

	SSNs are important for other reasons. Describe:
	The system/project provides special protection to SSNs (e.g., SSNs are encrypted, hidden from all users via a look-up table, or only available to certain users). Describe:
	\underline{x} It is not feasible for the system/project to provide special protection to SSNs.
	Explain: DCS-HQ is a document scanning tool. The collection of social security numbers that may be contained in the documents scanned has already been deemed necessary to carry out the particular function. DCS does not maintain a copy of the document scanned once the scanning process is complete.
€.	Is the system operated by a contractor?
	x_Yes. Information systems operated by contractors for the FBI may be considered Privacy Act systems of records. The Federal Acquisition Regulation contains standard contract clauses that must be included in the event the system collects, maintains or disseminates PII and additional requirements may be imposed as a matter of Department of Justice policy. Consultations with the Office of the General Counsel may be required if a contractor is operating the system for the FBI. Has the system undergone Certification & Accreditation (C&A) by the FBI
	Security Division (SecD)?
	xNO If no, indicate reason; if C&A is pending, provide anticipated completion date.
	System is new, C&A is pending. Anticipated date of completion: July 23, 2012
	YES If yes, please indicate the following, if known:
	Provide date of last C&A certification/re-certification:
	Confidentiality:_Low_Moderate_High_Undefined
	Integrity:LowModerateHighUndefined
	Availability:LowModerateHighUndefined
	Not applicable – this system is only paper-based.

Unclassified/1010

Unclassified DOCO

10.	Is this system/project the subject of an OMB-300 budget submission?
e ⁴⁴¹	
	YES If yes, please provide the date and name or title of the OMB submission:
	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 2000ce-3)?xNO
	YES If yes, please describe the data mining function:
12.	Is this a national security system (as determined by the SecD)?
	_x_no <u>ves</u>
13.	Status of System/ Project:
II.	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.] EXISTING SYSTEMS / PROJECTS
), \	When was the system/project developed?
2. I	tas 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.

Unclassified/1940

Unclassified/J244Q

	(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):
3, Dos	es a PIA for this system/project already exist?
	K_NOYES
If yes:	
	rovide date/title of the PIA:
b. i	las the system/project undergone any significant changes since the PIA?
NO	
FBI OGC/	is now complete and after division approval(s) should be submitted to PCLU for final FBI approval and determination if PIA and/or other required.]

Unclassified/POLO

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

Derived From:	F SYSTEM / PROJECT: FBI Academy From: SYSTEM/PROJECT POC		FBI OGC/PCLU/POC
Classified By:	Name: SSA	1000000 N. 10000 N. 1	
Reason:		Program Office: Firearms Training Unit 1	
Declassify On:	Division: Training		Room Number: JEH 9320
	Phone:	s	
	Room Number: FTU A	VG0340	<u> </u>
BI DIVISION INTERS	AEDIATE APPROVALS [complete as :	jęceskary consona:	it with Division policy]
	Program Manager (or other appropriat		rivacy Officer
	executive as Division determines)		3.5
Program Division:	Signature	Signature	
Firearms Training Unit	Date signed: <u>DEAS</u> (seria		<u>d: THŮRODA</u> Y - 5(18)2011
	Name	Name:	
FBIHQ Division:	Title: Unit Chief Signature: January & Colory	Title: S8A	
Training Division:	Signature: Timber of Colors of Color	Signature: Date signe	\$.
New Agent Training	Name: Timothy J. Delaney	Name:	•
	Title: Section Chief als, forward signed hard copy plus elect	ronic copy to FBI	
.fter all division approv		ronic copy to FBI	
ofter all division approve The FBI Privacy and Civicollowing page.)	sis, forward signed hard copy plus elect	renic copy to FBI tions, and/or final a	
ther all division approve The FBI Privacy and Civi ollowing page.) pon final FBI approval	als, forward signed hard copy plus elect I Liberties Officer's determinations, condi	ronic copy to FBI tions, and/or final a	pproval will be recorded on the
Ifter all division approvements FBI Privacy and Civical Privacy and Civical Privacy and Civical II - Signed original II - Copies (recipients pour privacy@usdoj.gov (if classified,	als, forward signed hard copy plus elect I Liberties Officer's determinations, condi- FBI OGC/PCLU will distribute as folk o file 190-HQ-C1321794 (fwd to JEH lease print/reproduce as needed for Pro rivacy and Civil Liberties (via e-mail t	ronic copy to FBI tions, and/or final a ws: 1B204 via PA-52 gram/Division fil-	oproval will be recorded on the o(s)): I - OGC/PCLU intrane I - PCLU UC I - PCLU Library
Litter all division approve The FBI Privacy and Civical allowing page.) pon final FBI approval. 1 - Signed original to Copies (recipients p. 1 - DOI Office of P. privacy@usdoj.gov (if classified, 20530)	als, forward signed hard copy plus elect I Liberties Officer's determinations, condi- FBI OGC/PCLU will distribute as follo o file 190-HQ-C1321794 (fwd to JEH lease print/reproduce as needed for Pro rivacy and Civil Liberties (via e-mail t) via hand delivery to 1331 Penn. Ave. ?	ronic copy to FBI tions, and/or final a ws: 1B204 via PA-52 gram/Division fil-	oproval will be recorded on the 0) 2(s)): 1 - OGC/PCLU intraner 1 - PCLU UC
Ifter all division approvements FBI Privacy and Civical Privacy and Civical Privacy and Civical Privacy Privacy (Figure 20530) 2 - FBI OCIO / OIF	als, forward signed hard copy plus elect I Liberties Officer's determinations, condit FBI OGC/PCLU will distribute as folk offile 190-HQ-C1321794 (fwd to JEH lease print/reproduce as needed for Pro trivacy and Civil Liberties (via e-mail t) via hand delivery to 1331 Penn. Ave. N	ronic copy to FBI tions, and/or final a ws: 1B204 via PA-52 gram/Division fil-	oproval will be recorded on the o(s)): I - OGC/PCLU intrane I - PCLU UC I - PCLU Library
Ifter all division approvements FBI Privacy and Civical Privacy and Civical Privacy and Civical III - Signed original III - Signed original III - DOI Office of Privacy@usdoj.gov (if classified, 20530) 2 - FBI OCIO / OIF III - FBI SecD/AU (etc.)	als, forward signed hard copy plus elect I Liberties Officer's determinations, condit FBI OGC/PCLU will distribute as folk o file 190-HQ-C1321794 (fwd to JEH lease print/reproduce as needed for Pro rivacy and Civil Liberties (via e-mail to) via hand delivery to 1331 Penn. Ave. Notes of the properties of the properties (via e-mail to) P(JEH 9376, attn:	ronic copy to FBI tions, and/or final a ws: 1B204 via PA-52 gram/Division fil-	oproval will be recorded on the o(s)): I - OGC/PCLU intrane I - PCLU UC I - PCLU Library
Litter all division approve The FBI Privacy and Civical allowing page.) pon final FBI approval. 1 - Signed original to Copies (recipients police of Porivacy@usdoj.gov (if classified, 20530) 2 - FBI OCIO / OIF 1 - FBI SecD/AU (ed)	als, forward signed hard copy plus elect I Liberties Officer's determinations, condit FBI OGC/PCLU will distribute as folk o file 190-HQ-C1321794 (fwd to JEH lease print/reproduce as needed for Pro rivacy and Civil Liberties (via e-mail to) via hand delivery to 1331 Penn. Ave. Notes of the properties of the properties (via e-mail to) P(JEH 9376, attn:	ronic copy to FBI tions, and/or final a ws: 1B204 via PA-52 gram/Division fil-	oproval will be recorded on the o(s)): I - OGC/PCLU intrane I - PCLU UC I - PCLU Library

