

Not applicable – this system is only paper-based.



	Is this system/project the subject of an OMB-300 budget submission?
	XNO
	YES If yes, please provide the date and name or title of the OMB submission:
11.	Does the system conduct data mining as defined in Section 804 of the Implementing Recommendations of the 9/11 Commission Act of 2007, P.L. 110-53?XNO
	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:
(T)	This is a new system/ project in development. [If you checked this block, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval and determination if PIA and/or other actions are required.] EXISTING SYSTEMS / PROJECTS
	. When was the system/project developed?
	. When was the system/project developed?
2. H	
	as the system/project undergone any significant changes since April 17, 2003?
	as the system/project undergone any significant changes since April 17, 2003? NO [If no, proceed to next question (II.3).]
X	
X	NO [If no, proceed to next question (II.3).] YES If yes, indicate which of the following changes were involved (mark all



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(5)



A new use of an IT system/project, including application technology, that changes how information in identifiable form is (For example, a change that would create a more open environm avenue for exposure of data that previously did not exist.)	managed.
A change that results in information in identifiable form merged, centralized, or matched with other databases.	being
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 i identifiable form purchased or obtained from commercial or publications.	
A new interagency use or shared agency function that re new uses or exchanges of information in identifiable form.	sults in
A change that results in a new use or disclosure of informidentifiable form.	mation in
A change that results in new items of information in ider form being added into the system/project.	ntifiable
_XX Changes do not involve a change in the type of remaintained, the individuals on whom records are maintained, or dissemination of information from the system/project.	
Other [Provide brief explanation]:	
3. Does a PIA for this system/project already exist?	
XNOYES	
If yes:	
a. Provide date/title of the PIA:	
b. Has the system/project undergone any significant changes since the I	PIA?
NOYES	
[The PTA is now complete and after division approval(s) should be submit FBI OGC/PCLU for final FBI approval and determination if PIA and/or cactions are required.]	

UNCLASSIFIED // FOUC 14-06-04-FBI-FOIA-20150318-4th-Production

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

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: Loose Media Kiosk (LMK)

Derived From: Classified By:	SYSTEM/PROJECT POC Name		FBI OGC/PCLU POC Name Phone
Reason: Declassify On:		Phone:	
FBI DIVISION INTER?	#EDIATE APPROVALS Program Manager (or other appropriate executive as Division determines)		Privacy Officer
Program Division: Albany Field Office [insert division name]	Program Manager (or other appropriate	Signatur Date sign Name: I	e: 1000 ned: 3/1/13 mul M. Holstein nief Division Counsel/Chief

After all division approvals, forward signed bard 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.	
PIA is to be completed as a matter of FBI/DOJ	discretion.
Is PIA to be published on FBI.GOV (after any RMD	FOIA redactions)?YesNo:
X PIA is not required for the following reason(s) X System does not collect, maintain, or diss System is grandfathered (in existence before a linformation in the system relates to intermed to system has been previously assessed under the linformation in the system relates to intermed the linformation in the system relates to intermed the linformation in the system relates to intermed the linformation in the system relates to intermediate the linformation in the system relates the linformat	eminate PH. ore 4/17/2003; no later changes posing significant privacy risks). al government operations. or an evaluation similar to a PIA.
	YesSee sample EC on PCLU intranet website here: Liberties%20Library/form_for_miog190-2-3_ec.wpd Yes :
Prepare/revise/add Privacy Act (e)(3) statements for i	related forms?NoYes:
The system may contain Federal records whether or no schedule approved by the National Archives and Recor	o identify/resolve any Federal records/electronic records issues. I it contains Privacy Act requests and, in any event, a records ds Administration is necessary. RMD can provide advice on this mic Recordsceping Certification and any necessary updates.
Other:	
Acting Unit Chief	Signatur
Privacy and Civil Liberties Unit	Date Signed: 18 (2)
Brian F. Binney, Acting Deputy General Counsel	Signature: // /
FBI Privacy and Civil Liberties Officer	Date Signed: () ()

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1. INFORMATION ABOUT THE SYSTEM / PROJECT

1. General Description of System

The Albany Field Office (AL FO), Loose Media Kiosk (LMK) is a standalone computer that provides a controlled environment to examine and analyze file structure, size, and types of files stored on secondary storage devices, primarily Universal Serial Bus (USB) connection oriented devices. Security concepts are covered in the LMK System Security Plan. The LMK is internally owned and managed exclusively by the FBI.

