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

FOUO Sensitive But Unclassified (added WAM 5/7/07)

NAME OF SYSTEM: Digital Collection System (DCS) 6000

FBI SYSTEM CONTACT PERSON

Name: [REDACTED]

Program Office: Telecommunications Intercept Collections Technology Unit (TICTU)

Division: Operational Technology Division

Phone: [REDACTED]

Room Number: 4A64 Engineering Research Facility E (ERF-E), Quantico VA

Date PTA submitted for approval: 19 April 2007

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

	Program Division: Operational Technology	FBIHQ Division: S&T Branch (OTD)
Program Manager (or other appropriate executive as Division determines)	Signature: /s/ Date signed: 20 April 2007 Name: [REDACTED] Title: Supervisory Special Agent	Signature: /s/ Date signed: 4/20/07 Name: [REDACTED] Title: UC
Division Privacy Officer	Signature: /s/ Date signed: 4/24/07 Name: Charles B. Smith Title: Acting SC	Signature: Date signed: Name: Title:

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

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature: /s/ Dave C. Larson for PWK Date Signed: 4/27/07 Name: Patrick W. Kelley Title: Deputy General Counsel
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Upon final FBI approval, FBI OGC will distribute as follows:

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1 - FBI OCIO

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

2* - Program Division POC /Privacy Officer

2* - FBIHQ Division POC /Privacy Officer

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

1 - OGC/PCLU intranet website

1 - PCLU Library

1 - PCLU Tickler

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: DCS-6000 ~~FOUO/SBU~~ (added WAM 5/7/07)

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

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

A. General System Description: Please briefly describe:

Mission: The mission of the DCS-6000 is to provide the FBI with a state of the art digital collection system for Title III authorized telecommunication interceptions. These interceptions must be monitored in real time and must provide the ability to meet all mandated requirements associated with the Title III standards.

Description:

The DCS-6000 is a computer based Electronic Surveillance (ELSUR) collection systems designed to conduct court-ordered ELSUR telephone and microphone collection operations. Title III evidence collection is accomplished [REDACTED]

[REDACTED]

[REDACTED] The DCS-6000 can collect ELSUR data under the following warrant types:

· [REDACTED]

· Title III - limited to call data and call content

· [REDACTED]

1. Type of information in the system: Title III ELSUR evidence collection system. This system collects and stores the following types of information:

· telephone and microphone voice data

· Call data content

[REDACTED]

· [REDACTED]

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

The information is collected in support of Title III cases and is used in the pursuit of these cases only.

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

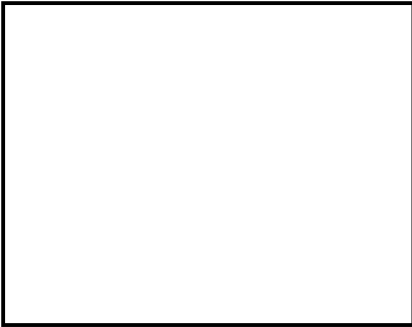
NAME OF SYSTEM: DCS-6000 FOUO/SBU (added WAM 5/7/07)

Major System Components

The DCS-6000 suite consists of [REDACTED] the DCS-6000 suite [REDACTED]

[REDACTED] The

DCS-6000 consists of the following functionalities:



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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: DCS-6000 FOUO/SBU (added WAM 5/7/07)

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

In addition to physical access to the system via the workstation, the following system connections are maintained:

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: DCS-6000 FOUO/SBU (added WAM 5/7/07)

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

FBI Personnel

The FBI Criminal Investigative Division (CID) and the FBI Counter Terrorism Division (CTD) are the primary users of DCS-6000. In addition, technical personnel who work at the Operational Technology Division (OTD) of the FBI Engineering Research Facility (ERF) also work with these systems

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General Access Controls

In addition to the numerous laws, regulations, and policies that influence the operation and modification of all current information technology (IT) systems and the development of new ones, the development and operation of the DCS-6000 and the conduct of those personnel who are part of its operation, have been, and will continue to be, rigidly controlled by the mandates of United States Code 18, Crimes and Criminal Procedure (i.e., 18 USC 2510 et seq., 2701 et seq., and 3121 et seq.). Virtually every activity associated with an FBI electronic surveillance operation is performed with these requirements firmly in mind. This system and the people who operate it must comply with all the legal requirements that this code stipulates for the conduct of every aspect of FBI electronic surveillance operations. Moreover, the system was developed with a set of security policies integrated into it that help enforce compliance with those requirements during its operation. Finally, the personnel who participate in the operation of the system are closely monitored to ensure they comply with this code. These inherent security components of the DCS-6000 system itself and of its operation collectively provide an additional layer of information security that is not present for the operation of most other IT systems that handle SBU information.

