ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED EXCEPT
WHERE SHOWN OTHERWISE

~~SECRET//NOFORN~~

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)

NAME OF SYSTEM / PROJECT: [redacted] b3 b7E

BIKR FBI Unique Asset ID: SYS-097

Derived From: FBI NSISC-20090615 Classified By: J46J15T20 Reason: Declassify On: **20381231**	**SYSTEM/PROJECT POC** Name: [redacted] Program Office: CD-3C Division: Counterintelligence Phone: [redacted] Room Number: JEH, Rm 5842	**FBI OGC/PCLU POC** Name: AGC [redacted] Phone: [redacted] Room Number: JEH, Rm 7350

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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: **Counterintelligence**	Signature: [redacted] Date signed: 8/19/2015 Name: [redacted] Title: Unit Chief, System Owner	Signature: [redacted] Date signed: 9/11/15 Name: [redacted] Title: Division Privacy Officer
FBIHQ Division:	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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

~~Classified By: J46J15T20~~
~~Derived From: FBI NSISC-20090615~~
~~Declassify On: 20381231~~

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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 discretion. **However, this will be accomplished by completing an updated Routine Database PIA Checklist.**

Is PIA to be published on FBI.GOV (after any RMD FOIA redactions)? ___ Yes. __X__ No : Because this is a national security system, the PIA will not be published.

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

Applicable SORN(s): The FBI Central Records System, JUSTICE/FBI-002, published at 63 Fed. Reg. 8671 (Feb. 20, 1998), as amended at 66 Fed. Reg. 17200 (Mar. 29, 2001) and 66 Fed. Reg. 29994 (June 4, 2001).

Notify FBI RMD/RIDS per MIOG 190.2.3? __X__ 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? __X__ No ___Yes

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

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

Other:

[redacted] Unit Chief Privacy and Civil Liberties Unit	Signature: [redacted] Date Signed: 8/21/13
Jacqueline F. Brown, Acting Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: Date Signed: 8/21/13

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

(S)

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

_____ NO

__X__ YES **[If yes, please continue.]**

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

__X__ The information directly identifies specific individuals.

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

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

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

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

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

__X__ NO _____ YES

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

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

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

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

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

_____ YES

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

_____ NO

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

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

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

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

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

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

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

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

_____ SSNs are important for other reasons. **Describe:**

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

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

8. Is the system operated by a contractor?

__X__ No.

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

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

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

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

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

Provide date of last C&A certification/re-certification: May 14, 2012 [redacted] **is currently undergoing re-certification)** b3 b7E

Confidentiality: __X__ **Low** __ **Moderate** __ **High** __ **Undefined**

Integrity: __X__ **Low** __ **Moderate** __ **High** __ **Undefined**

Availability: __X__ **Low** __ **Moderate** __ **High** __ **Undefined**

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

10. 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. 110-53 (codified at 42 USC 2000ee-3)?

__X__ NO

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

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

_____ NO __X__ YES

12. Status of System/ Project:

_____ This is a new system/ project in development.

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? 2003/2004

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

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

__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.

__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 sources.

__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.

__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 __X__ YES

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

NAME OF SYSTEM: 2257 Program Pornography Producer/Performer Databases

FBI SYSTEM CONTACT PERSON

Name: SSA [redacted]
Program Office: Violent Crimes Section, Crimes Against Children Unit (2257 Program)
Division: CID (but physically stationed in the Los Angeles Division)
Phone: [redacted] (cell) / [redacted] (office)
Room Number: N/A (physically stationed in the Los Angeles Division)
Date PTA submitted for approval: 08/24/2007

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

	Program Division: [insert division 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: [redacted] Title: Unit Chief
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: /s/ Date signed: 9/5/2007 Name: [redacted] Title: ASC

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

FINAL FBI APPROVAL: (** Subject to C&A condition at question A.7, page 4.)

FBI Privacy and Civil Liberties Officer	Signature: /s/ Date Signed: 9/14/07 Name: David C. Larson Title: Acting Deputy General Counsel

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

1 - Original signed copy to 190-HQ-C1321794

Copies:

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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.

2257 Program field personnel responsible for conducting inspections are currently comprised of two field Supervisory Special 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 [redacted] b7E

On-site 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 [redacted] b7E This database, named the "2257 Program Pornography Performer Database" (hereinafter "the Performer database") will be maintained by 2257 Program personnel [redacted]

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

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licenses, passports, etc.) either by obtaining such digital copies directly from the producer during an on-site inspection or by scanning hard copies of documents [redacted] 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:

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 pornography, including production companies, website addresses, magazine publishers, etc. An algorithm will be utilized to randomly select production companies, website addresses, magazine publishers, etc., for inspection by the 2257 Program pursuant to 18 U.S.C. §2257 and 28 C.F.R. Part 75.

The Performer database will be used to maintain a master list of performers that 2257 Program personnel can reference for information relative to the 2257 Program and inspections pursuant to 18 U.S.C. §2257 and 28 C.F.R. Part 75. [redacted] b7E

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

[redacted] b7E

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

Both databases will be maintained on the same stand-alone computer maintained at the secure 2257 Program offsite in the Los Angeles Division. The databases will only be able to be accessed via the stand-alone computer by 2257 Program personnel. The stand-alone computer will not be connected to any external system, including the Internet. No mass transmission of either database will occur. [redacted] b7E

[redacted] In addition, identifying information for a limited number of performers, including stage name, true name and date of birth, will be listed in regulatory inspection reports. [redacted]

[redacted] b7E

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NAME OF SYSTEM: 2257 Program Pornography Producer/Performer Databases

[redacted] b7E

[redacted] without having physical access to the entire Performer database, which only 2257 Program personnel will have.

[redacted] b7E

[redacted] 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:

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.

[redacted] b7E

[redacted] 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.