The LMK is located in the Albany Field Office Computer Analysis and Response Team (CART) Laboratory.



Figure I Loose Media Kiosk

The system has no network connectivity.

Does the system/project collect, maintain, or disseminate any information about individuals (i.e., a human being or natural person, regardless of nationality)?
<u>X</u> NO
(Note: It is theoretically possible to open the files that are contained on the inserted media However, there is no way to save the information in them, print their contents, or transfer the contents to another system.)
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., if 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?
NOYES
5. Is information about United States citizens or lawfully admitted permanent resident aliens retrieved from the system/project by name or other personal identifier?
NO. [If no, skip to question 7.]

YES.	[If yes, proceed to the next question.]
Does the system subject of the inform	project collect any information directly from the person who is the sation?
	[If no, proceed to question 7.]
YES	
a. Does the s assessments?	ystem/project support criminal, CT, or FC1 investigations or
NO	
YES	(If yes, proceed to question 7.)
	its of information from whom the information is directly collected rivacy. Act (e)(3) statement (either on the collection form or via a
	The program will need to work with PCLU to develop/implement is necessary form(s).]
	Identify any forms, paper or electronic, used to request such information from the information subject:
	rity Numbers (SSNs) collected, maintained or disseminated from the I SSNs should only be used as identifiers in limited instances.
NO	YES If yes, check all that apply:
	are necessary to establish/confirm the identity of subjects, victims, sources in this law enforcement or intelligence activity.
SSNs system.	are necessary to identify FBI personnel in this internal administrative
SSNs	are important for other reasons. Describe:
	vstem/project provides special protection to SSNs (e.g., SSNs are iden from all users via a look-up table, or only available to certain ribe:

	It is to SSNs - Explai	r feasible for the sy n:	stem/pi	oject to provi	de speci	al protection to
8.	Is the system (operated by a contra	etor?			
	No.					
	considered Pri contains stand collects, main imposed as a c	ormation systems of vacy Act systems of and contract clauses tains or disseminate natter of Department teneral Counsel ma FBL	i record that m s PII ar w of Ju	is. The Feder us) be include id additional i stice policy. (al Acqui d in the equatem toriseita	isition Regulation event the system ents may be tions with the
9.	Has the system Security Divis	n undergone Certifi ion (SecD)?	cation (£ Accreditatio	su (C&A) by the FBI
	NO	If no, indicate re- completion date:		C&A is pen	ding, pr	ovide anticipated
	YES	If yes, please ind	icate th	e following,	if known	Y:
		Provide date of 1:	ast C&	A certificatio	m/re-cer	tification:
		Confidentiality:	_Low_	_Moderate_	_High_	Undefined
		Integrity:	Low	Moderate	_High	_Undefined
		Availability:	_Low	Noderate	High	Undefined
	Not ap	plicable – this syste	m is or	ily paper-base	d.	
10.	Implementing	m conduct data mir Recommendations 42 USC 2000cc-3)	of the S			
	YES	If yes, please des	cribe tl	se data minis	ig functi	on:
13.	Is this a nationa	security system (as	detem	nned by the S	leci))?	
	NO	YŁ	S			
12.	Status of System	v/ Project				

Turs is a new system business in descriptions.
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 (IL3).]
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 this 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 dissembation of information from the system/project.

		ther [frovide bri	ef explanatio	8]:	
3. Do	es a PIA for t	his system project	already exist	7	
	NO	AEZ			
lf yes:					
a.)	Provide date/	title of the PIA:			
j _{3.})	Has the syster	n/project undergo	ne any signifi	cant changes si	nce the PIA?
NO	YES				

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: Maximo

Name:

*********	 	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	SYSTEM/PROJECT POC	FBI OGC/PCLU POC	
			Name:	Name:	b
			Program Office: FSIO	Phone:	b'
			Division: FD	Room Number: JEH, Rm 7350	
			Phone:		
			Room Number: MC-700		

Program Manager (or other appropriate Division Privacy Officer executive as Division determines) Signature: Program Division: Signature: Financial Systems Date signed Date signed Implementation Office Name: Name: b6 Title: FSIO Director (FSIO) Title: Unit Chief b7C FBIHQ Division: Signature: Signature: Finance Division (FD) Date signed: **7**8/11 Date signe

Name:

Title: Unit Chief

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.)