UNCLASSIFIED/DHQ FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS: (This section will be completed by the FBI

PCLUPCLO 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/DOI discretion. Is PIA to be published on FBLGOV (after any RMD FOIA reductions)? ____ Yes. ___ No (indicate reason): _X__ PIA is not required for the following reason(s): X System does not collect, maintain, or disseminate PH. 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 PJA. ____No significant privacy issues (or privacy issues are unchanged). Other (describe): Applicable SORN(s):

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:

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

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

SORN/SORN revision(s) required? _____No _____Yes (indicate revisions needed);

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

Signature: Date Signed:

UNCLASSIFIED//1940



L. 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.
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))?
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.]
YES [If yes, please continue.]
3. Does the system/project pertain only to government employees, contractors, or consultants?
NOYES
4. Is information about United States citizens or lawfully admitted permanent resident aliens retrieved from the system project by name or other personal identifier?

14-06-04-FBI-FOIA-20150417-515-Production

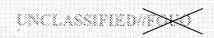
UNCLASSIFIED/

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 [I the necessar		iced to wor	k with PCLU to deve	lop/implement
	Identify any form rmation from the i		electronic, used to re n subject:	equest such
7. Has the system (Division (SecD)?	indergone Certifica	tion & Acc	reditation (C&A) by ti	ne FB1 Security
NO i completion date:	lf no, indicate reas	ion; if C&/	t is pending, provide	anticipated
YES	If yes, provide da	te of last C	&A certification/re-c	ertification:
Don't	Know.			
8. Is this system/pr	oject the subject of	an OMB-3	00 budget submission	?
NO	Do	m't know	YES If yes, the date and name o OMB submission:	
9. Is this a national	security system (as	determined	I by the SecD)?	
NO	YI	es .	Don't know	
10. Status of System	n/Project:			
STOP. The l submitted to	TA is now comple	ste and afte for final FB	iopment. (If you che er division approval(: I approval and deter) should be
II. EXISTING SYS	TEMS/PROJEC	TS		
1. When was the sys	tem/project develop	xed?		
2. Has the system/pr	oject undergone anj	y significan	t changes since April	17, 2003?
NO [If no, pr	oceed to next quest	ion (II.3).]		

YES If yes, indicate which of the following changes were involved (mark all baxes 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?
NOYES
If yes:
a. Provide date/title of the PIA:
b. Has the system/project undergone any significant changes since the PIA?



____YE\$

[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.]