Handling

As an unclassified system, Dissemination is tightly controlled under Title III of the US Code. All

generated in support of a Title III case are labeled, stored, transported, and transferred according to very clearly prescribed and strictly enforced Title III procedures.

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: DCS-6000 ~~FOUO/SBU~~ (added WAM 5/7/07)

Access

Access to Title III data is rigidly controlled and governed by the various Title III mandates of U.S Code 18, Crimes and Criminal Procedure.

Unauthorized access to evidentiary audio files or to the DCS-6000 system is highly unlikely due to the tightly controlled nature of the workplace in which Title III operations are conducted. Numerous and varied security measures are in place both physically and electronically to prevent such inappropriate activity.



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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: DCS-6000 FOUO/SBU (added WAM 5/7/07)

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 DCS-6000 requires that task force elements which may be comprised of FBI personnel, other law enforcement personnel [REDACTED] be granted access to FBI information because of their unique abilities, skills or knowledge. The same holds true for linguists, analysts and monitors. This is not required for all investigations, but there are instances where the FBI will benefit greatly from their contribution.

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Organizational Affiliation

All Personnel accessing this system are affiliated with either the FBI or on rare occasions when vendor maintenance is required, JSI personnel. In the case of vendor access, all access is escorted.

Formal Access Requirements

[REDACTED]

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[REDACTED]

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[REDACTED] Finally, any mishandling of evidentiary files by case participants may compromise the legality of a case and may result in their arrest and punishment according to the laws governing such activity.

On rare occasions, the DCS-6000 Program Manager calls maintenance and asks them to respond to an emergency relating to a system problem at one of the field offices. If an FBI representative is asked to respond, the program manager will sign the representative's FD Form 540, Travel Request, and notify the field office of the representative's impending arrival on site. If a contractor technical representative (i.e., JSI) is required to perform emergency maintenance on system equipment at a field office, then the program manager would direct the representative to perform the maintenance and would notify the field office of his or her arrival. It is important to note that all system contractor technical representatives have undergone and passed FBI limited background investigations and have been authorized to do this work.

[REDACTED]

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: DCS-6000 ~~FOUO/SBU~~ (added WAM 5/7/07)

Access Controls See Question 5 above.

7. Has this system been certified and accredited by the FBI Security Divisions? ☒_X_Yes ☐_No
8. Is this system encompassed within an OMB-300? ☒_X_Yes ☐_No ☐_Don't Know
(If yes, please attach copy of latest one.)

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

☒_X_ YES (If "yes," proceed to Question 1.) DCS-6000 has been operational

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☐_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.

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: DCS-6000 FOUO/SBU (added WAM 5/7/07)

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

(Continue to Question 2.)

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

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

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

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

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

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

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

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

III. Full or Short-Form PIA

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

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

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

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

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

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

SMIS-FC&A

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

NAME OF SYSTEM: SMIS-FC&A

FBI SYSTEM CONTACT PERSON Name: Program Office: Division: Phone: Room Number: Date PTA submitted for approval:	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: [insert division name]	FBIHQ Division:[insert division name]
Program Manager (or other appropriate executive as Division determines)	Signature: Date signed: Name: Title:	Signature: Date signed: 6/20/08 Name: <input type="text"/> Title: Program Manager
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: Date signed: 6/20/08 Name: <input type="text"/> Title: Deputy Assistant Director

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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: Date Signed: 6/17/08 Name: David C. Larson Title: Acting Deputy General Counsel
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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

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

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

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

A. General System Description: Please briefly describe:

1. Type of information in the system:

The Facilities Certification and Accreditation (FC&A) system is a component of the Security Management Information System (SMIS), a multi-year technology initiative employing knowledge management to increase the ability of the FBI to develop, analyze, share, manage and store security related data in order to reduce risk to people, facilities, operations and information.

The FC&A will be a part of the Automated Facilities Management System (AFMS), a collaboration of efforts with the Facilities and Logistics Services Division's (FLSD) Planning, Design and Construction Management Unit (PDCMU), an online system that will allow specific bureau personnel, with access to FBINet, to track facilities management processes and report on facilities information.

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

The SMIS FC&A system is used solely by FBI's Security Division (SecD), Physical Security Unit (PSU) to track facilities security certification and accreditation, an internal government operation. The only information in the system that identifies individuals consists of the names of FBI facilities security managers.

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

The overall goals and objectives of this project include the following:

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

See above response.

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

See above response.

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

Access to FC&A will be controlled by unique user accounts and system roles. Only users assigned to the FBI's

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM: [insert name]

Personnel Compliance Unit (PCU), Physical Security Unit (PSU), and FC&A Administrator and ISSO roles will have access to user account data. Only the Privileged User and system administrators will have access to the server's desktop.