Title: FD Accounting Deputy Section Chief

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:
PIA is required by the E-Government Act.
PIA is to be completed as a matter of FBI/DOI discretion.
Is PIA to be published on FBLGOV (after any RMD FOIA redactions)?YesNo.
X PIA is not required for the following reason(s): System does not collect, maintain, or disseminate PII. System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).
Information in the system relates to internal government operations. System has been previously assessed under an evaluation similar to a PIA.
No significant privacy issues (or privacy issues are unchanged). Other:
Computer systems Activity and Access Records, DOJ-002 Notify FBI RMD/RIDS per MIOG 190.2.37NoX_YesSee sample EC on PCLU intranet website here: http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_mtog190-2-3_ec.wpd SORN/SORN revision(s) required? _X_NoYes
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.
XXX X X X X X X X X X X X X X X X X X
Elizabeth Withnell, Acting Deputy General Counsel Signature: Signa

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

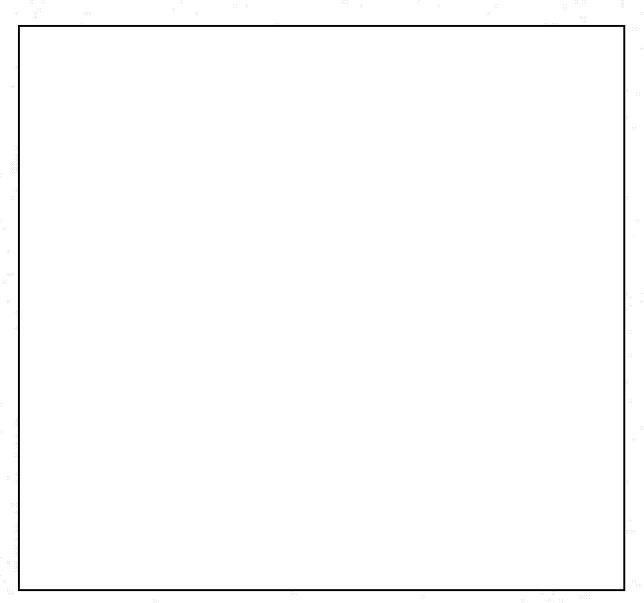
The systems used by the FBI to manage and track its supply chain processes for purchasing goods and services, including assets on hand, are outdated and insufficient. To better manage the FBI's growing number of assets, new supply chain management functionality is required, including: (1) an integrated asset management system to value and track assets throughout their useful lives (2) an improved ability to manage vendor interactions, and (3) new data collection devices to facilitate inventory processes.

The current asset management systems used by the FBI include the Property Management

Application (PMA), the Vehicle Management Application (VMA), the Fixed Assets Module (FA) and Issued Personal Property (IPP) system. Specific information and purpose of each system is summarized below:

Each is a separate system, over 20 years old, with a different architecture. As a result, these first generation systems contain numerous add-on enhancements and are not as efficient or flexible as more modern systems with updated capabilities, and fail to provide the functionality needed to maintain a robust process and improve accountability.