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

Program Office: Platform Engineering Unit Division: Information Technology Engineering Division Phone Room Number: LS-401 FBI DIVISION INTERMEDIATE APPROVALS Program Manager (or other appropriate executive as Division determines) Program Division: Signature: Date signed: Title: Platform Support Unit Acting Chief FBIHQ Division: Signature: Signature: Title: Platform Support Unit Acting Chief FBIHQ Division: Signature: Signature: Signature: Title: Signature: Signatu	Derived From: Classified By:	SYSTEM/PROJECT POC Name:	Name:	
Division: Information Technology Engineering Division Phone Room Number: LS-401 BI DIVISION INTERMEDIATE APPROVALS Program Manager (or other appropriate executive as Division determines) Program Division: Signature: Information Date signed: 113(1/2) Technology Services Division Title: Platform Support Unit Acting Chief FBIHQ Division: Signature: Division: Signature: Program Division: Signature: Date signed: 113(1/2) Name Title: Platform Support Unit Acting Chief FBIHQ Division: Signature: Date signed: 113(1/2) Name Title: Platform Support Unit Acting Chief FBIHQ Division: Signature: Signature: Deta signed: 113(1/2)	Reason:	1 ~	ingineering Phone Phone Room Number: bg-7350	
Engineering Division Phone Room Number: LS-401 PIOUSION INTERMEDIATE APPROVALS Program Manager (or other appropriate executive as Division determines) Program Division: Signature: Information Technology Services Division Title: Platform Support Unit Acting Chief Title: Program Division: Signature: Division Title: Platform Support Unit Acting Chief Title: Pote signature: Deta signature:	Declassify On:	,		
Room Number: LS-401		Engineering Division		
Program Manager (or other appropriate executive as Division determines) Program Division: Signature: Information Technology Services Division Title: Platform Support Unit Acting Chief FBIHQ Division: Signature: Name Title: Platform Support Unit Acting Chief Signature: Signature: Name Title: Platform Support Unit Acting Chief Signature: Deta signed: Signature: Deta signed: Signature: Deta signed:				
Program Division: Information Technology Services Division Title: Platform Support Unit Acting Chief Title: Signature Signature Date signed: 127/72/2 Name Title: Platform Support Unit Acting Chief Title: Signature: Signature:	BI DIVISION INTER		Physician Privacy Officer	
Information Technology Services Division Title: Platform Support Unit Acting Chief FBIHQ Division: Date signed: Name Name Signature: Signature: Deta signed: Name Date signed: Name			Division Titracy Officer	
Technology Services Division Title: Platform Support Unit Acting Chief Title: Signature: Signature: Deta signar: Deta signar: The signar of t	Program Division:	executive as Division determines)	· ·	
Division Title: Platform Support Unit Acting Chief Title: Signature: Signature: Data signar		executive as Division determines) Signature:	Signature	
Data signar	Information	executive as Division determines) Signature: Date signed: 113()/22	Signature Date signed:	es e
Information Date signed: 1/2///2	Information Technology Services Division	executive as Division determines) Signature: Date signed: 113()/22	Signature Date signed: Name Title:	ei e
	Information Technology Services Division FBIHQ Division:	executive as Division determines) Signature: Date signed: 1120/2000 Name: Title: Platform Support Unit Acting Chief Signature:	Signature Date signed: Name Title: Signature:	ei *
remains.	Information Technology Services Division FBIHQ Division: Information	executive as Division determines) Signature: Date signed: //3//////////////////////////////////	Signature Date signed: Name Title: Signature: Date signed: 7/28//2	eri er
Engineering Division Title: Platform Engineering Unit Acting Title: ITB Privacy Officer Chief	Information Technology Services Division FBIHQ Division: Information Technology	executive as Division determines) Signature: Date signed: 112()/2007 Name: Title: Plattorm Support Unit Acting Chief Signature: Date signed: 7.72.72 Name:	Signature Date signed: Name Title: Signature:	e e

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.org

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 PBI/DOJ discretion. Is PIA to be published on FBI.GOV (after any RMD FOIA redactions)? ____ Yes. ____ No (indicate reason): PIA is not required for the following reason(s): ____ System does not collect, maintain, or disseminate PII. System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks). Information in the system relates to internal government operations. System has been previously assessed under an evaluation similar to a PIA. No significant privacy issues (or privacy issues are unchanged). Other (describe): Applicable SORN(s): Notify FBI RMD/RIDS per MIOG 190.2.3? No Yes-See sample EC on PCLU intranet website here: http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd SORN/SORN revision(s) required? ____No ___Yes (indicate revisions needed): Prepare/revise/add Privacy Act (e)(3) statements for related forms? No Yes (indicate forms affected): RECORDS. The program should consult with RMD to identify/resolve any Federal records/electronic records issues. The system may contain Federal records whether or not it contains Privacy Act requests and, in any event, a records schedule approved by the National Archives and Records Administration is necessary. RMD can provide advice on this as well as on compliance with requirements for Electronic Recordkeeping Certification and any necessary updates. Other: Signature: Date Signed: PCAU Phay & Acking 9/17/12

Date Signed: PCAU Phay & Acking 9/17/12 Elizabeth Withnell, Unit Chief Privacy and Civil Liberties Unit James J. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer

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. (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.):	
	b7E
In March 2012, the FBI's Information and Technology Branch (ITB) - IT Engineering Division (ITED) published its new IT Services Strategy wherein the ITB announced its initiative to adopt a services-based strategy for delivering and managing IT investments.]
Pursuant to the IT Services Strategy, and desiring to assert more effective control of its resources, the FBI has identified the need to consolidate their SQL Server deployments.	b7E
will operate from the DAVE environment (Virtualized) further minimizing the server hardware footprint. Please see the attached system design layout below. This design allows the rapid expansion of services if additional services are needed that surpass the initial work load capacity of the server.	
may host various databases for enterprise applicationsitself does not contain, maintain or disseminate personally identifiable information (PII). As applications request SQL database support, appropriate privacy documentation will be completed that will address the specific needs of the requesting application.	b7 E
provides database services as a service. Databases are accessed via dedicated communication mechanism engaged by the front end application. responds to data queries presented by the application software. As user interacts with the front end application directly and does not access.]

administrators are cleared personnel that may have access to the databases that may reside in The access is controlled via the Active Directory team of the Enterprise. Strict database segregation between applications will be enforced via Active
Directory group policies and the appropriate database design implementation.
UNCLASSIFIEDIIFOHO
UNCLASSIFIED/IFOUD
2. Does the system/project collect, maintain, or disseminate any information about individuals (i.e., a human being or natural person, regardless of nationality)?
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.]
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.

b7E

The information is intended to be used, in conjunction with other data elements, to indirectly identify specific individuals.
The information can be used to distinguish or trace an individual's identity (i.e., it is linked or linkable to specific individuals).
If you marked any of the above, proceed to Question 4.
None of the above. If none of the above, describe why the information does not identify specific individuals either directly or indirectly. [If you checked this item, STOP here after providing the requested description.]
4. Does the system/project pertain only to government employees, contractors, or consultants?
NOYES
5. Is information about United States citizens or lawfully admitted permanent resident aliens retrieved from the system/project by name or other personal identifier?
NO. [If no, skip to question 7.]
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 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: Is the system operated by a contractor? 8. No. Yes. Information systems operated by contractors for the FBI may be considered Privacy Act systems of records. The Federal Acquisition Regulation contains standard contract clauses that must be included in the event the system collects, maintains or disseminates PII and additional requirements may be imposed as a matter of Department of Justice policy. Consultations with the Office of the General Counsel may be required if a contractor is operating the system for the FBI. Has the system undergone Certification & Accreditation (C&A) by the FBI 9. Security Division (SecD)? If no, indicate reason; if C&A is pending, provide anticipated completion date:

