

CLASSIFIED BY NSICG/C32W33B91

REASON: 1.4 (C)

DECLASSIFY ON: 10-08-2039

DATE: 10-08-2014

OGC/PCLU (Rev. 04/01/2011)

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

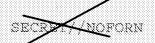
31KR FBI Unique Asse		
Derived From: FBI NS Classified By: J46J15T Reason: Declassify On: 203812	20 Name: Program Office: CD-3C	Name: AGC Phone gence Room Number: JEH, Rm 7350
BI DIVISION INTER	MEDIATE APPROVALS Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
FBI DIVISION INTER Program Division: Counterintelligence		Division Privacy Officer Signature: Date signed: 777/7/3 Name: Title: Division Privacy Officer

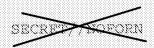
After all-division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7350), (The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)

Classified By J46015T20

Derived From: PK NSISC-20090615

Declassify 🔀: 20331231





FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

PIA is required by the E-Government Act.			
X_PIA is to be completed as a matter of FBI/DOJ updated Routine Database PIA Checklist.	discretion. Howe	ver, this will be accompli	shed by completing an
Is PIA to be published on FBLGOV (after any RMD security system, the PIA will not be published	FOIA redactions)?	YesX_No: Be	cause this is a national
PIA is not required for the following reason(s): System does not collect, maintain, or disse System is grandfathered (in existence befo Information in the system relates to interna System has been previously assessed under No significant privacy issues (or privacy is Other:	re 4/17/2003; no la Il government oper Lan evaluation sin	ations ilar to a PIA	cant privacy risks).
Applicable SORN(s): The FBI Central Records Systems 1998), as amended at 66 Fed. Reg. 17200 (Mar. 29, 200 Notify FBI RMD/RIDS per MIOG 190,2-37 X No. http://home/DO/OGC/LTB/PCLU/PrivacyCivil%200 SORN/SORN revision(s) required? X No. http://society.com/SORN/sor/Sor/Sor/Sor/Sor/Sor/Sor/Sor/Sor/Sor/S	1) and 66 Fed. Res YesSee s .iberties%201.ibra	<u>, 29994 (June 4, 2001).</u> ample EC on PCLU intra	net website here:
Prepare/revise/add Privacy Act (e)(3) statements for is		_NoYes	
RECORDS. The program should consult with RMD to system may contain Federal records whether or not it co approved by the National Archives and Records Admin compliance with requirements for Electronic Recordkee Other:	ntains Privacy Actistration is necessa	requests and, in any even ry: RMD can provide adv	t, a records schedule ice on this as well as on
Unit Chief	Signature:		—
Privacy and Civil Liberties Unit	Date Signed		8//21//3
Jacqueline F. Brown, Acting Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature		abeles .
	``		

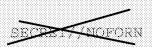
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L. INFORMATION ABOUT THE SYSTEM / PROJECT

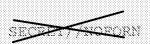
1. Provide a general description of the system or project that includes: (a) name of the system/project, including associated acronyms; (b) structure of the system/project, including interconnections with other projects or systems; (c) purpose of the system/project; (d) nature of the information in the 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.

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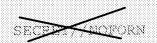
	nes the system/project collect, maintain, or disseminate any information about duals (i.e., a human being or natural person, regardless of nationality)?
	NO
<u>X</u>	YES [If yes, please continue.]
syster linkal	ease indicate if any of the following characteristics apply to the information in the material about individuals: Bear in mind that log-on information may identify or be all to an individual. It is all that apply.)
<u>X</u>	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., is linked or linkable to specific individuals).
II you	marked any of the above, proceed to Question 4.
identi	None of the above. If none of the above, describe why the information does not fy specific individuals either directly or indirectly.
	oes the system/project pertain only to government employees, contractors, or Itants?
	<u>X</u> NO YES
	information about United States citizens or lawfully admitted permanent resident 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.]
	oes the system/project collect any information directly from the person who is the a of the information?
	X_NO [If no, proceed to question 7.]
	YES YES
issess	a. Does the system/project support criminal, CT, or FCI investigations or ments?

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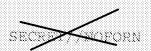
		NO		
		YES	[If yes, proceed to question 7.]	
		uen Pi	its of information from whom the information is directly collected rivacy. Act (e)(3) statement (either on the collection form or via a	
			The program will need to work with PCLU to develop/implement se necessary form(s).[
	·		Identify any forms, paper or electronic, used to request such information from the information subject:	
			rity Numbers (SSNs) collected, maintained or disseminated from the I SSNs should only be used as identifiers in limited instances.	
	X	NO	YES If yes, check all that apply:	
			are necessary to establish/confirm the identity of subjects, victims, ources in this law enforcement or intelligence activity.	
	system.	SSNs :	are necessary to identify FBI personnel in this internal administrative	*
	************	SSNs	are important for other reasons. Describe:	
		ed, hid	vstem/project provides special protection to SSNs (e.g., SSNs are lden from all users via a look-up table, or only available to certain ribe:	
	SSNs		ot feasible for the system/project to provide special protection to in:	
8.	Is the sy	stem e	operated by a contractor?	
	<u> </u>	0.		
	conside contains collects	red Pri stand maint	ormation systems operated by contractors for the FBI may be ivacy Act systems of records. The Federal Acquisition Regulation lard contract clauses that must be included in the event the system tains or disseminates PII and additional requirements may be matter of Department of Justice policy. Consultations with the	

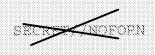




Office of the General Counsel may be required if a contractor is operating the system for the FBI.

) ,		m undergone Certif sion (SecD)?	ication &	Accreditation	(C&A)	ey the FBI	
	NO	If no, indicate re completion date		&A is pendi	ng, prov	ide anticipated	
	<u>X_</u> YES	If yes, please inc	licate the	following, if	known:		
		Provide date of May 14, 2012 certification)	last C&A			fication: ndergoing re-	b3 b7E
		Confidentiality:	X_Low_	_Moderate _	_High _	Undefined	
		Integrity:	X_Low_	_Moderate	_High	_Undefined	
		Availability:	X Low	Noderate	_High_	_Undefined	
	Not a	pplicable – this syst	em is only	paper-based.			
10.	Implementing	em conduct data mi ¿Recommendations at 42 USC 2000ee-3	of the 9/1				
	_ <u>X</u> NO						
	YES	If yes, please de:	cribe the	data mining	function):	
11.	Is this a nation:	al security system (a	is determin	ied by the Sec	:D)?		
	NO	X Y	ES				
2.	Status of Syste	m/ Project					
	This	is a new system/ pro	oject in de	velopment.			
Ĭ.	EXISTING SY	STEMS / PROJEC	718				
, 1	When was the sy	stem/project develo	ped? 200	V2004			
). }	las the system/p	roject undergone an	y significa	mt changes si	nce Apri	1 17, 2003?	
	NO [Ifno.p	roceed to next ques	tion (IL3).	1			





X	YES If yes, indicate which of the following changes were involved (mark all changes that apply, and provide brief explanation for each marked change):
	All the changes marked below occurred prior to the 2010 PTA and Routine Database PIA for this system.
	\underline{X} 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.
	X 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 source
	\underline{X} . 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.
	\underline{X} 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 _ <u>X</u> YE\$

ALL INFORMATION CONTAINED BEREIN IS UNCLASSIFIED DATE 10-00-2014 BY WEICC/C32W95B91

FBI Privacy Threshold Analysis (PTA) Cover Sheet (06C/PCLU (Row. 1/17/07)

NAME OF SYSTEM: 2257 Program Pomography Producer/Performer Databases

2*- FBIHQ Division POC/Privacy Officer

(*please reproduce as needed for Program/Division file(s))

ni ovotrka mokita mi neno	ONE!			
BI SYSTEM CONTACT PERS Name: SSA	ON			
Program Office Division: CID Phone: Room Number:	: Violent Crimes Section (but physically stationed (cell) N/A (physically stationed nitted for approval: 08/24	in the Los Ang (office) ed in the Los A		b6 b7С
ollaboration with IT, security ne Paperwork Reduction Act	, and end-user management and C should also be coordinated with th ion, prior to forwarding to OGC the	DGC/PCLU. (PIAs he RMD Forms Desi	ed/approved by the cognizant program man /PTAs relating to electronic forms/question k.) If the subject of a PTA/PIA is under the o be referred to the FBIHQ Division for prog	naires implicating program
	Program Division: [insert divi	sion name]	FBIHQ Division: CID	
Program Manager (or other appropriate executive as Division determines)	Signature: Date signed: Name: Title:		Signature:/s/ Date signed: 9/5/2007 Name: Title: Unit Chief	
Division Privacy Officer	Signature: Date signed: Name: Title:		Signature:/s/ Date signed: 9/5/2007 Name: Title: ASC	
pon Division approval, forw.	ard signed hard copy plus electron VAL: (** Subject to C&A cor			
FBI Privacy and Civil Libertie	s Officer	Signature:/s/ Date Signed: 9/ Name: Title:	14/07 David C. Larson Acting Deputy General Counse	ı
	GC will distribute as follows: ned copy to 190-HQ-C1321794			
1 - DOJ Privacy and Cr 1 - FBI OCIO 1 - FBI SecD (electroni 2* - Program Division	27.75 C	oom 4259	1 - OGC\PCLU intranet v 1 - PCLU Library 1 - PCLU Tickler	vebsite

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NAME OF SYSTEM: 2257 Program Pornography Producer/Performer Databases

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:

The 2257 Program is responsible for conducting inspections at pornography producers' places of business to ensure their compliance with Title 18, United States Code Section 2257 (18 U.S.C. §2257) and Title 28, Code of Federal Regulations Section 75 (28 C.F.R. Part 75). The statute and corresponding regulations were enacted in an effort to prevent the sexual exploitation of children. The statute requires that records be kept by producers for certain products made after 11/01/1990, and which contain one or more visual depictions of an actual human being engaged in actual sexually explicit conduct. In general, the records required to be maintained by producers of sexually explicit material include records related to the verification of a performer's legal name and date of birth. Under the statute and regulations, producers are required to obtain the legal name and date of birth of performers by examining an appropriate picture identification card. Producers must also maintain a copy of the picture identification card that was submitted, if the product was produced after a specified date. Additionally, producers have to record any name (other than the performer's legal name) ever used by the performer, including maiden name, nickname, stage name, or professional name, and are also required to cross reference performers names with other productions made by that producer in which the performer has appeared. The regulations also require that producers affix to every product, a statement which provides the name, title and business address of the person responsible for maintaining the required records.

Agents (SSAs), five retired agents ("contractors") (to be increased to eight contractors in the near future), and one part-time Support Services	
Technician. The producers to be inspected by 2257 Program personnel are randomly selected from a database using a random number	
generator algorithm. The database, named the "2257 Program Pornography Producer Database" (hereinafter "the Producer database"), will be	
maintained by 2257 Program personnel	
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	2,1
On-size inspections at the producer's listed place of business are conducted without advance notice to the producer as designated by	
the regulations. During the inspection, identification documents maintained by the producer are copied or electronically scanned by the	
contractors, and are then compared to —copies of facial photos of performers that were previously printed. —A regulatory inspection report is	
subsequently issued disclosing any violations found during the on-site inspection, such as the lack of identification or the use of illegible	
identification. The 2257 Program has also begun to develop a database comprised of the following information for each performer identified	
during on-site inspections conducted pursuant to 18 U.S.C. §2257 and 28 C.F.R. Part 75: stage name, true name, date of birth	
	57E
This database, named the "2257 Program Pornography Performer Database" (hereinafter	
"the Performer database") will be maintained by 2257 Program personnel	
the renormer database / will be manitabled by ££27 i rogram personnel	

2257 Program field personnel responsible for conducting inspections are currently comprised of two field Supervisory Special

For information, as indicated above, 2257 Program personnel will obtain digital copies of identification documents (e.g., driver

NAME OF SYSTEM: 2257 Program Pornography Producer/Performer Databases

document	
ployee/co	a. If the system is solely related to internal government operations please provide a brief explanation of the quantity and type of ntractor information:
	Not applicable.
2.	Purpose for collecting the information and how it will be used:
	The Producer database will be used to maintain a master list of all known/suspected producers of pomography, including ompanies, website addresses, magazine publishers, etc. An algorithm will be utilized to randomly select production companies, esses, magazine publishers, etc., for inspection by the 2257 Program pursuant to 18 U.S.C. §2257 and 28 C.F.R. Part 75.
ormation r	The Performer database will be used to maintain a master list of performers that 2257 Program personnel can reference for elative to the 2257 Program and inspections pursuant to 18 U.S.C. §2257 and 28 C.F.R. Part 75.
3,	The system's structure (including components/subsystems):
4.	Means of accessing the system and transmitting information to and from the system:
ngeles Divis mputer wil	Both databases will be maintained on the same stand-alone computer maintained at the secure 2257 Program offsite in the Los ion. The databases will only be able to be accessed via the stand-alone computer by 2257 Program personnel. The stand-alone I not be connected to any external system, including the Internet. No mass transmission of either database will occur.
ted in regu	In addition, identifying information for a limited number of performers, including stage name, true name and date of birth, will be atory inspection reports.

