FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: Financial Disclosure Forms

BIKR FBI Unique Asset ID: APP-0000120

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<td>Division: Security</td>
<td>Room Number: JEH, 7350</td>
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FBI DIVISION INTERMEDIATE APPROVALS

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<td>Name:</td>
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<tr>
<td></td>
<td>Title: Assistant General Counsel</td>
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After all division approvals, forward signed hard copy plus electronic copy to FBI OGC / PCLU (JEH 7350). (The FBI Privacy and Civil Liberties Officer’s determinations, conditions, and/or final approval will be recorded on the following page.)
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.   No: due to the sensitivities of the information collected from FBI employees and their families, the PIA will not be published.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): Central Records System, DOJ/FBI-063.

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_miojg/190-2-3_ec.wpd

SORN/SORN revision(s) required?   No   Yes:

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

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

Other:

___ Acting Unit Chief
Privacy and Civil Liberties Unit
Christine M. Costello, Acting Deputy General Counsel
FBI Privacy and Civil Liberties Officer

Signature:  
Date Signed: 8/19/2013

Signature:  
Date Signed:  
1-17-13
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 critical aspect of determining an individual's ability to receive or maintain a security clearance is that of financial status. For years, government agencies have required individuals with certain security classification levels to provide detailed information regarding their financial situations. Financial disclosure and analysis has historically been a lengthy, tedious, paper-based process. Current clearance holders must disclose their financial status annually to maintain their clearances.
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.

   ___ 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 (While the form asks for some information from the employee’s spouse/dependents, none of the PHI collected pertains to the non-employee.)
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: The following is posted immediately following user login:

Privacy Statement

AUTHORITY: Collection of the information requested by this form is authorized under: Public Law 103-359, Title VIII, Counterintelligence and Security Enhancements Act of 1994; Executive Order (E.O.) 12968, Access to Classified Information, Section 1.3; 50 U.S.C. 401-413, National Security Act of 1947, as amended; Public Law 104-134 (April 26, 1996), as amended in Title 31, Section 7701; E.O. 10450, Security Requirements for Government Employees; E.O. 10865, Safeguarding Classified Information Within Industry; E.O. 12958, Classified National
Security Information, as amended; 5 U.S.C. 301, Department Regulations; and E.O. 12333, United States Intelligence Activities.

CONSEQUENCES: Failure to furnish the requested information could result in your being considered unfavorably for new or continued access to particularly sensitive classified information as defined by E.O. 12968.

PRINCIPAL PURPOSE: The information will be used to help make personnel security determinations, including whether to grant a security clearance; to allow access to classified information, sensitive areas, and equipment; or to permit assignment to sensitive national security positions. The data may later be used as part of a review process to evaluate continued eligibility for access to classified information or as evidence in legal proceedings. (See Routine Uses.)

ROUTINE USES: Information may be disclosed to individuals, entities, or agencies in order to assist the U.S. Government in connection with investigating or resolving security, counterintelligence, or federal employment suitability matters.

Information may be disclosed to local, state, or federal agencies or entities for security or counterintelligence purposes or when the information alone, or in conjunction with other information, indicates a violation or potential violation of law, whether civil, criminal, or regulatory in nature.

Information may be disclosed to cooperating foreign government officials for security or counterintelligence purposes.

Information may be disclosed when required by federal statute.

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

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

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

_____ 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 a few System Administrators have access to the data and are also required to file a Financial Disclosure Form annually. An Information System Security Officer (ISSO) reviews audit logs on a weekly basis and reports any suspicious activity.

____ 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:
March 8, 2011

Confidentiality:    _Low_ Moderate _X_High _Undefined

Integrity:          _Low _X_Moderate _High _Undefined

Availability:       _X_Low _Moderate _High _Undefined

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

X  NO

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

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

  X  NO          _____ YES

12. Status of System/Project:

  _____ This is a new system/project in development.

II. EXISTING SYSTEMS / PROJECTS


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):

  X  A conversion from paper-based records to an electronic system. The conversion occurred prior to the 2006 PIA.

