

[UNCLASSIFIED/OFFICIAL USE ONLY]

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)
(equivalent to the DOJ Initial Privacy Assessment (IPA))

NAME OF SYSTEM / PROJECT: ASCLD-CV Database

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: [REDACTED]	Name: [REDACTED]
Reason:	Program Office:	Phone: [REDACTED]
Declassify On:	Division: Lab	Room Number: 7458
	Phone: [REDACTED]	
	Room Number: 1224	

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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as [REDACTED])	Division Privacy Officer
Program Division:	Signature: [REDACTED] Date signed: 2-3-09 Name: [REDACTED] Title: Special Assistant to the AD	Signature: Date signed: Name: Title:
FBIHQ Division: Lab	Signature: [Signature] Date signed: 04 Feb 09 Name: D. Christian Hassell Title: Assistant Director	Signature: Date signed: Name: Title:

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

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

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

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

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

1 - DOJ Office of Privacy and Civil Liberties (via e-mail to privacy@usdoj.gov)
(if classified, via hand delivery to 1331 Penn. Ave. NW, Suite 940, 20530)

2 - FBI OCIO / OIPP (JEH 9376, attn: [REDACTED])

1 - FBI SecD/AU (electronic copy: via e-mail to UC [REDACTED])

1 - RMD/RMAU (attn: [REDACTED])

2 - Program Division POC /Privacy Officer

2 - FBIHQ Division POC /Privacy Officer

1 - OGC/PCLU intranet

1 - PCLU UC

1 - PCLU Library

1 - PCLU Tickler

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FBI PTA: ASCLD-CV Database

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

PIA required: ☒ No ☐ Yes:

SORN/SORN revision required: ☒ No ☐ Yes:

System pertains to Laboratory employees only
and information is available in other FBI systems
or by consent from individuals who will be
adding data to the system.

Applicable SORN(s):

Notify FBI RMD/RIDS per MIOG 190.2.3: ☐ No ☒ Yes

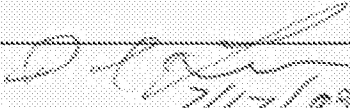
Prepare/revise/add Privacy Act (e)(3) statements for related forms? ☐ No ☐ Yes-forms affected:

The Division will develop a notice for the front page of the database that meets the requirements of the Privacy Act statement and provides transparency for the system. Information in the system is currently maintained by individual employees or in FBI databases, such as BPMS. This database will help make the information uniform and make it easier to obtain and use.

The program should consult with RMD to identify/resolve any Federal records/electronic records issues.

Other:

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

Signature: 
Date Signed: 7/17/09

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FBI PTA: ASCLD-CV Database

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

The proposed Microsoft Access database will allow Lab Division employees to store and maintain individual accreditation information, examiner qualification information, and human resources type data in one system. The database will produce American Society of Crime Laboratory Directors (ASCLD) Statement of Qualification (SOQ) forms, Curriculum Vitae and customized reports for management only. The proposed information to be stored in the database includes: employee name, work address, employee number, telephone numbers (work, home, cell, blackberry), email address, ASCLD discipline types, laboratory assignment, position number, job title, examination type/service, court testimony (dates, exam type/service, # of testimonies), previous work experience, education (institution, degree, major), training, foreign languages, professional organizations, publications, and research. Employees will only have access to their own information while management will have access to all employee records.

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

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

___x___ YES. [If yes, please continue.]

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

_____ NO. _____x___ YES.

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

_____ NO. _____x___ YES.

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

___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.

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FBI PTA: ASCLD-CV Database

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

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

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

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

Explain:

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

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

____x____ YES.

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

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

____x____ NO.

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

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

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

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

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

This will be a Microsoft Access system which has been approved by SecD.

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

_____ Don't Know.

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

____x____ NO.

_____ Don't know.

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

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FBI PTA: ASCLD-CV Database

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

☒ NO. ☐ YES. ☐ Don't know.

10. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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.