7. Has this system been certified and accredited by the FBI Security Divisions? __Yes _X_No

*** Program to contact ISSM to ascertain if C&A required, and if so, initiate process to obtain C&A. -DCL*

8 Is this system encompassed within an OMB-300? __Yes __No _X_Don't Know
(If yes, please attach copy of latest one.)

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

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

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 Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

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

___YES If "yes," is this a Major Information System (as listed on OGC's FBINET website)?:

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

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

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

II. For systems developed after April 17, 2003.

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

Please see the response provided in A.2. above.

(Continue to Question 2.)

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

X YES (If "yes," please proceed to Question 3.) 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 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)?:

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___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.))

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

III. Full or Short-Form PIA

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

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

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

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

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

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

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DATE 10-24-2014 BY NSICG/C32W33B91

FBI Privacy Threshold Analysis (PTA) Cover Sheet (OGC/PCLU (Rev. 07/06/07)

NAME OF SYSTEM: [redacted] b7E

FBI SYSTEM CONTACT PERSON	FBI OGC/PCLU POC
Name: [redacted] Program Office: ITB Division: IT Operations Phone: [redacted] Room Number: 8979 Date PTA submitted for approval: 04/24/2008	Name: [redacted] Phone: [redacted] Room Number: 7338

b6 b7C

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:	FBIHQ Division: IT Operations
Program Manager (or other appropriate executive as Division determines)	Signature: Date signed: Name: Title:	Signature: /s/ Date signed: 04/24/2008 Name [redacted] Title: IT Specialist
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: /s/ Date signed: 5/6/2008 Name [redacted] Title: Division Privacy Officer

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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: 6/26/2008 Name: David C. Larson Title: 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
2 - FBI OCIO / OIPP
1 - FBI SecD (electronic copy via e-mail)
2* - Program Division POC /Privacy Officer
2*- FBIHQ Division POC /Privacy Officer
1 - OGC\PCLU intranet website
1 - PCLU Library
1 - PCLU Tickler

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA) (OGC/PCLU (Rev. 07/06/07)

NAME OF SYSTEM: [redacted] 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).

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

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

A. General System Description: Please briefly describe:

1. Type of information in the system:

   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:

   The following types of information are collected in the [redacted]

   [redacted] b7E

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

   [redacted] b7E

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

   [redacted] b7E

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

   [redacted] b7E

EPIC-219

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:

FBI Headquarters and Field personnel with a need to see information related to [redacted] investigations. All access to the [redacted] is approved by [redacted] b7E

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:

[redacted] that run on the FBINET closed network. FBINET can only be accessed by authorized persons. 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___Yes __No __Don't Know
(if yes, please attach copy of latest one.)

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

__X___YES (If "yes," proceed to Question 1.)

___ 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?

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NAME OF SYSTEM: [redacted] 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 Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required. (FBI and DOJ reviewing officials reserve the right to require a PIA.))

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

II. For systems developed after April 17, 2003.

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

(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 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.)

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___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. (PTA is complete---forward with PIA.)

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

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DATE 10-24-2014 BY NSICG/C32W33B91

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM / PROJECT: [redacted] b7E

Derived From: Classified By: Reason: Declassify On:	**SYSTEM/PROJECT POC** Name: SA [redacted] Program Office: ASTOS/ASB/ASU Division: CIRG Phone: [redacted] Room Number:	**FBI OGC/PCLU POC** Name: [redacted] Phone: [redacted] Room Number: 7458 JEH

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

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: [insert division name]	Signature: Date signed: approved 7/21/09 Name: SSA [redacted] Title:	Signature: Date signed: 7/29/09 Name: SSA Kenneth R. Gross, Jr. Title: Chief Division Counsel
FBIHQ Division: [insert division name]	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7338).

(The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)

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

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

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

1 - DOJ Office of Privacy and Civil Liberties (via e-mail to privacy@usdoj.gov)
(if classified, via hand delivery to 1331 Penn. Ave. NW, Suite 940, 20530)
2 - FBI OCIO / OIPP (JEH 9376, attn: [redacted])
1 - FBI SecD/AU (electronic copy: via e-mail to UC [redacted])
1 - RMD/RMAU (attn: [redacted])
2 - Program Division POC /Privacy Officer
2 - FBIHQ Division POC /Privacy Officer

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

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b7C

FBI PTA: [redacted] b7E

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS: [This section will be completed by the FBI PCLU/PCLO following PTA submission. The PTA drafter should skip to the next page and continue.]

___ PIA is required by the E-Government Act.

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

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

__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? ___No ___Yes (see sample EC on PCLU intranet website).

SORN/SORN revision(s) required? ___No ___Yes (indicate revisions needed):

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

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

Other:

FBI PTA: [redacted] 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 / 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 al users.**

[redacted] b7E

[redacted] The FBI will be responsible for ensuring that only authenticated users can access the system, [redacted] in order to meet continuity of operations requirements. The security features of [redacted] will be approved by the Security Division before it becomes operational.

2. Does the system/project collect, maintain, or disseminate any information about individuals in identifiable form, i.e., is information linked to or linkable to specific individuals (which is the definition of personally identifiable information (PII))?

___XX_ NO. [If no, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval. Unless you are otherwise advised, no PIA is required.]

_____ YES. [If yes, please continue.]

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

_____ NO. _____ YES.

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

_____ NO. _____ YES.

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

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

_____ SSNs are necessary to establish/confirm the identity of subjects, victims, witnesses

FBI PTA: [redacted] b7E

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 a look-up table, or only available to certain users). **Describe:**

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

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

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

_____ YES.

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

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

_____ NO.

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

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

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

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

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

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

_____ Don't Know.

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

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

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

_____ NO. _____ YES. _____ Don't know.

FBI PTA: [redacted] b7E

10. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

____ YES. If yes, indicate which of the following changes were involved **(mark all boxes that apply)**:

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

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

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

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

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

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

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

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

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

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

____ Other. **[Provide brief explanation]:**

3. Does a PIA for this system/project already exist? ____ NO. ____ YES. If yes:

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

FBI PTA: [redacted] b7E

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

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

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

NAME OF SYSTEM: [redacted] b7E

FBI SYSTEM CONTACT PERSON

Name: [redacted]
Program Office: Network Engineering Unit, Network Section
Division: Information Technology Operations Division b6 b7C
Phone: [redacted]
Room Number: 1B964
Date PTA submitted for approval: 3/31/08

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: [redacted] b6 b7C Title: Unit Chief, Network Engineering	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: [redacted] b6 b7C 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

Copies:

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: [redacted] 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:

[redacted] 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:

[redacted] b7E

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

[redacted] b7E

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

[redacted] b7E

[redacted] 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:

[redacted] 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:

[redacted] b7E

[redacted] Only a limited number of system personnel (e.g., Network Management personnel, EOC operators, Security Division auditors, ISSOs, and ISSMs, etc.) have access [redacted]

EPIC-303

security purposes.

