_____ YES  [If yes, please continue.]

3. Please indicate if any of the following characteristics apply to the information in the system about individuals: Bear in mind that log-on information may identify or be linkable to an individual. (Check all that apply.)

_____ The information directly identifies specific individuals.

_____ The information is intended to be used, in conjunction with other data elements, to indirectly identify specific individuals.

_____ The information can be used to distinguish or trace an individual's identity (i.e., it is linked or linkable to specific individuals).

If you marked any of the above, proceed to Question 4.

_____ None of the above. If none of the above, describe why the information does not identify specific individuals either directly or indirectly. [If you checked this item, STOP here after providing the requested description.]

4. Does the system/project pertain only to government employees, contractors, or consultants?

_____ NO  _____ YES

5. Is information about United States citizens or lawfully admitted permanent resident aliens retrieved from the system/project by name or other personal identifier?

_____ NO. [If no, skip to question 7.]

_____ YES. [If yes, proceed to the next question.]

6. Does the system/project collect any information directly from the person who is the subject of the information?

_____ NO  [If no, proceed to question 7.]

_____ YES

a. Does the system/project support criminal, CT, or FCI investigations or assessments?

_____ NO
_____ YES  [If yes, proceed to question 7.]

b. Are subjects of information from whom the information is directly collected provided a written Privacy Act (e)(3) statement (either on the collection form or via a separate notice)?

_____ NO  [The program will need to work with PCLU to develop/implement the necessary form(s).]

_____ YES  Identify any forms, paper or electronic, used to request such information from the information subject:

7. Are Social Security Numbers (SSNs) collected, maintained or disseminated from the system/project? Full SSNs should only be used as identifiers in limited instances.

_____ NO  _____ YES  If yes, check all that apply:

_____ SSNs are necessary to establish/confirm the identity of subjects, victims, witnesses or sources in this law enforcement or intelligence activity.

_____ SSNs are necessary to identify FBI personnel in this internal administrative system.

_____ SSNs are important for other reasons. Describe:

_____ The system/project provides special protection to SSNs (e.g., SSNs are encrypted, hidden from all users via a look-up table, or only available to certain users). Describe:

_____ It is not feasible for the system/project to provide special protection to SSNs. Explain:

8. Is the system operated by a contractor?

_____ No.

_____ Yes. Information systems operated by contractors for the FBI may be considered Privacy Act systems of records. The Federal Acquisition Regulation contains standard contract clauses that must be included in the event the system collects, maintains or disseminates PII and additional requirements may be imposed as a matter of Department of Justice policy. Consultations with the
9. Has the system undergone Certification & Accreditation (C&A) by the FBI Security Division (SecD)?

   _____ NO If no, indicate reason; if C&A is pending, provide anticipated completion date:

   _____ YES If yes, please indicate the following, if known:

   Provide date of last C&A certification/re-certification:

   Confidentiality: __Low __Moderate __High __Undefined

   Integrity: ______ Low __Moderate __High __Undefined

   Availability: ______ Low __Moderate __High __Undefined

   ______ Not applicable – this system is only paper-based.

   _____ NO

   _____ YES  If yes, please describe the data mining function:

11. Is this a national security system (as determined by the SeeD)?

   _____ NO   _____ YES

12. Status of System/ Project:

   _____ This is a new system/ project in development. [If you checked this block, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval and determination if PIA and/or other actions are required.]

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

2. Has the system/project undergone any significant changes since April 17, 2003?

   _____ NO  [If no, proceed to next question (II.3).]

   _____ YES  If yes, indicate which of the following changes were involved (mark all changes that apply, and provide brief explanation for each marked change):

   _____ A conversion from paper-based records to an electronic system.

   _____ A change from information in a format that is anonymous or non-identifiable to a format that is identifiable to particular individuals.

   _____ A new use of an IT system/project, including application of a new technology, that changes how information in identifiable form is managed. (For example, a change that would create a more open environment and/or avenue for exposure of data that previously did not exist.)

   _____ A change that results in information in identifiable form being merged, centralized, or matched with other databases.
A new method of authenticating the use of and access to information in identifiable form by members of the public.

A systematic incorporation of databases of information in identifiable form purchased or obtained from commercial or public sources.

A new interagency use or shared agency function that results in new uses or exchanges of information in identifiable form.

A change that results in a new use or disclosure of information in identifiable form.

A change that results in new items of information in identifiable form being added into the system/project.

Changes do not involve a change in the type of records maintained, the individuals on whom records are maintained, or the use or dissemination of information from the system/project.

Other [Provide brief explanation]:

3. Does a PIA for this system/project already exist?

____ NO  ____ YES

If yes:

a. Provide date/title of the PIA:

b. Has the system/project undergone any significant changes since the PIA?

____ NO  ____ YES

[The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval and determination if PIA and/or other actions are required.]
FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: Public Access Line (PAL) Contact Manager

BIKR FBI Unique Asset ID: pending

<table>
<thead>
<tr>
<th>SYSTEM/PROJECT POC</th>
<th>FBI OGC/PCLU POC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name: UC</td>
<td>Name:</td>
</tr>
<tr>
<td>Program Office: NICS/PAL</td>
<td>Phone:</td>
</tr>
<tr>
<td>Division: CJIS</td>
<td>Room Number: C3-655</td>
</tr>
<tr>
<td>Phone:</td>
<td>Room Number: A1</td>
</tr>
</tbody>
</table>
**FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:**

- **X**. PIA is required by the E-Government Act.

- **X**. PIA is to be completed as a matter of FBI/DOJ discretion.

Is PIA to be published on FBI.GOV (after any RMD FOIA redactions)?  **X**. Yes.  **X**. No.

- **X**. PIA is not required for the following reason(s):
  - System does not collect, maintain, or disseminate PII.
  - System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).
  - Information in the system relates to internal government operations.
  - System has been previously assessed under an evaluation similar to a PIA.
  - No significant privacy issues (or privacy issues are unchanged).
  - Other:

**Applicable SORN(s):** Justice/I-Bl-002 (Central Records System).

Notify FBI RMD/RIDS per MIIOG 190.2.3?  **X**. Yes.  **X**. No—See sample EC on PCLU intranet website here: http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog.190-2-3_ec.wpd

SORN/SORN revision(s) required?  **X**. Yes.  **X**. No.