NAME OF SYSTEM: 2257 Program Pornography Producer/Performer Databases
without having physical access to the entire Performer database, which only 2257 Program personnel will have.
and ensure the Performer database's compliance with MIOG 190-10.4, while
still safeguarding the personally identifiable information from access by unauthorized personnel.
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 information;
Only personnel assigned to the secure 2257 Program offsite in the Los Angeles Division will have physical access to the databases,
which will be maintained on a stand-alone computer. The stand-alone computer will not be connected to any external system, including the
Internet. For information, the 2257 Program offsite is currently located in the secure Corman Federal Building, 6230 Van Nuys Boulevard, Van
Nuys, California. A copy of the databases, or just certain information from the databases, may be provided to authorized personnel from CID,
Violent Crimes Section, Crimes Against Children Unit, which is responsible for oversight of the 2257 Program, as well as senior FBI management, as
needed for program oversight.
without having physical access to the entire database, which only 2257 Program personnel will have.
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:
As stated above, only personnel assigned to the secure 2257 Program offsite in the Los Angeles Division will have physical access to
the databases. Certain information from the databases may also be provided to authorized personnel from the Department of Justice who have
responsibilities related to the 2257 Program, but they would not be able to directly access the system themselves. This would include Assistant
United States Attorneys assigned to review regulatory inspection reports or prosecute criminal cases referred by 2257 Program personnel. If there is
a prosecution related to violations of 18 U.S.C. §2257, information in the database may become relevant to the proceedings and could be disclosed as necessary.
we the country.
7. Has this system been certified and accredited by the FBI Security Divisions?YesX_No
** Program to contact ISSM to ascertain if C&A required, and if so, initiate process to obtain C&ADCL
8 Is this system encompassed within an OMB-300?YesNoX_Don't Know
(If yes, please attach copy of latest one.)
t. Was the system developed prior to April 17, 2003?
YES (If "ves," proceed to Question 1.)

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	FBI PRIVACY THRESHOLD ANALYSIS (PTA)
	NAME OF SYSTEM: 2257 Program Pornography Producer/Performer Databases
	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 Unix (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.)
For syste	ems developed after April 17, 2003.
1.	What is the purpose of the system? (Answer in detail unless details already provided in A. 2 above):
	Please see the response provided in A.2. above.
	(Continue to Question 2.)

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

X____YES (If "yes," please proceed to Question 3.) Custodian of Records name is "personally identifiable information." 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 DOf's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

Is the system solely related to internal government operations?

____YES __If "yes," is this a Major Information System (as listed on OGC's PBINET website)?:

NAME OF SYSTEM:

___NO

			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.))
		<u>x</u> NO	(If "no," go to section III to determine if a full or short-form PIA is required.)
111,	Full or S	hort-Form PIA	
	1.	Is the system a majo	r information system (as listed on OGC's FBINET website)?
		YES (If "yes," :	ı full PIA is required. PTA is complete.)
		_XNO	(If "no," please continue to question 2.)
	2.	Does the system inv	olve routine information AND have limited use/access?
		XYES	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.)

(If "no," a full PIA is required. PTA is complete.)

2257 Program Pornography Producer/Performer Databases

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 10-24-2014 BY NSICG/C32W33B91

> 2* - Program Division POC / Privacy Officer 2*- FBIHQ Division POC /Privacy Officer

ERI Privacy Threshold Analysis (PTA) Cover Sheet

NAME OF SYSTEM:	b7E	ysis (FTA) Cov	ei siiee	L (OGC/PCL	.U (Rev. 07/06/07)	
FBI SYSTEM CONTACT PER Name: Program Office: ITB Division: IT Operation Phone: Room Number: 8979 Date PTA submitted f				FBI OGC/PCLU POC Name: Phone: Room Number:7338	ъ6 ъ7С	
collaboration with IT, security, the Paperwork Reduction Act s	and end-user management and hould also be coordinated with on, prior to forwarding to OGC	d OGC/PCLU. (PI the RMD Forms D	As/PTAs r esk.) If	relating to elect the subject of a	gnizant program management in ronic forms/questionnaires implicatin PTA/PIA is under the program HQ Division for program review and	g
	Program Division:			FBIHQ Divisi	on: IT Operations	
Program Manager (or other appropriate executive as Division determines)	Signature: Date signed: Name: Title:			Signature: Date signed: Name Title: IT Speci		ъ6 ъ7С
Division Privacy Officer			Signature: Date signed: Name Title: Division		ь6 ь7С	
Upon Division approval, forwa	rd signed hard copy plus electr	onic copy to OGC/I	PCLU (JEH	Room 7338).		
:FINAL FBI APPROV		Signature: Date Signed: Name: Title:	6/26	/s/ s/2008 David C. I Acting De	Larson eputy General Counsel	
Upon final FBI approval, FBI OG 1 - Signed origin Copies:	GC will distribute as follows: nal to 190-HQ-C1321794					
1 - DOJ Privacy and Civ 2 - FBI OCIO / OIPP 1 - FBI SecD (electronic	il Liberties Office-Main Justice copy via e-mail)	, Room 4259		1-	OGC\PCLU intranet website PCLU Library PCLU Tickler	

(*please reproduce as needed for Program/Division file(s))

FBI PRIVACY THRESHOLD ANALYSIS (PTA) NAME OF SYSTEM: b7E	(OGC/PCLU (Rev. 07/06/07)
For efficiency, a system owner or program manager can be aided in making the determination of whether a P (PIA) is required by conducting and following Privacy Threshold Analysis (PTA).	rivacy Impact Assessment
Whether or not a PIA is required, the system owner/program manager should consult with the FBI Records <i>M</i> identify and resolve any records issues relating to information in the system.	ianagement Division (RMD) to
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:	
a. If the system is solely related to internal government operations please provide a brief explar employee/contractor information:	nation of the quantity and type of
The following types of information are collected in the	
	ь7Е
Purpose for collecting the information and how it will be used:	
	b7E
3. The system's structure (including components/subsystems):	1
	b7E
4. Means of accessing the system and transmitting information to and from the system:	
	b7E

	(OGC/PCLU (Rev. 07,
NAME OF SYSTEM: b7E	
5. Who within FBI will have access to the information in the system and controls for ensurthat only authorized persons can access the information:	uring
FBI Headquarters and Field personnel with a need to see information related to investigations. All access to the is approved by	b7E
6. Who outside the FBI will have access to the information in the system and controls for that only authorized persons can access the information:	ensuring
that run FBINET closed network. FBINET can only be accessed by authorized persons.	on the b7E
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 YesNo (If yes, please attach copy of latest one.)	Don't K
Was the system developed prior to April 17, 2003? X YES (If "yes," proceed to Question 1.)	
NO (If "no," proceed to Section II.)	
1. Has the system undergone any significant changes since April 17, 2003?	
 Has the system undergone any significant changes since April 17, 2003? YES If "yes," please explain the nature of those changes: 	
YES If "yes," please explain the nature of those changes:	
YES If "yes," please explain the nature of those changes: (Continue to Question 2.) XNO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil I	, no PIA is required.)
YES If "yes," please explain the nature of those changes: (Continue to Question 2.) XNO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil I and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised.	, no PIA is required.)
YES	, no PIA is required.) able form about individuals? Liberties Unit (PCLU) for review, a

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	FE	BI PRIVACY T	HRESHOLD AN	ALYSIS (PTA)		ı	(OGC/PCLU (Rev. 07/06/07)
	N	AME OF SYS	TEM:	}	o7E			
		YES If	"yes," is this a Maj	or Informa	ation System (as listed	on OGC's FBINET websi	te)?:	
			Yes.	(If "yes,"	a full PIA is required	PTA is complete.)		
				pproval, a	nd forwarding to DOJ		ies Office. Unless y	il Liberties Unit (PCLU) for ou are otherwise advised, IA.))
		NO	(If "no," go to s	ection III t	o determine if a full o	short-form PIA is requir	ed.)	
II. Fors	syste	ems developed	d after April 17, 2	003.				
	1.	What is the p	ourpose of the syst	em? (Answer in detail unles	s details already provide	d in A. 2 above):	
		(Continue to	Question 2.)					
	2.	Does the sys	tem collect, maint	ain or diss	eminate information i	n identifiable form abou	t individuals?	
		YES (If	f "yes," please prod	eed to Qu	estion 3.)			
				•		BI OGC's Privacy and Civ		
	3.	Is the system	ı solely related to i	nternal go	vernment operations?			
		YES If	"yes," is this a Maj	or Informa	ation System (as listed	on OGC's FBINET websi	te)?:	
			Yes.	(If "yes,"	a full PIA is required	PTA is complete.)		
					al, and forwarding to E	nd should be sent to FBI (DOJ's Privacy and Civil Lil OJ reviewing officials res	perties Office. Unle	ss you are otherwise
		NO	(If "no," go to s	ection III t	o determine if a full o	r short-form PIA is requir	ed.)	
III. Ful	l or S	Short-Form PI/	A					
	1.	Is the system	ı a major informat	ion system	n (as listed on OGC's F	BINET website)?		
		YES (If	f "yes," a full PIA is	required.	PTA is complete.)			

	ACY THRESHOLD ANALYSIS OF SYSTEM:	(PTA) b7E	(OGC/PCLU (Rev. 07/06/07)
N	O (If "no," please continue	e to question 2.)	
2. Does	the system involve routine inform	ation AND have limited use/access?	
YE	ES A short-form PIA is required.	and 8.9 of and DOJ r require co	.1, 3.1, 4.1, 5.1 (if appropriate), 6.2, 6.3, of the PIA template.) Please note that FBI reviewing officials reserve the right to completion of a full PIA. (PTA is eforward with PIA.)
N	O (If "no," a full PIA is requ	uired. PTA is complete.)	

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

(OGC/PCLU (Rev. 05/15/09)

b6 b7C

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(equivalent to the DOJ Initial Privacy Assessment (IPA))

NAME OF SYSTEM / PROJECT:		b7E		
Derived From: Classified By: Reason: Declassify Os:	SYSTEM/PROJECT Name: SA Program Office: A: Division: CIRG Phone: Room Number:			FBI OGC/PCLU POC Name: Phone: Room Number: 7458 JEH
FBI DIVISION INTERMEDIATE AI	PPROVALS (complete as necessary conso Program Manager (or other approp Division determines)	nant with Division priate executive as	policy] Division Priva	cy Officer
Program Division: [insert division name]	Signature: Date signed: approved 7/21/09 Name: SSA Title:	ь6 ь7С	Signature: Date signed: 7 Name: SSA Ke Title: Chief Div	nneth R. Gross, Jr.
FBIHQ Division: [insert division name]	Signature: Date signed: Name: Title:		Signature: Date signed: Name: Title:	
(The FBI Privacy and Civil Liberties Upon final FBI approval, FBI OGC 1 - Signed original to	o file 190-HQ-C1321794 (fwd to JEH 1E	r final approval will b	e recorded on th	e following page.)
1 - DOJ Office of Privacy	nic copy: via e-mail to UC	@usdoj.gov)		1 - OGC\PCLU intranet 1 - PCLU UC 1 - PCLU Library 1 - PCLU Tickler

		•	·	•
FBI PTA:	b7E			

INAL FBI APPROVAL / DETERMINATIONS / CONDITIONS: {This section will be completed by the FBI PCLU/PCLO following PTA submission. The TA 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)?YesNo (indicate reason):
_XX PIA is not required for the following reason(s): _XX 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): Notify FBI RMD/RIDS per MIOG 190.2.3?NoYes (see sample EC on PCLU intranet website). SORN/SORN revision(s) required?NoYes (indicate revisions needed):
Prepare/revise/add Privacy Act (e)(3) statements for related forms?NoYes (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:

	SSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]
FBI PTA:	b7E
David C. Larson, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: David C. Larson Date Signed: 07/28/09
I. INFORMATION ABOUT THE SYSTEM / F	PROJECT
-	tem or project that includes: name of the system/project, including associated urpose; nature of the information in the system and how it will be used; who will have the manner of transmission to al users.
authenticated users can access the system,	The FBI will be responsible for ensuring that only in order to meet
continuity of operations requirements. The se operational.	ecurity features of will be approved by the Security Division before it becomes
	or disseminate any information about individuals in identifiable form, i.e., is information th is the definition of personally identifiable information (PII))?
	PTA is now complete and after division approval(s) should be submitted to FBI Unless you are otherwise advised, no PIA is required.]
YES. [If yes, please cont	inue.]
3. Does the system/project pertain only to g	government employees, contractors, or consultants?
NO.	res.
4. Is information about United States citizen or other personal identifier?	ns or lawfully admitted permanent resident aliens retrieved from the system/project by name
NOYE	S.
5. Are Social Security Numbers (SSNs) colle	ected, maintained or disseminated from the system/project?

 $\underline{\hspace{1cm}} SSNs \ are \ necessary \ to \ establish/confirm \ the \ identity \ of \ subjects, victims, witnesses$

____YES. If yes, check all that apply:

____ NO.

b7E

			(INSERT CLASSIFICATION)	/CONTROL MARKINGS, IF APPROPRIATE
FE	BI PTA:		b7E	
		or source	s in this law enforcement or intellig	ence activity.
		SSNs	are necessary to identify FBI perso	nnel in this internal administrative system.
		SSNs	are important for other reasons.	Describe:
			ystem/project provides special pro ole, or only available to certain user	tection to SSNs (e.g., SSNs are encrypted, hidden from all users via a a s). Describe:
6.	Does the sy			o provide special protection to SSNs. Explain: om the person who is the subject of the information?
	N	O. [If no,	proceed to question 7.]	
	YE	ES.		
	a. Do	es the system	n/project support criminal, CT, or F0	Cl investigations or assessments?
		YES.	[If yes, proceed to question	7.]
		NO.		
staten			nformation from whom the inform ion form or via a separate notice)?	ation is directly collected provided a written Privacy Act (e)(3)
		NO.	[The program will need to wor	k with PCLU to develop/implement the necessary form(s).]
		YES.	Identify any forms, paper or el ion from the information subjec	ectronic, used to request such t:
7.	Has the sys	stem undergo	ne Certification & Accreditation (C	&A) by the FBI Security Division (SecD)?
		NO. If r	o, indicate reason; if C&A is pen	ling, provide anticipated completion date:
	YE	ES. If yes, p	provide date of last C&A certifica	tion/re-certification:
	D	on't Know.		
8.	Is this sys	tem/project t	he subject of an OMB-300 budget	submission?
	1	NO.	Don't know.	YES. If yes, please provide the date and name or title of the OMB submission:
9.	Is this a nat	tional security	system (as determined by the Sec	D)?
	N	Ο.	YES.	Don't know.