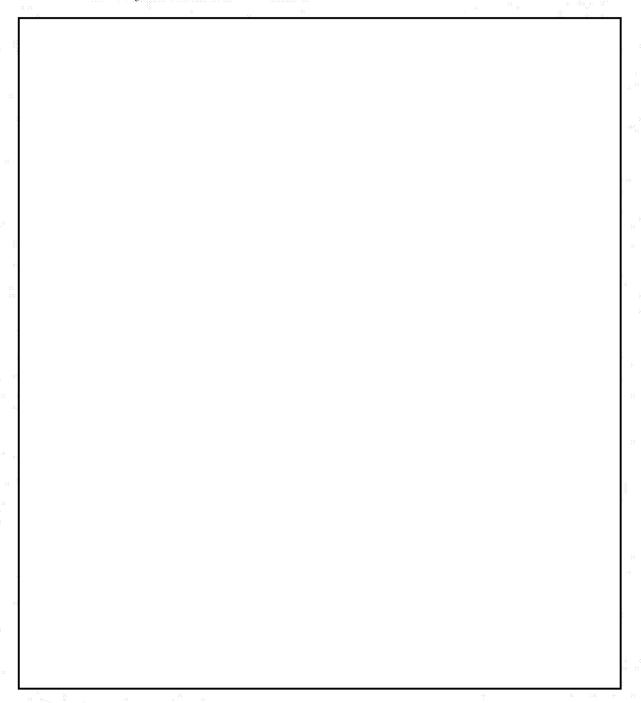
Additionally, the current system structure spreads various asset types across several systems, requiring multiple interfaces, duplicative asset entry, significant manual reconciliations between systems and delayed processing. The current system landscape is summarized below. Please note this is a working document subject to revision.



The Finance Division (FD) seeks to mitigate these issues through the deployment of a new Supply Chain Management (SCM) Program via three core projects (only Project 1 is intended to be covered by this PTA. Projects 2 and 3 will have additional privacy paperwork as necessary during their development and implementation):

1. Project 1 - Project Aikman

- Objectives: Replace the Property Management Application (PMA), Vehicle
 Management Application (VMA), Fixed Asset (FA) Module and Identifiable Personal
 Property (IPP) application with one Commercial Off the Shelf (COTS) Asset and Fleet
 Management Solution, IBM's Maximo software.
- <u>Estimated deployment</u>: Limited pilot (tentatively 3-5 FOs and an undetermined number of HQ division participation) in FY 11 Q4. A full FBI-wide deployment is scheduled to begin November 2011.
- <u>Software</u>: Maximo (IBM). Note this is the base software platform for which Project 2 and Project 3 software will be added.



ensure each project is optimally positioned to achieve its objectives. FD will be initiating a aggred approach to project implementation. In other words, Project I (which will be referred to Project Aikman throughout this document) will be the first rollout of FD's new SCM model, llowed by ease note the following: Project Aikman is replacing PMA, VMA, FA module and IPP systems with one central asset management system (IBM's Maximo). After historical information from legacy systems is transferred to Maximo (scheduled for FY 12 Q3), the legacy systems will be shut down and slated for the system retirement process.	
nggered approach to project implementation. In other words, Project 1 (which will be referred to Project Aikman throughout this document) will be the first rollout of FD's new SCM model, llowed by ease note the following: • Project Aikman is replacing PMA, VMA, FA module and IPP systems with one central asset management system (IBM's Maximo). After historical information from legacy systems is transferred to Maximo (scheduled for FY 12 Q3), the legacy systems will be	
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Project Aikman throughout this document) will be the first rollout of FD's new SCM model, flowed by case note the following: Project Aikman is replacing PMA, VMA, FA module and IPP systems with one central asset management system (IBM's Maximo). After historical information from legacy systems is transferred to Maximo (scheduled for FY 12 Q3), the legacy systems will be	
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systems is transferred to Maximo (scheduled for FY 12 Q3), the legacy systems will be	
smit down and stated for the system retirement process.	
*	
I I	
*	
Does the system/project collect, maintain, or disseminate any information about	
lividuals (i.e., a human being or natural person, regardless of nationality)?	
a canno trest a manar north ar manisa barreri refinancion in cantomarch.	
YES [If yes, please continue.]	
Please indicate if any of the following characteristics apply to the information in the	
stem about individuals: Bear in mind that log-on information may identify or be linkable	
an individual	
heck all that apply.)	
MANAN MANANA	
The information directly identifies specific individuals.	