Prepare/revise/add Privacy Act (e)(3) statements for related forms?  **X**. Yes.  **X**. No.

**RECORDS.** The program should consult with RMD to identify/resolve any Federal records/electronic records issues. The system may contain Federal records whether or not it contains Privacy Act requests and, in any event, a records schedule approved by the National Archives and Records Administration is necessary. RMD can provide advice on this as well as on compliance with requirements for Electronic Recordkeeping Certification and any necessary updates.

**Other:**

<table>
<thead>
<tr>
<th>Action Unit Chief</th>
<th>Signature:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Privacy and Civil Liberties Unit</td>
<td>Date Signed: 3/21/2003</td>
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</table>

<table>
<thead>
<tr>
<th>Brian Binney, Acting Deputy General Counsel</th>
<th>Signature:</th>
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</thead>
<tbody>
<tr>
<td>FBI Privacy and Civil Liberties Officer</td>
<td>Date Signed: 3/21/2003</td>
</tr>
</tbody>
</table>
I. INFORMATION ABOUT THE SYSTEM / PROJECT

1. Provide a general description of the system or project that includes: (a) name of the system/project, including associated acronyms; (b) structure of the system/project, including interconnections with other projects or systems; (c) purpose of the system/project; (d) nature of the information in the system/project and how it will be used; (e) who will have access to the information in the system/project; (f) and the manner of transmission to all users.

The FBI Public Access Line Unit (PAL) is a telephone call center that serves as the FBI's central intake for information and tips from members of the public regarding potential violations of criminal law and threats to national security. The Customer Service Representatives (CSR) of PAL answer the telephone calls and document pertinent information in the PAL Contact Manager database. All calls received by PAL are logged into the database, even those that are unintelligible/inaudible. This also includes those that are referred to other government jurisdictions or other tip lines, or those requesting government services.

The database will be accessible only to PAL staff. The database is currently at CJIS and is covered under a separate Privacy Threshold Analysis.

For those calls that report potential violations of criminal law and/or threats to national security, the CSR also electronically documents information in Sentinel or Guardian on an FD-71 (FBI Complaint/Assessment Form). These forms are sent electronically via Sentinel or Guardian to the appropriate Field Office for further review and investigatory decisions. PAL does not separately maintain these forms outside of the Sentinel or Guardian systems, both of which are covered by separate Privacy Impact Assessments.

2. Does the system/project collect, maintain, or disseminate any information about individuals (i.e., a human being or natural person, regardless of nationality)?

_____ NO

_X__ YES  [If yes, please continue.]
3. Please indicate if any of the following characteristics apply to the information in the system about individuals: Bear in mind that log-on information may identify or be linkable to an individual. (Check all that apply.)

____ X____ The information directly identifies specific individuals.

____ The information is intended to be used, in conjunction with other data elements, to indirectly identify specific individuals.

____ The information can be used to distinguish or trace an individual’s identity (i.e., it is linked or linkable to specific individuals).

If you marked any of the above, proceed to Question 4.

____ None of the above. If none of the above, describe why the information does not identify specific individuals either directly or indirectly.

4. Does the system/project pertain only to government employees, contractors, or consultants?

____ X____ NO ______ YES

5. Is information about United States citizens or lawfully admitted permanent resident aliens retrieved from the system/project by name or other personal identifier?

____ NO. [If no, skip to question 7.]

____ X____ YES. [If yes, proceed to the next question.]

6. Does the system/project collect any information directly from the person who is the subject of the information?

____ NO [If no, proceed to question 7.]

____ X____ YES

   a. Does the system/project support criminal, CT, or FCI investigations or assessments?

____ NO

____ X____ YES [If yes, proceed to question 7.]
b. Are subjects of information from whom the information is directly collected provided a written Privacy Act (c)(5) statement (either on the collection form or via a separate notice)?

_____ NO [The program will need to work with PCLU to develop/implement the necessary form(s).]

_____ YES Identify any forms, paper or electronic, used to request such information from the information subject:

7. Are Social Security Numbers (SSNs) collected, maintained or disseminated from the system/project? Full SSNs should only be used as identifiers in limited instances.

___ NO  _____ YES  If yes, check all that apply:

_____ SSNs are necessary to establish/confirm the identity of subjects, victims, witnesses or sources in this law enforcement or intelligence activity.

_____ SSNs are necessary to identify FBI personnel in this internal administrative system.

_____ SSNs are important for other reasons. Describe:

_____ The system/project provides special protection to SSNs (e.g., SSNs are encrypted, hidden from all users via a look-up table, or only available to certain users). Describe:

______ It is not feasible for the system/project to provide special protection to SSNs. Explain:

8. Is the system operated by a contractor?

____ No.

_____ Yes. Information systems operated by contractors for the FBI may be considered Privacy Act systems of records. The Federal Acquisition Regulation contains standard contract clauses that must be included in the event the system collects, maintains or disseminates PII and additional requirements may be imposed as a matter of Department of Justice policy. Consultations with the Office of the General Counsel may be required if a contractor is operating the system for the FBI.

9. Has the system undergone Certification & Accreditation (C&A) by the FBI Security Division (SecD)?

_____ NO  If no, indicate reason; if C&A is pending, provide anticipated
completion date:

[X] YES If yes, please indicate the following, if known: The PAL Contact Manager Database resides on the [ ] which has been certified and accredited until 08/16/15.

Provide date of last C&A certification/re-certification:

Confidentiality: [ ] Low [ ] Moderate [X] High [ ] Undefined

Integrity: [ ] Low [ ] Moderate [X] High [ ] Undefined

Availability: [ ] Low [ ] Moderate [X] High [ ] Undefined

Not applicable – this system is only paper-based.