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FBI PTA: ASCLD-CV Database

_____ Other. [Provide brief explanation]:

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

a. Provide date/title of the PIA:

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

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

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FBI Privacy Threshold Analysis (PTA) Cover Sheet

(OGC/PCLU (Rev. 05/02/07))

NAME OF SYSTEM: [REDACTED] b7E

	SYSTEM POC	FBI OGC/PCLU POC
	Name: SSA [REDACTED]	Name: AGC [REDACTED]
	Program Office: Cryptologic & Electronic Analysis Unit (CEAU)	Phone: [REDACTED]
	Division: Operational Technology Division (OTD)	Room Number: 7338 JEH
	Phone: [REDACTED]	
	Room Number: 3A94A, ERF-E	

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FBI DIVISION APPROVALS.

	Program Division:	FBIHQ Division: OTD
Program Manager (or other appropriate executive as Division determines)	Signature: [REDACTED]	Signature: [REDACTED]
	Date signed:	Date signed: SEP 24 2008
	Name:	Name: SSA [REDACTED]
	Title:	Title: Unit Chief, CEAU
Division Privacy Officer	Signature: [REDACTED]	Signature: [REDACTED]
	Date signed:	Date signed: 9/26/08
	Name:	Name: SSA Charles Barry Smith
	Title:	Title: Section Chief, OTD

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

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature: [REDACTED]
	Date Signed: 10/6/08
	Name: David C. Larson
	Title: Deputy General Counsel

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

1 - Signed original to 190-HQ-C1321794

Copies:

1 - DOJ Privacy and Civil Liberties Office

2 - FBI OCIO / OIPP

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

2* - FBIHQ Division POC /Privacy Officer

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

1 - OGC/PCLU intranet website

1 - PCLU UC

1 - PCLU Library

1 - PCLU Tickler

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: [REDACTED] b7E

A. General System Description: Please briefly describe:

[REDACTED]

b7E

[REDACTED] contains technical information and analyses only and does not contain Personally Identifiable Information (PII). b7E

1. Type of information in the system:

a. The majority of information contained in [REDACTED] consists of analysis and reports on

[REDACTED]

b7E

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

The information in the system is collected in order to facilitate FBI analysis of [REDACTED] analysis and exploitation of [REDACTED]. The information is used to prepare analytic reports which are then forwarded to TEDAC or other FBI components as necessary. b7E

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

[REDACTED]
[REDACTED]

b7E

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

[REDACTED] is a standalone system. Users are issued accounts to access the system, and must log in with a valid username and password. The domain enforces strong password authentication. Information is input into [REDACTED] by CEAU personnel [REDACTED] b7E

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: [REDACTED] b7E

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

Access to [REDACTED] is limited to CEAU personnel who require access to the system to perform their assigned duties. Information in [REDACTED] is used to prepare analytic reports disseminated to TEDAC and other FBI components as required. Users with need-to-know access [REDACTED] is controlled by the user's supervisor, who is responsible for determining their required level of access to network resources in support of their tasking. [REDACTED] is performed by system administrators. All [REDACTED] users must complete a security awareness briefing and sign acknowledgment documents prior to network access. b7E

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

The only information available to people outside the FBI is analytic information in the form of technical reports and similar products prepared by CEAU. The information is then disseminated, as warranted, to exterior entities who may benefit from the technical information being distributed. The information shared does not include Personally Identifiable Information, as no PII is contained and/or collected in [REDACTED] b7E

7. Has this system been certified and accredited by the FBI Security Divisions? ☒ Yes ☐ No

8. Is this system encompassed within an OMB-300? ☐ Yes ☒ No ☐ Don't Know

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

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

☐ NO (If "no," proceed to Section II.)

1. Has the system undergone any significant changes since April 17, 2003?

☐ YES If "yes," please explain the nature of those changes:

(Continue to Question 2.)

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

2. Do the changes involve the collection, maintenance, or dissemination of information in identifiable form about individuals?

☐ YES (If "yes," please proceed to Question 3.)

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

b7E

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

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

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

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

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

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

II. For systems developed after April 17, 2003.

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

(Continue to Question 2.)