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	The information is intended to be used, in conjunction indirectly identify specific individuals.	m with other dat	a elements, to
.X.	The information can be used to distinguish or trace a linked or linkable to specific individuals).	m individual's ic	lentity (i.e., it
If you	n marked any of the above, proceed to Question 4.		
identi	None of the above. If none of the above, describe wify specific individuals either directly or indirectly.	hy the informati	on does not
	oes the system/project pertain only to government emp iltants?	doyees, contract	ors, or
	XNOYES		
	of such an incident, the name and contact informatio would be maintained within the Vehicle Managemer and the Managemer would be maintained within the Vehicle Managemer for the maintained States citizens or lawfully as retrieved from the system/project by name or other pe	nt files. dmitted permans	m resident
	NO. [If no, skip to question 7.]		
	X_YES. [If yes, proceed to the next question.]		
	oes the system/project collect any information directly of the information?	from the person	who is the
	NO [If no, proceed to question 7.]		
assess	a. Does the system/project support criminal, CT, or Fiments?	CI investigation	SO
	YES [If yes, proceed to question 7.]		

	b. Are subjects of information from whom the infect a written Privacy Act (e)(3) statement (either		
sepan	ite notice)?		
	X NO [The program will need to work wit the necessary form(s).]	h PCLU to develo	p/implement
	Some of the forms have a Privacy Act (e)(3) sta program is working with PCLU to ensure that a		
	YES Identify any forms, paper or elect information from the information		nest such
	re Social Security Numbers (SSNs) collected, ma n/project? Full SSNs should only be used as iden		
	NO X YES If yes, check all the	st apply:	
	SSNs are necessary to establish/confirm witnesses or sources in this law enforcement or i		
	X SSNs are necessary to identify FBI pers system.	onnel in this intern	al administrative
	SSNs are important for other reasons. D	escribe:	
	X The system/project provides special pro- encrypted, hidden from all users via a look-up ta- users). Describe:		
	A unique user-name and password are required for a approval, an FBI employee will be unable to access? roles commensurate with their job responsibilities an PII maintained in Maximo. Where one's job responsemployee's PII, the system will allow this.	Maximo. All users as id not all users will be	re assigned specific ave access to the
	way of a company specific to the company of the com		o S o lestadordo ⁸
	It is not feasible for the system/project to	provide special pri	nection to SSNs.
	Explain:		
8	Is the system operated by a contractor?		
	XX00.		

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. 13 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 is a new system and is currently undergoing the the C&A process. The anticipated completion date is mid-June 2011. YES If yes, please indicate the following, if known: Provide date of last C&A certification/re-certification: Confidentiality: Low Moderate High Undefined Low Moderate High Undefined Integrity: __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 X YES If yes, please provide the date and name or title of the OMB submission: An OMB-300 budget submission is planned for the spring budget submission (05/18/2011) Does the system conduct data mining as defined in Section 804 of the Implementing Recommendations of the 9/11 Commission Act of 2007, P.L. 110-53 (codified at 42 USC 2000ee-3)? X NO If yes, please describe the data mining function: 12. Is this a national security system (as determined by the SecD)? X NO 13. Status of System/ Project:

This is a new system/ project in development. II. EXISTING SYSTEMS / PROJECTS 1. When was the system/project developed? 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 nonidentifiable 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.

	· · · · · · · · · · · · · · · · · · ·					
	NO	YES				
yes:						
** ×						
ä.	Provide d	ate/title of the	PIA:			
8 g.	8 2 9	stem/project w		 . 3.36	 	

(OGC/PCLU (Rev. 08/18/2010)

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

Derived From: Classified By:	SYSTEM/PE Name	OJECT POC	FBI OGC/PCLU POC	7
Reason: Declarally On:		e: System Management	Phone: Room Number:	
	Phone Room Numbe	, a , a , a , a , a , a , a , a , a , a		
BI DIVISION INTERN	EDIATE APPROVALS (comp			
31 DIVISION INTERN	Program Manager (or other a	ppropriate Division I	nt with Division policy) Privacy Officer	
	Program Manager (or other a executive as Division determine Signature:	ppropriate Division I ses) Signature Date sign	Privacy Officer	
	Program Manager (or other a executive as Division determined Signature:	ppropriate Division I iss) Signature Date sign Name:	Privacy Officer	
BI DIVISION INTERN Program Division: ITSI) FBIHQ Division: ITSI)	Program Manager (or other a executive as Division determine Signature:	ppropriate Division I iss) Signature Date sign Name:	Privacy Officer	