[X] NO

[ ] YES If yes, please describe the data mining function:

11. Is this a national security system (as determined by the SecD)?

[X] NO [ ] YES

12. Status of System/Project:

[X] This is a new system/project in development.

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

2. Has the system/project undergone any significant changes since April 17, 2003?

[ ] NO [If no, proceed to next question (II.3).]

[ ] YES If yes, indicate which of the following changes were involved (mark all changes that apply, and provide brief explanation for each marked change):

[ ] A conversion from paper-based records to an electronic system.
A change from information in a format that is anonymous or non-identifiable to a format that is identifiable to particular individuals.

A new use of an IT system/project, including application of a new technology, that changes how information in identifiable form is managed. (For example, a change that would create a more open environment and/or avenue for exposure of data that previously did not exist.)

A change that results in information in identifiable form being merged, centralized, or matched with other databases.

A new method of authenticating the use of and access to information in identifiable form by members of the public.

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A change that results in new items of information in identifiable form being added into the system/project.

Changes do not involve a change in the type of records maintained, the individuals on whom records are maintained, or the use or dissemination of information from the system/project.

Other [Provide brief explanation]:

3. Does a PIA for this system/project already exist?

   _____ NO   _____ YES

   If yes:

   a. Provide date/title of the PIA:

   b. Has the system/project undergone any significant changes since the PIA?

      ___ NO   ___ YES
FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1272295-0

Total Deleted Page(s) = 7
Page 2 ~ b5; b6; b7C; b7E;
Page 3 ~ b5;
Page 4 ~ b5; b7E;
Page 5 ~ b5; b7E;
Page 6 ~ b5; b7E;
Page 7 ~ b5;
Page 8 ~ b5;

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X   Deleted Page(s)   X
X   No Duplication Fee X
X   For this Page     X
XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
**FBI PRIVACY THRESHOLD ANALYSIS (PTA)**
(Equivalent to the DOJ Initial Privacy Assessment (IPA))

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<th>NAME OF SYSTEM / PROJECT:</th>
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<td>Classified By:</td>
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<td>Reason:</td>
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<td>Declassify On: 20350401</td>
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**FBI DIVISION INTERMEDIATE APPROVALS**

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<th>Date signed: 4/5/10</th>
<th>Name:</th>
<th>Title: SSA</th>
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<tr>
<td>FBIHQ Division:</td>
<td>Signature: /s/</td>
<td>Date signed: 4/6/10</td>
<td>Name:</td>
<td>Title: Unit Chief</td>
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<tr>
<th>FBI OGC/PCLU POC</th>
<th>Name:</th>
<th>Phone:</th>
<th>Room Number: JEH</th>
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<tr>
<td></td>
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<td>NVRA/4W-200</td>
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</tbody>
</table>

Signature: Date signed: Name: Title:

After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7338).
(The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)

Upon final FBI approval, FBI OGC/PCLU will distribute as follows: (OGC)(FBI)

1 - Signed original to file 190-HQ-C1321794 (fwd to JEH 1B204 via PA-520)

Copies (recipients please print/reproduce as needed for Program/Division file(s)):

1 - DOJ Office of Privacy and Civil Liberties (via e-mail to privacy@usdoj.gov) (if classified, via hand delivery to 1331 Penn. Ave. NW, Suite 940, 20530)

1 - OGC\PCLU intranet
1 - PCLU UC
1 - PCLU Library
1 - PCLU Tickler

2 - FBI OCIO / OIPP (JEH 9376, attn:)
1 - FBI SecD/AU (elec. copy: via e-mail to UC
1 - RMD/RMAU (attn:

2 - Program Division POC /Privacy Officer
2 - FBIHQ Division POC /Privacy Officer
FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS: [This section will be completed by the FBI PCLU/PCLO following PTA submission. The PTA drafter should skip to the next page and continue.]

___ PIA is required by the E-Government Act.

___ PIA is to be completed as a matter of FBI/DOJ discretion.

Is PIA to be published on FBI.GOV (after any RMD FOIA redactions)? ___ Yes. ___ No (indicate reason):

___ PIA is not required for the following reason(s):
___ System does not collect, maintain, or disseminate PII.
___ System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).
___ Information in the system relates to internal government operations.
___ System has been previously assessed under an evaluation similar to a PIA.
___ No significant privacy issues (or privacy issues are unchanged).
X ___ Other (describe): This is a good example of why national security systems are exempt from the eGovernment PIA requirement.

This PTA should suffice for privacy documentation.

Applicable SORN(s): _______ CRS

Notify FBI RMD/RIDS per MIOG 190.2.3? ___ No ___ Yes--See sample EC on PCLU intranet website here: http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_mioig190-2-3_ec.wpd

SORN/SORN revision(s) required? ___ No ___ Yes (indicate revisions needed):

Prepare/revise/add Privacy Act (e)(3) statements for related forms? ___ No ___ Yes (indicate forms affected):

RECORDS. The program should consult with RMD to identify/resolve any Federal records/electronic records issues. The system may contain Federal records whether or not it contains Privacy Act requests and, in any event, a records schedule approved by the National Archives and Records Administration is necessary. RMD can provide advice on this as well as on compliance with requirements for Electronic Recordkeeping Certification and any necessary updates.

Other:

David C. Larson, Deputy General Counsel
FBI Privacy and Civil Liberties Officer
Signature: /s/
Date Signed: 5/20/2010
I. INFORMATION ABOUT THE SYSTEM / PROJECT

1. Provide a general description of the system or project that includes: name of the system/project, including associated acronyms; structure of the system/project, purpose; nature of the information in the system and how it will be used; who will have access to the information in the system and the manner of transmission to all users. [X] is the codename for the designed for The primary objective of

[ ]

[X/NF]

Currently, only select individuals have access. It is important to note that

[X]

Although in its infancy, has been valuable in efforts to

2. Does the system/project collect, maintain, or disseminate any information about individuals in identifiable form, i.e., is information linked to or linkable to specific individuals (which is the definition of personally identifiable information (PII))? __ NO [If no, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval. Unless you are otherwise advised, no PIA is required.]