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can access the information:

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:

N/A.

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



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300\SMIS OMB-300 2

(If yes, please attach copy of latest one.)

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

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

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

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

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

(Continue to Question 2.)

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

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

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

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

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

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

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

☐ No. (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy

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

NAME OF SYSTEM: [insert name]

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):
See above response.

(Continue to Question 2.)

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

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

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

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

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

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

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

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

III. Full or Short-Form PIA

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

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

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

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM: [insert name]

completion of a full PIA. (PTA is
complete---forward with PIA.)

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

FBI Privacy Threshold Analysis (PTA) Cover Sheet

(OGC/PCLU (Rev. 1/17/07))

NAME OF SYSTEM: HumRRO FBI Classified Laptop System

FBI SYSTEM CONTACT PERSON

Name: **Acting Unit Chief** [REDACTED]
Program Office: **Career Path Unit**
Division: **Human Resources Division (D-3)**
Phone: [REDACTED]
Room Number: **Room 1B-233, Bldg. 9, FBI Academy Quantico**
Date PTA submitted for approval: **05/01/2007**

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

	Program Division: EDSP, HRD	FBIHQ Division: HRD (D-3)
Program Manager (or other appropriate executive as Division determines)	Signature: Date signed: Name: [REDACTED] Title: Assistant Section Chief	Signature: Date signed: 5/4/07 Name: Timothy D. Cox Title: Section Chief
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: Date signed: 5/7/07 Name: [REDACTED] Title: HRD 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: Date Signed: 5/15/07 Name: Patrick W. Kelley Title: Deputy General Counsel
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1 - PCLU Library

1 - PCLU Tickler

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: HumRRO FBI Classified Laptop System

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

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

A. General System Description: Please briefly describe: **The Human Resources Research Organization (HumRRO) FBI Classified Laptop System, accredited to process classified information up to the SECRET level.**

1. Type of information in the system: **Non-personally identifiable information consisting of minutes from contractor-held focus group meetings with FBI employees who are Subject Matter Experts (SMEs) regarding the tasks performed and the knowledge, skills and abilities required in their area of specialization, information generated from the analysis of the results of those meetings, and information related to the preparation of reports to the FBI by HumRRO as deliverables under the contracts.**

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 HumRRO contracts (OPM Project Codes: 02EA3TS218 and 02EA3TS251) provide analysis of multiple job series. The purpose of this analysis is to determine program-specific competencies and their associated developmental opportunities. Program-specific competencies reflect specialized knowledge, skills or abilities that are required to perform the critical job tasks. For each program-specific competency developed, HumRRO must identify proficiency levels, measurable behavioral indicators and related development opportunities. This system is used to record minutes from focus groups, analyze the recorded information, and prepare reports for the FBI. The goal is to describe what personnel in various internal FBI departments do and how they do it in order to improve training. Each task addresses a different focus group. In addition, the data gathered from the questionnaires will be analyzed by a statistical software package to facilitate the identification of the important tasks and knowledge-skills-and-abilities (KSAs). Finally, this information system will be used to produce various deliverables associated with the generation of the tasks, KSAs, and then ultimately competencies. These deliverables include lists, as well as the final report.**

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

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

All personnel authorized to use this information system have a security clearance of Secret, at a minimum, and are authorized as having need-to-know status. All authorized personnel are HumRRO employees or contractors and are required to have a Secret level security clearance, as defined by the project requirements. Each person authorized to access this information system has agreed to the user rules of behavior for this system. Upon change in access or termination, the specified user's login will be disabled.

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: HumRRO FBI Classified Laptop System

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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: **Acting Unit Chief**

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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:

7. Has this system been certified and accredited by the FBI Security Divisions? ☒ Yes ☐ No
EC dated 03/07/2007, file/serial number 319U-HQ-A1487677-SECD-523

8. Is this system encompassed within an OMB-300? ☐ Yes ☒ No ☐ Don't Know
(If yes, please attach copy of latest one.)

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

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

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

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

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

(Continue to Question 2.)

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

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

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: HumRRO FBI Classified Laptop System

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):

See A.2 supra

(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.)

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.)

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)?

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: HumRRO FBI Classified Laptop System

☐ 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.)

FBI Privacy Threshold Analysis (PTA) Cover Sheet

(OGC/PCLU (Rev. 1/17/07))

NAME OF SYSTEM:

b7E

FBI SYSTEM CONTACT PERSON

Name:

Program Office: OCIO

Division: IT Operations

Phone:

Room Number: 1334

Date PTA submitted for approval: 1/30/2007

b6

b7C

FBI DIVISION APPROVALS.