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

No one outside 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_Yes __No

8 Is this system encompassed within an OMB-300? _x_ Yes __No __Don't Know
(If yes, please attach copy of latest one.)

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

_X_ YES (If "yes," proceed to Question 1.)

___ 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.)

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

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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 systems developed after April 17, 2003.

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

(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 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.

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: [redacted] b7E

(PTA is complete---forward with PIA.)

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

EPIC-306

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FBI Privacy Threshold Analysis (PTA) Cover Sheet (OGC/PCLU (Rev. 07/06/07)

NAME OF SYSTEM: Bank Robbery Statistical Application

FBI SYSTEM CONTACT PERSON	FBI OGC/PCLU POC
Name: [redacted]	Name: [redacted]
Program Office: **ITB**	[redacted]
Division: **ITOD**	Phone: [redacted]
Phone: [redacted]	Room Number: 7338
Room Number: **8979**	
Date PTA submitted for approval: **2/29/2008**	

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FBI DIVISION APPROVALS.

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

	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: [redacted] Title: IT Specialist b6 b7C
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: /s/ Date signed: 5/6/2008 Name [redacted] Title: Division Privacy Officer b6 b7C

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: 6/26/08 Name: David C. Larson Title: 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
2 - FBI OCIO / OIPP
1 - FBI SecD (electronic copy via e-mail)
2* - Program Division POC /Privacy Officer
2*- FBIHQ Division POC /Privacy Officer
(*please reproduce as needed for Program/Division file(s))

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA) (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 FBI Security Divisions? ___X Yes __No

8 Is this system encompassed within an OMB-300? X Yes __No _____ Don't Know

(if yes, please attach copy of latest one:.SORRY, I do not have a copy of the latest one)

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

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

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

(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,

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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 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. (PTA is complete---forward with PIA.)

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

EPIC-242

ALL INFORMATION CONTAINED
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FBI Privacy Threshold Analysis (PTA) Cover Sheet (OGC/PCLU (Rev. 07/06/07)

NAME OF SYSTEM: [redacted] b7E

FBI SYSTEM CONTACT PERSON	FBI OGC/PCLU POC
Name: [redacted] Program Office: ITB Division: IT Operations Phone: [redacted] Room Number: 8979 Date PTA submitted for approval: 04/24/2008	Name: [redacted] Phone: [redacted] Room Number: 7338

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FBI DIVISION APPROVALS.

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

	Program Division:	FBIHQ Division: IT Operations
Program Manager (or other appropriate executive as Division determines)	Signature: Date signed: Name: Title:	Signature: /s/ Date signed: 04/24/2008 Name: [redacted] Title: IT Specialist
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: /s/ Date signed: 5/6/08 Name: [redacted] Title: Division Privacy Officer

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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: 6/26/08 Name: David C. Larson Title: 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
2 - FBI OCIO / OIPP
1 - FBI SecD (electronic copy via e-mail)
2* - Program Division POC /Privacy Officer
1 - OGC\PCLU intranet website
1 - PCLU Library
1 - PCLU Tickler

2*- FBIHQ Division POC /Privacy Officer

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

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

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

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

A. General System Description: Please briefly describe:

1. Type of information in the system:

   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:

b7E

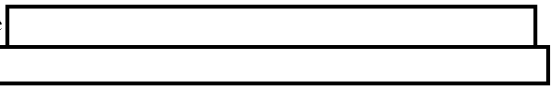
2. Purpose for collecting the information and how it will be used:

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 

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:

NAME OF SYSTEM: [redacted] b7E

FBI Headquarters and Field personnel with a need to [redacted]

[redacted] b7E

[redacted] All access to the [redacted] is approved by [redacted]

[redacted]

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:

[redacted] that run on the FBINET closed network. FBINET can only be accessed by b7E authorized persons.

7. Has this system been certified and accredited by the FBI Security Divisions? ___X Yes __No

8 Is this system encompassed within an OMB-300? ___X___Yes __No __Don't Know
(if yes, please attach copy of latest one.)

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

__X___YES (If "yes," proceed to Question 1.)

___ 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?

EPIC-260

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 Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required. (FBI and DOJ reviewing officials reserve the right to require a PIA.))

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

II. For systems developed after April 17, 2003.

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

(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 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.)

EPIC-261

NAME OF SYSTEM: [redacted] b7E

___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. (PTA is complete---forward with PIA.)

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

EPIC-262

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

FBI Privacy Threshold Analysis (PTA) Cover Sheet (OGC/PCLU (Rev. 07/06/07)

NAME OF SYSTEM: [redacted] b7E

FBI SYSTEM CONTACT PERSON	FBI OGC/PCLU POC
Name: [redacted]	Name: [redacted]
Program Office: **ITB**	[redacted]
Division: **ITOD**	Phone [redacted]
Phone: [redacted]	Room Number: 7338
Room Number: **8979**	
Date PTA submitted for approval: **04/29/2008**	

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b7C

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: **DI**	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: [redacted] Title: IT Specialist
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: /s/ Date signed: 5/6/2008 Name [redacted] Title: Division Privacy Officer

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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: 6/26/2008 Name: David C. Larson Title: 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
2 - FBI OCIO / OIPP
1 - FBI SecD (electronic copy via e-mail)
2* - Program Division POC /Privacy Officer
2*- FBIHQ Division POC /Privacy Officer
(*please reproduce as needed for Program/Division file(s))

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA) (OGC/PCLU (Rev. 07/06/07)

NAME OF SYSTEM: [redacted] 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).