  _____ 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.)

  X  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: 02/24/2006, PRIVACY IMPACT ASSESSMENT (PIA), SECURITY DIVISION IMPLEMENTATION OF THE FINANCIAL DISCLOSURE FORMS

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

   NO   YES (The only significant change is noted above and is based on a request to match FDF-A information against additional DIVS/IDW datasets -- a PIA will be drafted to reflect the current FDF-A program.)
FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1272295-0

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

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: __________________________ b7E

BIKR FBI Unique Asset ID: pending

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FBI DIVISION INTERMEDIATE APPROVALS

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

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

___ PIA is required by the E-Government Act.

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

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

___ 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). The system is not intended to capture PII and any PII that is captured is not retrieved by name or personal identifier.
   ___ Other

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

Notify FBI RMD/RIDS per MI0G 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? ___ 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:

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<th>Acting Unit Chief</th>
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<tr>
<td>Privacy and Civil Liberties Unit</td>
<td></td>
<td>18/2/2013</td>
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<tr>
<td>Christine M. Costello, Acting Deputy General Counsel</td>
<td>Signature</td>
<td>Date Signed</td>
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<tr>
<td>FBI Privacy and Civil Liberties Officer</td>
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UNCLASSIFIED//FOR OFFICIAL USE ONLY
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.

1. Provide a general description of the system or project that includes:

(a) Name of the system/project, including associated acronyms;

The Washington Field Office (WFO) is participating in a pilot project wherein the FBI Information and Technology Branch (ITB) has

Also approved as part of this pilot program is a

allows WFO Field Agents to enter information

It is not contemplated that on this however, Agents are trained to follow the DIOG in the event of

The information is then displayed in the
Only select WFO field agents and WFO personnel will be able to enter, update, or change information.

Does not expand current FBI WFO capabilities. Prior to the current system, the process was time-consuming and burdensome because it required field agents to do something that WFO was already doing through the use of [redacted] and other means. Merely streamlines this process by allowing field agents to [redacted].

(b) Structure of the system/project, including interconnections with other projects or systems:

(c) The purpose of the system/project:

The purpose of [redacted] is to streamline the same information via [redacted]. This information had to then be
(d) Nature of the information in the system/project and how it will be used:

No personal identifying information (PII) will be entered into the system without an authorized law enforcement purpose.

(e) Who will have access to the information in the system/project:

Agents in the field will have access to the information entered by FBI personnel.

Only WFO Agents and personnel who have access will be able to enter, change, or update information. Personnel with an who are not authorized to access the information in the system will not be able to view, enter or change the information in the system.

(f) Manner of transmission:

The information will be transmitted

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

___ YES While the system is not intended to collect, maintain, or disseminate any information about individuals, it is possible that it will

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.)

While the purpose of the system is to enter information and not PII, some PII might be entered into the system such as

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____ 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). While the information collected is not intended to be used for this, it is possible that may allow for distinguishing or tracing an individual’s identity.

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  ____ 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:

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Since this is part of a pilot project, it has not undergone C&A at this point. However, it will go through C&A at the appropriate stage.

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

Provide date of last C&A certification/re-certification:
Confidentiality:  __Low __Moderate __High __Undefined
Integrity:  __Low __Moderate __High __Undefined
Availability:  __Low __Moderate __High __Undefined

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


_____ NO

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

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

_____ NO  _____ 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?

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
FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: 

BIKR FBI Unique Asset ID: SYS-0000035

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<td>Reason:</td>
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<td>Declassify On:</td>
<td>Division: Operational Technologies Div. (OTD)</td>
<td>Room Number: 7350 JEH</td>
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FBI DIVISION INTERMEDIATE APPROVALS [complete as necessary consonant with Division policy]

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</tr>
<tr>
<td>Title: Program Manager, OTD/EODU</td>
<td>Title: Assistant Section Chief, OTD</td>
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After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7350). (The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)
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FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS: [This section will be completed by the FBI PCLU/PCLO following PTA submission. The PTA drafter should skip to the next page and continue.]