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

	Program Division:	FBIHQ Division:IT Operations
Program Manager (or other appropriate executive as Division determines)	Signature: Date signed: Name: Title:	Signature: Date signed: 01/31/2007 Name: <input type="text"/> Title: IT Specialist
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: Date signed: 01/31/2007 Name: <input type="text"/> Title: Asst. Section Chief

b6

b7C

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

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature: Date Signed: 2/20/07 Name: Patrick W. Kelley Title: Deputy General Counsel
---	--

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

1 - Original signed copy to 190-HQ-C1321794

Copies:

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

1 - FBI OCIO

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

2* - Program Division POC /Privacy Officer

2* - FBIHQ Division POC /Privacy Officer

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

1 - OGC/PCLU intranet website

1 - PCLU Library

1 - PCLU Tickler

EPIC-468

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

b7E

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

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

A. General System Description: Please briefly describe:

1. Type of information in the system:

- 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:

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

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

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:

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:

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

b7E

7. Has this system been certified and accredited by the FBI Security Divisions? ☒_X_Yes ☐_No
8. Is this system encompassed within an OMB-300? ☐_Yes ☒_X_No ☐_Don't Know
(if yes, please attach copy of latest one.)

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

☐_YES (If "yes," proceed to Question 1.)

☒_X_NO (If "no," proceed to Section II.)

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

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

(Continue to Question 2.)

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

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

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

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

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

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

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

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

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

II. For systems developed after April 17, 2003.

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

b7E

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

(Continue to Question 2.)

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

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

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

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

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

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

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

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

III. Full or Short-Form PIA

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

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

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

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

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

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

FBI Privacy Threshold Analysis (PTA) Cover Sheet

(OGC/PCLU (Rev. 1/17/07))

NAME OF SYSTEM: Sensitive Compartmented Information Operational Network (SCION)

FBI SYSTEM CONTACT PERSON

Name:
Program Office: SCION
Division: IT Operations
Phone:
Room Number: FBIHQ 6421
Date PTA submitted for approval: April 30, 2007

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b7c

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

	Program Division: Directorate of Intelligence	FBIHQ Division: IT Operations
Program Manager (or other appropriate executive as Division determines)	Signature: Date signed: Name: Title:	Signature: Date signed: 4/27/2007 Name: Title: Chief, Telecom. Services Unit
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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: Date Signed: 4/30/2007 Name: Patrick W. Kelley Title: Deputy General Counsel

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

1 - Original signed copy to 190-HQ-C1321794

Copies:

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

1 - FBI OCIO

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

2* - Program Division POC /Privacy Officer

2* - FBIHQ Division POC /Privacy Officer

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

1 - OGC/PCLU intranet website

1 - PCLU Library

1 - PCLU Tickler

EPIC-429

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: SCION

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

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

A. General System Description: Please briefly describe:

SCION is the FBI enterprise network for processing, transmitting, and storing information at the TS/SCI level. The infrastructure employs augmented security measures, enforced user accountability, and enhanced information assurance methodology. SCION connects the FBI to the rest of the United States Government Intelligence Community (IC) through a connection to the Joint Worldwide Intelligence Communications System (JWICS) enabling the FBI National Security Professionals (NSP) to share information and coordinate with their counterparts throughout the IC.

b7E

1. Type of information in the system:

SCION is part of the architecture of the FBI that is employed by authorized users to access and exchange classified intelligence information. Users may create and store documents related to counter intelligence and counter terrorism activities.

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

The only personally identifiable information stored in the system are lists of authorized users, their passwords, and their clearance levels. These data are used to authorize logins to the system and ensure that users are only permitted access to information they are authorized to see.

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

The intelligence information accessed and collected by SCION users is used to identify potential threats to the security of the United States and develop counter terrorism and counter intelligence plans and strategies. User information is stored for enforcing access rules and for oversight and auditing purposes.

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

b7E

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: SCION

SCION users must have TS/SCI clearances and must be trained prior to being given access to the system. Each user has a unique user ID and password that must be entered in order to gain access to the system.

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:

FBI agents, intelligence analysts, and other authorized FBI personnel and contractors with TS/SCI clearances may be granted access to SCION. Each user has a unique User ID and password that must be changed in accordance with FBI policy. The

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:

Authorized personnel from other Governmental Agencies and other members of the US Intelligence Community may be granted access to SCION. All of these external users must have TS/SCI clearances and must complete SCION user training and security briefings before being given access to the system. Each user has a unique User ID and password that must be changed in accordance with FBI policy.

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
(If yes, please attach copy of latest one.)