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

____YES (If "yes," please proceed to Question 3.)

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

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

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

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

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

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

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: **b7E**

III. Full or Short-Form PIA

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

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

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

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

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

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

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FBI Privacy Threshold Analysis (PTA) Cover Sheet

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

NAME OF SYSTEM: **Criminal Law Enforcement Application**

FBI SYSTEM CONTACT PERSON Name: <input type="text"/> Program Office: ITB Division: ITOD Phone: <input type="text"/> Room Number: 8979 Date PTA submitted for approval: 04/29/2008	FBI OGC/PCLU POC Name: <input type="text"/> Phone: <input type="text"/> Room Number: 7338
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FBI DIVISION APPROVALS. A PIA (and/or PTA) should be prepared/approved by the cognizant program management in collaboration with IT, security, and end-user management and OGC/PCLU. (PIAs/PTAs relating to electronic forms/questionnaires implicating the Paperwork Reduction Act should also be coordinated with the RMD Forms Desk.) If the subject of a PTA/PIA is under the program cognizance of an FBIHQ Division, prior to forwarding to OGC the PTA/PIA must also be referred to the FBIHQ Division for program review and approval, if required by the FBIHQ Division.

	Program Division: CID	FBIHQ Division: ITOD
Program Manager (or other appropriate executive as Division determines)	Signature: _____ Date signed: _____ Name: _____ Title: _____	Signature: <u>/s/</u> Date signed: 04/29/2008 Name: <input type="text"/> Title: IT Specialist
Division Privacy Officer	Signature: _____ Date signed: _____ Name: _____ Title: _____	Signature: <u>/s/</u> Date signed: 5/6/2008 Name: <input type="text"/> Title: Division Privacy Officer

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

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature: <u>/s/</u> Date Signed: 6/26/2008 Name: David C. Larson Title: Acting Deputy General Counsel
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Upon final FBI approval, FBI OGC will distribute as follows:

1 - Signed original to 190-HQ-C1321794

Copies:

1 - DOJ Privacy and Civil Liberties Office-Main Justice, Room 4259

2 - FBI OCIO / OIPP

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

2* - Program Division POC /Privacy Officer

2*- FBIHQ Division POC /Privacy Officer

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

1 - OGC/PCLU intranet website

1 - PCLU Library

1 - PCLU Tickler

NAME OF SYSTEM: **Criminal Law Enforcement Application**

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

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

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

A. General System Description: Please briefly describe:

The Criminal Law Enforcement Application (CLEA) is a computer application designed to assist the field in the management of and access to the voluminous intelligence data derived from criminal investigations.

1. Type of information in the system:

Intelligence data derived from criminal investigations.

a. If the system is solely related to internal government operations please provide a brief explanation of the quantity and type of employee/contractor information:

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

Criminal Investigations.

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

Database Management System [ADABAS/Natural]

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

FBI Investigative Mainframe

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

Only customers that have access to FBINET may have access to CLEA.

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

Only customers that have access to FBINET may have access to CLEA.

7. Has this system been certified and accredited by the FBI Security Divisions? X Yes No

8. Is this system encompassed within an OMB-300? X Yes No Don't Know

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

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM: **Criminal Law Enforcement Application**

_____ NO (If "no," proceed to Section II.)

1. Has the system undergone any significant changes since April 17, 2003?

___ YES If "yes," please explain the nature of those changes:

(Continue to Question 2.)

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

2. Do the changes involve the collection, maintenance, or dissemination of information in identifiable form about individuals?

___ YES (If "yes," please proceed to Question 3.)

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

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

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

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

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

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

II. For systems developed after April 17, 2003.

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

(Continue to Question 2.)

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

___ YES (If "yes," please proceed to Question 3.)

___ NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval,

NAME OF SYSTEM: **Criminal Law Enforcement Application**

and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

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

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

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

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

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

III. Full or Short-Form PIA

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

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

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

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

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

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM / PROJECT: [REDACTED] b7E

BIKR FBI Unique Asset ID: _____

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: [REDACTED]	Name: [REDACTED]
Reason:	Program Office: ITMS/SDU	Phone: [REDACTED]
Declassify On:	Division: CJIS	Room Number: C3, 655
	Phone: [REDACTED]	
	Room Number: Module B-2	

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

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: [insert division name]	Signature: Date signed: Name: Title:	Signature: Date signed: 6/26/10 Name: [REDACTED] Title: CJIS Division Privacy Officer
FBIHQ Division: [insert division name]	Signature: Date signed: Name: [REDACTED] Title: COTR	Signature: Date signed: Name: Title:

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if classified, via hand delivery to 1331 Penn. Ave. NW, Suite 940, 20530)

2- FBI OCIO / OIPP [REDACTED]

1- FBI SecD/AU (UC [REDACTED])

1 - RMD/RMAU [REDACTED]

1- Program Division POC

1- Division Privacy Officer

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[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

____ PIA is required by the E-Government Act.

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

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

☒ 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): This PIA covers a project during which a contractor will develop an improved [redacted] for use in several CJIS systems. When the new [redacted] is used in these systems, that fact, and the privacy implications of the new [redacted] will be assessed in pertinent privacy documentation. A separate PIA is not required for this contract.