[X] YES [If yes, please continue.] The PII However, these identifiers would not fully identify the individual without additional

3. Does the system/project pertain only to government employees, contractors, or consultants?

[SECRET/NOFORN]
4. Is information about United States citizens or lawfully admitted permanent resident aliens retrieved from the system/project by name or other personal identifier?

   ____ NO  ____ YES

5. Are Social Security Numbers (SSNs) collected, maintained or disseminated from the system/project?

   ____ X ____ NO  ____ YES  If yes, check all that apply:

   ____ SSNs are necessary to establish/confirm the identity of subjects, victims, witnesses or sources in this law enforcement or intelligence activity.

   ____ SSNs are necessary to identify FBI personnel in this internal administrative system.

   ____ SSNs are important for other reasons. Describe:

   ____ The system/project provides special protection to SSNs (e.g., SSNs are encrypted, hidden from all users via a look-up table, or only available to certain users). Describe:

   ____ It is not feasible for the system/project to provide special protection to SSNs. Explain:

6. Does the system/project collect any information directly from the person who is the subject of the information?

   ____ X ____ NO  [If no, proceed to question 7.]

   ____ YES

   a. Does the system/project support criminal, CT, or FCI investigations or assessments?

      ____ X ____ YES  [If yes, proceed to question 7.]

[SECRET/NOFORN]
b. Are subjects of information from whom the information is directly collected provided a written Privacy Act (e)(3) statement (either on the collection form or via a separate notice)?

   ____ NO [The program will need to work with PCLU to develop/implement the necessary form(s).]

   ____ YES Identify any forms, paper or electronic, used to request such information from the information subject:

7. Has the system undergone Certification & Accreditation (C&A) by the FBI Security Division (SecD)?

   ____ NO If no, indicate reason; if C&A is pending, provide anticipated completion date:

   ____ YES If yes, provide date of last C&A certification/re-certification:

   ___ X ___ Don't Know.

8. Is this system/project the subject of an OMB-300 budget submission?

   ___ X ___ NO _____ Don't know _____ YES If yes, please provide the date and name or title of the OMB submission:

9. Is this a national security system (as determined by the SecD)?

   ____ NO _____ X ___ YES _____ Don't know

10. Status of System/Project:

    ___ X ___ This is a new system/project in development. [If you checked this block, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval and determination if PIA and/or other actions are required.]

    II. EXISTING SYSTEMS / PROJECTS

    [SECRET//NOFORN]
1. When was the system/project developed?

2. Has the system/project undergone any significant changes since April 17, 2003?
   - NO  [If no, proceed to next question (II.3).]
   - YES  If yes, indicate which of the following changes were involved (mark all boxes that apply):
     - A conversion from paper-based records to an electronic system.
     - A change from information in a format that is anonymous or non-identifiable to a format that is identifiable to particular individuals.
     - A new use of an IT system/project, including application of a new technology, that changes how information in identifiable form is managed. (For example, a change that would create a more open environment and/or avenue for exposure of data that previously did not exist.)
     - A change that results in information in identifiable form being merged, centralized, or matched with other databases.
     - A new method of authenticating the use of and access to information in identifiable form by members of the public.
     - A systematic incorporation of databases of information in identifiable form purchased or obtained from commercial or public sources.
     - A new interagency use or shared agency function that results in new uses or exchanges of information in identifiable form.
     - A change that results in a new use or disclosure of information in identifiable form.
     - A change that results in new items of information in identifiable form being added into the system/project.
     - Changes do not involve a change in the type of records maintained, the individuals on whom records are maintained, or the use or dissemination of information from the system/project.
     - Other [Provide brief explanation]:

3. Does a PIA for this system/project already exist?
_____ NO   _____ YES

If yes:

a. **Provide date/title of the PIA:**

b. Has the system/project undergone any significant changes since the PIA?

_____ NO   _____ YES

[The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval and determination if PIA and/or other actions are required.]
FBI Privacy Threshold Analysis (PTA) Cover Sheet

NAME OF SYSTEM: b7E

FBI SYSTEM CONTACT PERSON

Name: 
Program Office: CALEA Implementation Unit
Division: OTD
Phone: b7C
Room Number: C-115
Date PTA submitted for approval: 1/29/07

FBI DIVISION APPROVALS. A PIA (and/or PTA) should be prepared/approved by the cognizant program management in collaboration with IT, security, and end-user management and OGC/PCLU. (PIAs/PTAs relating to electronic forms/questionnaires implicating the Paperwork Reduction Act should also be coordinated with the RMD Forms Desk.) If the subject of a PTA/PIA is under the program cognizance of an FBIHQ Division, prior to forwarding to OGC the PTA/PIA must also be referred to the FBIHQ Division for program review and approval, if required by the FBIHQ Division.

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<thead>
<tr>
<th>Program Division</th>
<th>FBIHQ Division: OTD</th>
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</thead>
<tbody>
<tr>
<td>Program Manager</td>
<td></td>
</tr>
<tr>
<td>(or other appropriate executive as Division determines)</td>
<td>Signature: /s/</td>
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<tr>
<td>Date signed:</td>
<td>Date signed: 1/30/07</td>
</tr>
<tr>
<td>Name:</td>
<td>Name: Charles Barry Smith</td>
</tr>
<tr>
<td>Title:</td>
<td>Title: Acting Section Chief</td>
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<td>Division Privacy Officer</td>
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</table>

Upon Division approval, forward signed hard copy plus electronic copy to OGC/PCLU (JEH Room 7338).

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer

Signature: /s/  
Date Signed: 5/18/2007  
Name: David C. Larson for Patrick W. Kelley  
Title: Deputy General Counsel  
*See my supplemental comments attached

Upon final FBI approval, FBI OGC will distribute as follows:

1 - Original signed copy to 190-HQ-C1321794  
1 - DOJ Privacy and Civil Liberties Office-Main Justice, Room 4259  
1 - FBI OCIO  
1 - FBI SecD (electronic copy via e-mail)  
2* - Program Division POC /Privacy Officer  
2* - FBIHQ Division POC /Privacy Officer  
(*)please reproduce as needed for Program/Division file(s)
FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: b7E

For efficiency, a system owner or program manager can be aided in making the determination of whether a Privacy Impact Assessment (PIA) is required by conducting and following Privacy Threshold Analysis (PTA).