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

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

☐ 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:

Since initial deployment the system has been expanded for use throughout the FBI, its Field Offices, Resident Agencies and Legal Attaches in order to provide an integrated, centralized network that interconnects and consolidates access to all TS/SCI networks and related databases throughout the FBI.

(Continue to Question 2.)

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: SCION

☐ 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.) The only exception to this is, of course, as use has expanded, information about users has also expanded.

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: SCION

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.)

Privacy Threshold Analysis for the

Automated Case Support (ACS) Application

Federal Bureau of Investigation
Contact Point



**Information Technology Operations Division
(ITOD)**



b6
b7C

Reviewing Official:
Patrick W. Kelley,
Senior Privacy Official
Office of the General Counsel
Federal Bureau of Investigation
Department of Justice

Privacy Threshold Analysis

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

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

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

☒ YES

☐ NO

(If the answer is "yes" proceed to Question 1.)

(If the answer is "no", proceed to Section II.)

1. Has the system undergone any significant changes¹ since April 17, 2003?

☐ YES
☒ NO

¹ "Significant Changes" are defined as changes which create new privacy risks, such as, converting paper-based records to electronic systems; changing anonymous information into information in identifiable form; new uses of an IT system, including application of new technologies, significantly change how information in identifiable form is managed in the system; merging, centralizing, or matching databases that contain information in identifiable form with other databases, or otherwise significantly manipulating such databases; newly applying any user-authenticating technology to an electronic information system that is accessed by members of the public; systematically incorporating into existing information systems databases of information in identifiable form that are purchased or obtained from commercial or public sources; working with another agency or agencies on shared functions that involving significant new interagency uses or exchanges of information in identifiable form; altering a business process that results in significant new uses or disclosures of information or the incorporation into the system or addition items of information in identifiable form; or adding new information in identifiable form, the character of which raises the risks to personal privacy (for example, adding health or financial information).

(If "yes," please continue to Question 2.)

(If "no," the PTA is complete and should be sent to your component's Senior Privacy Officer if the system is a non-MIS or the PCLO if it is a MIS.)

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

☐ YES

☐ NO

(If the answer to Question 2 is "yes" please proceed to Question 3.)

(If the answer is "no" the Threshold Analysis is complete. Please send to your component's Senior Privacy Officer if the system is a non-MIS or the PCLO if it is a MIS.)

3. Is the system solely related to internal government operations?²
See page 6 of the PIA Manual.

☐ YES

☐ NO

(If the answer to Question 3 is "yes" the Threshold Analysis is complete.)

² When a PIA is NOT Required: No PIA is required where information relates to internal government operations; has been previously assessed under an evaluation similar to a PIA; or where privacy issues are unchanged. Examples of when a PIA would not be required: For government-run websites, IT systems, or collections of information to the extent that they do not collect or maintain information in identifiable form about members of the general public or where the information pertains to government personnel, contractors, or consultants; for government-run public websites where the user is given the option of contacting the site operator for the limited purposes of providing feedback or obtaining additional information; when all elements of a PIA are addressed in a matching agreement governed by the computer matching provisions of the Privacy Act of 1974; when all elements of a PIA are addressed in an interagency agreement permitting the merging of data for strictly statistical purposes and the resulting data is protected under Title V of the E-Government Act of 2002; when developing IT systems or collecting non-identifiable information for a discrete purpose, not involving matching with or retrieval from other databases that generate information in identifiable form; and for minor changes to a system or collection that do not create new privacy risks.

Automated Case Support (ACS) Application

Please send to your components Senior Privacy Officer if the system is a non-MIS or the PCLO if it is a MIS.)

(If the answer to Question 3 is "no" go to subsection 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 and proceed to Question 2.)

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

☐ YES

☐ NO

(If the answer to Question 2 is "yes" please proceed to Question 3.)

(If the answer is "no" the Threshold Analysis is complete. Please send to your components Senior Privacy Officer if the system is a non-MIS or the PCLO if it is a MIS.)

3. Is the system solely related to internal government operations?
See page 6 of the PIA Manual.

☐ YES

☐ NO

(If the answer to Question 3 is "yes" the Threshold Analysis is complete. Please send to your components Senior Privacy Officer if the system is a non-MIS or the PCLO if it is a MIS.)

(If the answer to Question 3 is "no" go to subsection 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?

☐ YES

☐ NO

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

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

2. Does the system involve routine information AND have limited use/access?
Please explain what type of information is collected and the access provided.
Please note that the reviewing official has the right to require the component
complete a full PIA.

☐ YES (Please explain what type of information is collected and the
access provided.

<<ADD ANSWER HERE>>

If "yes", a short-form PIA is required. 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.