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

FINAL FRI APPROVAL / DETERMINATIONS / CONDITIONS:
FIA is required by the E-Government Act.
PIA is to be completed as a matter of FBVDOI discretion.
Is PIA to be published on FBLGOV (after any RMD FOIA reductions)? Yes No (indicate reason):
XPIA is not required for the following reason(s):xx_System does not collect, maintain, or disseminate PIISystem is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks)Information in the system relates to internal government operationsSystem has been previously assessed under an evaluation similar to a PIANo significant privacy issues (or privacy issues are unchanged)Other (describe):Other (describe):
Applicable SORN(s): N/A
Notify FBI RMD/RIDS per MIOG 190.2.3?NoYes-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?NoYes (indicate revisions needed):
Prepare/revise/add Privacy Act (e)(3) statements for related forms?NoYes (indicate forms affected):
RECORDS. The program should consult with RMD to identify/resolve any Federal records/electronic records issues. The system may contain Federal records whether or not it contains Privacy Act requests and, in any event, a records schedule approved by the National Archives and Records Administration is necessary. RMD can provide advice on this as well as on compliance with requirements for Electronic Records/eeping Certification and any necessary updates.
James J. Landon, Deputy General Counsel Signature:

I. INFORMATION ABOUT THE SYSTEM / PROJECT

1. Provide a general description of the system/project, including associated system/project, including interconnection purpose of the system/project; (d) nature and how it will be used; (e) who will have system/project; (f) and the manner of tra	ns with other projects or systems; (c) ; of the information in the system/project ; access to the information in the
2. Does the system/project collect, maintain individuals (i.e., a human being or natural p	
XNO _ [If no, STOP. The PTA is n should be submitted to FBI OGC/PCLU fo otherwise advised, no PIA is required.]	ow complete and after division approval(s) or final FBI approval. Unless you are
YES [If yes, please continue.]	
3. Please indicate if any of the following che system about individuals: Bear in mind that linkable to an individual. (Check all that apply.)	
The information directly identifies sp	secific individuals

UNCLASSIFIED

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?
TO THE NO TO THE STATE OF THE S
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.]
Y YS
a. Does the system/project support criminal, CT, or FCI investigations or assessments?
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: Are Social Security Numbers (SSNs) collected, maintained or disseminated from the system/project? Full SSNs should only be used as identifiers in limited instances. 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: 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 FBL 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: $\forall \mathbb{P} \mathsf{S}$ If yes, please indicate the following, if known:

			Provide date of la	ıst C&	A certificatio	m/re-cei	tification:
			Confidentiality:_	_Low_	_Moderate_	_High _	_Undefined
			Integrity:	_Low_	Moderate_	High_	_Undefined
			Availability:	_Low	Moderate	High_	Undefined
	Not	app	licable – this syste	m is on	dy paper-base	d.	

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:
	Implementing	em conduct data mining as defined in Section 804 of the Recommendations of the 9/11 Commission Act of 2007, P.L. 110- at 42 USC 2000ee-3)?
	YES	If yes, please describe the data mining function:
12.	Is this a nationa	al security system (as determined by the SecD)?
	NO	YESYES
13.	Status of System	n/ Project:
	STOP. The l	s a new system/project in development. [If you checked this block PTA is now complete and after division approval(s) should be FBI OGC/PCLU for final FBI approval and determination if ther actions are required.]
II. I	EXISTING SYS	TEMS / PROJECTS
1. V	/hen was the sys	stem/project developed?
2. H	as the system/pr	oject undergone any significant changes since April 17, 2003?
	NO [If no, pi	rocced to next question (II.3).]
20 (20 (20 (20 (20 (20 (20 (20 (20 (20 (idicate which of the following changes were involved (mark all apply, and provide brief explanation for each marked change):
		A conversion from paper-based records to an electronic system.
	identiif	A change from information in a format that is anonymous or non- lable to a format that is identifiable to particular individuals.
	techno	A new use of an IT system/project, including application of a new logy, that changes how information in identifiable form is managed.

	(For example, a change that would create a more open environment and/or avenue for exposure of data that previously did not exist.)
	A change that results in information in identifiable form being merged, centralized, or matched with other databases.
	A new method of authenticating the use of and access to information in identifiable form by members of the public.
	A systematic incorporation of databases of information in identifiable form purchased or obtained from commercial or public source
	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	s a PIA for this system/project already exist?
	NOYES
If yes:	
a. Pr	ovide date/title of the PIA:
b H	is the system/project undergone any significant changes since the PIA?
	_YES
. 7	now complete and after division approval(s) should be submitted to CLU for final FBI approval and determination if PIA and/or other required.]