FBI PT.	A: [[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE] 67E
10.	St	atus of S	system/	Project:
	-		and a	s a new system/ project in development. [If you checked this block, STOP. The PTA is now complete fter division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval and determination if nd/or other actions are required .]
II. E	EXIS	TING S	YSTEM	S / PROJECTS
1. ν	Vhe	n was th	e systei	n/project developed?
2. ⊦	Has t	the syste	m/proj	ect 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. С			-	estem/project already exist?NOYES. If yes:

[INSERT CLASSIFICATION/CONT**2**OL MARKINGS, IF APPROPRIATE]

(insert classification/control markings, if appropriate)					
FBI PTA:	b7E				
Ь.	Has the system/project undergone any significant changes since the PIA?NOYES.				
	ow complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval and				

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 10-24-2014 BY NSICG/C32W33B91

> FBI Privacy Threshold Analysis (PTA) Cover Sheet (OGC/PCLU (Rev. 1/17/07)

NAME OF SYSTEM	b7E	
FBI SYSTEM CONTACT PERSON Name: Program Office: Division: Phone: Room Number: Date PTA submitted for	Network Engineering Unit, Network Section Information Technology Operations Division 1B964 For approval: 3/31/08	ъ6 ъ7С

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.

	Program Division: NEU	FBIHQ Division:Network Section	
Program Manager (or other appropriate executive as Division determines)	Signature: /s/ Date signed: 4/16/08 Name: b6 Title: Unit Chief, Network Engineering b7C	Signature: /s/ Date signed: 4/16/08 Name: Julius J Brooks Title: Chief, Network Section	
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature:/s/ Date signed: 4/21/08 Name b6 Title: ITOD Division Privacy Officer	

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:5/15/08			
	Name: David C. Larson			
	Title: Chief Privacy and Civil Liberties Officer			

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 - OGC\PCLU intranet website

1 - FBI OCIO

1 - PCLU Library

1 - FBI SecD (electronic copy via e-mail)

1 - PCLU Tickler

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:	
k	b7E
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:	
b7	Æ
2. Purpose for collecting the information and how it will be used:	
	b7E
3. The system's structure (including components/subsystems): Output Description:	
	b7E
There have been no significant changes to it since 2003. No PIA was done (because it was grandfathered under the E-Government Act). No significant changes are being proposed that would involve personally identifiable information.	
4. Means of accessing the system and transmitting information to and from the system:	
	b7E
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 a limited number of system personnel (e.g., Network Management personnel, EOC operators, Security Division auditors, ISSOs,	b7E
and ISSMs, etc.) have access	

	FBI PRIVACY THRESHOLD ANALYSIS (PTA)			
	NAME OF SYSTEM: b7E			
security purpo	oses.			
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 info				
access the min				
No one outsid	de the FBI unless authorized by both ITOD and the Security Division			
7.	Has this system been certified and accredited by the FBI Security Divisions? _x_YesNo			
8	Is this system encompassed within an OMB-300? _x_YesNoDon't Know			
	(if yes, please attach copy of latest one.)			
I. Was	s the system developed prior to April 17, 2003?			
i, vvas	stile system developed phor to April 17, 2003:			
_ <u>X</u>	YES (If "yes," proceed to Question 1.)			
NO	(If "no," proceed to Section II.)			
4	H. d			
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.)			
	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?			
	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.)			
	tes. (ii yes, arail i i i i i i i i i i i i i i i i i i			
	xNo. (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.))			

	FBI PRIVACY THRESHOLD ANALYSIS (PTA)				
		NAME OF SYSTEM: b7E			
		NO (If "no," go to section III to determine if a full or short-form PIA is required.)			
II.	For syste	ems developed after April 17, 2003.			
	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?			
		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.)			
III.	Full or S	Short-Form PIA			
	1.	Is the system 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," please continue to question 2.)			
	2.	Does the system involve routine information AND have limited use/access?			
		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.			

FBI PRIVACY	THRESHOLD ANALYSIS (P	IA)	
NAME OF SYSTEM:			b7E
			(PTA is completeforward with PIA.)
NO	(If "no," a full PIA is required.	PTA is complete.)	

INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 10-24-2014 BY NSICG/C32W33B91

FBI Privacy Threshold Analysis (PTA) Cover Sheet

(OGC/PCLU (Rev. 07/06/07)

NAME OF SYSTEM: Bank Robbery Statistical Application

FBI SYSTEM CONTACT PE	rson	FBI OGC/PCLU POC	
Name: Program Office: Division: Phone:	ITB ITOD	Name: Phone: Room Number:7338	ь6 b7С
Room Number: Date PTA submitted	8979 for approval: 2/29/2008		

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.

	Program Division: CID	FBIHQ Division: ITOD
Program Manager (or other appropriate executive as Division determines)	Signature: Date signed: Name: Title:	Signature: /s/ Date signed: 04/29/2008 Name: b6 b7C Title: IT Specialist
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: /s/ Date signed: 5/6/2008 Name b6 Title: Division Privacy Officer

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: Date Signed:	/s/ 6/26/08	
	Name: Title:		David C. Larson Acting Deputy General Counsel

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 - OGC\PCLU intranet website

2 - FBI OCIO / OIPP

1 - PCLU Library

1 - FBI SecD (electronic copy via e-mail)

1 - PCLU Tickler

2* - Program Division POC/Privacy Officer

2*- FBIHQ Division POC/Privacy Officer

(*please reproduce as needed for Program/Division file(s))

(OGC/PCLU (Rev. 07/06/07)

NAME OF SYSTEM: Bank Robbery Statistical Application

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:

The Bank Robbery Statistical Application (BRSA) is a mainframe application that serves as the repository for all statistical data reported on the FD-430 Form

1. Type of information in the system:

Bank Crime Statistics

- 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:

Bank Crime Statistical reports

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

Database Management System [ADABAS/Natural]

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

FBI Investigative Mainframe

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 customers that have access to FBINET may have access to BRSA.

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 customers that have access to FBINET may have access to BRSA.

	7.	Has this system been certified and accredited by the F	FBI Security Divisions?	<u>X</u> Yes	_No
Cnow	8	Is this system encompassed within an OMB-300?	X Yes	No	Don't
		(If yes, please attach copy of latest one: SORRY.	l do not have a copy of :	the latest one)	

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

(OGC/PCLU (Rev. 07/06/07)

NAME OF SYSTEM:	Bank Robbery Statistical Application

		X YES (If "yes," proceed to Question 1.)			
		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.)			
		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?			
		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 syste	ems developed after April 17, 2003.			
	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?			
		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,			

NAME OF SYSTEM: Bank Robbery Statistical Application

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 Infor	mation System (as lis	sted on OGC's FBINE	T website)?:
			Yes. (If "ye	s," a full PIA is requir	ed PTA is comple	te.)
			for review, appro	val, and forwarding	to DOJ's Privacy and	to FBI OGC's Privacy and Civil Liberties Unit (PCLU) Civil Liberties Office. Unless you are otherwise cials reserve the right to require a PIA.))
		NO	(If "no," go to section I	II to determine if a fu	ll or short-form PIA i	s required.)
III.	Full or S	Short-Forr	n PIA			
	1.	Is the sys	stem a major information syst	em (as listed on OGC	s's FBINET website)?	
		YES	(If "yes," a full PIA is require	d. PTA is complete	e.)	
		NO	(If "no," please continu	ie to question 2.)		
	2.	Does the	e system involve routine infori	nation AND have lim	nited use/access?	
		YES	A short-form PIA is required	. (I.e., you need or	nly answer Question	s 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 re	nuired. PTA is com	uplete.)	

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

AME OF SYSTEM:		b7E		
FBI SYSTEM CONTACT PE Name: Program Office: ITB Division: IT Operation Phone: Room Number: 8979 Date PTA submitted]	08	FBI OGC/PCLU POC Name: Phone: Room Number:7338	
laboration with IT, security Paperwork Reduction Act	and end-user management a should also be coordinated w forwarding to OGC the PTA/F	ind OGC/PCLU. (PIAs/PT iith the RMD Forms Desk.)	approved by the cognizant program management in FAs relating to electronic forms/questionnaires implicated if the subject of a PTA/PIA is under the program cognithe FBIHQ Division for program review and approval, i	izance
	Program Division:		FBIHQ Division: IT Operations	
rogram Manager or other appropriate xecutive as Division letermines)	Signature: Date signed: Name: Title:		Signature: /s/ Date signed: 04/24/2008 Name: Title: IT Specialist	
	Signature: Date signed:		Signature: /s/ Date signed: 5/6/08 Name:	
Division Privacy Officer	Name: Title:		Title: Division Privacy Officer	
ŕ	Title: ard signed hard copy plus elec	ctronic copy to OGC/PCLU	, in the second	

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 - PCLU Library

 $1 - \mathsf{OGC} \backslash \mathsf{PCLU} \ intranet \ website$

2 - FBI OCIO / OIPP

1 - FBI SecD (electronic copy via e-mail)

1 - PCLU Tickler

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 is required by conducting and following Privacy Threshold Analysis (PTA).	Privacy Impact Assessment (PIA)
Whether or not a PIA is required, the system owner/program manager should consult with the FBI Records <i>t</i> identify and resolve any records issues relating to information in the system.	Management Division (RMD) to
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:	
a. If the system is solely related to internal government operations please provide a brief explement operations please provide a brief explement operations.	anation of the quantity and type of
	b7E
Purpose for collecting the information and how it will be used:	·
	b7E
3. The system's structure (including components/subsystems):	
	b7E
4. Means of accessing the system and transmitting information to and from the system:	
Information is manually entered into the	

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:

b7E

	FBI PRIVACY THRESHOLD ANALYSIS (PTA) (OGC/PCLU (Rev. 07/06,	/07)
	NAME OF SYSTEM: b7E	
	FBI Headquarters and Field personnel with a need to	
	b7E	
	All access to the is approved by	
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:	
	that only authorized persons can access the information.	
	b7E	
	that run on the FBINET closed network. FBINET can only be accessed by authorized persons.	
7.	Has this system been certified and accredited by the FBI Security Divisions? XYes No	
8	Is this system encompassed within an OMB-300? X YesNoDon't Know	
	(If yes, please attach copy of latest one.)	
Wa	as the system developed prior to April 17, 2003?	
<u>x</u>	YES (If "yes," proceed to Question 1.)	
	NO (If "no," proceed to Section II.)	
	NO (II III), 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.)	
	X NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approva	ıl,
	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?	
	VIS. //// " also are read to Outstan 2.)	
	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, approve	ւl,
	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?	

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		FBI PRIVACY THRESHOLD ANALYSIS (PTA)	(OGC/PCLU (Rev. 07/06/07)
		NAME OF SYSTEM: b7E	
		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 review, approval, and forwarding to DOJ's Privacy and Civil Liberties Of no PIA is required. (FBI and DOJ reviewing officials reserve the right t	fice. Unless you are otherwise advised,
		NO (If "no," go to section III to determine if a full or short-form PIA is required.)	
II.	For syste	tems developed after April 17, 2003.	
	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 indiv	iduals?
		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 Libe and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advise	
	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 for review, approval, and forwarding to DOJ's Privacy and Civil Liberties advised, no PIA is required. (FBI and DOJ reviewing officials reserve t	Office. Unless you are otherwise
		NO	
III.	Full or S	Short-Form PIA	
	1.	Is the system a major information system (as listed on OGC's FBINET website)?	
		YES (If "yes," a full PIA is required. PTA is complete.)	

	FBI PRI	VACY THRESHOLD ANALYS	SIS (PTA)		(OGC/PCLU (Rev. 07/06/07)
	NAME	OF SYSTEM:		b7E	
	NO	(If "no," please continue	to question 2.)		
2.	Does the	e system involve routine informa	tion AND have limited use/acces	s?	
	YES	A short-form PIA is required.	(I.e., you need only answer Que	estions 1.1, 1.2, 2.1, 3.1, 4.1, 5.1 (if ap and 8.9 of the PIA template.) and DOJ reviewing officials re require completion of a full PI completeforward with PIA.	Please note that FBI serve the right to A. (PTA is
	NO	(If "no," a full PIA is requ	ired. PTA is complete.)		