☐ NO (If "no", a full PIA is required. In the interim, you must
complete a short form PIA. A full PIA will be required at a later date)

Automated Case Support (ACS) Application

Responsible Official:

[Redacted Signature]

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[Redacted Signature]

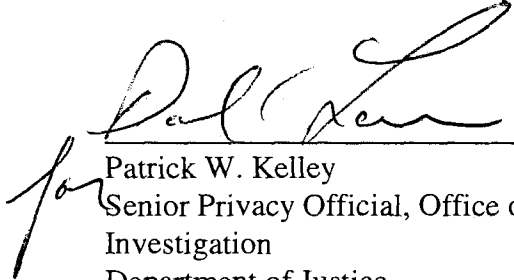
6/14/06 Sign Date>>

Federal Bureau of Investigation
Department of Justice

Automated Case Support (ACS) Application

Please note: If any significant changes are made to the application a new PTA should be completed.

Approval Signature Page:

 4/27/2007 <<Sign Date>>
Patrick W. Kelley
Senior Privacy Official, Office of the General Counsel, Federal Bureau of
Investigation
Department of Justice

Privacy Threshold Analysis for the

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Federal Bureau of Investigation
Contact Point

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**Information Technology Operations Division
(ITOD)**

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Reviewing Official:
Patrick W. Kelley,
Senior Privacy Official
Office of the General Counsel
Federal Bureau of Investigation
Department of Justice

Privacy Threshold Analysis

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

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

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

☒ YES

☐ NO

(If the answer is "yes" proceed to Question 1.)

(If the answer is "no", proceed to Section II.)

1. Has the system undergone any significant changes¹ since April 17, 2003?

☐ YES
☒ NO

¹ "Significant Changes" are defined as changes which create new privacy risks, such as, converting paper-based records to electronic systems; changing anonymous information into information in identifiable form; new uses of an IT system, including application of new technologies, significantly change how information in identifiable form is managed in the system; merging, centralizing, or matching databases that contain information in identifiable form with other databases, or otherwise significantly manipulating such databases; newly applying any user-authenticating technology to an electronic information system that is accessed by members of the public; systematically incorporating into existing information systems databases of information in identifiable form that are purchased or obtained from commercial or public sources; working with another agency or agencies on shared functions that involving significant new interagency uses or exchanges of information in identifiable form; altering a business process that results in significant new uses or disclosures of information or the incorporation into the system or addition items of information in identifiable form; or adding new information in identifiable form, the character of which raises the risks to personal privacy (for example, adding health or financial information).

(If "yes," please continue to Question 2.)

(If "no," the PTA is complete and should be sent to your component's Senior Privacy Officer if the system is a non-MIS or the PCLO if it is a MIS.)

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

☐ YES

☐ NO

(If the answer to Question 2 is "yes" please proceed to Question 3.)

(If the answer is "no" the Threshold Analysis is complete. Please send to your component's Senior Privacy Officer if the system is a non-MIS or the PCLO if it is a MIS.)

3. Is the system solely related to internal government operations?²
See page 6 of the PIA Manual.

☐ YES

☐ NO

(If the answer to Question 3 is "yes" the Threshold Analysis is complete.)

² When a PIA is NOT Required: No PIA is required where information relates to internal government operations; has been previously assessed under an evaluation similar to a PIA; or where privacy issues are unchanged. Examples of when a PIA would not be required: For government-run websites, IT systems, or collections of information to the extent that they do not collect or maintain information in identifiable form about members of the general public or where the information pertains to government personnel, contractors, or consultants; for government-run public websites where the user is given the option of contacting the site operator for the limited purposes of providing feedback or obtaining additional information; when all elements of a PIA are addressed in a matching agreement governed by the computer matching provisions of the Privacy Act of 1974; when all elements of a PIA are addressed in an interagency agreement permitting the merging of data for strictly statistical purposes and the resulting data is protected under Title V of the E-Government Act of 2002; when developing IT systems or collecting non-identifiable information for a discrete purpose, not involving matching with or retrieval from other databases that generate information in identifiable form; and for minor changes to a system or collection that do not create new privacy risks.

Please send to your components Senior Privacy Officer if the system is a non-MIS or the PCLO if it is a MIS.)

(If the answer to Question 3 is "no" go to subsection 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 and proceed to Question 2.)

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

☐ YES

☐ NO

(If the answer to Question 2 is "yes" please proceed to Question 3.)

(If the answer is "no" the Threshold Analysis is complete. Please send to your components Senior Privacy Officer if the system is a non-MIS or the PCLO if it is a MIS.)