YES

If yes, please indicate the following, if known:

Confidentiality:_	_Low_	_Moderate_	_High _	_Undefined
Integrity:	_Low_	Moderate_	High_	Undefined
Availability:	Low	Moderate	High	Undefined

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)? NO
	YES If yes, please describe the data mining function:
11.	Is this a national security system (as determined by the SecD)?
	NOYES
12.	Status of System/ Project:
	This is a new system/ project in development. [If you checked this block STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval and determination if PIA and/or other actions are required.]
II.	EXISTING SYSTEMS / PROJECTS
1.	When was the system/project developed?
2. 1	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.

FBI OG	A is now complete and after division approval(s) should be submitted to C/PCLU for final FBI approval and determination if PIA and/or other tre required.]
NO	YES
b	Has the system/project undergone any significant changes since the PIA?
a.	Provide date/title of the PIA:
If yes:	
·	NO YES
3. D	oes a PIA for this system/project already exist?
	Other [Provide brief explanation]:
	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.
	A change that results in new items of information in identifiable form being added into the system/project.
	A change that results in a new use or disclosure of information in identifiable form.
	A new interagency use or shared agency function that results in new uses or exchanges of information in identifiable form.
	A systematic incorporation of databases of information in identifiable form purchased or obtained from commercial or public sources.
	A new method of authenticating the use of and access to information in identifiable form by members of the public.

FBI PRIVACY THRESHOLD ANALYSIS (PTA) INSTRUCTIONS

What is a Privacy Threshold Analysis (PTA)? A PTA is designed to assess and document whether a Privacy Impact Assessment (PIA), a Privacy Act system of records notice (SORN), and/or other privacy-related documents are required.

When should a PTA be completed? A PTA should be completed at the beginning of any information system's/project's development, including system testing or pilot projects. Additionally, a PTA should be completed whenever there is a significant system/project change to determine whether there are any privacy issues as a result of such a change.

A current PTA (and PIA if indicated by the PTA) is required for:

- A security certification and accreditation (C&A) of an IT system;
- An OMB-300 budget submission involving an IT system;
- IT life cycle milestones beyond system concept and prior to any solicitations or expenditures involving project funds (i.e., before
- Acquisition Review Board (ARB) consideration, or applications for external funding/grants;
- Significant changes in FBI SORNs;
- Reportable data mining systems or projects; and
- Submissions to OMB for Paperwork Reduction Act approval of non-investigative IT forms, questionnaires, or surveys involving personally identifiable information (PII) posed to 10 or more persons or entities (other than current FBI employees, detailees, assignees, contractors).

When is a PTA current? A PTA may be considered current when the PTA is less than 3 years old with no subsequent changes involving significant new privacy risks.

Who should prepare/approve the PTA?

Preparation/coordination/intermediate approval: A PTA should be prepared/approved by the program management and Division Privacy Officer, in collaboration with IT, security, and end-user management. If the subject of a PTA 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. PTAs relating to forms/questionnaires/surveys implicating the Paperwork Reduction Act should also be coordinated with the RMD Forms Desk. Until such time as electronic formats and signatures may be authorized for record copies, all PTAs should be submitted in both hard copy and electronic formats. Preparers/reviewers are encouraged to coordinate with FBI OGC/PCLU for guidance and assistance during this process.

Final FBI approval: Following divisional approval(s), forward the PTA to FBI OGC's PCLU for staffing for final determination/approval by the FBI Privacy and Civil Liberties Officer (PCLO). Electronic copies of any system security plan (SSP) or other

materials explaining the system should be forwarded with the PTA. PCLU staffing will include a thorough review and any appropriate follow-up, and may include returning a submission to the division for revision. PTA processing is complete upon final approval by the FBI PCLO. OGC/PCLU will file the signed final PTA in OGC's PIA control file and provide copies to FBI stakeholders for filing and retention in pertinent files.

How should the terms "PII" and "identifiable form" be interpreted?

In this PTA, "PII" means: information which can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc. alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc.

In this PTA, "identifiable form" means: any representation of information that permits the identity of an individual to whom the information applies to be reasonably inferred by either direct or indirect means.

Section 208 of the E-Government Act of 2002. See also M-03-22, OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002.

Please complete the FBI PTA form per the specific guidance provided in the questions on the form.

(And please detach these instructions before submitting completed PTA.)

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT P Name: Program Office: ITMS/S Division: Criminal Justic Phone: Room Number: Module	DU e Info. Services	FBI OGC/PCLUPOC Name: Phone: Room Number: C3-655
BI DIVISION INTER	MEDIATE APPROVALS [complete as ne Program Manager (or other appropriate executive as Division determines)		t with Division policy] ivacy Officer
Program Division: Criminal Justice Information Services	Signature: Date signed: Name: Title:	Signature: Date signed Name: Title:	:
FBIHQ Division: Criminal Justice Information Services	Signature: Date signed: Name: Title:	Signature: Date signed Name: Title:	6 4 4 7 1
The FBI Privacy and Civ ollowing page.)	als, forward signed hard copy plus electro il Liberties Officer's determinations, condition i, FBI OGC/PCLU will distribute as follow	ms, and/or final ap	OGC/PCLU (JEH 7338). proval will be recorded on the
	to file 190-HQ-C1321794 (fwd to JEH 1	B204 via PA-520))
		anas Missisias est	7.XX.
Copies (recipients plants of 1 - DOJ Office of 1 privacy@usdoj.go (if classified, 20530)	ilease print/reproduce as needed for Prog Privacy and Civil Liberties (via e-mail to		(s)): 1 - OGC\PCLU intranet 1 - PCLU UC 1 - PCLU Library 1 - PCLU Tickler