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:

[redacted] b7E

1. Type of information in the system:

[redacted] 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:

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

The information provided by the [redacted] b7E **exists in the field divisions.**

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

[redacted] b7E

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

FBI Administrative 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:

Members of the various [redacted] **units, bureau-wide.** b7E

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

No One.

7. Has this system been certified and accredited by the FBI Security Divisions? __X__Yes __No

8 Is this system encompassed within an OMB-300? __X__Yes __No __Don't Know

(if yes, please attach copy of latest one: SORRY, I do not have a copy of the latest one.)

EPIC-235

FBI PRIVACY THRESHOLD ANALYSIS (PTA) (OGC/PCLU (Rev. 07/06/07)

NAME OF SYSTEM: [ ] b7E

I. 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?

__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 systems developed after April 17, 2003.

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

(Continue to Question 2.)

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

EPIC-236

NAME OF SYSTEM: [ ] b7E

___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 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. (PTA is complete---forward with PIA.)

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

EPIC-237

NAME OF SYSTEM: b7E

EPIC-238

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM / PROJECT: [redacted] b7E

Derived From: **Classified By:** **Reason:** **Declassify On:**	**SYSTEM/PROJECT POC** Name: [redacted] Program Office: Aviation Surveillance Branch Division: CIRG Phone: [redacted] Room Number:	**FBI OGC/PCLU POC** Name: [redacted] Phone: [redacted] Room Number: 7458

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b7C

FBI DIVISION INTERMEDIATE APPROVALS

	Program Division: Critical Incident Response Group (CIRG)	FBIHQ Division: CIRG
Program Manager (or other appropriate executive as Division determines)	Signature: Date signed: Name: [redacted] Title: Supervisory Special Agent, Aviation Support Unit	Signature: Date signed: Name: J. Britt Johnson Title: Section Chief, Surveillance and Aviation Section (SAS)
Division Privacy Officer	Signature: Date signed: Name: Kenneth R. Gross, Jr. Title: SSA/CDC	Signature: Date signed: Name: Title:

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After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7338).

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

PIA required: __x_No ___Yes: SORN/SORN revision required: _x_No ___Yes:

Applicable SORN(s):

Notify FBI RMD/RIDS per MIOG 190.2.3: _x_No ___Yes

Consult with RMD to identify/resolve any Federal records/electronic records issues: _x_No ___Yes:

Prepare/revise/add Privacy Act (e)(3) statements for related forms? _x_No ___Yes-forms affected:

Other:

David C. Larson, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: /s Date Signed: 10/31/2009

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: [redacted] 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)
(if classified, via hand delivery to 1331 Penn. Ave. NW, Suite 940, 20530)
2 - FBI OCIO / OIPP (JEH 9376, attn: [redacted])
1 - FBI SecD/AU (electronic copy: via e-mail to UC [redacted])
1 - RMD/RMAU (attn: [redacted])
2 - Program Division POC /Privacy Officer
2 - FBIHQ Division POC /Privacy Officer

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

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b7C

EPIC-228

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: [redacted] b7E

EPIC-229

FBI PRIVACY THRESHOLD ANALYSIS (PTA)
NAME OF SYSTEM / PROJECT: [redacted] 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:

[redacted] b7E

2. Briefly describe the system's/project's structure (including identification of any components/subsystems or parent system, if applicable):

[redacted] b7E

3. What is the purpose for the system/project?

[redacted] b7E

4. Please provide a general summary of the nature of information in the system/project and how it will be used:

[redacted] 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 that only 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:

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

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)
NAME OF SYSTEM / PROJECT: [ ] b7E

____ NO

____ YES. If yes, provide a brief explanation of the quantity and type of information:

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

____ NO ____ YES

9. Are Social Security Numbers 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/project collect any information directly from the person who is the subject of the information?
____ NO

____ 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 undergone 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:

FBI PRIVACY THRESHOLD ANALYSIS (PTA)
NAME OF SYSTEM / PROJECT: [redacted] 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?

_____ NO _____ Don'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)?

_____ NO _____ YES _____ Don'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.

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)
NAME OF SYSTEM / PROJECT: [ ] b7E

_____ 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 system/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 .

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

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

Derived From: Classified By: UNCLASSIFIED Reason: Declassify On:	**SYSTEM/PROJECT POC** Name: [redacted] Program Office: Telecommunications Intercept & Collection Technology Unit (TICTU) Division: OTD Phone: [redacted]	**FBI OGC/PCLU POC** Name: AGC [redacted] Phone: [redacted] Room Number: 7338 JEH

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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
FBIHQ Division: Operational Technology Division	Signature: Date signed: 07/21/2009 Name: [redacted] Title: Supervisory Special Agent	Signature: [redacted] Date signed: 7/21/09 Name: SSA [redacted] Title: Unit Chief, TICTU

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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: _X_ No ___Yes:

Applicable SORN(s):

Notify FBI RMD/RIDS per MIOG 190.2.3: _X_ No ___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.

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 FBI Privacy and Civil Liberties Officer	Signature: Date Signed: 4/5/09

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 al 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.):

Digital Collection System 3000 (DCS 3000) is an electronic surveillance (ELSUR) collection system supporting the FBI's use of Pen Registers in both criminal investigations and FISA investigations. A Pen Register, sometimes called a dialed number recorder, is a device that records the numbers dialed from a specific telephone numbers. [redacted] DCS 3000 [redacted] provides the FBI with a digital collection system for authorized wired and wireless communication pen registers. b7E

[redacted] b7E

DCS 3000 is deployed in central monitoring points throughout the FBI. The system is currently operating under an existing certification and accreditation dated June 12, 2006. Continued authority to operate (ATO) has been granted pending re-certification and accreditation.