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 10-24-2014 BY NSICG/C32W33B91

> 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) Cover Sheet

(OGC/PCLU (Rev. 07/06/07)

FBI SYSTEM CONTACT PER Name: Program Office: Division: Phone: Room Number: Date PTA submitted f	ITB ITOD 8979			FBI OGC/PCLU POC Name: Phone Room Number:7338	ь6 ь7
collaboration with IT, security, the Paperwork Reduction Act s	hould also be coordinated with the forwarding to OGC the PTA/PIA mu	SC/PCLU. (PIAs/PTA: RMD Forms Desk.)	s relating to elect If the subject of a	ognizant program management in tronic forms/questionnaires implicating a PTA/PIA is under the program cognizar n for program review and approval, if	псе
	Program Division: DI		FBIHQ Divis	sion: ITOD	
Program Manager (or other appropriate executive as Division determines)	Signature: Date signed: Name: Title:		Name:	/s/ : 04/29/2008 Specialist	ъ6 ъ70
Division Privacy Officer	Signature: Date signed: Name: Title:		Signature: Date signed Name Title: Divisio	/s/ : 5/6/2008 on Privacy Officer	ь6 ь70
Upon Division approval, forwa		copy to OGC/PCLU (JE		<u>·</u>	
FINAL FBI APPROV	AL:				
FBI Privacy and Civil Libertie	1	Signature: Date Signed: 6/: Name: Fitle:	/s/ 26/2008 David C. Acting D	. Larson eputy General Counsel	
Upon final FBI approval, FBI O 1 - Signed origi Copies:	GC will distribute as follows: nal to 190-HQ-C1321794				
·	vil Liberties Office-Main Justice, Roo : copy via e-mail)	om 4259	1.	- OGC\PCLU intranet website - PCLU Library - PCLU Tickler	

FBI PRIVACY THRESHOLD ANALYSIS (PTA)	(OGC/PCLU (Rev. 07/06/07)
NAME OF SYSTEM:	b7E
For efficiency, a system owner or program manager can be aided in making the det	termination 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 cons	sult 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 basi	ic system description. The questions are as follows:
A. General System Description: Please briefly describe:	
	1.55
	b7E
1. Type of information in the system:	
	b7E
	2,2
, , , , , , , , , , , , , , , , , , , ,	is 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 provided by the	b7E
exists in the field divisions.	
3. The system's structure (including components/subsystems):	
	b7E
4. Means of accessing the system and transmitting information to and	from the system:
FBI Administrative Mainframe	
5 What isk to FDL ill have a second at the continuous section to the	
5. Who within FBI will have access to the information in the system ar	nd controls for ensuring that only authorized persons
can access the information:	1
Members of the various	units, bureau-wide. 67E
C. Who was dealer EDI. III have a second sinformation in the sure	
6. Who outside the FBI will have access to the information in the syste	em and controls for ensuring that only authorized persons
can access the information:	
No One.	
7 Has this system been contified and assertited by the FDLSis Di	visions? Y Vos No
7. Has this system been certified and accredited by the FBI Security Di	visions? <u>X</u> YesNo
9 Is this quotom on a read with its at OMAR 2002	No. Denta Varia
8 Is this system encompassed within an OMB-300? X Yes	_NoDon't Know

FBI PRIVACY THRESHOLD ANALYSIS (PTA)	(OGC/PCLU (Rev. 07/06/07)
NAME OF SYSTEM:	b7E
Was the system developed prior to April 17, 2003?	
X YES (If "yes," proceed to Question 1.)	
NO (If "no," proceed to Section II.)	
Has the system undergone any significant changes since April 17, 2003	3?
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 tapproval, and forwarding to DOJ's Privacy and Civil Liberties Office.	to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, 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 and forwarding to DOJ's Privacy and Civil Liberties Office. Unless yo	OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval ou 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 OGO	C's FBINET website)?:
Yes. (If "yes," a full PIA is required PTA	is complete.)
review, approval, and forwarding to DOJ's Privac	ld be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for y and Civil Liberties Office. Unless you are otherwise advised, icials reserve the right to require a PIA.))
NO (If "no," go to section III to determine if a full or short-f	form PIA is required.)
systems developed after April 17, 2003.	
1. What is the purpose of the system? (Answer in detail unless details	s already provided in A. 2 above):
(Continue to Question 2.)	

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

2

I.

II.

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FB	BI PRIVAC	YTHRESH	OLD ANALYS	IS (PTA)				(OGC/PCLU (Rev. 07/06/07)
N	AME OF S	SYSTEM:					b7E	
	YES	(If "yes," p	lease proceed to	Question 3.)			
	NO	(If "no," th	e PTA is comple	te and should	d be sent to F	BI OGC's Privac	cy and Civil Liberties Unit (PCLI	J) for review, approval,
	and forw	varding to D0	OJ's Privacy and	Civil Libertie	s Office. U	Inless you are o	therwise advised, no PIA is req	uired.)
3.	Is the sys	stem solely r	elated to interna	ıl governmen	t operations?	,		
	YES	If "yes," is	this a Major Info	ormation Syst	em (as listed	on OGC's FBIN	IET website)?:	
			Yes. (If ")	ves," a full PIA	is required	PTA is comp	olete.)	
					•		ent to FBI OGC's Privacy and Cir	
			advised, no PIA		-	-	nd Civil Liberties Office. Unle fficials reserve the right to requ	-
	NO	(If "n	o," go to sectior	ı III to determ	ine if a full oi	r short-form PI <i>P</i>	A is required.)	
III. Full or S	Short-Form	n PIA						
1.	Is the sys	stem a major	information sy	stem (as listed	d on OGC's Fl	BINET website)	?	
	YES	(If "yes," a	full PIA is requi	red. PTA is	complete.)			
	NO	(If "n	o," please conti	nue to questi	on 2.)			
2.	Does the	e system invo	lve routine info	rmation ANE) have limited	d use/access?		
	YES	A short-fo	rm PIA is requir	ed. (I.e., yo	u need only a	answer Questio	ons 1.1, 1.2, 2.1, 3.1, 4.1, 5.1 (if and 8.9 of the PIA template and DOJ reviewing officials	.) Please note that FBI
							require completion of a full completeforward with PI	PIA. (PTA is
	NO	(1 f "∽	o " a full PIA is r	oguirod P	TA is comple	to)		

FBI PRIVACY THRESHO	LD ANALYSIS (PTA)		(OGC/PCLU (Rev. 07/06/07)
NAME OF SYSTEM:		b7E	

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(OGC/PCLU (Rev. 08/28/08)

b6 b7C

Unclassifed/FOUO

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(equivalent to the DOJ Initial Privacy Assessment (IPA))

NAME OF SYSTEM / PROJECT:	b7E				_
Derived From: Classified By: Reason: Declassify On:	Name:		ranch	FBI OGC/PCLU POC Name: Phone: Room Number: 7458	ь6 ь7с
FBI DIVISION INTERMEDIATE AP	PROVALS				_
	Program Division: Critical Inci	dent Response Group (CIRG)	FBIHQ Divisio	on: CIRG	
Program Manager (or other appropriate executive as Division determines)	Signature: Date signed: Name: Title: Supervisory Special Age	nt, Aviation Support Unit	Signature: Date signed: Name: J. Br Title: Section (SAS)	ritt Johnson Chief, Surveillance and Aviation Section	b6 b70
Division Privacy Officer	Signature: Date signed: Name: Kenneth R. Gross, Jr. Title: SSA/CDC	Signature: Date signed: Name: Title:			
After all division approvals, forward		c copy to FBI OGC/PCLU (JEH 73	338).		_
PIA required:x_No	Yes:	SORN/SORN revision	on required:	_x_NoYes:	
Applicable SORN(s):					
Notify FBI RMD/RIDS per MIOG 1	90.2.3: _x_No	Yes			
Consult with RMD to identify/reso	olve any Federal records/electro	nic records issues: _x_No	Yes:	:	
Prepare/revise/add Privacy Act (e)	(3) statements for related forms	? _x_NoYes-fc	orms affected:		
Other:					
David C. Larson, Deputy General C	Counsel	Signature: /s			1
FBI Privacy and Civil Liberties Offic	cer	Date Signed: 10/31/2009			

FBI PRIVACY THRESHOLD ANALYSIS (PTA) NAME OF SYSTEM / PROJECT: b7E		
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)		1 - OGC\PCLU intranet
(if classified, via hand delivery to 1331 Penn. Ave. NW, Suite 940, 20530)		1 - PCLU UC
2 - FBI OCIO / OIPP (JEH 9376, attn:		1 - PCLU Library
1 - FBI SecD/AU (electronic copy: via e-mail to UC		1 - PCLU Tickler
1 - RMD/RMAU (attn	b6 b7С	
2 - Program Division POC / Privacy Officer	D/C	
2 - FBIHQ Division POC /Privacy Officer		

FBI PRIVACY THRESHOLD ANALY	SIS (PTA)		
NAME OF SYSTEM / PROJECT:		b7E	

FBI PRIVACY THRESHOLD ANALYSIS (PTA) NAME OF SYSTEM / PROJECT: b7E	
I. INFORMATION ABOUT THE SYSTEM / PROJECT	
1. Name of the system/project. Provide current name, any previous or anticipated name changes, and any associated acronyms:	
b7E	
2. Briefly describe the system's/project's structure (including identification of any components/subsystems or parent system, if applicable):	
	b7E
3. What is the purpose for the system/project?	
b7E	
4. Please provide a general summary of the nature of information in the system/project and how it will be used:	
	b7E
5. 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))?	
X_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.	
6. Access	
a. Describe the means of accessing the system/project and transmitting information to and from the system/project:	
b. Describe who within the FBI will have access to the information in the system and the controls for ensuring authorized persons can access the information:	
c. Describe who outside the FBI will have access to the information in the system/project and the controls for ensuring that only authorized persons can access the information:	

Unclassified/#OUO

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

	BI PRIVACY THRESHOL NAME OF SYSTEM / PRO	
	NO	
	YES.	If yes, provide a brief explanation of the quantity and type of information:
	Is information about U her personal identifier?	Inited States citizens or lawfully admitted permanent resident aliens retrieved from the system/project by name
	NO	YES
9.	Are Social Security Nu	mbers collected, maintained or disseminated from the system/project?
	NO	
	YES.	If yes, for systems/projects other than those supporting law enforcement or intelligence activities: - What is the purpose for the collection, maintenance or dissemination of SSNs?
		- Is it feasible to eliminate SSNs from the system/project (please indicate why or why not)?
		- In light of Federal policy to reduce the use of SSNs, is it feasible to minimize system/project-user access to SSNs in the system/project (why or why not)?
10.	Does the system/pro	ject collect any information directly from the person who is the subject of the information?
	YES.	If yes, for systems/projects other than those relating to criminal investigations, CT, or CI: - Indicate how such information is collected:
		- Identify by name and form number any forms used to request such information from the information subject (this includes paper or electronic forms):
		- Are information subjects from whom information is directly collected provided a written Privacy Act (e)(3) statement (either on the collection form or via a separate notice)? Yes No
11.	Has the system unde	rgone Certification & Accreditation (C&A) by the FBI Security Division (SecD)?
	NO.	If no, please indicate reason; if C&A is pending, provide anticipated completion date:
	YES.	If yes, please:

Unclassified/POUO

	NAME OF SYSTEM / PROJECT: b7E				
	- Provide date of last C&A certification/re-certification:				
	Don't Know				
12.	Is this system/project the subject of an OMB-300 budget submission?				
	NODon't know				
	YES. If yes, if the name of the OMB 300 is not the same as the name of the system/project, please provide OMB name:				
13.	Is this a national security system (as determined by the SecD)?				
	NOYESDon't know				
14.	Status of System/ Project:				
	This is a new system/project in development. [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.]				
	This is an existing system/project. [Continue to Section II.]				
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 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.				

Unclassified POUO

	FBI PRIVACY THRESHOL NAME OF SYSTEM / PRO	
		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. [Please provide brief explanation]:
3.	Does a PIA for this syst	em/project already exist?
	NO	
	YES.	If yes, please provide date/title of the PIA:

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

Derived From:

UNCLASSIFIED/FOR OFFICIAL USE ONLY

(OGC/PCLU (Rev. 01/05/09)

FBI OGC/PCLU POC

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

SYSTEM/PROJECT POC

(equivalent to the DOJ Initial Privacy Assessment (IPA))

NAME OF SYSTEM / PROJECT: Digital Collection System (DCS) 3000

Classified By: UNCLASSIFIED Reason: Declassify On:		Name: Program Office: Telecommunications Int & Collection Technolog (TICTU) Division: OTD Phone		Name: AGC Phone: Room Number: 7338 JEH	ъ6 ъ7С
FBI DIVISION INT	Program Mana	·····	Divisi	ion Privacy Officer	
FBIHQ Division: Operational Technology Division	Name	97/21/2009 risory Special Agent	Signat Date s Name Title:	signed: 7/24 0 9 : SSA	ъ6 ъ70

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.)