___ PIA is required by the E-Government Act.

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

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

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

___ System does not collect, maintain, or disseminate PII.

___ System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).

X Information in the system relates to internal government operations.

___ System has been previously assessed under an evaluation similar to a PIA.

___ X ___ No significant privacy issues (or privacy issues are unchanged). Privacy issues have remained unchanged since the previous PTA for FOISS was approved on December 10, 2009.

___ Other (describe):


Notify FBI RMD/RIDS per MI0G 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_milog190-2-3_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

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:

Unit Chief, Privacy and Civil Liberties Unit
FBI Privacy and Civil Liberties Officer

Signature
Date Signed

4/2/14
1. INFORMATION ABOUT THE SYSTEM / PROJECT

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

At the FBI's field locations, such as Field Offices, Resident Agencies (RAs) and off-site facilities. The system controls and manages both

Data collected and stored within consists of the names of individuals (no other identifiers are maintained within the system) and the date and time

Also contains

Each FBI facility (e.g., FO HQ, RAs and offsites)

Access to data in is restricted to authorized users within each Field Office. The number of authorized users within a Field Office varies somewhat, for which a Field Office is responsible. Information contained in one field office's cannot be accessed by personnel assigned to another field office or to FBIHQ.

All Bureau employees, contractors, task force officers and consultants with security clearances issued by the FBI's Security Division are
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Records from ____________ including access and audit logs, are maintained off-line by each Field Office for two years.

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.]

The system contains the names of FBI personnel (employees, contractors, consultants, and task force officers). The names of these individuals are the only personal identifiers contained in ____________.

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 individuals identified in ____________ are all FBI personnel; see response to Q.2, supra.

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

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

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

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

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

____ NO   [X] YES

See responses to Q.2 and Q.3, supra.

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.]

In addition to user access and activity data, the personal information that may be retrieved from ___ consists of the names of individuals who have been ___

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

___ 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).]

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

A Privacy Act system of records notice (SORN) for the ___ provides general notice of the routine uses that may be made of information in the system, such as the date and time ___

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 PHI 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: June 15, 2009: [ ]

currently has Authority to Operate (ATO) through February 26, 2015 at the following risk levels:

Confidentiality: Low Moderate High

Integrity: Low Moderate High

Availability: Low Moderate High

Not applicable – this system is only paper-based.

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_X_ NO

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

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

_X_ NO  _____ 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? ______ was developed prior to April 17, 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 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.
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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.

System enhancements now enable [redacted] at a FO HQ to communicate directly with [redacted] at the FO's subordinate RAs and offsites. This capability enables, for example, system updates to be pushed from the FO HQ without requiring that a technician visit each subordinate facility to update hardware/software.

Other:

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

X. NO   YES

A PIA for [redacted] was previously approved on December 10, 2009.

If yes:

a. Provide date/title of the PIA:

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

NO   YES

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

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

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<thead>
<tr>
<th>NAME OF SYSTEM / PROJECT:</th>
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<td>Program Office</td>
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<td>Division: Directorate of Intelligence</td>
<td>Phone:</td>
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<td>Room Number: 7350, JEH</td>
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**FBI DIVISION INTERMEDIATE APPROVALS**

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<td>FBIHQ Division:</td>
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<td>Date signed:</td>
<td>Name:</td>
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<tr>
<td>Directorate of Intelligence</td>
<td>[Signature: William G. Davidson 3/9/2019]</td>
<td>[Date signed: 3/9/2019]</td>
<td>[Name: William G. Davidson]</td>
<td>[Title: Section Chief]</td>
</tr>
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</table>

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

____ Other:

Applicable SORN(s): Bureau Mailing Lists, DOJ/FBI-003; Central Records System (CRS), DOJ/FBI-002

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?  ____ X____ No  ____ Yes:

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

__________________________  ______________________
Unit Chief                      Signature:
Privacy and Civil Liberties Unit  Date Signed:

__________________________  ______________________
James J. Landon, Deputy General Counsel  Signature:
FBI Privacy and Civil Liberties Officer  Date Signed:

UNCLASSIFIED//FOUO
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.