A PTA contains basic questions about the nature of the system in addition to a basic system description. The questions are as follows:

A. General System Description: Please briefly describe:

1. Type of information in the system: This system contains CALEA specific information. This information has been collected by the CALEA Implementation Unit and contains information in regards to CALEA compliance. The system also contains the capability to conduct lawfully authorized electronic surveillance.

   a. If the system is solely related to internal government operations please provide a brief explanation of the quantity and type of employee/contractor information:

2. Purpose for collecting the information and how it will be used: The information is used to:

3. The system’s structure (including components/subsystems): The system is composed of:

4. Means of accessing the system and transmitting information to and from the system: The system can only be assess from the CIU to:

5. Who within FBI will have access to the information in the system and controls for ensuring that only authorized persons can access the information: Only CIU FBI personnel have access to the system, and the administrator controls the access to specific information on the system through username and password logon verification. These personnel must be in the

6. Who outside the FBI will have access to the information in the system and controls for ensuring that only authorized persons can access the information: Only CIU Contractor personnel have access to the system and the administrator controls the access to specific information on the system through username and password logon verification. These personnel must be in the

7. Has this system been certified and accredited by the FBI Security Divisions? X Yes _ No

8. Is this system encompassed within an OMB-300? _ Yes X No _ Don't Know
   (if yes, please attach copy of latest one)

I. Was the system developed prior to April 17, 2003?
FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: b7E

___ YES (If “yes,” proceed to Question 1.)

X__ NO (If “no,” proceed to Section II.)

1. Has the system undergone any significant changes since April 17, 2003?

___ YES If "yes," please explain the nature of those changes:

(Continue to Question 2.)

___ NO (If "no," the PTA is complete and should be sent to FBI OGC’s Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ’s Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

2. Do the changes involve the collection, maintenance, or dissemination of information in identifiable form about individuals?

___ YES (If “yes,” please proceed to Question 3.)

___ NO (If “no,” the PTA is complete and should be sent to FBI OGC’s Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ’s Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

3. Is the system solely related to internal government operations?

___ YES If "yes," is this a Major Information System (as listed on OGC’s FBINET website)?

___ Yes. (If "yes," a full PIA is required. PTA is complete.)

___ No. (If "no," the PTA is complete and should be sent to FBI OGC’s Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ’s Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required. (FBI and DOJ reviewing officials reserve the right to require a PIA.))

___ NO (If “no,” go to section III to determine if a full or short-form PIA is required.)

II. For systems developed after April 17, 2003.

1. What is the purpose of the system? (Answer in detail unless details already provided in A. 2 above):

The CALEA Implementation Unit employs a number of government and contract employees who must deal regularly with public telecommunications sector and law enforcement to perform their duties.

2. Does the system collect, maintain or disseminate information in identifiable form about individuals?

___ YES (If “yes,” please proceed to Question 3.)

___ NO (If “no,” the PTA is complete and should be sent to FBI OGC’s Privacy and Civil Liberties Unit (PCLU) for review, approval, and
FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: [Redacted]

forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

3. Is the system solely related to internal government operations?

   [X] YES  If "yes," is this a Major Information System (as listed on OGC's FBINET website)?

   ___ Yes.  (If "yes," a full PIA is required. PTA is complete.)

   [X] No.  (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required. (FBI and DOJ reviewing officials reserve the right to require a PIA.)

   * See supplemental comments attached.

   ___ NO  (If "no," go to section III to determine if a full or short-form PIA is required.)

III. Full or Short-Form PIA

1. Is the system a major information system (as listed on OGC's FBINET website)?

   [X] YES  (If "yes," a full PIA is required. PTA is complete.)

   ___ NO  (If "no," please continue to question 2.)

2. Does the system involve routine information AND have limited use/access?

   [X] YES  A short-form PIA is required. (i.e., you need only answer Questions 1.1, 1.2, 2.1, 3.1, 4.1, 5.1 (if appropriate), 6.2, 6.3, and 8.9 of the PIA template. Please note that FBI and DOJ reviewing officials reserve the right to require completion of a full PIA. (PTA is complete—forward with PIA.)

   ___ NO  (If "no," a full PIA is required. PTA is complete.)
**FBI Privacy Threshold Analysis (PTA) Cover Sheet**

**NAME OF SYSTEM:**

**FBI SYSTEM CONTACT PERSON**

Name:

Program Office: IATI Program
Division: SecD
Phone:
Room Number: SpyB 6th Floor
Date PTA submitted for approval: 6/08/07

**FBI DIVISION APPROVALS.** A PIA (and/or PTA) should be prepared/approved by the cognizant program management in collaboration with IT, security, and end-user management and OGC/PCLU. (PIAs/PTAs relating to electronic forms/questionnaires implicating the Paperwork Reduction Act should also be coordinated with the RMD Forms Desk.) If the subject of a PTA/PIA is under the program cognizance of an FBIHQ Division, prior to forwarding to OGC the PTA/PIA must also be referred to the FBIHQ Division for program review and approval, if required by the FBIHQ Division.

<table>
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<tr>
<th>Program Division: Security Division</th>
<th>FBIHQ Division: [insert division name]</th>
</tr>
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<tbody>
<tr>
<td>Program Manager (or other appropriate executive as Division determines)</td>
<td>Signatures: /s/</td>
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<tr>
<td>Date signed: 6/11/07</td>
<td></td>
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<tr>
<td>Name:</td>
<td></td>
</tr>
<tr>
<td>Title: IATU Unit Chief</td>
<td></td>
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<tr>
<td>Division Privacy Officer</td>
<td>Signature: /s/</td>
</tr>
<tr>
<td>Date signed: 6/11/07</td>
<td></td>
</tr>
<tr>
<td>Name: Jeffery J. Berkin</td>
<td></td>
</tr>
<tr>
<td>Title: SecD AD (acting)/Privacy Officer</td>
<td></td>
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</tbody>
</table>

Upon Division approval, forward signed hard copy plus electronic copy to OGC/PCLU (JEH Room 7338).