PIA is required by the E-Government.	Act	
PIA is to be completed as a matter of F	BI/DOI discretion.	
Is PIA to be published on FBI.GOV (after a	ny RMD FOIA redactions)?YesNo (indicate reason):	
Information in the system relates t	, or disseminate PII. moe before 4/17/2003; no later changes posing significant privacy risks). to internal government operations. sed under an evaluation similar to a PIA.	
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Applicable SORN(s): <u>1)/A</u>		
http://home/DO/OGC/LTB/PCLU/PrivacyC SORN/SORN revision(s) required?No	NoYesSee sample EC on PCLU intranet website here: ivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd Yes (indicate revisions needed): ents for related forms?NoYes (indicate forms affected):	
The system may contain Federal records wheth schedule approved by the National Archives an	RMD to identify/resolve any Federal records/electronic records issues, er or not it contains Privacy Act requests and, in any event, a records d Records Administration is necessary. RMD can provide advice on this Electronic Recordkeeping Certification and any necessary updates.	
Other:		
David C. Larson, Deputy General Counsel	Signature: Date Signed: 5/3/c	
FBI Privacy and Civil Liberties Officer		
FBI Privacy and Civil Liberties Officer		
FBI Privacy and Civil Liberties Officer		

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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.

Provide a general description of the system or project that includes: name of the system/project, including associated acronyms:

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What is the structure of the system/project?

consists of the following	segments:	

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A C X369 X 5/2 4	he purpose of the	: sy <mark>stem/pr</mark> oje	et?			
						7
						b'
What is t used?	he nature of the i	information in	the system a	nd how it w	rill be	
						b
be the ma	have access to the	sion to all use:	rs? 	and what	will	
be the ma		sion to all use:	rs? isal <u>users</u>	i and what i	will	<u> </u>
be the ma	i <mark>nner of transmis</mark> i <u>ation wi</u> ll be acc <u>ess</u>	sion to all user ad by the indivi	rs? isal <u>users</u>	e and what r	will	h
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be the ma	i <mark>nner of transmis</mark> i <u>ation wi</u> ll be acc <u>ess</u>	sion to all user ad by the indivi	rs? isal <u>users</u>	e and what r	will	
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be the ma	i <mark>nner of transmis</mark> i <u>ation wi</u> ll be acc <u>ess</u>	sion to all user ad by the indivi	rs? isal <u>users</u>	rickwhate	will	
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be the ma	i <mark>nner of transmis</mark> i <u>ation wi</u> ll be acc <u>ess</u>	sion to all user ed by the indivi- administra maintain, or di- is information	rs? dual users tors sseminate any linked to or li	information	about	
be the ma	mner of transmis ation will be access and the m/project collect, a	sion to all user ed by the indivi- administra maintain, or di- is information	rs? dual users tors sseminate any linked to or li	information	about	
be the ma The inform Oes the system iduals in ider iduals (which idual	mner of transmis ation will be access and the m/project collect, inifiable form, i.e., i is the definition of	sion to all user ed by the indivi- administra maintain, or dis is information of personally ic	rs? dual users tors sseminate any linked to or li	information	about	
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be the ma The inform The inform oes the syster iduals in ider iduals (which which which which which to the extent	mner of transmis ation will be access and the m/project collect. httfiable form, i.e., h is the definition of	sion to all user ed by the indivi- administra maintain, or dir is information of personally ic	rs? dual users tors seminate any linked to or li lentifiable info	information inkable to sp ormation (Pi	about ecific I))7	
be the ma The inform The inform iduals in ider iduals (which NO YES [If] to the extent rized user according	mner of transmis ation will be access and the m/project collect, a ntifiable form, i.e., a is the definition of	sion to all user ed by the indivi- administra maintain, or dir is information of personally ic ue.] and associated	rs? dual users tors sseminate any linked to or li lentifiable info	information inkable to sp ormation (PI ployee, cont ords of user	about ecific I))/7	

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XNOYES	
. Is information about United States citizens or lawfully admitted permanent reside liens retrieved from the system/project by name or other personal identifier?	int
NO X YES nly to the extent thatadministrators can retrieve FBI employee, contractor, or other account information and associated audit log records of user activity.	•
. Are Social Security Numbers (SSNs) collected, maintained or disseminated from ystem/project?	the
NO _XYES If yes, check all that apply:	
The system does not collect SSNs for its own purposes,	
SSNs are necessary to establish/confirm the identity of subjects, victin witnesses or sources in this law enforcement or intelligence activity.	is,
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 certai users). Describe:	
It is not feasible for the system/project to provide special protection to SSNs. Explain:	
Does the system/project collect any information directly from the person who is the subject of the information?	38
X_NO [If no, proceed to question 7.]	
YES	

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	YES (If ye	s, proceed to c	juestion 7.)		
	NO				
b. Are subjects provided a written separate notice)?				is directly collect collection form or	
NO (The necessary t		ill need to wo	rk with PCLU t	o develop/imple	meni
		orms, paper o the informatic		ed to request suc	li
7. Has the system und Division (SecD)?	dergone Certi	ification & Ac	creditation (C&A	A) by the FBI Sec	urity
NO If completion date:	no, indicate	reason; if C&	A is pending, p	rovide anticipate	d
X YES new ATO has not yet	ATO di	ated 9/30/2009). C&A complet	tion/re-certificat ed August 2009, tation boundary	but 575
Den't Kı	BOW.				
8. Is this system/proj	ect the subjec	n of an OMB-	300 budget subm	nission?	
<u>X</u> NO		Don't know		If yes, please pro came or title of thion;	
9. Is this a national se	curity system	ı (as determine	d by the SecD)?		
<u> </u>		_YES	Don't k	now	
10. Status of System/	Project:				
STOP. The PT	A is now con H OGC/PCI	nplete and aft .U for final F	er division appı	ou checked this roval(s) should h I determination	e

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]:

	NOYES
If yes:	
ä.	Provide date/title of the PIA:
b .	Has the system/project undergone any significant changes since the PIA?
NO	YES

actions are required.]