3. Is the system solely related to internal government operations?
See page 6 of the PIA Manual.

☐ YES

☐ NO

(If the answer to Question 3 is "yes" the Threshold Analysis is complete. Please send to your components Senior Privacy Officer if the system is a non-MIS or the PCLO if it is a MIS.)

(If the answer to Question 3 is "no" go to subsection 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?

☐ YES

☐ NO

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

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

2. Does the system involve routine information AND have limited use/access?
Please explain what type of information is collected and the access provided.
Please note that the reviewing official has the right to require the component
complete a full PIA.

☐ YES (Please explain what type of information is collected and the
access provided.)

<<ADD ANSWER HERE>>

If "yes", a short-form PIA is required. 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.

☐ NO (If "no", a full PIA is required. In the interim, you must
complete a short form PIA. A full PIA will be required at a later date)

[Redacted]

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Responsible Official:

[Redacted]

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[Redacted]


6/14/06

<<Sign Date>>

Federal Bureau of Investigation
Department of Justice

Please note: If any significant changes are made to the application a new PTA should be completed.

Approval Signature Page:

 4/27/2007 <<Sign Date>>
for Patrick W. Kelley
Senior Privacy Official, Office of the General Counsel, Federal Bureau of
Investigation
Department of Justice

~~SENSITIVE BUT UNCLASSIFIED/FOR OFFICIAL USE ONLY~~

FBI Privacy Threshold Analysis (PTA) Cover Sheet

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

NAME OF SYSTEM: SIPRNET TO THE DESKTOP

Derived From:	SYSTEM POC	FBI OGC/PCLU POC
Classified By:	Name: [REDACTED]	Name: [REDACTED]
Reason:	Program Office: NEU	Phone: [REDACTED]
Declassify On:	Division: ITOD	Room Number: 7338
	Phone: [REDACTED]	
	Room Number: 1B964	

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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: [ITOD]	FBIHQ Division: [insert division name]
Program Manager (or other appropriate executive as Division determines)	Signature: [REDACTED]	Signature:
	Date signed: 6/6/08	Date signed:
	Name: [REDACTED]	Name:
	Title: NEU Unit Chief	Title:
Division Privacy Officer	Signature: [REDACTED]	Signature:
	Date signed: 6/6/08	Date signed:
	Name: [REDACTED]	Name:
	Title: DPO Room # 9911 Phone [REDACTED]	Title:

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: 8/27/08
	Name: [REDACTED]
	Title: Deputy General Counsel

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

1 - Signed original to 190-HQ-C1321794

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|--|-------------------------------|
| 1 - DOJ Privacy and Civil Liberties Office-Main Justice, Room 4259 | 1 - OGC/PCLU intranet website |
| 2 - FBI OCIO / OIPP | 1 - PCLU UC |
| 1 - FBI SecD (electronic copy via e-mail) | 1 - PCLU Library |
| 2* - Program Division POC /Privacy Officer | 1 - PCLU Tickler |
| 2* - FBIHQ Division POC /Privacy Officer | |

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

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PLU/OGC JUN 6, 2008

~~SENSITIVE BUT UNCLASSIFIED/FOR OFFICIAL USE ONLY~~
FBI PRIVACY THRESHOLD ANALYSIS (PTA)
NAME OF SYSTEM: SIPRNET TO THE DESKTOP (STTD)

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

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

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

A. General System Description: Please briefly describe:

1. Type of information in the system: This system is used currently for web browsing and email. No privacy information is collected or stored; it is a minor service under FBI Net General Support System.
2. Purpose for collecting the information and how it will be used: System does not collect or store privacy information.

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

--

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4. Means of accessing the system and transmitting information to and from the system: Any user with FBI Net access has access to STTD services. It is simply a service within FBI Net.
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: See answer to previous question.
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 users outside authorized FBI Net users.
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
(If yes, please attach copy of latest one.)

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

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

~~SENSITIVE BUT UNCLASSIFIED/FOR OFFICIAL USE ONLY~~
FBI PRIVACY THRESHOLD ANALYSIS (PTA)
NAME OF SYSTEM: SIPRNET TO THE DESKTOP (STTD)

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

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

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

(Continue to Question 2.)

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

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

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

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

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

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

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

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

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

II. For systems developed after April 17, 2003.

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

See A. 2 above.

(Continue to Question 2.)

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

~~SENSITIVE BUT UNCLASSIFIED/FOR OFFICIAL USE ONLY~~
FBI PRIVACY THRESHOLD ANALYSIS (PTA)
NAME OF SYSTEM: SIPRNET TO THE DESKTOP (STTD)

☐ 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.)
System does not store or collect privacy information, it is just a email and web browsing service at the desktop.

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.)

