.
- (2) Containing an active (embedded) hyperlink (uniform resource locator web address or email address) and/or attachment and sent to a recipient in the DOD Global Address List.
- (3) Containing an attachment.

Add to paragraph **4-13. Publishing and printing:**

f. TRADOC administrative publication policy. See TR 25-35 for TRADOC administrative publication policy.

Add to paragraph **4-20. Privacy impact assessment:**

TRADOC PA officers will assist system, application, and electronic data collection owners to complete the DD Form 2930 (Privacy Impact Assessment (PIA)).

Add the following to **appendix A. References, section II, related publications:**

AR 25-22

The Army Privacy Program

AR 870-5

Military History: Responsibilities, Policies, and Procedures

TR 1-8

U.S. Army Training and Doctrine Command Operations Reporting

TR 25-35

Preparing and Publishing U.S. Army Training and Doctrine Command (TRADOC) Administrative Publications

TRADOC Pamphlet 25-53

List of Approved Recurring Information Management Requirements

Add **appendix C. ARIMS record series, numbers, and dispositions:**

C. ARIMS record series, numbers, and dispositions

Records created under 25-series functions (information management) to include AR 25-1, AR 25-2, AR 25-22, AR 25-30, AR 25-50, AR 25-55, AR 25-58, AR 25-59, AR 25-98, will be maintained in accordance with AR 25-400-2. To determine record numbers and dispositions visit the ARIMS Records Retention Schedule-Army at <https://www.arims.army.mil/arims/Login.aspx> or <https://intranet.tradoc.army.mil/sites/rm/default.aspx> in the training folder.

Add to the **glossary:**

Section I, Abbreviations

| | |
|-------|---|
| DD | Department of Defense |
| FACTS | Freedom of Information Act and Privacy Case Tracking System |
| IDA | Initial Denial Authority |
| TR | U.S. Army Training and Doctrine Command regulation |

Section II, Terms

1-n priority list

A 1-n priority list is a decision making tool to identify an organization's first to last number (n) of priorities for resource and financial implication considerations.