1. Type of information in the system: The DCS 3000 system [redacted]

[redacted] b7E

2. Does the system/project collect, maintain, or disseminate any information about individuals in identifiable form, i.e., is information linked to or linkable to specific individuals (which is the definition of personally identifiable information (PII))?

_____ NO. [If no, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval. Unless you are otherwise advised, no PIA is required.]

__X__ YES. [If yes, please continue.]

DCS 3000 contains specific telephone numbers [redacted] of wired and wireless telecommunications devices for which ELSUR (in the form of Pen Registers) has been authorized by an appropriate judicial officer. In addition, DCS 3000 [redacted] b7E

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

__X__ NO. _____ YES.

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

_____ NO. __X__ YES.

While DCS 3000 contains [redacted] telephone numbers of individuals who are the target of court authorized ELSUR in the form of pen registers, [redacted] b7E DCS 3000 [redacted]

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

__X__ NO. _____ YES. **If yes, check all that apply:**

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

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

_____ SSNs are important for other reasons. **Describe:**

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

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

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

_____ 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.

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:**

Prior notice to the individual target is not required as the *ex parte* collection of Pen Register data by DCS 3000 has been judicially authorized. To the extent that the Pen Registers are used in support of a criminal investigation, notice to the target is normally provided, pursuant to 18 U.S.C. § 2518(8)(d), within ninety days of the commencement of the surveillance. A judicial officer may postpone such notice for good cause.

In the case of Pen Registers authorized by the Foreign Intelligence Surveillance Act (FISA), 50 U.S.C. §§ 1801 et seq., notice is unnecessary as the *ex parte* collection of telephone data is authorized pursuant to 50 U.S.C. § 1842. In the event that data collected pursuant to FISA is to be used as evidence or otherwise disclosed, notice must be given to the person whose telephone was the subject of the FISA warrant.

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

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

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

DCS 3000 was originally certified and accredited by the FBI's Security Division on June 12, 2006. Updated ATO through May 15, 2010 has been granted by the FBI's Security Division.

8. Is this system/project 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 Digital Collection System, including DCS 3000, is the subject of an FY 2010 Exhibit 300 dated April 25, 2008.

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

__X__ NO. _____ YES. _____ Don't know.

10. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? DCS-3000 has been operational and deployed at multiple FBI field offices [redacted] A PTA for DCS 3000 was previously completed in June 2006. At that time, it was determined that DCS 3000 was a "grandfathered" system so that no PIA was necessary. b7E

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

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

__X__ 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.

__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.

The only changes to DCS 3000 since it first became operational involve hardware replacement and security software upgrades that do not affect the collection, maintenance or dissemination of PII.

_____ Other. **[Provide brief explanation]:**

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

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

b. Has the system/project undergone any significant changes since the PIA? ___ NO. ___ YES.

A PTA for DCS 3000 was completed in June 2006, at which time a determination was made that no PIA was required as the system was grandfathered under the E-Government Act.. There have been no significant changes to DCS 3000 affecting PII since that PTA.

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM / PROJECT: Digital Collection System (DCS) 5000

Derived From: Classified By: UNCLASSIFIED Reason: Declassify On:	**SYSTEM/PROJECT POC** Name: ET [redacted] Program Office: TICTU Division: OTD Phone: [redacted]	**FBI OGC/PCLU POC** Name: AGC [redacted] Phone: [redacted] Room Number: 7338 JEH

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FBI DIVISION INTERMEDIATE APPROVALS [complete as necessary]

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
FBIHQ Division: Operational Technology Division	Signature: [redacted] Date signed: [redacted] Name: EE [redacted] Title: Program Manager, TICTU	Signature: [redacted] Date signed: 7/21/[redacted] Name: [redacted] Title: Unit Chief, TICTU

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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: __X__ No ___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.

Other:

David C. Larson, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: Date Signed: 8/2/13

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 al 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 [redacted] b3 b7E DCS 3000.

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.

[redacted] b3 b7E

[redacted] 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;

[redacted] b3 b7E

[redacted] b3 b7E

[redacted] b3 b7E

2. Does the system/project collect, maintain, or disseminate any information about individuals in identifiable form, i.e., is information linked to or linkable to specific individuals (which is the definition of personally identifiable information (PII))?

_____ NO.

__X__ YES. [If yes, please continue.]

[redacted] b3 b7E

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

__X__ NO. _____ YES.

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

_____ NO. __X__ YES.

DCS 5000 contains [redacted] b3 b7E

_____

[redacted] b3 b7E

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

__X__ NO. _____ YES. **If yes, check all that apply:**

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

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

_____ SSNs are important for other reasons. **Describe:**

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

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

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

_____ 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.

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:**

Prior notice to an individual target of ELSUR is unnecessary as the collection of voice data [redacted] by DCS 5000 has been judicially authorized. [redacted]

[redacted]

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

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

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

DCS 5000 was recently re-certified and accredited by the Security Division and was granted authority to operate on February 18, 2009.

8. Is this system/project 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 Digital Collection System, including DCS 5000, is the subject of an FY 2010 Exhibit 300 dated April 25, 2008.

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

_____ NO. __X__ YES. _____ Don't know.

10. Status of System/ Project:

_____ This is a new system/ project in development.

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? DCS-5000 has been operational at multiple FBI field offices [redacted]

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

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

__X__ 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.

__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.

DCS 5000 has undergone routine hardware updates and software security updates that do not impact the collection, maintenance or dissemination of PII.

_____ Other. **[Provide brief explanation]:**

3. Does a PIA for this system/project already exist? ____ NO. __X__ YES. If yes:

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

A PIA for the original version of DCS 5000 [redacted] was approved on August 27, 2001. A supplemental PIA [redacted] was approved December 22, 2005. [redacted] DCS 5000. b3 b7E

b. Has the system/project undergone any significant changes since the PIA? _X_ NO. ___ YES.

As noted in II.2, the changes to DCS 5000 since the 2005 PIA involve routine hardware updates and software security updates that do not impact the collection, maintenance or dissemination of PII.