INAL FBI APPROVAL/ DETERMINATIONS/ COMDITIONS:				
PIA required: X_NoYes: SORN/SORN revision required: X_NoYes:				
Applicable SORN(s):				
Notify FBI RMD/RIDS per MIOG 190.2.3: X_NoYes				
Prepare/revise/add Privacy Act (e)(3) statements for related forms?XNoYes-forms affected:				
The program should consult with RMD to identify/resolve any Federal records/electronic records issues.				
Other:				
A PTA for DCS 3000 was approved in June 2006, at which time DCS 3000 was determined to be a "grandfathered" system. DCS 3000 has not undergone any significant changes affecting the acquisition, retention or dissemination of personally identifiable information (PII) since that time. No PIA is required.				
David C. Larson, Deputy General Counsel Signature: 4 Signature FBI Privacy and Civil Liberties Officer Date Signed: 4 Signature Signature				

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. (This kind of information may be available in the System Security Plan, if available, or from a Concept of Operations document, and can be cut and pasted here.):

from a specific telephone numbers.	DCS 3000
	provides the FBI with
a digital collection system for authorized wired and wirele	ess communication pen registers.
DCS 3000 is deployed in central monitoring point	norm, riese, na karo 077 septembrio inconsectamber karo que etroma estre de la cuenta de la composición de com
operating under an existing certification and accreditation	
operate (ATO) has been granted pending re-certification a	um desculation.
1. Type of information in the system: The DCS 3	000 system
2 PS control control for a control of the control o	
 Does the system/project collect, maintain, or dissemination linked to or linkable of personally identifiable information (PII) 	
NO. [If no, STOP. The PTA is now comsubmitted to FBI OGC/PCLU for final FBI app	
PIA is required.	the second to th

	[If yes, please continue.]
<u> </u>	tains specific telephone numbers
100000	wired and wireless telecommunications devices for which ELSUR (in the form of
Cit ixegisicis) into oce	n authorized by an appropriate judicial officer. In addition, DCS 3000
. Does the system/pr	oject pertain only to government employees, contractors, or consultants?
<u>X</u> NO.	YES.
Is information about	ut United States citizens or lawfully admitted permanent resident aliens retrieved at by name or other personal identifier?
NO.	<u>X</u> YES.
While DCS 300	
ourt authorized ELSU	JR in the form of pen registers,
000	Pes
8888	
. Are Social Security	Numbers (SSNs) collected, maintained or disseminated from the system/project?
X NO.	YES. If yes, check all that apply:
	iSNs are necessary to establish/confirm the identity of subjects, victims, witnesses ses in this law enforcement or intelligence activity.
	SNs are necessary to identify FBI personnel in this internal administrative system.
	SNs are important for other reasons. Describe :
	The system/project provides special protection to SSNs (e.g., SSNs are encrypted, from all users via a a look-up table, or only available to certain users). Describe:
je Explain	t is not feasible for the system/project to provide special protection to SSNs.
. Does the system/proformation?	oject collect any information directly from the person who is the subject of the
NO DE	no, proceed to question 7.1

b7E

b7E

Z YES.	
 a. Does the system/project support criminal, CT, 	or FCI investigations or assessments?
X_YES. [If yes, proceed to question	(7.]
NO.	
 b. Are subjects of information from whom the in Privacy Act (e)(3) statement (either on the collect 	formation is directly collected provided a written tion form or via a separate notice)?
NO. [The program will need to v	work with PCLU to develop/implement the
YES. Identify any forms, paper information from the information subj	
Prior notice to the individual target is not require by DCS 3000 has been judicially authorized. To the exteriminal investigation, notice to the target is normally provithin ninety days of the commencement of the surveilla for good cause.	ent that the Pen Registers are used in support of a ovided, pursuant to 18 U.S.C. § 2518(8)(d).
In the case of Pen Registers authorized by the For U.S.C. §§ 1801 et seq., notice is unnecessary as the expopursuant to 50 U.S.C. § 1842. In the event that data collor otherwise disclosed, notice must be given to the persowarrant.	wie collection of telephone data is authorized ected pursuant to FISA is to be used as evidence
7. Has the system undergone Certification & Accreditat	ion (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, provide date of last C&A co	rtification/re-certification:
DCS 3000 was originally certified and accredited Updated ATO through May 15, 2010 has been granted by	by the FBI's Security Division on June 12, 2006. y the FBI's Security Division.
8. Is this system/project the subject of an OMB-300 bu	dget submission?
NODon't know.	\underline{X} YES. If yes, please provide the date and name or title of the OMB submission:

The FBI's entire Digital Collection System, including DCS 3000, is the subject of an FY 2010 Exhibit 300 dated April 25, 2008.

X.	NO.	YES.	Don't know.
10. Status c	of System	/ Project:	
	PTA i	s now complete and afte PCLU for final FBI app	development. (If you checked this block, STOP. The or division approval(s) should be submitted to FBI broval and determination if PIA and/or other actions are
II. EXISTI	NG SYS	TEMS/PROJECTS	
FBI field off	ices	A PTA for DCS	OCS-3000 has been operational and deployed at multiple 3000 was previously completed in June 2006. At that time, fathered" system so that no PIA was necessary.
2. Has the sy	ystem/pro	iject undergone any signi	ficant changes since April 17, 2003?
***************************************	NO. [J	if no, proceed to next que	stion (II.3).]
X_		YES. If yes, indicate wi boxes that apply):	tich of the following changes were involved (mark all
	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	A conversion from pape	r-based records to an electronic system.
			ion in a format that is anonymous or non-identifiable to a e to particular individuals.
		changes how information	em/project, including application of a new technology, that in identifiable form is managed. (For example, a change open environment and/or avenue for exposure of data that)
		A change that results in or matched with other de	information in identifiable form being merged, centralized, stabases.
		A new method of auther form by members of the	ticating the use of and access to information in identifiable public.

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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 for	m.
A change that results in new items of information in identifiable form being adde into the system/project.	ed
X Changes do not involve a change in the type of records maintained, the individual on whom records are maintained, or the use or dissemination of information from the system/project.	
The only changes to DCS 3000 since it first became operational involve hardware replacement is security software upgrades that do not affect the collection, maintenance or dissemination of PII.	and
Other. [Provide brief explanation]:	
3. Does a PIA for this system/project already exist?NOYES. If yes:	
8. Provide date/title of the PIA:	
b. Has the system/project undergone any significant changes since the PIA? NOYE	S.
A PTA for DCS 3000 was completed in June 2006, at which time a determination was made the no PIA was required as the system was grandfathered under the E-Government Act There have been a significant changes to DCS 3000 affecting PII since that PTA.	

(OGC/PCLU (Rev. 01/05/09)

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(equivalent to the IXOI Initial Privacy Assessment (IPA))

Derived From: Classified By: UNCLASSIFIED Reason: Declassify On:		SYSTEM/PROJECT P Name: ET Program Office: TICTU Division: OTD Phone:	Name: AGC	
FBI DIVISION INT	Program Ma	APPROVALS (complete a mager (or other exacutive at Bivision	is necessary] Division Privacy Officer	
		C. D. C.		3

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.)

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

PIA required: X_NoYes: SORN/SORN revision required:No	Yès:
Applicable SORN(s):	
Notify FBI RMD/RIDS per MIOG 190.2.3:X_NoYes	
Prepare/revise/add Privacy Act (e)(3) statements for related forms? X No Yes-fo affected:	ntis
The program should consult with RMD to identify/resolve any Federal records/electronic rules issues.	scords
Other:	
David C. Larson, Deputy General Counsel Signature:	
FBI Privacy and Civil Liberties Officer Date Signed: 2/3	

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. (This kind of information may be available in the System Security Plan, if available, or from a Concept of Operations document, and can be cut and pasted here.):	
DCS 5000 provides the FBI with a digital collection system for a variety of Electronic Surveillance (ELSUR) information collected pursuant to the Foreign Intelligence Surveillance Act (FISA) as authorized by a judicial officer. DCS 5000 contains information collected from digital and analog telephones, facsimile machines and microphones. DCS 5000 DCS 3000.	b3 b7E
DCS 5000 enables the FBI to monitor, exploit, and disseminate intelligence collected by ELSUR in a collaborative environment among linguists, case agents, and case managers. DCS 5000 provides these services both at FBI Field Offices and at FBIHQ.	
	b3 b7E
	b3 b7E
In support of national security investigations, DCS 5000 collects and maintains the following types of information pursuant to authorization from the FISA court: a. voice data recorded from telephone calls or overheard by surveillance microphones;	
	b3 b7E
	b3 b7

XNOYES. Is information about United States citizens or lawfully admitted permanent resident aliens retrieved		
X_YES. [If yes, please continue.] Does the system/project pertain only to government employees, contractors, or consultants? X_NOYES. Is information about United States citizens or lawfully admitted permanent resident aliens retrieved om the system/project by name or other personal identifier? NOX_YES.	lentifiable fonn, i.e.,	is information linked to or linkable to specific individuals (which is the definition
. Does the system/project pertain only to government employees, contractors, or consultants? XNOYES. . Is information about United States citizens or lawfully admitted permanent resident aliens retrieved rom the system/project by name or other personal identifier? NOXYES.	NO.	
XNOYES. Is information about United States citizens or lawfully admitted permanent resident aliens retrieved from the system/project by name or other personal identifier? NOXYES.	<u>X</u> YES. [If	yes, please continue.]
XNOYES. Is information about United States citizens or lawfully admitted permanent resident aliens retrieved from the system/project by name or other personal identifier? NOXYES.		
Is information about United States citizens or lawfully admitted permanent resident aliens retrieved from the system/project by name or other personal identifier? NOXYES.		
Is information about United States citizens or lawfully admitted permanent resident aliens retrieved from the system/project by name or other personal identifier? NOXYES.	 Does the system/p 	roject pertain only to government employees, contractors, or consultants?
Is information about United States citizens or lawfully admitted permanent resident aliens retrieved from the system/project by name or other personal identifier? NOXYES.	N NO	VES
rom the system/project by name or other personal identifier?NONONES	anning and a second	
DCS 5000 contains	NO.	<u>X</u> YES.
	DCS 5000 contain	

XNO.	YES. If yes, check all that apply:
	SSNs are necessary to establish/confirm the identity of subjects, victims, witnesses
or s	ources 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, en 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
Does the sy ormation?	stem/project collect any information directly from the person who is the subject of the
NO.	[If no, proceed to question 7.]
X_ YES.	
a. Does the	system/project support criminal, CT, or FCI investigations or assessments?
X	YES. [If yes, proceed to question 7.]
	NO.
	ects of information from whom the information is directly collected provided a written (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 ssary form(s).]
	YES. Identify any forms, paper or electronic, used to request such
info	rmation from the information subject:

by DCS	5000 has been judicially au	thorized.
Has the system un-	lergone Certification & Aco	creditation (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 ye	s, provide date of last C&	A certification/re-certification:
DCS 5000 athority to operate on		d accredited by the Security Division and was granted
. Is this system/proj	ect the subject of an OMB-	300 budget submission?
NO.	Don't know.	X YES. If yes, please provide the date and name or title of the OMB submission:
The FBI's entire Di 00 dated April 25, 20	uran da	cluding DCS 5000, is the subject of an FY 2010 Exhibit
. Is this a national se	ourity system (as determine	ed by the SecD)?
NO.	XYES.	Don't know.
). Status of System/	Project:	
This is a ne	w system/ project in develo	qment.
I. EXISTING SYST	EMS/PROJECTS	
. When was the syste	m/project developed? DCS	S-5000 has been operational at multiple FBI field offices
Eloo tha arestam (mad	ant madamenta ann ainmit an	mt changes since April 17, 2003?

	"NO.	[If no, proceed to next question (II.3).]
	_ YES. apply	If yes, indicate which of the following changes were involved (mark all boxes that /):
		A conversion from paper-based records to an electronic system.
	3333333333	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.
	mannan	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.
	X	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.
impact th		5000 has undergone routine hardware updates and software security updates that do not tion, maintenance or dissemination of PII.
		Other. [Provide brief explanation]:
3. Does s	i PIA fe	or this system/project already exist?NOX_YES. If yes:
a. Pr	ovide d	ate/title of the PIA:

3.

A PIA for the original version of DCS 5000	was approved on August 27, 2001. A	Пъ
supplemental PIA	was approved December 22, 2005. DCS 5000.	ப _ம ்
 b. Has the system/project undergone any significal 	nt changes since the PIA? <u>X</u> NOYES.	
As noted in II.2, the changes to DCS 5000 since th	e 2005 PIA involve routine hardware updates and	

software security updates that do not impact the collection, maintenance or dissemination of PII.

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(Equivalent to the DOI Initial Privacy Assessment (IPA))

	ique Asset ID: <u>Enclave - 155</u>	
Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: (ISSO) Program Office: DITU Division: Operational Technol Phone: (Room Number: 4C46 ERF-E	
FBI DIVISIO	N INTERMEDIATE APPROVALS Program Manager (or other appropriate	Division Privacy Officer
	executive as Division determines)	
Program Division: Operational Technology Division	Signature: Date signed: \$/2.7//O Name: Title: Unit Chief, Data Intercept Tech, Unit	Signature: \\ \frac{7}{27}/\tilde{\rho} \\ \text{Date signate} \\ \frac{9}{27}/\tilde{\rho} \\ \text{bare: J. Clay Price b70} \\ \text{Title: Section Chief, OTD}
FBIHQ Division:	Signature: Date signed: Name: Title:	Signature: Date signext: 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.

FBI INFO.

CLASSIFIED BY NSICG/C32W33B91

REASON: 1.4 (C)

DECLASSIFY ON: 01-21-2040

DATE: 01-21-2015

SECONORUM UNCLASSIFIED//FOUO WHEN REMOVED FROM ATTACHED PTA

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS: PIA is required by the E-Government Act. PIA is to be completed as a matter of FBI/DOI discretion. Is PIA to be published on FBLGOV (after any RMD FOIA redactions)? Yes. No X 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. X No significant privacy issues (or privacy issues are unchanged). X Other: While within the information is encrypted and cannot be Applicable SORN(s): <u>N/A</u> 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 Propare/revise/add Privacy Act (c)(3) statements for related forms? 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: Signature: Date Signed: (カルタルはん シスマロー オル/) Elizabeth Ross Withnell, Acting Deputy General

Counsel & FBI Privacy and Civil Liberties Officer

- 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.
- (U) The FBI's Data Intercept Technology Unit (DITU) develops and deploys systems and equipment for lawfully authorized electronic surveillance of data network communications technologies in support of the FBI's Counterterrorism.