Applicable SORN(s): ____ N/A

Notify FBI RMD/RIDS per MIOG 190.2.3? ____ No ____ Yes--See sample EC on PCLU intranet website here:
http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd

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

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

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

Other:

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

Signature: [Signature]
Date Signed: 6/29/2010

b7E

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

BACKGROUND

The Criminal Justice Information Services (CJIS) Division of the Federal Bureau of Investigation (FBI) has undertaken a project to modernize much of the technological infrastructure that allows state and federal law enforcement agencies to aggregate and share criminal justice information. Although fingerprint matching remains the only method of positive identification, the law enforcement community continues to rely heavily on CJIS's [redacted] technology for near-immediate responses. This PTA addresses CJIS's plan to improve and to consolidate its [redacted] [redacted] CJIS manages the following databases that may be queried by name and other biographic information: the Interstate Identification Index (III), the National Instant Criminal Background Check System (NICS) and the National Crime Information Center (NCIC). Each system uses [redacted]

b7E

[redacted]

[redacted]

To standardize and improve its [redacted] CJIS has initiated

[redacted]

[redacted] This PTA addresses only the [redacted]
[redacted] A subsequent PTA will be submitted for the [redacted]

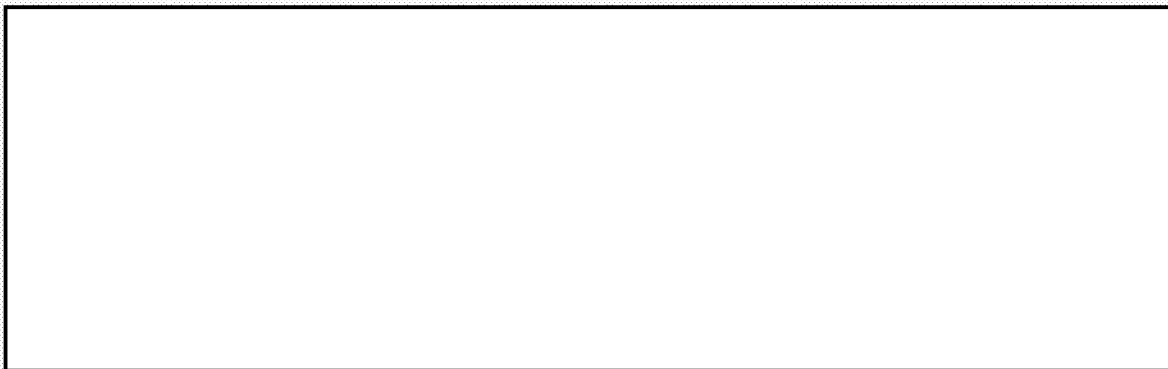
b7E

[redacted]

[redacted]

b7E

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]



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To ensure direct knowledge of employee responsibility for the security of PII, each employee is required to sign the FD-868 Non-Disclosure Agreement for Joint Task Force Members, Contracts, Detailees, Assignees, and Interns. The contractor will not duplicate, retain, or share with unauthorized individuals or entities FBI-provided information containing PII. The contractor will document the processes and procedures necessary to protect and preclude unauthorized dissemination of PII and privacy information under its control. The contractor has been made aware of the DOJ protocol for reporting potential and actual PII breaches and will abide by that policy. The contractor will be responsible for performing recurring audits to ensure strict compliance with privacy protection requirements. The FBI Contracting Officer's Technical Representative (COTR) will ensure contractor compliance with contract terms related to PII. Additionally, the FBI will provide Information Security training, which includes privacy instruction, annually to all affected contract employees. The FBI will ensure strict compliance with these procedures and perform audits, as necessary.