(OGC/PCLU (Rev. 06/08/2010)

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM / PROJECT: [redacted] b7E
BIKR FBI Unique Asset ID: Enclave - 155

Derived From: Classified By: Reason: Declassify On:	**SYSTEM/PROJECT POC** Name: [redacted] (ISSO) Program Office: DITU Division: Operational Technology Div. Phone: [redacted] Room Number: 4C46 ERF-E	**FBI OGC/PCLU POC** Name: AGC [redacted] b6 b7C Phone: [redacted] Room Number: 7350 JEH

FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Operational Technology Division	Signature: [redacted] Date signed: 8/27/10 Name: [redacted] Title: Unit Chief, Data Intercept Tech. Unit	Signature: [redacted] Date signed: 9/27/10 Name: J. Clay Price Title: Section Chief, OTD b6 b7C
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 7338).

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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FBI INFO.
CLASSIFIED BY NSICG/C32W33B91
REASON: 1.4 (C)
DECLASSIFY ON: 01-21-2040
DATE: 01-21-2015
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FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

____ PIA is required by the E-Government Act.

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

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

_X_ PIA is not required for the following reason(s):
___ System does not collect, maintain, or disseminate PII.
___ System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).
___ Information in the system relates to internal government operations.
___ System has been previously assessed under an evaluation similar to a PIA.
_X_ No significant privacy issues (or privacy issues are unchanged).
_X_ Other: [redacted] **While within [redacted] the information is encrypted and cannot be viewed.** b7E

Applicable SORN(s): **N/A**

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

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

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

Other:

Elizabeth Ross Withnell, Acting Deputy General Counsel & FBI Privacy and Civil Liberties Officer	Signature: [signature] Date Signed: 3/11

I. INFORMATION ABOUT THE SYSTEM / PROJECT : [redacted] b7E

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.

(S//NF) [redacted] (S)

[redacted] b1 b3 b7E

[redacted] The database does not, however, contain any Personally Identifiable Information (PII) [redacted]

[redacted] (S)

[redacted] b1 b3 b7E

(S//NF) [redacted] (S) b1 b3 b7E

[redacted]

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

___X___ NO **[If no, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval. Unless you are otherwise advised, no PIA is required.]**

b7E

_____ YES **[If yes, please continue.]**

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

_____ The information directly identifies specific individuals.

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

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

If you marked any of the above, proceed to Question 3.

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

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

_____ NO _____ YES

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

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

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

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

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

_____ YES

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

_____ NO

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

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

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

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

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

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

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

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

_____ SSNs are important for other reasons. **Describe:**

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

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

8. Is the system operated by a contractor?

_____No.

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

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

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

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

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

Confidentiality: __Low __Moderate __High __Undefined

Integrity: __Low __Moderate __High __Undefined

Availability: __Low __Moderate __High __Undefined

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

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

_____ NO

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

11. 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. 110-53?

_____ NO

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

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

_____ NO _____ YES

13. Status of System/ Project:

_____ This is a new system/ project in development

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.

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

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

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

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

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

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

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

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

_____ Other **[Provide brief explanation]:**

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

_____ NO _____ YES

If yes:

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

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

___ NO ___ YES

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

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
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ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 10-20-2014 BY NSICG/C32W33B91

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM / PROJECT: Data Integration and Visualization System (DIVS)

Derived From: Classified By: Reason: Declassify On:	**SYSTEM/PROJECT POC** Name: [redacted] Program Office: Special Technologies and Applications Office Division: 24 Phone: [redacted] Room Number:CH-102	**FBI OGC/PCLU POC:** Name: [redacted] Phone: [redacted] Room Number: 7350

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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Special Technologies and Applications Office	Signature: [redacted] Date signed: Name: [redacted] Title: Assistant Section Chief	Signature: [signature] Date signed: 7/9/10 Name: Marcie Fuller Title: CSO (Acting)
FBIHQ Division:	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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

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

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

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

1 - DOJ Office of Privacy and Civil Liberties (via e-mail to privacy@usdoj.gov)
(if classified, via hand delivery to 1331 Penn. Ave. NW, Suite 940, 20530)
2 - FBI OCIO / OIPP (JEH 9376, attn: [redacted]
1 - FBI SecD/AU (elec. copy: via e-mail to UC [redacted]
1 - RMD/RMAU (attn: [redacted]
2 - Program Division POC /Privacy Officer
2 - FBIHQ Division POC /Privacy Officer
1 - OGC/PCLU intranet
1 - PCLU UC
1 - PCLU Library
1 - PCLU Tickler

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b7C

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

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 discretion.

Is PIA to be published on FBI.GOV (after any RMD FOIA redactions)? ___ Yes. __X__ No (indicate reason): This is a national security system.

_____ 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): In progress

Notify FBI RMD/RIDS per MIOG 190.2.3? ___No __X__Yes--See sample EC on PCLU intranet website here: http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd

SORN/SORN revision(s) required? ___No __X__Yes (indicate revisions needed): A new SORN will be required.

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:

David C. Larson, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: Date Signed: 7/19/2010

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

EPIC-146

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 10-20-2014 BY NSICG/C32W33B91

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

The 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 searchable through the DIVS major application by September 30, 2010:

[redacted]

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2. Does the system/project collect, maintain, or disseminate any information about individuals in identifiable form, i.e., is information linked to or linkable to specific individuals (which is the definition of personally identifiable information (PII))?

_____ NO [If no, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval. Unless you are otherwise advised, no PIA is required.]

_X_ YES [If yes, please continue.]

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

__X__ NO ___ YES

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

_____ NO __X___ YES

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

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

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

_____ 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:**

__X___ It is not feasible for the system/project to provide special protection to SSNs. **Explain:** Since this system pulls data directly from other systems, it is unable to provide special protection to all SSNs.

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

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

_____ YES

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

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

_____ NO

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)?

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)?

__X__ NO **If no, indicate reason; if C&A is pending, provide anticipated completion date**: The Special Technologies and Applications Office (STAO) development of this major application is being performed on TACNet which is an existing STAO system. TACNet was granted a three year approval to operate on March 22, 2009, and the ATO expiration is March 22, 2012. This project will require certification and accreditation as a major application. Certification and accreditation activities for this major application are projected to be completed by September 30, 2010.