**FINAL FBI APPROVAL:**

<table>
<thead>
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<th>FBI Privacy and Civil Liberties Officer</th>
<th>Signature: /s/</th>
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<tbody>
<tr>
<td>Date Signed: 7/13/07</td>
<td></td>
</tr>
<tr>
<td>Name: David C. Larson</td>
<td></td>
</tr>
<tr>
<td>Title: Acting Deputy General Counsel</td>
<td></td>
</tr>
</tbody>
</table>

Upon final FBI approval, FBI OGC will distribute as follows:

1 - Signed original to 190-HQ-C1321794
Copies:

1 - DOJ Privacy and Civil Liberties Office-Main Justice, Room 4259
1 - FBI OCIO
1 - FBI SecD (electronic copy via e-mail)
2* - Program Division POC /Privacy Officer
2* - FBIHQ Division POC /Privacy Officer

(*please reproduce as needed for Program/Division file(s))
For efficiency, a system owner or program manager can be aided in making the determination of whether a Privacy Impact Assessment (PIA) is required by conducting and following Privacy Threshold Analysis (PTA).

A PTA contains basic questions about the nature of the system in addition to a basic system description. The questions are as follows:

A. **General System Description:** Please briefly describe:

1. Type of information in the system: It provides information storage, search and retrieval, workflow monitoring and tracking, resource management and tracking, and report generation.

   a. If the system is solely related to internal government operations please provide a brief explanation of the quantity and type of employee/contractor information:

   Employee/contractor information contained in the system include user name, userid, phone numbers, organization, security credentials (i.e. security clearance level), internal FBI email address, and

2. Purpose for collecting the information and how it will be used:

   The user information is primarily used for reference except for the userid and email address. The userid is the part of the key to allow a user access to the system. The email address is used by the system to email tasks notifications to the user. Internally, users will be able to see who is assigned particular tasks and who is assigned a particular role in the workflow. The information collected is for internal use only and will not be made available to the general public.

3. The system’s structure (including components/subsystems):

4. Means of accessing the system and transmitting information to and from the system:

   General and privileged users access via the FBI Secret Enclave. Users gain access to the system with their PKI smart card

   Users PKI credentials are validated against the PKI server and matched against the userid in

   If the userid is active and PKI authenticates the user then access is granted to the user. The information contained in the system is not transmitted to any other system. Again, the data contained in the system is not made available to the general public and is contained within the system itself.

5. Who within FBI will have access to the information in the system and controls for ensuring that only authorized persons can access the information:

   The system will be Certified and Accredited as a to ensure the proper security controls are in place. Privileged users (System admins) and the Enterprise Security Operations Center personnel will have access to the

6. Who outside the FBI will have access to the information in the system and controls for ensuring that only authorized persons can access the information:

   No one outside has access to the system. All system data is contained within the Secret Enclave.
FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: 

7. Has this system been certified and accredited by the FBI Security Divisions?  X Yes _ No

8. Is this system encompassed within an OMB-300?  X Yes _No ___ Don’t Know
   (If yes, please attach copy of latest one.)

I. Was the system developed prior to April 17, 2003?

   _X Yes  (If “yes,” proceed to Question 1.)

   _X No  (If “no,” proceed to Section II.)

1. Has the system undergone any significant changes since April 17, 2003?

   _X YES  If “yes,” please explain the nature of those changes:
   (Continue to Question 2.)

   _X NO  (If “no,” the PTA is complete and should be sent to FBI OGC’s Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ’s Privacy and Civil Liberties Office.  Unless you are otherwise advised, no PIA is required.)

2. Do the changes involve the collection, maintenance, or dissemination of information in identifiable form about individuals?

   _X YES  (If “yes,” please proceed to Question 3.)

   _X NO  (If “no,” the PTA is complete and should be sent to FBI OGC’s Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ’s Privacy and Civil Liberties Office.  Unless you are otherwise advised, no PIA is required.)

3. Is the system solely related to internal government operations?

   _X YES  If “yes,” is this a Major Information System (as listed on OGC’s FBINET website)?:

      _X Yes.  (If “yes,” a full PIA is required.  PTA is complete.)

      _X No.  (If “no,” the PTA is complete and should be sent to FBI OGC’s Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ’s Privacy and Civil Liberties Office.  Unless you are otherwise advised, no PIA is required.  (FBI and DOJ reviewing officials reserve the right to require a PIA).)

      _X NO  (If “no,” go to section III to determine if a full or short-form PIA is required.)

II. For systems developed after April 17, 2003.
FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: ____________________________  [b7E]

1. What is the purpose of the system? (Answer in detail unless details already provided in A. 2 above):

   (Continue to Question 2.)

2. Does the system collect, maintain or disseminate information in identifiable form about individuals?

   _X_ YES  (If “yes,” please proceed to Question 3.)

   ___NO  (If “no,” the PTA is complete and should be sent to FBI OGC’s Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ’s Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

3. Is the system solely related to internal government operations?

   _X_ YES  If “yes,” is this a Major Information System (as listed on OGC’s FBINET website)?:

   ___Yes. (If “yes,” a full PIA is required. PTA is complete.)

   _X_ No.  (If “no,” the PTA is complete and should be sent to FBI OGC’s Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ’s Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required. (FBI and DOJ reviewing officials reserve the right to require a PIA.))

   ___NO  (If “no,” go to section III to determine if a full or short-form PIA is required.)

III. Full or Short-Form PIA

1. Is the system a major information system (as listed on OGC’s FBINET website)?

   _X_ YES  (If “yes,” a full PIA is required. PTA is complete.)

   ___NO  (If “no,” please continue to question 2.)

2. Does the system involve routine information AND have limited use/access?

   _X_ YES  A short-form PIA is required. (i.e., you need only answer Questions 1.1, 1.2, 2.1, 3.1, 4.1, 5.1 (if appropriate), 6.2, 6.3, and 8.9 of the PIA template.) Please note that FBI and DOJ reviewing officials reserve the right to require completion of a full PIA. (PTA is complete—forward with PIA.)

   ___NO  (If “no,” a full PIA is required. PTA is complete.)
FBI PRIVACY THRESHOLD ANALYSIS (PTA)
(Equivalent to the DOJ Initial Privacy Assessment (IPA))

<table>
<thead>
<tr>
<th>NAME OF SYSTEM / PROJECT:</th>
<th>SYSTEM / PROJECT POC</th>
<th>FBI OGC / PCLU POC</th>
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<tbody>
<tr>
<td>Derived From:</td>
<td>Name:</td>
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<tr>
<td>Classified By:</td>
<td>Program Office: ITB</td>
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<td>Reason:</td>
<td>Division: ITSD</td>
<td>Room Number: 7350 JEH</td>
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<tr>
<td>Declassify On:</td>
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<td></td>
<td>Room Number: 8979 JEH</td>
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FBI DIVISION INTERMEDIATE APPROVALS

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<tr>
<th>Program Division:</th>
<th>Program Manager (or other appropriate executive as Division determines)</th>
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<td>Signature:</td>
<td>Date signed:</td>
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<tr>
<td>Name:</td>
<td>Title:</td>
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<tr>
<td>FBIHQ Division:</td>
<td>IT Specialist, ITSD, Intelligence Applications Support Unit</td>
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<tr>
<td>Signature:</td>
<td>Date signed:</td>
</tr>
<tr>
<td>Name:</td>
<td>Title: Unit Chief, ITSD, Process Policy &amp; Metrics Unit</td>
</tr>
</tbody>
</table>

After all division approvals, forward signed hard copy plus electronic copy to FBI OGC / PCLU (JEH 7338).
(The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)

Upon final FBI approval, FBI OGC / PCLU will distribute as follows:

1 - Signed original to file 190-HQ-C1321794 (fwd to JEH 1B204 via PA-520)

Copies (recipients please print / reproduce as needed for Program / Division file(s)):
1 - DOJ Office of Privacy and Civil Liberties (via e-mail to privacy@usdoj.gov)  
    (if classified, via hand delivery to 1331 Penn. Ave. NW, Suite 940, 20530)  
1 - OGC / PCLU intranet  
1 - PCLU UC  
1 - PCLU Library  
1 - PCLU Tickler  
2 - FBI OCIO / OIPP (JEH 9376, attn:  
1 - FBI SecD / AU (elec. copy: via e-mail to UC  
1 - RMD / RMAU (attn:  
2 - Program Division POC / Privacy Officer  
2 - FBIHQ Division POC / Privacy Officer
UNCLASSIFIED
FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

--- PIA is required by the E-Government Act.

--- PIA is to be completed as a matter of FBI/DOJ discretion.

Is PIA to be published on FBI.GOV (after any RMD FOIA redactions)? ___Yes. ___No (indicate reason):

X ___PIA is not required for the following reason(s):
___ System does not collect, maintain, or disseminate PII.
___ System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).
X ___Information in the system relates to internal government operations.
___ System has been previously assessed under an evaluation similar to a PIA.
___ No significant privacy issues (or privacy issues are unchanged).
X ___Other: [will provide a centralized application through which to perform system audits (users, when accessed, changes made)]

Applicable SORN(s):

Notify FBI RMD/RIDS per MIOG 190.2.3? ___No ___Yes --See sample EC on PCLU intranet website here: http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miof190-2-3_ec.wpd

SORN/SORN revision(s) required? ____No ___Yes

Prepare/revise/add Privacy Act (e)(3) statements for related forms? ___No ___Yes

RECORDS: The program should consult with RMD to identify/resolve any Federal records/electronic records issues. The system may contain Federal records whether or not it contains Privacy Act requests and, in any event, a records schedule approved by the National Archives and Records Administration is necessary. RMD can provide advice on this as well as on compliance with requirements for Electronic Recordkeeping Certification and any necessary updates.

Other:

All individuals whose limited PII (FBI.NET user name) is contained in the database are FBI personnel. The system is for internal Bureau use only.

David C. Larson, Deputy General Counsel
FBI Privacy and Civil Liberties Officer

Signature: [Signature]
Date Signed: 5/13/2010
FBI PTA: 

I. INFORMATION ABOUT THE SYSTEM / PROJECT

1. Provide a general description of the system or project that includes: name of the system/project, including associated acronyms; structure of the system/project, purpose; nature of the information in the system and how it will be used; who will have access to the information in the system and the manner of transmission to all users.

The purpose of [ ] is to develop and deploy a standardized [ ] application that may be used within the Bureau to perform IT system auditing functions. [ ] will: (1) receive auditing data directly [ ] and place the data in a centralized database; (2) allow system users, such as Information Systems Security Officers and Program Managers, to decide what information about specific applications and users will be stored in the database; and (3) allow system users to search the database for specific activities.

Because [ ] is designed to enhance IT auditing functions, access to the database in [ ] will be limited to users who have specifically granted access rights. Within [ ], users (except for [ ] administrators) will have access only to information about applications for which they are responsible. The standard data fields in [ ] will be: application name, user name, access date/time and modification date/time, although a user may include additional information about the specific system for which they are responsible.

[ ] will be accessed through FBINET and the information acquired will reside on the FBI's Mainframe Environment, which is part of a Secret Enclave. Secret Enclave is the subject of an existing PTA.

2. Does the system/project collect, maintain, or disseminate any information about individuals in identifiable form, i.e., is information linked to or linkable to specific individuals (which is the definition of personally identifiable information (PII))? [ ] NO [If no, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval. Unless you are otherwise advised, no PIA is required.]

[ ] YES [If yes, please continue.]

3. Does the system/project pertain only to government employees, contractors, or consultants?

[ ] NO [ ] YES
4. Is information about United States citizens or lawfully admitted permanent resident aliens retrieved from the system/project by name or other personal identifier?

   X NO  YES

5. Are Social Security Numbers (SSNs) collected, maintained or disseminated from the system/project?

   X NO  YES  If yes, check all that apply:

   _____ SSNs are necessary to establish/confirm the identity of subjects, victims, witnesses or sources in this law enforcement or intelligence activity.

   _____ SSNs are necessary to identify FBI personnel in this internal administrative system.

   _____ SSNs are important for other reasons. Describe:

   _____ The system/project provides special protection to SSNs (e.g., SSNs are encrypted, hidden from all users via a look-up table, or only available to certain users). Describe:

   _____ It is not feasible for the system/project to provide special protection to SSNs. Explain:

6. Does the system/project collect any information directly from the person who is the subject of the information?

   X NO  [If no, proceed to question 7.]

   YES

   a. Does the system/project support criminal, CT, or FCI investigations or assessments?

     _____ YES  [If yes, proceed to question 7.]

     _____ NO

   b. Are subjects of information from whom the information is directly collected provided a written Privacy Act (c)(3) statement (either on the collection form or via a separate notice)?
UNCLASSIFIED

FBI PTA: [Redacted]

_____ NO [The program will need to work with PCLU to develop/implement the necessary form(s).]

_____ YES Identify any forms, paper or electronic, used to request such information from the information subject:

7. Has the system undergone Certification & Accreditation (C&A) by the FBI Security Division (SecD)?

_____ X NO  If no, indicate reason; if C&A is pending, provide anticipated completion date: [Redacted] is an application that will reside on the FBI’s Enterprise Mainframe environment. The Enterprise Server has been certified and accredited through December 23, 2010.

_____ YES If yes, provide date of last C&A certification/re-certification:

_____ Don't Know.

8. Is this system/project the subject of an OMB-300 budget submission?

_____ X NO  _____ Don't know  _____ YES If yes, please provide the date and name or title of the OMB submission:

9. Is this a national security system (as determined by the SecD)?

_____ X NO  _____ YES  _____ Don't know

10. Status of System/Project:

_____ X This is a new system/project in development. [If you checked this block, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval and determination if PIA and/or other actions are required.]
FBI Privacy Threshold Analysis (PTA) Cover Sheet

NAME OF SYSTEM: 

SYSTEM POC

<table>
<thead>
<tr>
<th>Name:</th>
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<tbody>
<tr>
<td>Program Office:</td>
<td>Technology Information Services Unit (TISU) Information Technology Management Section (ITMS)</td>
</tr>
<tr>
<td>Division:</td>
<td>CJIS</td>
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<tr>
<td>Phone:</td>
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FBI OGC/PCLU POC

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FBI DIVISION APPROVALS. A PIA (and/or PTA) should be prepared/approved by the cognizant program management in collaboration with IT, security, and end-user management and OGC/PCLU. (PIAs/PTAs relating to electronic forms/questionnaires implicating the Paperwork Reduction Act should also be coordinated with the RMD Forms Desk.) If the subject of a PTA/PIA is under the program cognizance of an FBIHQ Division, prior to forwarding to OGC the PTA/PIA must also be referred to the FBIHQ Division for program review and approval, if required by the FBIHQ Division.

<table>
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<tbody>
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<td>Program Manager (or other appropriate executive as Division determines)</td>
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<tr>
<td>Signature:</td>
</tr>
<tr>
<td>Date signed:</td>
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<tr>
<td>Name:</td>
</tr>
<tr>
<td>Title: TISU Unit Chief (Acting)</td>
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<tr>
<th>FBIHQ Division: CJIS</th>
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<tbody>
<tr>
<td>Division Privacy Officer</td>
</tr>
<tr>
<td>Signature:</td>
</tr>
<tr>
<td>Date signed:</td>
</tr>
<tr>
<td>Name:</td>
</tr>
<tr>
<td>Title: CJIS Division Privacy Officer</td>
</tr>
</tbody>
</table>

Signature: 
Date signed: 
Name: William McKinsey
Title: ITMS Section Chief

Upon Division approval, forward signed hard copy plus electronic copy to OGC/PCLU (JEH Room 7338).

FINAL FBI APPROVAL:

<table>
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<td>Signature:</td>
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<tr>
<td>Date Signed:</td>
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<tr>
<td>Name:</td>
</tr>
<tr>
<td>Title: Deputy General Counsel</td>
</tr>
</tbody>
</table>

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1 - Signed original to 190-HQ-C1321794

Copies:

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2* - Program Division POC /Privacy Officer
1 - PCLU Tickler
2** - FBIHQ Division POC /Privacy Officer

(*please reproduce as needed for Program/Division file(s))
FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: 

For efficiency, a system owner or program manager can be aided in making the determination of whether a Privacy Impact Assessment (PIA) is required by conducting and following Privacy Threshold Analysis (PTA).

Whether or not a PIA is required, the system owner/program manager should consult with the FBI Records Management Division (RMD) to identify and resolve any records issues relating to information in the system.

A PTA contains basic questions about the nature of the system in addition to a basic system description. The questions are as follows:

A. General System Description: Please briefly describe:

1. Type of information in the system:

   [Redacted] utilized by the CJIS Division personnel and/or contractors for activities such as research and development, email support, as well as general browsing capabilities.

   a. If the system is solely related to internal government operations please provide a brief explanation of the quantity and type of employee/contractor information:
      
      Not Applicable

2. Purpose for collecting the information and how it will be used:

   [Redacted] does not collect any information but only provides access to information contained in systems/applications which are currently accessible to FBI employees and/or contractors.

   Information may be accessed and retained by the [Redacted] account holder from the underlying systems/applications for future reference.

   The information is used, among other things, to support the FBI’s law enforcement missions.

3. The system's structure (including components/subsystems):

   [Redacted] consists of the following elements which all reside within CJIS Division space;