Derived Frame:

Classified By:

Xeaxou.

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

22. N. 22.4N

FBI_OGC/PCLU POC

Name: Phone

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

SYSTEM/PROJECT POC

NAME OF SYSTEM / PROJECT: Electronic Surveillance Records System (ELSUR)

Name

Programi Office:

BIKR FBI Unique Asset ID: APP-0000176

	Phone: Room Number: 8977	ion Room Number, 7330
FBI DIVISION INTERM	EDIATE APPROVALS [complete as neces Program Manager (or other appropriate executive as Division determines)	sary consonant with Division policy] Division Privacy Officer
Program Division: Operational Technology Division	Signatures Date signed: 31 (31 77 12) Name: Title: Team Lead	Signature: Date signed: Name: Title:
FBIHQ Division; IT Services Division	Signature: Date signed: 34-F4 h-47	Signature: Date signed: 3-7-72 Name:

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.org

INSERT CLASSIFICATION CONTROL MARKINGS, IF APPROPRIATE

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/DOI discretion. Is PIA to be published on FBLGOV (after any RMD FOIA redactions)? Yes. No (indicate reason): ___x_PIA is not required for the following reason(s): ____ System does not collect, maintain, or disseminate PII. ____ System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks). ____Information in the system relates to internal government operations. System has been previously assessed under an evaluation similar to a PIA. ____No significant privacy issues (or privacy issues are unchanged). x. Other (describe): ELSUR Records System was developed prior to 2003 and the data residing in ERS is also located in other systems for which PIAs have been conducted. Applicable SORN(s): JUSTICE/FBI-006 (Electronic Surveillance Indices) 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

JANSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE)

as well as on compliance with requirements for Electronic Recordkeeping Certification and any necessary updates.

INSERT CLASSIFICATION CONTROL MARKINGS, IF APPROPRIATE.

The functions of the ERS are	no langue noadad	
	183 (0.01%) 0.0 (1860/1800)	
A PTA was completed on		
Elizabeth Withnell, Unit Chief	Signature:	
Privacy and Civil Liberties Unit	Date Signed:	

INSERT CLASSIFICATION CONTROL MARKINGS, IF APPROPRIATE]

[INSERT CLASSIFICATION CONTROL MARKINGS. IF APPROPRIATE]

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

																								٠	

Electronic Surveillance (ELSUR) Records System (ERS).

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

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(c) Purpose for collecting the information and how it will be used:

Primary Purpose: For reporting by the Declarant to the Judge (Title III cases)¹ whether any subject(s) for which the FBI is requesting authorization to conduct electronic surveillance has ever been surveilled before and, if so, when.

Secondary Purpose(s): Reporting metrics regarding electronic surveillances.

(d) Nature of the information in the system/project and how it will be used:

ELSUR contains the names of all persons, businesses, organizations, locations and facilities for which electronic surveillance has been sought or administered by the FBI in a court order.

ELSUR also contains the true name or best known name of all persons, businesses and organizations who have been a party to a communication intercepted by the FBI as authorized by a court order or via consensual monitoring.

Additionally, ELSUR contains select biographical information (Social Security Numbers - SSNs, Dates of Birth – DOBs, and FBI Numbers) of some individuals who are in the system. Note that

ELSUR records checks are no longer reported upon in FISA declarations.

[INSERT CLASSIFICATION CONTROL MARKINGS. IF APPROPRIATE]

The legacy ELSUR application that this PTA covers has been replaced by a product from OTD collective ELSUR Data Application (EDA). EDA went live in Jan. 2012, the legacy ELSUR application remains in restricted access (less than 10 users) with read-only mode. The legacy ELSUR application will be retried in the future.

ELSUR Operations Technicians (EOTs), EOT Supervisors, Management & Program Analysts assigned to the former ELSUR Operations Unit (RMD), and programmers in assigned to the ELSUR application (aroundin total) have direct access to ELSUR.
Special Agents have indirect access (through their EOTs).
Analysts, judges, court clerks, task force members, and others <u>may</u> have indirect access to some information as provided by a member of one of the two above paragraphs.
(f) Manner of transmission to all users:
Electronically via FBINet. Reports may be printed or downloaded by EOTs and provided to other users.
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.]
should be submitted to FBI OGC/PCLU for final FBI approval. Unless you are
should be submitted to FBI OGC/PCLU for final FBI approval. Unless you are otherwise advised, no PIA is required.]
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.
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.)

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

INSERT CLASSIFICATION CONTROL MARKINGS. IF APPROPRIATE!

identify specific indi	ipove. If none of the above, describe why the information tipes how ividuals either directly or indirectly. [If you checked this item, oviding the requested description.]
4. Does the system consultants?	project pertain only to government employees, contractors, or
XNO	YES
	oout United States citizens or lawfully admitted permanent resident the system/project by name or other personal identifier?
NO. [If no, skip to question 7.]
XYES.	[If yes, proceed to the next question.]
6. Does the system subject of the inform	project collect any information directly from the person who is the lation?
NO	If no, proceed to question 7.1
_X_YES	
a. Does the sy assessments?	ystem/project support criminal, CT, or FCI investigations or
NO	
_X_YES	[If yes, proceed to question 7.]
	ts of information from whom the information is directly collected rivacy Act (e)(3) statement (either on the collection form or via a
	he program will need to work with PCLU to develop/implement ie necessary form(s).]
	Identify any forms, paper or electronic, used to request such information from the information subject:
7. Are Social Secur	ity Numbers (SSNs) collected, maintained or disseminated from the

system/project? Full SSNs should only be used as identifiers in limited instances.