[REDACTED] will not result in the collection or retention of additional biographic information by CJIS and it will not result in the establishment of additional authorized users of the CJIS systems. [REDACTED]

b7E

[REDACTED] is expected to result in an improved [REDACTED] that will permit law enforcement and other partners to receive consistent and more accurate responses [REDACTED] of existing records.

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

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

☐ 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 PLA 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.

☐ 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.]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

_____ 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?

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

☐ 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: 07/16/09

Confidentiality: ☐ Low ☒ Moderate ☐ High ☐ Undefined

Integrity: ☐ Low ☒ Moderate ☐ High ☐ Undefined

Availability: ☒ Low ☐ Moderate ☐ High ☐ Undefined

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

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

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

_____ NO

____X____ YES If yes, please provide the date and name or
title of the OMB submission: OMB FY2012 Draft FBI National
Crime Information Center NCIC

11. Does the system conduct data mining as defined in Section 804 of the
Implementing Recommendations of the 9/11 Commission Act of 2007, P.L. 110-
53?

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

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

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

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

_____ A new use of an IT system/project, including application of a new
technology, that changes how information in identifiable form is managed.

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

(For example, a change that would create a more open environment and/or avenue for exposure of data that previously did not exist.)

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

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

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

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

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

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

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

_____ Other [Provide brief explanation]:

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

_____ NO _____ YES

If yes:

a. Provide date/title of the PIA:

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

_____ NO _____ YES

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

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

~~SECRET~~

FBI Privacy Threshold Analysis (PTA) Cover Sheet

(OGC/PCLU (Rev. 05/02/07))

NAME OF SYSTEM: [REDACTED] b7E

Derived From: Classified By: Reason: Declassify On:	SYSTEM POC Name: [REDACTED] Information Systems Security Officer Program Office: Cryptanalysis & Racketeering Records Unit (CRRU) Division: Laboratory Phone: [REDACTED] Room Number: 2106	FBI OGC/PCLU POC Name: AGC [REDACTED] Phone: [REDACTED] Room Number: JEH 7338
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b6
b7C

FBI DIVISION APPROVALS

	Program Division:	FBIHQ Division: Laboratory
Program Manager (or other appropriate executive as Division determines)	Signature: [REDACTED] Date signed: 8/16/08 Name: [REDACTED] Title: Unit Chief, CRRU	
Division Privacy Officer	Signature: [REDACTED] Date signed: 8/16/08 Name: John Joseph Behun Title: Section Chief, Laboratory Division	

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b7C

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature: [REDACTED] Date Signed: 8/27/08 Name: David C. Larson Title: Deputy General Counsel
---	---

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

1 - Signed original to 190-HQ-C1321794

Copies:

1 - DOJ Privacy and Civil Liberties Office

2 - FBI OCIO / OIPP (electronic copy via e-mail)

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

2* - Program Division POC /Privacy Officer (electronic copy)

2* - FBIHQ Division POC /Privacy Officer (electronic copy)

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

1 - OGC/PCLU intranet website

1 - PCLU UC

1 - PCLU Library

1 - PCLU Tickler

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~~SECRET~~

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: [REDACTED]

b7E

A. General System Description: Please briefly describe:

International and domestic terrorists, foreign intelligence agents, violent criminals and street and prison gangs commonly use codes and ciphers to conceal their activities. The Cryptanalysis & Racketeering Records Unit (CRUU) examines manually encrypted documents and records of illegal enterprises, deciphers and decodes such documents and provides expert testimony regarding the examination and analysis. CRUU conducts forensic examinations of [REDACTED] categories of encrypted communications: codes, ciphers [REDACTED]

b7E

To assist CRUU in examining and deciphering encrypted documents, the unit employs [REDACTED] previously known as [REDACTED]. The primary use of [REDACTED] is for [REDACTED]

b7E

1. Type of information in the system:

[REDACTED] CRUU analyzes three principal categories of encrypted documents: documents pertaining to counter-terrorism; documents pertaining to racketeering enterprises (such as organized crime); and documents pertaining to trafficking in illegal drugs. [REDACTED]

b7E

a. If the system is solely related to internal government operations please provide a brief explanation of the quantity and type of employee/contractor information:

N/A

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

The information in [REDACTED]

b7E

¹ A PTA for [REDACTED] was previously approved in June 2006.