 Counterintelligence, Cyber, and Criminal investigative responsibilities and the intelligence community.

(NF)								
								*
abase doe	s not, howes	er, conta	n any P	ersonally lde	ntifiable Ii	nformation (1	The	
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<u> </u>			<u>"</u>	× "			<u> </u>	# 18 # 18 # 18
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								30 30 900 4000
		#	e.			8		
(NE)							**************************************] _(S)

<u>X</u> NO [If no, STOP. The PTA is now complete should be submitted to FBI OGC/PCLU for final FB! otherwise advised, no PIA is required.]		100 T 1 T 1 T 1 T 1 T 1 T 1 T 1 T 1 T 1	
	n	* ************************************	b7E
YES [If yes, please continue.]			
3. Please indicate if any of the following characteristics system about individuals: Bear in mind that log-on info linkable to an individual. (Check all that apply.)			
The information directly identifies specific indix	riduals		
The information is intended to be used, in conjugate to indirectly identify specific individuals.	nction with other dat	s elements,	
The information can be used to distinguish or training is linked or linkable to specific individuals).	sce an individual's id	entity (i.e., it	
If you marked any of the above, proceed to Question			
None of the above. If none of the above, described identify specific individuals either directly or indirectly.		m does not	
4. Does the system/project pertain only to government consultants?	employees, contracto		
NOYES			
 Is information about United States citizens or lawful aliens retrieved from the system/project by name or oths 			
NO. [If no, skip to question 7.]			

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(ES. [If yes, proceed to the next question.]

/				r san ji	na Bau aga	3 4 S	3 x 3x	
6. Does the	system/proje	ect collect	any infor	mation di	rectly from	n the perso	s who is th	ic.
	e informatior							
	_NO [lf n c	, proceed	to questi	ion 7.1				
		A. C			+ 35 35 - 4			
	YES							
	a. Accres							
7	and the second state	Le Asilia Antika di		inchent C	J. V. DAJL	(namentantin	150 DE	
	es the systen	acprojeces	appon ci	mma, C	3 5 03 3 X X .	merminn	\$10.750	
assessments'								
	NO							
	_YES [If	yes, proce	eed to qu	estion 7.]				
b. Aı	re subjects of	`informati	on from v	vhom the	informatic	on is directl	y collected	Ì
provided a v	vritten Privac	v Act (e)(stateme 	ent (eithe	r on the co	llection for	m or via a	
separate not		A. 11. 12. 12. 12. 12. 12. 12. 12. 12. 12	n i sa marana na marana di ana Marana marana manana di ana					
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	tter. His of the second in	cessary fo		ec erezer	** XXXC X ~ 6		. \$11. 01.x0 \$1.x x 0x2	Vare
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	78787-610	ate a compa	a Badadaanka kaandada		and and the same	ana Madalana		
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	inior	mation fr	om me n	ntormatu	on suojec			
		a a a a a a a a a a a a a a a a a a a						i.
	ial Security N							the
system/proje	ect? Full SS	Ns should	only be u	sed as ide	ntifiers in	limited ins	tances.	
	NO	YES	If yes, cl	heck all t	hat apply	<u>.</u>		
			00° 30° 300 30					
	SSNs are r	Secessary t	o establis	b/confirm	the ident	ity of subje	ets, victim	S.
xwîtme	SSCS OF SOURC					Co. T. Co. Co. Co. Co. Co. Co. Co. Co. Co. Co		THE H
3610300	anko di muito	*** 111 11110 1	arr chava	erinera or	surensgen	ac accing.		
	The second of the second of	: 2	· · · · · · · · · · · · · · · · · · ·	June Committee		5. 7 3		
	The same of the sa	iecessary t	io identity	ribi pers	sonnei in t	his internal	administr	HV
systei	n.							
	SSNs are i	mporiant i	for other i	reasons. I	Describe:			
	The systen	a/project n	novides s	pecial pro	stection to	SSNs (e.g.,	SSNs are	
cncrv	pted, hidden	2007 N 2073 N 20				- 1915 - 1915 III - 1915 - 1915 - 1915 - 1915 - 1915 - 1915 - 1915 - 1915 - 1915 - 1915 - 1915 - 1915 - 1915 -		
) Describe:		and the second s	and the second s	a ay ar ay an ay bar ar a	in in the second	yana ara saturiyan n amar galab	95

	SSNs. Explain:
3.	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.
) ,	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:LowModerateHighUndefined
	Integrity:LowModerateHighUndefined
	Availability:LowModerateHighUndefined
	Not applicable – this system is only paper-based.
0.	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:
1.	Does the system conduct data mining as defined in Section 804 of the Implementing Recommendations of the 9/11 Commission Act of 2007, P.L., 110-
	537 NO

SECRETORN UNCLASIFIED/FOUO WHEN REMOVED FROM ATTACHED PTA YES If yes, please describe the data mining function:

12. Is this a national security system (as determined by the SecD)?	
NOYES	
13. Status of System/ Project:	
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 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.	e e e
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/c avenue for exposure of data that previously did not exist.)	d.
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.	:es.
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 d		ACHED `informa	
, ide	ntifiable form.			
for	A change that results in new items of it n being added into the system/project.	nformation	în identi	fiable
the	Changes do not involve a change in the individuals on whom records are maintaine	200000000000000000000000000000000000000		úntaine
	Changes do not involve a change in the individuals on whom records are maintaine semination of information from the system/j	d, or the us		iíntaine
	individuals on whom records are maintaine	d, or the us		intaine
- dis	individuals on whom records are maintaine semination of information from the system/j	d, or the us		intaine
dis.	individuals on whom records are maintaine semination of information from the system/p Other [Provide brief explanation]:	d, or the us		intaine

___NO __YES

[The PYA 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

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

a. Provide date/title of the PIA:

actions are required.]

FEDERAL BUREAU OF INVESTIGATION FOI/PA
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Page 4 ~ b3; b7E;

OCCPCLU (Rev. 05/15/09)

FBI PRIVACY THRESHOLD ANALYSIS (PTA) (Equivalent to the DOI Initial Privacy Assessment (IPA))

Derived From Claudfied By	ROJECT: Data Integration and Vi SYSTEMPRO Nation		FBI OGCPCLUPOC
Residently Op.	Program Office and Applications Distance 24 Plante Kasan Number (Phone Room Number: 7350
BIDIVISION INTERN	IEDIATE APPROVALS		
	Program Manager (or other appleacements as Division desermines		Privacy Officer
Program Division: Special Technologies and Applications Office	Signature Date signed: Name: Title: Assistant Section Chief	Signature Date sign Name: M	: 1/01/4 OUT st = 7/4 to arcie Fuller) (Acting)
FBIHQ Division:	Signature Date signed Name: Title:	Signature Date sign Name: Title:	
itter all division approve The FBI Privacy and Civi ollowing page.)	ds, forward signed hard copy plu Liberies Office's determinations,	s efectronic copy to FBI conditions, maker final	OGC/PCLU (JEH 7338). Sproval will be recorded on the
pon final FSI approval,	FBI OGC/PCLU will distribute a	is follows:	
1. Ciornal minima)	o file 190-HQ-C1321794 (fwd t	o TETES STEPPING WILLIAM S	47%
r . orknen mikumi s	and and when were to this me	STATE TENTON ARE LAND	60)
Copies (recipients pl 1 - DOI Office of P privacy@uedoj.gov	case print/reproduce as needed f rivacy and Civil Liberties (via e-) via hand delivery to 1331 Penn.)	or Program/Division fi mail to	*

INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE; FINAL FINAPPROVAL / DETERMINATIONS / CONDITIONS:

PIA is required by the E-Government A	cs.		
XPIA is to be completed as a matter of I	FBI/IXVI discretion.		
Is PIA to be published on FBLGOV (after any This is a national security system.	/ RMD FOIA reduction	1877 <u></u> Yes.	XNo (indicate reason):
PIA is not required for the following rea System does not collect, maintain, of the System is grandfathered (in existen information in the system relates to System has been previously assessed No significant privacy issues (or prother (describe):	or disseminate PII. we before 4/17/2003; n Historial government c cd under an evaluation	iperations. similar to a P1/	
Applicable SORN(e):inprogram			
Notify FBI RMD/RIDS per MIOG 190.2.37 http://home/DO/CGC/LTB/PCLU/PrivacyCr	NoXYes\ vii%20Liberties%20Lii	ies sample EC brary/form_for	on PCLU intraner website here: _miog199-2-3_ec.wpd
SORN/SORN revision(s) required?No	X Yes (indicase s	evisions acade	d): A new XXXX will be required.
Prepare/revise/add Privacy Act (e)(3) statemen	its for related forms?	.X.,.X0	Yes (indicate forms attented):
RECORDS. The program should consult with I The system may contain Federal records whethe schedule approved by the National Archives and as well as on compliance with requirements for I	r or not it contains Pris Records Administration	acy Act reques as is necessary	ds and, in any event, a records . RMD can provide advice on this:
Other:			
		···., A	
David C. Larson, Deputy General Counsel FB! Privacy and Civil Liberties Officer	Signature: //	177.	7//4/2000

INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE

UNCLASSIFIED/FOUO

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 aeronyms; 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 Special Technologies and Applications Office (STAO) has been tasked to engineer a program with the overall goal of making major improvements in data accessibility, search capabilities, and analysis across extant FBI, Intelligence Community (IC). Law Enforcement (LE), and public applications and data stores. The proposed project name for this effort and major application is the Data Integration and Visualization System (DIVS).

The primary function of the Data Integration and Visualization System (DIVS) is to support and enhance the analysis and presentation capabilities of data maintained in support of the FBI's multifaceted missions.

Essentially, the application will not be the single or primary repository for data but rather a tool enabling access, search, and analytics across multiple existing data sources.

The development and deployment plan includes more than one operating capability release. The scope of this PTA is limited to the initial operating capability with an anticipated release date of October 1, 2010. Future increments of the project will address enhancing analytical capabilities provided by the major application and the aggregation of additional data sources from other FBI law enforcement and intelligence systems and applications.

DIVS will be managed by the FBI Special Technologies and Applications Office (STAO). STAO will report directly to the ADD Chairman of the Data Exploitation and Aggregation Group (DEAG) for direction and authority regarding this project. STAO will lead the first step of DIVS by coding legal controls and integrating the many data sources and types into a common major application for viewing and presentation. STAO will begin by addressing ten data sources, as identified by NSB, to develop a logical path toward developing an integrated search and analysis capability. The following data sources will be consolidated and scarchable through the DIVS major application by September 30, 2010:

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lindividuais in	ystem/project collect, maintain, or disseminate any information about identifiable form, i.e., is information linked to or linkable to specific shich is the definition of personally identifiable information (PII))?
should be sub	no, STOP. The PTA is now complete and after division approval(s) mitted to FBI OGC/PCLU for final FBI approval. Unless you are ised, no PIA is required.
LX_YES	[If yes, please continue.]
3 Does the sconsultants?	ystem/project pensin only to government employees, contractors, or
in Hum.	NOYES
and the control of th	tion about United States citizens or lawfully admitted permanent resident d from the system/project by name or other personal identifier?
<u></u>	NO X_YES
5. Are Social system/projec	Security Numbers (SSNs) collected, maintained or disseminated from the 12
	NO X YES If yes, check all that apply:
	_ SSNs are necessary to establish/confirm the identity of subjects, victims, es or sources in this law enforcement or intelligence activity.
SARCIU.	SSNs are necessary to identify FBI personnel in this internal administrative
	SSNs are important for other reasons. Describe:
	The system/project provides special protection to SSNs (e.g., SSNs are ed. hidden from all users via a look-up table, or only available to certain Describe:
SSNs.	It is not feasible for the system/project to provide special protection to Explain: Since this system pulls data directly from other systems, it is

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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.]
a. Does the system/project support criminal, CT, or FCI investigations or assessments?
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 of via a separate notice)?
Not Applicable
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)7
YES If yes, provide date of last C&A certification/re-certification:
Don't Knew.

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 Is this system/project the sub 	ject of an OMI	8-300 (xadget submission?
	Don't knov	YES If yes, please provide the date and name or title of the OMB submission: Data Integration and Visualization System 3/26/2009
9. Is this a national security syst	em (as determi	ned by the Sect)?
NO	XYES	Don't know
10. Status of Systems Project:		
STOP. The PYA is now.	complete and CLU for fina	levelopment. (If you checked this block, after division approval(s) should be FMI approval and determination if
M. EXISTING SYSTEMS/PF	ROJECTS	
1. When was the system/project.	developed?	
2. Has the system/project underg	one any signif	icant changes since April 17, 2003?
NO [If no, proceed to ne	st question (11.	3) 1
YES If yes, indicate whic boxes that apply):	h of the fallow	ing changes were involved (mark all
	oo hom paper	-based records to an electronic system.
AND THE PROPERTY OF THE PROPER		on in a format that is anonymous or non- ntifiable to particular individuals.
teshnology, that ch (For example, a ch	unges how infi ange that woul	n/project, including application of a new prination in identifiable form is managed. d create a more open environment and/or previously alid not exist.)
		nformation in ide ntifiabl e form being with other databases.