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

_____ Don't Know.

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

_____ NO _____ Don't know __X__ 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 system (as determined by the SecD)?

_____ NO __X__ YES _____ Don't know

10. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

_____ YES If yes, indicate which of the following changes were involved **(mark all boxes that apply)**:

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

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

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

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

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

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

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

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

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

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

_____ **Other [*Provide brief explanation*]:**

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

_____ NO _____ YES

If yes:

a. Provide date/title of the PIA:

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

___ NO ___ YES

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

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DATE 10-23-2014 BY NSICG/C32W33B91

FBI PTA: [redacted] b7E

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: [redacted] b7E

BIKR FBI Unique Asset ID: PENDING

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: ITS [redacted] Program Office: ITB Division: ITSD Phone: [redacted] Room Number: 8979 JEH	FBI OGC/PCLU POC Name: AGC [redacted] Phone: [redacted] Room Number: 7350 JEH

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FBI DIVISION INTERMEDIATE APPROVALS (complete as necessary consonant with Division policy)

	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: [redacted] Date signed: [redacted] Name: [redacted] Title: Unit Chief, ITB FMU	Signature: [redacted] Date signed: 7-15-11 Name: [redacted] Title: ITS, Information Technology Branch, Product Assurance Unit
FBIHQ Division:	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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

FBI PTA: [redacted] b7E

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS

____ PIA is required by the E-Government Act.

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

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

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

Applicable SORN(s): Accounting Systems for the DOJ, JUSTICE-001, 69 Fed. Reg. 31406 (June 3, 2004), as supplemented, 71 Fed. Reg. 146 (Jan. 3, 2006).

Notify FBI RMD/RIDS per MIOG 190.2.3? _X_ 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? _X_ No ___ Yes (indicate revisions needed):

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:

[redacted] Unit Chief Privacy and Civil Liberties Unit	Signature: [redacted] Date Signed: 6/30/11
James J. Landon, Deputy General Counsel and FBI Privacy and Civil Liberties Officer	Signature: Date Signed: 7/14/11

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FBI PTA: [redacted] b7E

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

The FBI is developing and deploying an Oracle-based application, [redacted] to replace the existing [redacted] b7E

The primary tool used within the FBI to measure the availability and expenditure of requisition-related funds is the *spend plan*. In practical terms, a spend plan may be envisioned as a checking account, upon which individual requisitions (or "checks") are drawn. In order for a requisition to pass through ITB's Financial Management Unit (FMU – the equivalent of the "bank"), sufficient funding must be available to cover the cost of the requisition.

Spend plans are generated at a unit level as *spend plan requests* identifying specific financial needs, such as the purchase of IT hardware, software or use license. Spend plan requests include a description of the item to be purchased, the funds required to purchase the item and certain financial and programmatic data. The unit submitting a spend plan request enters this information into the Financial Management System (FMS), a major FBI FISMA application supporting the management of FBI business and personnel financial records. [redacted] b7E

[redacted] will contain (as does [redacted] presently) limited personally identifiable information (PII) about individuals. [redacted] b7E

[redacted] of the data contained in FMS. b7E

FBI PTA: [redacted] b7E

While [redacted] will be deployed through FBINET/Secret Enclave, access will be restricted to authorized users and system administrators. Each user's privileges will be governed either by the cost code of the unit to which they are assigned or their overall level of responsibility within ITB. [redacted] b7E

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

____ NO **[If no, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval. Unless you are otherwise advised, no PIA is required.]**

__X__ YES **[If yes, please continue.]**

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

__X__ The information directly identifies specific individuals.

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

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

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

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

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

____ NO __X__ YES

FBI PTA: [redacted] b7E

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

___ NO **[If no, skip to question 7.]**

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

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

_X_ NO **[If no, proceed to question 7.]**

___ YES

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

___ NO

___ YES **[If yes, proceed to question 7.]**

b. Are subjects of information from whom the information is directly collected provided a written Privacy Act (e)(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.

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

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

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

FBI PTA: [redacted] b7E

_____ SSNs are important for other reasons. **Describe:**

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

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

8. Is the system operated by a contractor?

__X__ No.

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

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

[redacted] will not be separately accredited. It resides, as an application, on the administrative mainframe and is encompassed in the C& A for the FBI's Administrative Mainframe Applications (AMA). The following information pertains to AMA. b7E

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

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

AMA was re-accredited on July 26, 2009 and has Authority to Operate (ATO) through July 25, 2012.

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

Confidentiality:	__Low	__Moderate	__X__ High	__Undefined
Integrity:	__Low	__Moderate	__X__ High	__Undefined
Availability:	__Low	__X__ Moderate	___ High	__Undefined

FBI PTA: [redacted] b7E

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

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

__X__ NO

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

11. 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. 110-53 (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)?

__X__ NO _____ YES

13. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

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

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

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

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DATE 10-23-2014 BY NSICG/C32W33B91

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM / PROJECT: Enterprise Security Operations Center (ESOC)

Derived From: Classified By: Reason: Declassify On:	**SYSTEM/PROJECT POC** Name: [redacted] Program Office: ESOC Division: SecD Phone: [redacted] Room Number: JEH: 9459/10674	**FBI OGC/PCLU POC** Name: AGC [redacted] Phone: [redacted] Room Number: 7338

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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Security Division	Signature: /S/ Date signed: 06/24/09 Name: [redacted] Title: Unit Chief, SecD	Signature: /S/ Date signed: 06/24/09 Name: Michael F. Morehart Title: DAD, Security Division
FBIHQ Division: Security Division	Signature: /S/ Date signed: 06/24/09 Name: Robert Cox Title: Section Chief, SecD IAS	Signature: Date signed: Name: Title:

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Additional division(s) approvals may be added as warranted:

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 FBI Privacy and Civil Liberties Officer	Signature: Date Signed:

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 al 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) provides the FBI with the ability to conduct real-time monitoring and security analysis of FBI Information Technology (IT) systems.[1] ESOC is designed to detect and deter IT activity that may be associated with espionage.