b7E

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: [REDACTED] b7E

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

[REDACTED]

b7E

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

[REDACTED] operates in a standalone, dedicated network and must be accessed from dedicated workstations that are only available to CRUU personnel at the FBI Laboratory. [REDACTED]

b7E

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

Access to [REDACTED] as well as the CRUU office space containing [REDACTED] is restricted to CRUU personnel. Access to [REDACTED] requires a valid username and password. In addition, access to [REDACTED] requires a separate valid username and password. [REDACTED] Access control to [REDACTED] is controlled by the Unit Chief and enforced by the [REDACTED] system administrator for technical access control and the Laboratory Division Security Officer for physical access control. Audit logs are maintained and examined on a regular basis in accordance with the [REDACTED] System Security Plan.

b7E

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

No personnel outside the FBI has access to the information in the system.

7. Has this system been certified and accredited by the FBI Security Divisions? XX Yes ___ No

8. Is this system encompassed within an OMB-300? ___ Yes XX No ___ Don't Know

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

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

___ NO (If "no," proceed to Section II.)

1. Has the system undergone any significant changes since April 17, 2003?

_____ YES If "yes," please explain the nature of those changes:

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

b7E

(Continue to Question 2.)

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

2. Do the changes involve the collection, maintenance, or dissemination of information in identifiable form about individuals?

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

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

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

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

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

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

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

II. For systems developed after April 17, 2003.

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

(Continue to Question 2.)

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

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

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

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

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

~~SECRET~~

~~SECRET~~

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

b7E

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

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

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

III. Full or Short-Form PIA

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

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

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

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

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

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

~~SECRET~~

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM / PROJECT:

b7E

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: <input type="text"/> Program Office: RCFL NPO Division: OTD Phone: <input type="text"/> Room Number: 3A97-A	FBI OGC/PCLU POC Name: <input type="text"/> Phone: <input type="text"/> Room Number: 7458
--	--	---

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

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer <input type="text"/>
Program Division: Operational Technology Division	Signature: /s Date signed: 9/30/2009 Name: <input type="text"/> Title: UC RCFL NPO	Signature: Date signed: Name: Title:
FBIHQ Division: [insert division name]	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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

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

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

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

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

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

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

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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):

☒ 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).

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

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

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

Other:

FBI PTA:

[Redacted]

b7E

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

Signature: /s
Date Signed: 9/29/2009

I. INFORMATION ABOUT THE SYSTEM / PROJECT

1. Provide a general description of the system or project that includes: name of the system/project, including associated acronyms; structure of the system/project, purpose; nature of the information in the system and how it will be used; who will have access to the information in the system and the manner of transmission to all users. (This kind of information may be available in the System Security Plan, if available, or from a Concept of Operations document, and can be cut and pasted here.):

[Redacted] b7E

The purpose of [Redacted] criminal and intelligence investigations. [Redacted]

b7E

[Redacted]

b7E

[Redacted] each agent's access is restricted to [Redacted] from his/her own cases, and, as needed, to [Redacted] from related investigations. All access is logged and tracked.

[Redacted]

b7E

[Redacted]

b7E

[Redacted] It does not transmit information to or from any other system, and does not support email, file transfer or print services. [Redacted]

b7E

[Redacted]

FBI PTA:

b7E

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

☒ NO. which may or may not involve PII. Any analytical product relevant to an ongoing investigation becomes part of the relevant investigative case file and systemically handled in accordance with established data processes and protocols for investigative case data.

b7E

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

☐ YES. [If yes, please continue.]

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

☐ NO. ☐ YES.

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

☐ NO. ☐ YES.

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

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

☐ SSNs are necessary to establish/confirm the identity of subjects, victims, witnesses 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:** During the examination digital media seized under legal authority, SSNs of victims and accomplices would provide scope of the investigation and assist in the identification of those involved.

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

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

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

☐ NO. [If no, proceed to question 7.]

☐ YES, but only to the extent any of the media collected provides information about the author of that media.

FBI PTA:

b7E

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

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

____ NO.

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

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

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

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

____ NO. If no, indicate reason; if C&A is pending, provide anticipated completion date: October 6, 2009.

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

____ Don't Know.

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

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

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

____ NO. ____ YES. ____ Don't know.

10. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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 .]