In order to collect feedback from state and local law enforcement partners regarding information from the user, such as, customer role, position type, organization, and region of interest. The customer will be asked if an individual volunteers his/her information, the contact information will be used only for that purpose. Results, including agency information of the respondent, will be analyzed personnel to better help the FBI understand its customer base and their needs. With this information, the FBI will be able to create better, more relevant and usable.

is in PDF format

The user has the option to choose: IF he or she chooses:

without the respondent’s name/email address, will be maintained in a shared folder that is only accessible to personnel within

UNCLASSIFIED//FOUO

epic.org 14-06-04-FBI-FOIA-20150417-5th-Production EPIC-1411
2. Does the system/project collect, maintain, or disseminate any information about individuals (i.e., a human being or natural person)?

_____ NO

X  YES  [If yes, please continue.]

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

X  The information directly identifies specific individuals.

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

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

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

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?

X  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.

___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)?

   ___X___ NO   If no, indicate reason; if C&A is pending, provide anticipated completion date:
   Per the Security Division, no C&A is required for this

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

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

   Confidentiality: ___Low___Moderate___High___Undefined
   Integrity:    ___Low___Moderate___High___Undefined
   Availability: ___Low___Moderate___High___Undefined

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

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

    ___X___ NO

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


    ___X___ NO

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

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

    ___X___ NO   ___ YES

13. Status of System/Project:

    ___X___ This is a new system/project in development.
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 (II3).]

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

_____ NO  _____ YES

If yes:

a. Provide date/title of the PIA:

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

_____ NO  _____ YES
**FBI PRIVACY THRESHOLD ANALYSIS (PTA)**

**NAME OF SYSTEM / PROJECT:** FIPS (FedEx Invoice Processing System)

**BIKR FBI Unique Asset ID:** 2010-015-01-P-402-126-3411

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

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<th>Program Division:</th>
<th>Program Manager (or other appropriate executive as Division determines)</th>
<th>Division Privacy Officer</th>
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<tr>
<td>Facilities &amp; Logistics</td>
<td>Signature: [signature] Date signed: [date] Name: [name] Title: Unit Chief</td>
<td>Signature: [signature] Date signed: [date] Name: Elton W. Thomas Title: Chief Security Officer</td>
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<tr>
<td>Services Division (FLSD)</td>
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<tr>
<td>FBIHQ Division:</td>
<td>Signature: [signature] Date signed: [date] Name: [name] Title: Management &amp; Program Analyst</td>
<td>Signature: [signature] Date signed: [date] Name: [name] Title: Assistant Chief Security Officer</td>
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<tr>
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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.)*
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FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS: [This section will be completed by the FBI PCLU/PCLO following PTA submission. The PTA drafter should skip to the next page and continue.]

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<td>___</td>
<td>PIA is to be completed as a matter of FBI/DOJ discretion.</td>
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Is PIA to be published on FBI.GOV (after any RMD FOIA redactions)?  ___ Yes.  ___ No (indicate reason):  

___ x ___ PIA is not required for the following reason(s):  
___ System does not collect, maintain, or disseminate PII.  
___ System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).  
___ 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).  
___ Other (describe):  

System is a workflow to manage packages. If there is PII it is likely in package addresses and the privacy concerns are de minimis at best.  

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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_mio190-2-3_ec.wpd  

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

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

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

Other:  

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, Deputy General Counsel  Signature:  
FBI Privacy and Civil Liberties Officer  Date Signed:  6/24/11  

UNCLASSIFIED/FOR OFFICIAL USE ONLY
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.

For payment and invoice processing between FedEx and the FBI, there is an established process which allows the FBI to collect billing invoices on delivered items and make payments to FedEx for the approved deliveries. FIPS (FedEx Invoice Processing System) is an updated version of the legacy system (DirectLink) previously used to complete this process. The FIPS application facilitates invoice approval, report generation, data archiving and exception handling. The system's purpose is to assist FLSD with routine tasks involving validation and payment of Federal Express shipping invoices.

The FLSD system POC will have access to information in the system, and field personnel will receive reports (on their specific shipping information only) delivered via email. Field personnel do not access the application; information is transmitted to them via automated email delivery.

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.] Any PII in the system consists of addressee information in the event a package is sent to an individual. The system is intended to be a workflow and is therefore predominantly internal. Any privacy concerns are minimal.

____ YES    [If yes, please continue.]

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

(Check all that apply.)

____ The information directly identifies specific individuals.

____ The information is intended to be used, in conjunction with other data elements, to indirectly identify specific individuals.
The information can be used to distinguish or trace an individual's identity (i.e., it is linked or linkable to specific individuals).

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

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

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

_____ NO  _____ YES

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

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

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

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

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

_____ YES

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

_____ NO

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

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

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

UNCLASSIFIED/FOR OFFICIAL USE ONLY
Confidentiality: __Low__ Moderate __High___ Undefined

Integrity: __Low__ Moderate __High___ Undefined

Availability: __Low__ Moderate __High___ Undefined

Not applicable – this system is only paper-based.
10. Is this system/project the subject of an OMB-300 budget submission?
   
   _____ NO
   
   _____ YES  If yes, please provide the date and name or title of the OMB submission:

   
   _____ NO
   
   _____ YES  If yes, please describe the data mining function:

12. Is this a national security system (as determined by the SecD)?
   
   _____ NO    _____ YES

13. Status of System/ Project:
   
   _____ 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.

UNCLASSIFIED/FOR OFFICIAL USE ONLY
(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
DELETED PAGE INFORMATION SHEET
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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

**NAME OF SYSTEM / PROJECT:**

**BIKR FBI Unique Asset ID:**

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<th>Derived From</th>
<th>Unclassified</th>
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<td>Reason</td>
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<tr>
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<th>FBI OGC/PCLU POC</th>
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<tbody>
<tr>
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<tr>
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<tr>
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**FBI DIVISION INTERMEDIATE APPROVALS**

<table>
<thead>
<tr>
<th>Program Division</th>
<th>Program Manager (or other appropriate executive as Division determines)</th>
<th>Division Privacy Officer</th>
</tr>
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<tbody>
<tr>
<td>New York Intelligence Division</td>
<td>Signature: [Signature] Date signed: 1/31/2014 Name: Gerald Rose Title: SAC</td>
<td>Signature: [Signature] Date signed: 1/31/2014 Name: [Name] Title: CDC</td>
</tr>
<tr>
<td>FBIHQ Division:</td>
<td>Name: [Division Name] Date signed: [Date] Name: [Name] Title: [Title]</td>
<td>Signature: [Signature] Date signed: [Date] Name: [Name] Title: [Title]</td>
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</tbody>
</table>

After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7350). (The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)
**FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:** [This section will be completed by the FBI PCLU/PCLO following PTA submission. The PTA drafter should skip to the next page and continue.]

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___ 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. ___ 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): ___ FBI-002 Central Records System SORN

Notify FBI RMD/RIDS per MIIOG 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? ___ 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:

---

Monica Ryan  
FBI Privacy and Civil Liberties Officer  
Signature: [Signature]  
Date Signed: 1/31/2014
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.

Definitions for document:

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:
(e) Who will have access to the information in the system/project:  

(f) Transmission to all 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)?

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

__X__ The information directly identifies specific individuals.

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

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

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

__X__ NO

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

__X__ YES.

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

__X__ NO

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

      __X__ YES

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
8. Is the system operated by a contractor?
   
   _X___ No.

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

ASU Internal Assessment Completed 01/31/14

- Company: _____________________________
- Location: Florida, U.S. owned company
- Counterintelligence Concerns: None
- Foreign Ownership/Influence: None
- Criminal Concerns: None
- Sentinel: No derogatory information found
- DIVS: No derogatory information found
- Company Website: No derogatory information found

    
   _X___ NO

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

12. Status of System/Project:
    
   _X___ This is a new system/project in development.

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

2. Has the system/project undergone any significant changes since April 17, 2003?
   
   _____ NO [If no, proceed to next question (II.3).]