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ESOC is composed of that provide detection and analysis of system intrusions and misuse on monitored systems throughout the FBI enterprise.

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The data in ESOC consists of metadata about computer usage within the FBI.[2] 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.

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[1] 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.

[2] 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.

2. Does the system/project collect, maintain, or disseminate any information about individuals in identifiable form, i.e., is information linked to or linkable to specific individuals (which is the definition of personally identifiable information (PII))?

_____ NO.

__X__ YES. [If yes, please continue.]

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

_____ NO. __X__ YES.

Since ESOC analyzes metadata from FBI internal IT systems, the metadata is limited to FBI employees, contractors or consultants with access to those systems.

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

_____ NO. __X__ YES.

Metadata retrieved by ESOC may include the name or other personal identifier of FBI employees, contractors or consultants with access to FBI IT systems.

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

_____ NO. __X__ YES. **If yes, check all that apply:**

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

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

_____ SSNs are important for other reasons. **Describe:**

__X__ 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:**

Only ESOC users conducting searches or analysis with specific need-to-know may access SSNs.

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

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

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

_____ YES.

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

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

_____ NO.

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

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

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

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

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

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

The ESOC network and environments were re-accredited on April 15, 2008.

_____ Don't Know.

8. Is this system/project 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:**

An OMB 300 for ESOC dated April 25, 2008 was submitted to OMB.

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

_____ NO. __X__ YES. _____ Don't know.

10. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? October 1, 2003.

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

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

__X__ 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.

__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.

_____ 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? _____ NO. __X__ 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

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. .

C. Identify program division and unit/squad:
Security Division, Information Assurance Section, ESOC

D. Provide name, address, and phone number of point of contact:
[redacted]IEH/10674,[redacted] b6 b7C

E. Checklist (all must be checked as being accurate for this database/application):

__X__ 1. Information in the system identifies individuals, either directly or indirectly. An individual can be identified indirectly through a combination of descriptors such as gender, race, birth data, geographic indicator, license number, or license plate number.[1]

__X__ 2. The system derives information from FBI records covered by existing Privacy Act system of records notices (http://foia.fbi.gov/rec_sys.htm) regardless of format in which those records are maintained and/or from information that is publicly available at no cost. (If information comes from FBI records that are not covered by existing systems of records notices, contact the PCLU.)

__X__ 3. Neither commercial data nor paid subscription service data is included in the database unless that information is derived from existing FBI records.

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

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__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.

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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 [redacted] b6 b7C 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.

APPROVING OFFICIALS

Program Manager (or other appropriate official as division determines)	Division Privacy Officer
Signature: [redacted] Date signed: [redacted] Name: [redacted] b6 b7C Title: Program Manger	Signature: [redacted] Date signed: [redacted] 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).

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DATE 11-06-2014 BY NSICG/C32W33B91

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM / PROJECT: [redacted] b7E

BIKR FBI Unique Asset ID: SYS-0000187

Derived From: Classified By: Reason: Declassify On:	**SYSTEM/PROJECT POC** Name: [redacted] Program Office: Data Intercept Technology Unit (DITU) Division: Operational Technology Phone: [redacted] Room Number: ERFBLDG 27958-A	**FBI OGC/PCLU POC** Name: AGC [redacted] b6 b7C Phone: [redacted] Room Number: 7350 JEH

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

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Data Intercept Technology Unit	Signature: [redacted] Date signed: 8/8/12 Name: [redacted] Title: Unit Chief, DITU	Signature: [redacted] b6 b7C Date signed: [redacted] Name: R. K. Voss Title: Section Chief, OTD
FBIHQ Division: Operational Technology Division (OTD)	Signature: [redacted] Date signed: 8/28/2012 Name: [redacted] Title: EE, DITU	Signature: [redacted] Date signed: [redacted] Name: R.K. Voss Title: Section Chief, OTD

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.)

EPIC-487

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

Notify FBI RMD/RIDS per MIOG 190.2.3? ___No _X_Yes--See sample EC on PCLU intranet website here: http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd

SORN/SORN revision(s) required? __No _X_Yes (indicate revisions needed): This system can be covered in a separate SORN for intercepted information.

Prepare/revise/add Privacy Act (e)(3) statements for related forms? _X_No ___Yes (indicate forms affected):

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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 WITMER

Brian Binney, (Acting) Deputy General Counsel and FBI Privacy and Civil Liberties Officer	Signature: [signature] Date Signed: 9/11/12

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

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[redacted] b7E

[redacted]

[redacted] b7E

[redacted] b7E

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

_____ NO {If no, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval. Unless you are otherwise advised, no PIA is required.}

__X__ YES **{If yes, please continue.}**

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

(Check all that apply.)

__X__ The information directly identifies specific individuals.

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

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

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

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

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

__X__ NO _____ YES

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

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

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

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

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

__X__ YES

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

_____ NO

__X__ YES **[If yes, proceed to question 7.]**

b. Are subjects of information from whom the information is directly collected provided a written Privacy Act (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:**

___X___ It is not feasible for the system/project to provide special protection to SSNs.

Explain:

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8. Is the system operated by a contractor?

___X___ No.

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

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

__X__ NO **If no, indicate reason; if C&A is pending, provide anticipated completion date**: Pending. Note the C&A conducted for [redacted] is separate and apart from the C&A conducted for Insight-State & Local. b7E

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

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

Confidentiality:__Low__Moderate__High__Undefined

Integrity: **__Low__Moderate__High__Undefined**

Availability: **__Low__Moderate__High__Undefined**

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

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

__X__ NO

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

11. 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. 110-53 (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)?

__X__ NO ____ YES

13. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

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

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

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

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

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

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

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

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

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

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

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

_____ Other **[Provide brief explanation]:**

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

_____ NO _____ YES

If yes:

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

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

___ NO ___ YES

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