[INSERT CLASSIFICATION/CONTROL MARKINGS. IF APPROPRIATE]

NO	XYES_If yes, check all that apply:
	are necessary to establish/confirm the identity of subjects, victims, ources in this law enforcement or intelligence activity.
SSNs :	are necessary to identify FBI personnel in this internal administrative
SSNs :	are important for other reasons. Describe:
	stem/project provides special protection to SSNs (e.g., SSNs are den from all users via a look-up table, or only available to certain libe:
SSNs. Explai	of feasible for the system/project to provide special protection to n: To the extent social security numbers are collected, they are lentify the individuals or may be collected as part of the surveillanc
Is the system of	operated by a contractor?
No.	
considered Pri contains stand collects, main imposed as a r	formation systems operated by contractors for the FBI may be vacy Act systems of records. The Federal Acquisition Regulation and contract clauses that must be included in the event the system ains or disseminates PII and additional requirements may be natter of Department of Justice policy. Consultations with the Seneral Counsel may be required if a contractor is operating the FBI.
Has the system Security Divis	nundergone Certification & Accreditation (C&A) by the FBI ion (SecD)?
NO	If no, indicate reason; if C&A is pending, provide anticipated completion date:
XYES	If yes, please indicate the following, if known:
2009	Provide date of last C&A certification/re-certification: Feb.
	According to the IMA SSP v2-1 2012-01-09: Confidentiality: Low Moderate X High Undefined

8.

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	Integrity:	Low	Moderate	X_High	_Undefined
	Availability:	1 aw	Maderate	X High	Undefiner
	~~ ~~			~~~~~~~~~	
Not app	ilicable – this syste	m is onb	/ paper-base	d.	

HASERT CLASSIFICATION CONTROL MARKINGS. HEAPPROPRIATE:

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)?
	XNOYES
12.	Status of System/ Project:
	This is a new system/ project in development. [If you checked this block STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval and determination if PIA and/or other actions are required.]
II.	EXISTING SYSTEMS / PROJECTS
1, 3	When was the system/project developed?
Prio	or to January, 1999.
2. 1	fas 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):
	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.)

HANERT CLASSIFICATION CONTROL MARKINGS. H SPROPRISE

	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.	
	X_ A change that results in new items of information in identifiable form being added into the system/project.	
	SSNs, Dates of Birth and FBI Numbers were linked to individual names at the request of the sponsor (RMD).	b'
	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.	
3. De	dissemination of information from the system/project.	
3. Do	dissemination of information from the system/projectOther [Provide brief explanation]:	
3. Do If yes:	dissemination of information from the system/project. Other [Provide brief explanation]: ses a PIA for this system/project already exist?	
If yes:	dissemination of information from the system/project. Other [Provide brief explanation]: ses a PIA for this system/project already exist?	
If yes: a.	dissemination of information from the system/project. Other [Provide brief explanation]: ses a PIA for this system/project already exist? NO YES	

UNSERT CLASSIFICATION CONTROL MARKINGS.

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: Employee Skills Profile BIKR FBI Unique Asset ID: SYSTEM/PROJECT POC FBI OGC/PCLU POC Derived From: N/A Name: Name: Classified By: N/A Program Office: Workforce Planning Phone: Resson: N/A b6 Room Number: Unit Declassify On: N/A b7C Division: Human Resources Phone: Room Number: JEH 10373 FBI DIVISION INTERMEDIATE APPROVALS (complete as necessary consonant with Division policy) Program Manager (or other appropriate Division Privacy Officer executive as Division determines) Program Division: Signature: Signature: Date signed: Date signed: 9/21/12/12 Human Resources Name: Name: Title: Supervisory Mgmt. & Program Title: Supervisory Mgmt. & Program b6

Analyst

Name:

Analyst

Signature:

Date signed: 4/21/2012

Title: Supervisory Mgmt. & Program

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.)

Analyst

Signature

Analyst

Name:

Date signed: 9/2//

Title: Supervisory Mgmt. & Program

FBIHQ Division:

Human Resources

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FINAL FBI APPROVAL / DETERMINATIONS	/ CONDITIONS:
PIA is required by the E-Government Act.	
_XXPIA is to be completed as a matter of Fl	SI/DAN discretion.
Is PIA to be published on FBI.GOV (after any R	MD FOIA redactions)? Yes No (indicate reason):
PIA is not required for the following reason System does not collect, maintain, or of System is grandfathered (in existence Information in the system relates to in System has been previously assessed of No significant privacy issues (or privation of the control	disseminate PII. before 4/17/2003; no later changes posing significant privacy risks). ternal government operations. under an evaluation similar to a PIA.
should post this on its website so employees ar	o complete a PIA for this system, but in lieu of that, HRD e aware of the system and its uses.
Applicable SORN(s):Justice/FBI-002 t Justice/FBI -008, BPMS	to the extent information will be maintained in a personnel file;
	_No XX_YesSee sample EC on PCLU intranet website here: %20Liberties%20Library/form_for_miog190-2-3_ec.wpd
SORN/SORN revision(s) required? _XNo	Yes (indicate revisions needed):
Prepare/revise/add Privacy Act (e)(3) statements	for related forms?NoXX_Yes (indicate forms affected):
The system may contain Federal records whether o schedule approved by the National Archives and R	ID to identify/resolve any Federal records/electronic records issues. r not it contains Privacy Act requests and, in any event, a records ecords Administration is necessary. RMD can provide advice on this ectronic Recordkeeping Certification and any necessary updates.
Other:	
Arting	**************************************
Deputy General Counsel ERI Privacy and Civil Liberties Officer	Signature: Colyabah W. www 9/24/12
were provious and a marker of the cor	representation of the second o

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.
- (a) Employee Skills Profile (ESP)
- (b) ESP is a database that will be housed on the Compass/Resource Allocation Planning (RAP) Tool platform on the FBI intranet.
- (c) ESP will capture the skills, education, and certifications of the FBI workforce. This skills database will allow the Workforce Planning Unit (WPU) to analyze the gaps between the current and desired skills for workforce as well as develop recommendations to close any identified gaps.
- (d) ESP will ask employees to select their skills from a list and then provide their proficiency level, the year the skill was last used, and where they obtained the skill (e.g. Federal Government, state/local government, private industry). The data will be used as described in part (c) above.
- (e) WPU will have access to the data for purposes describe above. WPU would likely show specific skill information to managers with critical skill needs or cumulative data to executive management to show gaps in critical skill areas. Additionally, so this information may be shared with them to minimize administrative burden on FBI employees. Furthermore, the data could potentially be used, in an aggregated form, to answer Congressional queries, GAO audits, etc.
- (f) ESP will be housed on the FBI intranet and will be delivered to all employees through the intranet. WPU will act as administrators for ESP, and will generate and provide reports as describe in part (e) above.
- 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.)

b7E

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?
NOX_YE\$
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.]
XYES
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

INSERT CLASSIFICATION/CONTROL MARKINGS,

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).]
	X YES Identify any forms, paper or electronic, used to request such information from the information subject: A privacy statement will appear on-screen when a user accesses ESP. This statement is being developed by the Privacy and Civil Liberties Unit in OGC.
	Are Social Security Numbers (SSNs) collected, maintained or disseminated from the em/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?
	XNo.
	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	completion da	ite: The Con and this add	C&A is pending, provide anticipated npass/RAP platform has already l-on does not meet the threshold for
YES	If yes, please	ndicate the	e following, if known:
	Provide date	of last C&/	\ certification/re-certification:
	Confidentialit	y:Low	Moderate High Undefined
	Integrity:	_Low_	_ModerateHighUndefined
	Availability:	Low_	ModerateHighUndefined
Not ar	plicable – this s	ystem is onl	y paper-based.
Implementing		ons of the 9/	efined in Section 804 of the //11 Commission Act of 2007, P.L. 110-
YES	If yes, please	lescribe th	e data mining function:
11. Is this a nationa	l security system	ı (as determ	ined by the SecD)?
_X_NO		YES	
12. Status of System	n/Project:		
STOP. The I submitted to	TA is now com	plete and a U for final	evelopment. (If you checked this block, fter division approval(s) should be FBI approval and determination if
II. EXISTING SYS	STEMS/PROJ	ECTS	
1. When was the sys	stem/project deve	loped?	
2. Has the system/pr	oject undergone	any signific	cant changes since April 17, 2003?
NO [If no, p	roceed to next qu	estion (II.3).]

	es 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?
\$ minimi	NOYES
If yes:	
a. Pre	ovide date/title of the PIA:

[INSERT CLASSIFICATION/CONTROL MARKINGS,

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

NOYES					
	id after divis	***************************************	val(s) shoul	ranger 1975an dan ar	8
FBI OGC/PCLU for final FB	I approval a	nd detern	sination if P		
antiane con manimal !					

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / P	ROJECT:	b7E		
BIKR FBI Unique Asset	II):			
Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POON Name: Program Office: Division: Information Tect Services Division Phone: Room Number: 18467		FBI OGC/PCLU POC Name: Phone: Phone: Room Number: 7350	ь6 ь70
FBI DIVISION INTERN	IEDIATE APPROVALS			
	Program Manager (or other appropriate executive as Division determines)	Division Pr	ivacy Officer	
Program Division: [insert division name]	Signature: Date signed: \(\text{3/8}\)/\(\text{2} \) Name: Title: IT Specialist/System Owner	Signature: Date signed Name: Title: Priva		b6 b7C
FBIHQ Division: [insert division name]	Signature: Date signed: \$/\$///> Nams: Title: A/U/	Signature: Date signed Name: Title:		B /C

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

FINAL FBI APPROVAL / DETERMINATIO PCLU/PCLO following PTA submission—The P					
PIA is required by the E-Covernment A	9 8				
	I/DOI discretion.		::		
Is PIA to be published on PDLGOV (after any	KMD FOIA reductions)?	YexNo (indi	czie reikon):		
X_PIA is not required for the following reason System does not collect, maintain, of System is grandfathered (in existem information in the system relates to System has been previously assessed X_No significant privacy issues (or profit the collection). Other (describe):	or discominate PT. ce before 4/17/2003, no let internal guivennment open if under an evaluation sint vacy issues are unchanged UN for PAULAL X8	isom der in a PAA. D C. C. F. Calain I.	*		
Applicable SO(ONs)		- 5,440,40,700	234		
Notify FBLBMD/BIDS per MIOG 190.2.39 http://timee/DO/OGC/LTBPCLU/PrivacyCri SORN/SORN revision(s) required? — No	37.97.07.05.05.05.05.05.05.05.0	A countent confine ses	m nhų se mepsije jarė:		
Property revise/add Privacy Act (e)(3) statemen	is for robited forms?	No. Yes (indicate)	cessis affected):		
RECORDS. The program should consult with P The system may contain Federal records whether schedule approved by the National Archives and so well as on compliance with requirements for E	or not is contains Privacy Records Administration is	Act requests and, in any necessary. BMD can pr	event, a records oxide advice on this		
	S	8.			
	*				
Unit Chisi	Signature:		81.01.2	b6	
Privacy and Civil Liberties Unit Igames 4-82000000000000000000000000000000000000	Date Signo Signature: Date Signod	10.25 1 1 1 2 5 m s		ъ7С	
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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. (This kind of information may be available in the System Security Plan, if available, or from a Concept of Operations document, and can be out and pasted here.)	ь7Е
The information in the system concerns each user's account information, which is	b7E b7E
the same information as is located in 2. Does the system/project collect, maintain, or disseminate any information about individuals (i.e., a human being or natural person, regardless of nationality)? X_NO	
2. 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.