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5555	A MON MEDINA OF STONE MEDICAL AND THE AND THE AND ACCESS SO
ir	formation in identifiable form by members of the public.
	A systematic incorporation of databases of information in lentifiable form purchased or obtained from commercial or public sources.
	A new interagency use or shared agency function that results in ew uses or exchanges of information in identifiable form.
ŭ	A change that results in a new use or disclosure of information in lentifiable form.
ī	A change that results in new items of information in identifiable our being added into the system/project.
	Changes do not involve a change in the type of records maintained, se individuals on whom records are maintained, or the use or insemination of information from the system/project.
	Other [Provide brief explanation]:
3. Does a i	A for this system/project already exist?
	(OYES
Myes	
a. Provi	de date/title of the PIA:
b, Has û	ne system/project undergone any significant changes since the PIA?
XOY	E S
The PTA is no FMI OGC/PCL actions are req	w complete and after division approval(s) should be submitted to U for final FBI approval and determination if FIA and/or other nived.]

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 10-23-2014 BY NSICG/C32W33B91

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FBI PTA:		b7E	
		(OGC/PCL1) (Rev. 08/16/2010)	
	FBI PRIVACY THRESHOLD A	NALYSIS (PTA)	
NAME OF ST	YSTEM / PROJECT:	b7E	
BIKRFBIU	tique Asset II): <u>PENDING</u>		
Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT PO Name: ITS Program Office: ITB Division: ITSD Phone Room Number: 8979 JEH	Name: AGC Phone: Room Number: 7350 JEH	ъ6 ъ7с
FBI DIVISIO Division polic	N INTERMEDIATE APPROVALS (comp v)	lete as necessary consonant with	
*****	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer	
Program Division: Information Technology Branch (ITB), Financial and Asset Management Unit (FMU)	Signature: Date signed: // /////////// Name: // ////////// Trile: Unit Chief, ITB FMU	Signature: Date signed: 7-75-11 Name: Title: ITS, Information Technology Branch, Product Assurance Unit	b6 b7С
FBIHQ Division:	Signature: Date signed: Name: Title:	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.)

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FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS

	Nos.	
PIA is to be completed as a matter of F	BI/DOJ discretion.	
Is PIA to be published on FBLGOV (after an	y RMD FOIA redactions)? Yo	esNo
X PIA is not required for the following re System does not collect, maintain, System is grandfathered (in existe X Information in the system relates t System has been previously assess No significant privacy issues (or p	or disseminate PH. noe before 4/17/2003; no later char o internal government operations. sed under an evaluation similar to a	
Applicable SORN(s): Accounting Systems fo supplemented, 71 Fed. Reg. 146 (Jan. 3, 2006). Notify FBI RMD/RIDS per MIOG 190.2.3? http://bome/DO/OGC/LTB/PCLU/PrivacyC SORN/SORN revision(s) required?X_No	X No Yes-See sample ivil%20Library/form	EC on PCLU intranet website here: _for_miog190-2-3_ec.wpd
Prepare/revise/add Privacy Act (e)(3) stateme	ints for related forms? X No	Yes (indicate forms affected):
RECORDS. The program should consult with The system may contain Federal records wheth schedule approved by the National Archives an as well as on compliance with requirements for Other:	er or not it contains Privacy Act red d Records Administration is necess	puests and, in any event, a records sary. RMD can provide advice on this
Unit Chief	Signature: /	. ;
Privacy and Civil Liberties Unit	Date Signed	Q/44/i
James J. Landon, Deputy General Counsel		
and FBI Privacy and Civil Liberties Officer	Date Signed 7/14/	, ,

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I. INFORMATION ABOUT THE SYS	TEM/PROJECT	
name of the system/project, inclu the system/project, including into (c) purpose of the system/project: system/project and how it will be	the system or project that includes: (a) iding associated acronyms; (b) structure of erconnections with other projects or systems; ; (d) nature of the information in the used; (e) who will have access to the t; (f) and the manner of transmission to all	
The FBI is developing and deploying	ng an Oracle-based application. to replace the existing	
of requisition-related funds is the <i>spend pla</i> envisioned as a checking account, upon whe drawn. In order for a requisition to pass the (FMU – the equivalent of the "bank"), sufficest of the requisition. Spend plans are generated at a unit specific financial needs, such as the purchase spend plan requests include a description of the purchase the item and certain financial a	ficient funding must be available to cover the level as spend plan requests identifying use of IT hardware, software or use license of the item to be purchased, the funds required and programmatic data. The unit submitting a into the Financial Management System (FMS),	b7 E
will contain (as does nformation (PII) about individuals.	presently) limited personally identifiable	
		b7E
\$1,000 M (2000)	of the data contained in FMS. 67E	
\$ 100 \$ 10 \$ 10 \$ 10 \$ 10 \$ 10 \$ 10 \$ 1	TO AND INVALABLE TO CONTRACT C	

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governed eitl	o authorized users and system : er by the cost code of the unit t	rough FBINET/Secret Enclave, access will administrators. Each user's privileges will be o which they are assigned or their overall
level of respo	nsability within ITB.	
	T	, or disseminate any information about rson, regardless of nationality)?
	. 7	ow complete and after division approval(s) ir final FBI approval. Unless you are
X_YES	[If yes, please continue.]	
	individuals: Bear in mind that individual.	aracteristics apply to the information in the log-on information may identify or be
X. The ii	formation directly identifies sp	ecific individuals
95 2011 1 N 1970 1970 1970 1970 1970 1970 1970 1970	formation is intended to be use rectly identify specific individu	d, in conjunction with other data elements, tals.
	formation can be used to distin ed or linkable to specific indivi	guish or trace an individual's identity (i.e., it duals).
lf you marke	d any of the above, proceed to	o Question 4.
	of the above. If none of the abo he individuals either directly or	ove, describe why the information does not indirectly.
4. Does the consultants?	ystem/project pertain only to g	overnment employees, contractors, or
* ************************************	NO <u>X</u> YES	

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FBI PTA:	b7E
Is information about United States citizens or lawfully admitted perr aliens retrieved from the system/project by name or other personal ident	
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 pesubject of the information?	rson who is the
X NO [If no, proceed to question 7.]	
YES	
a. Does the system/project support criminal, CT, or FCI investigassessments?	ations or
XO	
YES [If yes, proceed to question 7.]	
b. Are subjects of information from whom the information is directly provided a written Privacy Act (e)(3) statement (either on the collection separate notice)?	
NO [The program will need to work with PCLU to dev	/elop/implement
YES Identify any forms, paper or electronic, used to re information from the information subject:	equest such
7. Are Social Security Numbers (SSNs) collected, maintained or dissensystem/project? Full SSNs should only be used as identifiers in limited	
X NO YES If yes, check all that apply:	
SSNs are necessary to establish/confirm the identity of su- witnesses or sources in this law enforcement or intelligence activi	
SSNs are necessary to identify FBI personnel in this inten	nal administrative

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SSNs are im	portant for oth	er reasons. Describ	e:	
The system/gencrypted, hidden frusers). Describe:		s special protection a a look-up table, or		
It is not feasi SSNs. Explain:	ble for the sys	tem/project to provi	de special p	rotection to
is the system operate	ed by a contrac	tor?		
X%				
Yes, Informaticonsidered Privacy a contains standard co collects, maintains o imposed as a matter Office of the General system for the FBI.	Act systems of ntract clauses r disseminates of Departmen	that must be include PH and additional r of Justice policy.	al Acquisiti d in the eve equirement: Consultation	on Regulation ni the system s may be is with the
Has the system unde Security Division (S		ation & Accreditatio	m (C&A) bj	y the FBI
will not be sadministrative mains Administrative Main pertains to AMA.	rame and is er		& A for the	FBI's
	, indicate reas detion date:	on; if C&A is pendi	ng, provide:	anticipated
<u> </u>	s, please indic	ate the following, if	known:	
AMA was re-accred through July 25, 20	.,	6, 2009 and has Aut	bority to Op	erate (ATO)
Provide date of last	C&A certifica	tion/re-certification		
Confidentiality:	Low	Moderate	X_ High	Undefined
Integrity:	low	Moderate	X_ High	Undefined
Availability:	Low	X Moderate	High	Undefined

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FBI PTA:	b7E
Not applicable – this system is only paper-based.	
10. Is this system/project the subject of an OMB-300 budget submissio	n?
YES If yes, please provide the date and name or title of the OMB submission:	
11. Does the system conduct data mining as defined in Section 804 of Implementing Recommendations of the 9/11 Commission Act of 2 53 (codified at 42 USC 2000ec-3)?	
<u>x</u> %	
YES If yes, please describe the data mining function:	
12. Is this a national security system (as determined by the SecD)?	
XNOYE\$	
13. Status of System/ Project:	
X This is a new system/ project in development. [If you che STOP. The PTA is now complete and after division approval(submitted to FBI OGC/PCLU for final FBI approval and determined and/or other actions are required.]	s) should be
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 involve changes that apply, and provide brief explanation for each ma	
A conversion from paper-based records to an elect	ronic system.
A change from information in a format that is anor identifiable to a format that is identifiable to particular indi	

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(OGC/PCLU (Rev. 01/05/09)

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(equivalent to the DOJ Initial Privacy Assessment (IPA))

Derived From: Classified By: Reason: Declassify On:	/PROJECT: Enterprise Security O SYSTEM/PROJECT Name: Program Office: ESOC Division: SecD Phone: Room Number: JEH: 9	P OC	FBI OGC/PCLU POC Name: AGC Phone Room Number: 7338
BI DIVISION INTI	ERMEDIATE APPROVALS		
	Program Manager (or other appropriate executive as Division determines)	Divisio	n Privacy Officer
Program Division: Security Division	Signature: /S/ Date signed: 06/24/09 Name: Title: Unit Chief, SecD	Date si Name:	are: /S/ gned: 06/24/09 Michael F. Morehart DAD, Security Division
FBIHQ Division: Security Division	Signature: /S/ Date signed: 06/24/09 Name: Robert Cox Title: Section Chief, SecD IAS	Signati Date si Name: Title:	gned:
Additional division(s) approvals may be added as warran	Hed:	

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.)

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

PIA required: X No Yes: SORN/SORN revision required: No Yes:
Applicable SORN(s):
Notify FBI RMD/RIDS per MIOG 190.2.3:No _X_Yes
Prepare/revise/add Privacy Act (e)(3) statements for related forms? X No Yes-forms affected:
The program should consult with RMD to identify/resolve any Federal records/electronic records issues.
RMD has consulted with RMD regarding Federal records/electronic records issues. RMD has concluded that ESOC is not a system of record.
Other: To the extent a PIA may be deemed necessary for ESOC, it qualifies as a routine FBI database, per the attached checklist. A PIA for FBI Routine Databases was completed in August 2008. Since this system is concerned with access to, and use of, FBI IT systems, it is wholly internal to the FBI.
While the analysis performed in ESOC may be construed as pattern-based data mining, such activity is not required to be reported to Congress under the Federal Agency Data Mining Reporting Act of 2007. The Act does not extend to searches whose purpose is the protection of a government computer system. 42 U.S.C. § 2000-ee-3(C) (ii).
David C. Larson, Deputy General Counsel Signature:

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. (This kind of information may be available in the System Security Plan, if available, or from a Concept of Operations document, and can be cut and pasted here.):

The Enterprise Security Operations Center (ESOC) pro- real-time monitoring and security analysis of FBI Information designed to detect and deter IT activity that may be associated	Technology (IT) systems. ESOC is
	b3 b7
ESOC is composed of provide detection and analysis of system intrusions and misuse	that on monitored systems throughout the FBI
emerprise.	ь3 ь7E

The data in ESOC consists of metadata about computer usage within the FBL? This data originates in individual FBI IT systems. The metadata includes general system information as well as information about specific IT transactions, although the precise data in ESOC is CLASSIFIED.

Only a limited number of FBI personnel, assigned to enterprise security at FBI Headquarters, have direct access to ESOC data. One group of analysts monitors network activity, while a second group of analysts conducts specific analysis of metadata searching for patterns of IT behavior suggesting illegal or improper use of FBI IT systems. Within enterprise security, access to ESOC utilizes role-based access, based on need-to-know principles. System administrators perform administrative tasks (such as granting user access) but cannot conduct searches or analysis. Users with an appropriate need-to-know may conduct searches or analysis, but are unable to perform administrator tasks.

ESOC is the acronym for both the FBI's enterprise security operations center, as well as the analysis conducted by the center to detect illegal or improper use of FBI IT systems. As used in the PTA, ESOC refers to the analytic process employed by the security center.

Metadata is structured information that describes, explains, locates, or otherwise makes it easier to retrieve, use or manage an IT resource. Because metadata consists of information about pre-existing data, it is sometimes referred to as "data about data."

Requests for analysis of metadata submitted by operational divisions (e.g., the Counterintelligence Division) are individually reviewed and require supervisory approval. In the event that information about metadata analyzed by ESOC is disseminated outside of enterprise security personnel, such dissemination is made to personnel with investigative responsibility for FBI IT systems on a need to know basis. If actual metadata is to be used for investigative purposes, the component involved is referred to the particular IT system containing the original data. There is no dissemination of ESOC data outside the FBI.

dentifiable fo	rm, i.e.,	roject collect, maintain, or disseminate any information about individuals in is information linked to or linkable to specific individuals (which is the definition able information (PII))?
*		
		[If yes, please continue.]
3. Does the s	ystem/p	raject pertain only to government employees, contractors, or consultants?
	NO.	Land VES
		nalyzes metadata from FBI internal IT systems, the metadata is limited to FBI is or consultants with access to those systems.
		out United States citizens or lawfully admitted permanent resident aliens retrieved oct by name or other personal identifier?
011911119000111	NO.	<u>X</u> YES.
		eved by ESOC may include the name or other personal identifier of FBI employees, ants with access to FBI IT systems.
5. Are Social	Securi	y Numbers (SSNs) collected, maintained or disseminated from the system/project?
	NO.	XYES. If yes, check all that apply:
		SSNs are necessary to establish/confirm the identity of subjects, victims, witnesses rees in this law enforcement or intelligence activity.
	X\$	SSNs are necessary to identify FBI personnel in this internal administrative system.
	22222222222222	SSNs are important for other reasons. Describe:
	4.2 (0.01) 92 (4.1) 1.0 (0.00)	The system/project provides special protection to SSNs (e.g., SSNs are encrypted, from all users via a look-up table, or only available to certain users). Describe:

Only	ESOC users conducting search	hes or analysi:	s with specific need-to-know may access SSNs.
	<u>N/A</u> It is not feasible fo	or the system/	project to provide special protection to SSNs.
6. Does the information'		ormation direc	ctly from the person who is the subject of the
X_	NO. [If no, proceed to que:	stion 7.)	
	YES.		
a. D	oes the system/project support	criminal, CT,	or FCI investigations or assessments?
	YES. [If yes, proce	eed to question	n 7.]
	NO.		
			formation is directly collected provided a written ion form or via a separate notice)?
	NO. [The program necessary form(s).]	will need to v	vork with PCLU to develop/implement the
	YES. Identify any finformation from the info		or electronic, used to request such ect:
7. Has the s	ystem undergone Certification	ı & Accreditat	ion (C&A) by the FBI Security Division (SecD)?
*********	_ NO. If no, indicate reason	a; if C&A is p	ending, provide anticipated completion date:
Х	YES. If yes, provide date	of last C&A c	ertification/re-certification:
	The ESOC network and env	ironments we	re re-accredited on April 15, 2008.
	Don't Know.		
8. Is this s	stem/project the subject of an	OMB-300 bu	dget submission?
7 <u></u>	NODon't	know.	X YES. If yes, please provide the date and name or title of the OMB submission:
	An OMB 300 for ESOC dat	ed April 25, 2	008 was submitted to OMB.

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9. Is th	is a national	security system (as determine	d by the SecD)?
	NO.	X_YES.	Don't know.
10. Sta	itus of Systen	n/Project:	
•	PTA	is now complete and after d /PCLU for final FBI approv	velopment. [If you checked this block, STOP. The ivision approval(s) should be submitted to FBI val and/or other actions ar
II. EXI	STING SYS	TEMS/PROJECTS	
1. Whe	n was the sys	tem/project developed? Octo	ober 1, 2003.
2. Has:	the system/pr	oject undergone any signific	ant changes since April 17, 2003?
·	NO.	If no, proceed to next question	on (II.3).]
	_X YES.		following changes were involved (mark all boxes that
		A conversion from paper-b	ased records to an electronic system.
	***************************************	A change from information format that is identifiable to	in a format that is anonymous or non-identifiable to a particular individuals.
		A new use of an IT system/ changes how information is that would create a more of previously did not exist.)	project, including application of a new technology, that i identifiable form is managed. (For example, a change sen environment and/or avenue for exposure of data that
		A change that results in info or matched with other datal	ormation in identifiable form being merged, centralized, pases.
		A new method of authentic form by members of the pu	ating the use of and access to information in identifiable blic.
		A systematic incorporation purchased or obtained from	of databases of information in identifiable form commercial or public sources.
		A new interagency use or si exchanges of information in	hared agency function that results in new uses or a identifiable form.
		. A change that results in a n	ew use or disclosure of information in identifiable form.
		A change that results in nev into the system/project.	vitems of information in identifiable form being added
	X	Changes do not involve a c	hange 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]:
Technical improvements to ESOC since its initial operation permit monitoring and analysis of additional FBI IT systems and databases. However, the types of monitoring and analysis performed by ESOC on IT systems and databases remains unchanged.
3. Does a PIA for this system/project already exist?NOX_YES. If yes:
a. Provide date/title of the PIA:
Enterprise Security Operations Center (ESOC), January 25, 2006.
b. Has the system/project undergone any significant changes since the PIA?NO _X_YES
As discussed in II.2, supra, technical enhancements to ESOC since the 2006 PIA permit monitoring and analysis of additional FBI IT systems and databases. However, the types of monitoring and analysis performed by ESOC on IT systems and databases remains unchanged.
[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 .]

CHECKLIST FOR PRIVACY COMPLIANCE FOR FBI ROUTINE DATABASES

(including comparable applications)

This checklist is based on the FBI Privacy Impact Assessment (PIA) for FBI Routine Databases of 4/7/08 as approved 8/29/08 (190-HQ-C1321794 Serial 432, 9/8/08). Per the PIA, this checklist may be used in lieu of any additional PIA (or PTA), so long as every one of the twelve blocks below can be checked. This checklist should be completed by the database manager (or other appropriate official/ as determined by the division) and approved by the Division Privacy Officer. [If warranted, add classification markings.]

A. Add date checklist prepared: May 18, 2009

C. Identify program division and unit/squad:

B. Provide name and brief description of database (or comparable application):

As used in this document, Enterprise Security Operations Center (ESOC) is a data warehouse monitoring a number of connected FBI IT systems and databases. ESOC contains metadata and related audit data (data about users accessing data) from these systems and databases.

D. Prov	ide name, address, and phone number of point of contact: JEH/10674,	ь6 ь7с
E. Chec	klist (all must be checked as being accurate for this databa	ise/application):
is	. Information in the system identifies individuals, either direct idividual can be identified indirectly through a combination of tender, race, birth data, geographic indicator, license number, or	descriptors such as
s; ti	. The system derives information from FBI records covered by stem of records notices (http://foia.fbi.gov/rec_sys.htm) regar nose records are maintained and/or from information that is put information comes from FBI records that are not covered by ecords notices, contact the PCLU.)	dless of format in which blicly available at no cos

Systems that do not contain any personally identifiable information need not complete this checklist.

X 4. The system can be accessed only by members of a particular office, unit, squad or other similar FBI entity and sharing of information is based strictly on an operational need to know. X 5. The system is not used for purposes of pattern-based data mining. NOTE: While ESOC does search for, and analyze, suspicious patterns of IT system access and use, such activity is designed to detect possible espionage activity involving FBI IT systems. The activity is therefore related to the security of FBI IT systems and excluded from the definition of reportable data mining, pursuant to 42 U.S.C. § 2000ee-3(C)(ii).__X__6. Initial and continued access to the system is subject to permission controls enforced by FBI supervisory personnel, including the use of access passwords. X 7. Access to the system can be audited. X___8. The system is part of an established platform on which a Security Certification and Accreditation has been performed. X 9. The system was developed after April 17, 2003. X__10. If the system maintains information about U.S. citizens or legal permanent residents, it is covered by a published Privacy Act System of Records Notice. NOTE: To the extent that ESOC accesses or maintains metadata concerning access and use of FBI IT systems that contains information about U.S. Citizens or lawful permanent residents, such information formally resides in one or more FBI records systems covered by published System of Records Notices. These systems include the Central Records System (JUSTICE/FBI-002), the Electronic Surveillance (ELSUR) Indices, JUSTICE/FBI-006, the Bureau Personnel Management System (BPMS, JUSTICE/FBI-008), and the Terrorist Screening Records System (TSRS, JUSTICE/FBI-019). X__11. Records retention issues have been discussed with the Records Management Division. NOTE: RMD has been consulted regarding Federal records/electronic records issues. RMD has advised that, since all the information in ESOC originates and resides in other FBI systems, ESOC is not a system of record. ___X___12. Any personally identifiable information placed on a mobile device or on media that is transported outside FBI facilities must comply with the FBI policy on encryption and must be password protected.

NOTE: It is not anticipated that PII from ESOC will be placed on mobile devices or media that will be transported outside of FBI facilities. In the event that PII is placed on removable media, the information will be encrypted.

- F. If a database contains information that may be considered sensitive/controversial or is maintained as part of a larger FBI program, the database administrator or program manager (or division privacy officer) must consult with the FBI's Office of the General Counsel, Privacy and Civil Liberties Unit, about the potential need to assess the privacy risks in a separate PIA.
- G. File Notes (summarize any additional information that may be warranted for record purposes, e.g., coordination with OGC, etc.):

The ESOC PTA and this checklist have been coordinated with AGC in OGC/PCLU. Based on the nature of the metadata in ESOC and its use in monitoring FBI IT systems and databases against illegal or unauthorized use in connection with espionage activity. ESOC has been determined to be a routine FBI database.

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APPROVING OFFICIALS

Program Manager (or other appropriate official as division determines)		Division Privacy Officer	
Signature: Date signed: 272727 Name: Title: Program Manger	b6	Signature: Autopolicies Autopolicies Date signed: Alados Name: Michael F. Morehart Title: SecD DAD	

DISTRIBUTION:

- File signed original (or copies) in one or more official division/program files for documentation, inspection, records, and other oversight purposes.
- Forward copy to the FBI Privacy and Civil Liberties Unit (PCLU) (JEH 7338).

(OGC/PCLU (Rev. 08/16/2010)

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(Equivalent to the DOJ Initial Privacy Assessment (IPA))

IKR FBI Unique Asset I Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POO Name Program Office: Data Interc Technology Unit (DITU) Division: Operational Techn Phone Room Number: ERFBLDG	ept Phone Room Number: 7350 JEH 27958-A	
BI DIVISION IN LEKN	EDIATE APPROVALS [complete as neces Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer	
Program Division: Data Intercept Technology Unit	Signature: Date signed: #/\$//\$ Name:	Signature: Date signed: Name: R. K. Voss Title: Section Chief, OTD	
~ ~ \$	Title: Unit Chief, DITU		

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.)

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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. 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): DOJ/FBI-002, Central Records System _X_Yes--See sample EC on PCLU intranet website here: Notify FBI RMD/RIDS per MIOG 190.2.3? No http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd X Yes (indicate revisions needed): This system can be covered in a SORN/SORN revision(s) required? __No separate SORN for intercepted information. Prepare/revise/add Privacy Act (e)(3) statements for related forms? X_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: ELIZABETH WITHUELL Signature: Brian-Binney, (Acting) Deputy General Counsel and 9/11/12

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Date Signed:

FBI Privacy and Civil Liberties Officer

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

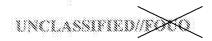
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2. Does the s	ystem/project collect, maintain, or disseminate any information about	
individuais (1	e., a human being or natural person, regardless of nationality)?	
NO	IIf no, STOP. The PTA is now complete and after division approval(s	
	mitted to FBI OGC/PCLU for final FBI approval. Unless you are	No.
	/ised, no PIA is required.]	
X_YES	[If yes, please continue.]	
A SYNTHESIS CONTRACTOR	in the information in the	
 Hease and 	icate if any of the following characteristics apply to the information in the	

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.)
$\underline{\mathbf{x}}$ 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.
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_NOYES
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 VFS IIf was proceed to question 7.1





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:	
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:	
$\underline{\underline{\mathbf{X}}}$ It is not feasible for the system/project to provide special protection to SSNs.	ti.
Evolain:	b7E
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. Has the system undergone Certification & Accreditation (C&A) by the FBI 9. Security Division (SecD)? If no, indicate reason; if C&A is pending, provide anticipated X NO completion date: Pending. Note the C&A conducted for separate and apart from the C&A conducted for Insight-State & Local. If ves. please indicate the following, if known: YES Provide date of last C&A certification/re-certification: Confidentiality: Low Moderate High Undefined __Low __Moderate __High __Undefined Integrity: Low Moderate High Undefined Availability: Not applicable - this system is only paper-based. 10. Is this system/project the subject of an OMB-300 budget submission? X NO If yes, please provide the date and name or YES title of the OMB submission: Does the system conduct data mining as defined in Section 804 of the 11. Implementing Recommendations of the 9/11 Commission Act of 2007, P.L. 110-53 (codified at 42 USC 2000ee-3)? X NO YES If yes, please describe the data mining function: 12. Is this a national security system (as determined by the SecD)? YES X NO



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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.]

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	FXISTING SYSTEM	

1. When was th	e system/project developed?
2. Has the syste	m/project undergone any significant changes since April 17, 2003?
NO [If t	no, proceed to next question (II.3).]
YES If y	es, indicate which of the following changes were involved (mark all that apply, and provide brief explanation for each marked change):
	A conversion from paper-based records to an electronic system.
ić	A change from information in a format that is anonymous or non- lentifiable to a format that is identifiable to particular individuals.
(I	A new use of an IT system/project, including application of a new echnology, that changes how information in identifiable form is managed. For example, a change that would create a more open environment and/or venue for exposure of data that previously did not exist.)
n	A change that results in information in identifiable form being nerged, centralized, or matched with other databases.
ii	A new method of authenticating the use of and access to afformation in identifiable form by members of the public.
īc	A systematic incorporation of databases of information in dentifiable form purchased or obtained from commercial or public sources
ñ	A new interagency use or shared agency function that results in lew uses or exchanges of information in identifiable form.
Ţ.	A change that results in a new use or disclosure of information in dentifiable form.





A change that results in new items of informa	tion in identifiable
form being added into the system/project.	
Changes do not involve a change in the type of the individuals on whom records are maintained, or the dissemination of information from the system/project	ie use or
Other [Provide brief explanation]:	
3. Does a PIA for this system/project already exist?	
NOYES	
If yes:	
a. Provide date/title of the PIA:	
b. Has the system/project undergone any significant change	s since the PIA?
NOYES	
[The PTA is now complete and after division approval(s) should FBI OGC/PCLU for final FBI approval and determination if Pactions are required.]	d be submitted to IA and/or other
www.man.a	

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