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: MP 2

BIKR FBI Unique Asset ID: ____Not currently available

Derived From:		SYSTEM/PROJECT POC Name: Program Office:		FBI OGC/PCLU POC	
Classified By:				Name: Phone:	b6
Reason:					b70
Declassify On:	Division	Division: FLSD Phone:		Room Number:	
	Phone:				
	Room N	umber: 1B301			
	Program Manager (or of executive as Division det	** *	Division F	rivacy Officer	
	executive as Division det	ermines)			
Program Division: ITSD	Signature:		Signature:		
	Date signed: 11/30/2010		Date signe	ed: 11/30/2010	ь6
	Name:			Name:	
	Title: ITS		Title:		b70
FBIHQ Division:	Signature:		Signature:		
[insert division name]	Date signed:		Date signed:		
	Name:		Name:		
	Title:		Title:		

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

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

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

the state of the s	in the state of th		
PIA is required by the E-Government Act.			
PIA is to be completed as a matter of FBI/I	OOJ discretion.		
Is PIA to be published on FBI.GOV (after any R	MD FOIA redactions)? Yes No (indicate reason):		
X PIA is not required for the following reas System does not collect, maintain, or of System is grandfathered (in existence X Information in the system relates to in System has been previously assessed to X No significant privacy issues (or privacy Other (describe):	disseminate PII. before 4/17/2003; no later changes posing significant privacy risks). Internal government operations. Inder an evaluation similar to a PIA.		
Applicable SORN(s):DOJ/FBI-	002/classification for administrative matters		
	YesSee sample EC on PCLU intranet website here: %20Liberties%20Library/form_for_miog190-2-3_ec.wpdYes (indicate revisions needed):		
Prepare/revise/add Privacy Act (e)(3) statements	for related forms?NoYes (indicate forms affected):		
The system may contain Federal records whether or schedule approved by the National Archives and Ro	ID to identify/resolve any Federal records/electronic records issues. In not it contains Privacy Act requests and, in any event, a records ecords Administration is necessary. RMD can provide advice on this ctronic Recordkeeping Certification and any necessary updates.		
Other:			
, Deputy General Counsel	Signature: Elizabeth Withnell		
FBI Privacy and Civil Liberties Officer Date Signed: 3/11/2011			

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

MP2 is a COTS database that collects information regarding building
maintenance.
2. Does the system/project collect, maintain, or disseminate any information about individuals (i.e., a human being or natural person, regardless of nationality)?
NATION AND COMPLETE AND ADDRESS AS A STATE OF THE STATE O
NO [If no, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval. Unless you are otherwise advised, no PIA is required.]
X YES [If yes, please continue.]
3. Please indicate if any of the following characteristics apply to the information in the system about individuals: Bear in mind that log-on information may identify or be linkable to an individual. (Check all that apply.)
X The information directly identifies specific individuals. Employee names – those making a maintenance request or those performing the work – is the only PII maintained in this system.
The information is intended to be used, in conjunction with other data elements, to indirectly identify specific individuals.

(INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE) b6 b7C b7E

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

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
5. Is information about United States citizens or lawfully admitted permanent resident aliens retrieved from the system/project by name or other personal identifier?
NO. [If no, skip to question 7.]
X YES. [If yes, proceed to the next question.]
6. Does the system/project collect any information directly from the person who is the subject of the information?
X NO [If no, proceed to question 7.]
YES
a. Does the system/project support criminal, CT, or FCI investigations or assessments?
NO
YES [If yes, proceed to question 7.]
b. Are subjects of information from whom the information is directly collected provided a written Privacy Act (e)(3) statement (either on the collection form or via a separate notice)?
NO [The program will need to work with PCLU to develop/implement the necessary form(s).]
YES Identify any forms, paper or electronic, used to request such

(INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE)

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

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 administrativ 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
MP2 will be accredited under its parent operating system.
YES If yes, please indicate the following, if known:
Provide date of last C&A certification/re-certification:

(INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE)