The automation of this normal day-to-day manual field office function has resulted in incalculable savings in personnel resources.

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 [If no, STOP. The PIA 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.]

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.

   X__ 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?

   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?

X 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)(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 X 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.

X SSNs are necessary to identify FBI personnel in this internal administrative system. That SSNs are stored to uniquely identify FBI personnel. No identifying numbers (SSN or otherwise) are maintained within on members of the general public.
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:**

No SSNs obtained from investigative data (i.e., records concerning members of the general public) are stored in SSNs are only used on in order to identify FBI personnel (including task force officers) who sought access to SSNs are only visible to system administrators and cannot be seen by general users. Beginning in 2010, records in identify FBI personnel by their Unique Employee Identifier (UEID), rather than by an SSN.

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:

- **YES** If yes, please indicate the following, if known:

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

  05/27/2009

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

   __ X __ NO

   _____ YES  If yes, please provide the date and name or title of the OMB submission:


   __ X __ NO

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

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

   _____ NO  _____ YES

13. 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? ___ was developed in _______.

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

   _____ X __ 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
FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: 

BIKR FBI Unique Asset ID: N/A; Application not required to be listed in BIKR

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<th>FBI OGC/PCLU POC</th>
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| Reason: | Program Office: ITSD | Phone:
| Declassify On: | Division: ITSD | Room Number: 7350 JEH |
| | Phone: | |
| | Room Number: 1514 JEH | |

FBI DIVISION INTERMEDIATE APPROVALS [complete as necessary consonant with Division policy]

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<th>Division Privacy Officer</th>
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<td>Signature: Date signed: 5-6-12</td>
<td>Signature: Date signed: 5-7-12</td>
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<td></td>
<td>Name: Unit Chief, Storage Management Support Unit (SMSU), ITSD</td>
<td>Name: Unit Chief, Product Assurance Management Unit, Information Technology Management Division (PAMU/ITMD)</td>
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After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7350). (The FBI Privacy and Civil Liberties Officer’s determinations, conditions, and/or final approval will be recorded on the following page.)
UNCLASSIFIED//FOR OFFICIAL USE ONLY

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):

X 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): on the Secret Enclave. Underlying data contained in the applications cannot be accessed from

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_miog190-2-3_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:

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<th>Unit Chief</th>
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<th>Date Signed:</th>
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<tr>
<td>Privacy and Civil Liberties Unit</td>
<td>[Signature]</td>
<td>3/13/12</td>
</tr>
<tr>
<td>James J. Landon, Deputy General Counsel</td>
<td>[Signature]</td>
<td>3/15/12</td>
</tr>
<tr>
<td>FBI Privacy and Civil Liberties Officer</td>
<td>[Signature]</td>
<td>[Date Signed]</td>
</tr>
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UNCLASSIFIED//FOR OFFICIAL USE ONLY
1. 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 currently utilizes __________ operating on the Secret Enclave __________ enables customers on the Secret Enclave __________

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  [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.]
FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:  

BIKR FBI Unique Asset ID:  

Derived From:  
Classified By:  
Reason:  
Declassify On:  

SYSTEM/PROJECT POC  
Name:  
Program Office: CIS  
Division: DI  
Phone:  
Room Number: 3646  

FBI OGC/PCLU POC  
Name:  
Phone:  
Room Number: 7350  

FBI DIVISION INTERMEDIATE APPROVALS [complete as necessary consonant with Division policy]

Program Division: [insert division name]  
Program Manager (or other appropriate executive as Division determines)  
Signature:  
Date signed:  
Name:  
Title:  

Division Privacy Officer  
Signature:  
Date signed:  
Name:  
Title:

FBIIHQ Division: [insert division name]  
Signature:  
Date signed:  
Name:  
Title:  

After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7350).  
(The FBI Privacy and Civil Liberties Officer’s determinations, conditions, and/or final approval will be recorded on the following page.)
FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: b7E

BIKR FBI Unique Asset ID: 

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FBI DIVISION INTERMEDIATE APPROVALS [complete as necessary consonant with Division policy]

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FBIHQ Division: [insert division name]

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<th>Name:</th>
<th>Title:</th>
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After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7250). (The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)
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 FBIgov (after any RMD FOIA redactions)? ___ Yes. ___ No (indicate reason):

___XX__ PIA is not required for the following reason(s):

___ System does not collect, maintain, or disseminate PIL
___ 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 (describe): De minimis privacy concerns.

Applicable SORN(s): ______ CRS, Justice/FBI-002

Notify FBI RMD/RIDS per MIIG 190.2.3? ___ No ___ X Yes--See sample EC on PCLU intranet website here: http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_mig190-2-3_ec.wpd

SORN/SORN revision(s) required? ___X No ___ Y es (indicate revisions needed):

Prepare/revises/modify Privacy Act (e)(3) statements for related forms? ___ No ___ Y es (indicate forms affected): N/A

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:

James J. Landon, Deputy General Counsel
FBI Privacy and Civil Liberties Officer

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]
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;

   project manager will have access

   The FBI

   [INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]
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

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.

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

___x__ 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?

___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.]

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]
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  _____ x__ YES  (This is an option).

      ____ 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:
8. Is the system operated by a contractor?

___X___ 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)?

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

and no separate C&A is required.

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

   _x___ NO

   _____ YES  If yes, please provide the date and name or title of the OMB submission:


   _x___ NO

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

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

   _x___ NO   _____ YES

13. 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

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.
[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

(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.]
FEDERAL BUREAU OF INVESTIGATION
FOI/PA
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FOI/PA# 1272295-0

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: [redacted]

BIKR FBI Unique Asset ID: 2009-037-01-P-113-264-9999

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**FBI DIVISION INTERMEDIATE APPROVALS**

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<tr>
<td></td>
<td>Name: Michael A. Clancy Title: Section Chief</td>
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After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7350). (The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)
UNCLASSIFIED//FOR OFFICIAL USE ONLY

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

- X_ 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.  X_ 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).
- ___ Other (describe):

Applicable SORN(s): ___Central Records System, DOJ/FBI-002

Notify FBI RMD/RIDS per MIIG 190.2.3? ___ No  X_ Yes--See sample EC on PCLU intranet website here: http://home.fbi.gov/DC/OGC/4TB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miig190-2-3_ec.wpd

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

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

Elizabeth Withnell, Acting Deputy General Counsel  
Acting FBI Privacy and Civil Liberties Officer  
Signature:  
Date Signed: 3/15/16

UNCLASSIFIED//FOR OFFICIAL USE ONLY
1. INFORMATION ABOUT THE SYSTEM/PROJECT

- 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.

This is a Privacy Threshold Analysis (PTA) on the developed by the within the Counterterrorism Division (CTD).
The following user groups (and their described role-based access) have been designed for and incorporated into "Administrators:" The "Administrators" will be restricted to members of the information technology department. Members of this user group will be able to perform any and all functionality within the system in addition to maintaining user accounts.

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.

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

__X__ 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?

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

_____ YES

a. Does the system/project support criminal, CT, or FCI investigations or assessments?
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___ 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 (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  ___X___ YES  If yes, check all that apply:

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

___ NO  ___X___ YES  SSNs are necessary to identify FBI personnel in this internal administrative system.

___ NO  ___X___ YES  SSNs are important for other reasons. Describe:

___ NO  ___X___ YES  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:

___ NO  ___X___ YES  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:

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

Provide date of last C&A certification/re-certification:
October 26, 2010

Confidentiality: ___ Low ___ Moderate ___ High ___ Undefined

Integrity: ___ Low ___ Moderate ___ High ___ Undefined

Availability: ___ Low ___ Moderate ___ High ___ Undefined

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

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

___ NO

___ YES If yes, please provide the date and name or title of the OMB submission:


___ NO

___ YES If yes, please describe the data mining function:
12. Is this a national security system (as determined by the SecD)?

_____ NO  _____ YES

13. 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.

_____ 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.
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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
FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: Virtual Career Event

BIKR FBI Unique Asset ID: ________________________________

<table>
<thead>
<tr>
<th>Derived From:</th>
<th>SYSTEM / PROJECT POC</th>
<th>FBI OGC / PCLU POC</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Name:</td>
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<td></td>
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<td>Phone:</td>
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<tr>
<td></td>
<td>Division: HRD</td>
<td>Room Number: GP 702 A</td>
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FBI DIVISION INTERMEDIATE APPROVALS

<table>
<thead>
<tr>
<th>Program Division: HRD</th>
<th>Program Manager (or other appropriate executive as Division determines)</th>
<th>Division Privacy Officer</th>
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<tbody>
<tr>
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<tr>
<td></td>
<td>Date signed: 4/26/17</td>
<td>Date signed:</td>
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<tr>
<td></td>
<td>Name: W. Fred Hill</td>
<td>Name:</td>
</tr>
<tr>
<td></td>
<td>Title: Acting Section Chief</td>
<td>Title:</td>
</tr>
</tbody>
</table>

After all division approvals, forward signed hard copy plus electronic copy to FBI OGC / PCLU (JEH 7350). (The FBI Privacy and Civil Liberties Officer’s determinations, conditions, and/or final approval will be recorded on the following page.)
**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.]

- [x] 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).
  - [ ] Other (describe):

**Applicable SORN(s):**  

- [ ] 01/5  FBI-002

- 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_miog190-2-3_ec.wpd](http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd)

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

- Prepare/revise/add Privacy Act (v)(2) 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:**

<table>
<thead>
<tr>
<th>Unit Chief</th>
<th>Signature:</th>
<th>Date Signed:</th>
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<tbody>
<tr>
<td>Privacy and Civil Liberties Unit</td>
<td></td>
<td></td>
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<tr>
<td>James J. Landon, Deputy General Counsel</td>
<td></td>
<td></td>
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<tr>
<td>FBI Privacy and Civil Liberties Officer</td>
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</tbody>
</table>
1. 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 Personnel Recruitment Unit in the FBI’s Human Resources Division intends to create a website for a Virtual Career Event (VCE). The website may be used to host one or more of these events, which are intended as a recruitment tool to create talent pools for future FBI vacancies. The VCE is interactive: potential candidates can interface with FBI subject matter experts. In order to participate, individuals register on the site and provide sufficient information not only to identify who they are, but also to identify their skills and abilities. Having this information helps align the skills of potential applicants with FBI vacancies. Participants will use instant messaging, videos, and chat rooms to ask questions or and interact with recruiters and subject matter experts to learn more about specific FBI career opportunities.

Data elements to be collected from participants in the VCE consist of the following:

1. Recruitment Source (Event, Referrals, etc.)
2. Race, National Origin (this is optional)
3. Education/Skills
4. Veterans Status
5. FBI Suitability
6. Last 4 of SSN
7. Resumes
8. Name
9. Email Address
10. Address
11. Phone

The last digits of an individual’s SSN will be collected in order to be able to trace back, in the event a VCE participant gets hired, the fact that the VCE was used as a gateway for the hiring of the individual. This will help HRD determine its return on investment for this kind of activity. FBI suitability questions are intended to ensure that the individual doesn’t have any disqualifiers that would preclude employment, such as recent drug use. The other data elements are being requested to enhance the user experience on the VCE and to provide HRD with some information about the efficacy of its recruitment efforts. In addition to this data, when an individual participates in the VCE, certain information will be collected about the visit for statistical purposes and to improve the technical aspects of the site. A robust privacy policy will explain the rationale for the collection of the personally identifiable information.
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   [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.]

   XX__ 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.)

   XX__ The information directly identifies specific individuals.

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

   XX__ 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?

   XX__ 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.]

   _XX_ 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.]
XX YES

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

XX 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).]

XX 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 XX YES If yes, check all that apply: Note that only the last four digits of the SSN are being requested.

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.

XX SSNs are important for other reasons. Describe: The last four digits will be helpful to link applicant information to employee information (as the SSN is used in BPMS as an identifier) in order to see whether VCEs are an effective recruitment tool.

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: Access to the last four digits only will be restricted to HRD personnel working on the VCE.
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)?

   The VCE will sit on UNET which has been accredited by SecD. C&A date is 1/18/2011.

   _____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.

   \_XX\_ NO

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

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

   \_XX\_ NO          _____ YES

12. Status of System/Project:

   \_XX\_ 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.]