FBI Privacy Threshold Analysis (PTA) Cover Sheet

NAME OF SYSTEM: b3
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FBI SYSTEM CONTACT PERSON Name: <input type="text"/> Program Manager: <input type="text"/> Division: STAO Unit: CEU Phone: <input type="text"/> Date PTA submitted for approval: 8/22/2007	FBI OGC/PCLU POC Name: <input type="text"/> Phone: <input type="text"/> Room Number: LX-1 3S-126
---	--

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

	Program Division: [insert division name]	FBIHQ Division: Special Technologies and Applications Office (STAO)
Program Manager (or other appropriate executive as Division determines)	Signature: Date signed: Name: Title:	Signature: /s/ Date signed: 8/22/2007 Name: <input type="text"/> Title: Dep. Asst. Dir.
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: /s/ Date signed: 8/22/2007 Name: <input type="text"/> Title: SSA

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Upon Division approval, forward signed hard copy plus electronic copy to OGC/Privacy and Civil Liberties Law Unit (JEH Room 7338).

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature: /s/ Date Signed: 8/23/2007 Name: David C. Larson Title: Acting Deputy General Counsel
--	---

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

1 - Signed original to 190-HQ-C1321794

Copies to:

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

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

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

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:

(U//~~FOUO~~)

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(U//~~FOUO~~) 1. Type of information in the system:

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

(U//~~FOUO~~) 2. Purpose for collecting the information and how it will be used: n/a

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

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

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(U//~~FOUO~~) 4. Means of accessing the system and transmitting information to and from the system:

(U//~~FOUO~~) 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? See applicable PIAs and updates.

(U//~~FOUO~~) 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? See applicable PIAs and updates.

(U//~~FOUO~~) 7. Has this system been certified and accredited by the FBI Security Division?
x Yes ___ No

(U//~~FOUO~~) 8. Is this system encompassed within an OMB-300? _x_ Yes ___ No ___ Don't Know (Please attach copy of latest one.)

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

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

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

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

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

(Continue to Question 2.)

___ NO (If "no," the PTA is complete and should be sent to FBI OGC's Administrative Law Unit 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 Administrative

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

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Law Unit 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," please provide a brief explanation of a) the purpose of the system, and b) quantity and type of employee/contractor information:

☐ NO (If the answer to Question 3 is "no" go to subsection 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 and proceed to Question 2.)

(U//FOUO)

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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 Administrative Law Unit 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," please provide a brief explanation of a) the purpose of the system, and b) quantity and type of employee/contractor information:

☐ 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 If "yes, please explain what type of information is collected and the access provided:

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.)

Privacy Threshold Analysis for the

b7E

Federal Bureau of Investigation
Contact Point

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**Information Technology Operations Division
(ITOD)**

Reviewing Official:
Patrick W. Kelley,
Senior Privacy Official
Office of the General Counsel
Federal Bureau of Investigation
Department of Justice

Privacy Threshold Analysis

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

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

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

☒ YES

☐ NO

(If the answer is "yes" proceed to Question 1.)

(If the answer is "no", proceed to Section II.)

1. Has the system undergone any significant changes¹ since April 17, 2003?

☐ YES
☒ NO

¹ "Significant Changes" are defined as changes which create new privacy risks, such as, converting paper-based records to electronic systems; changing anonymous information into information in identifiable form; new uses of an IT system, including application of new technologies, significantly change how information in identifiable form is managed in the system; merging, centralizing, or matching databases that contain information in identifiable form with other databases, or otherwise significantly manipulating such databases; newly applying any user-authenticating technology to an electronic information system that is accessed by members of the public; systematically incorporating into existing information systems databases of information in identifiable form that are purchased or obtained from commercial or public sources; working with another agency or agencies on shared functions that involving significant new interagency uses or exchanges of information in identifiable form; altering a business process that results in significant new uses or disclosures of information or the incorporation into the system or addition items of information in identifiable form; or adding new information in identifiable form, the character of which raises the risks to personal privacy (for example, adding health or financial information).

(If "yes," please continue to Question 2.)

(If "no," the PTA is complete and should be sent to your component's Senior Privacy Officer if the system is a non-MIS or the PCLO if it is a MIS.)

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

☐ YES

☐ NO

(If the answer to Question 2 is "yes" please proceed to Question 3.)

(If the answer is "no" the Threshold Analysis is complete. Please send to your component's Senior Privacy Officer if the system is a non-MIS or the PCLO if it is a MIS.)

3. Is the system solely related to internal government operations?²
See page 6 of the PIA Manual.

☐ YES

☐ NO

(If the answer to Question 3 is "yes" the Threshold Analysis is complete.)

² When a PIA is NOT Required: No PIA is required where information relates to internal government operations; has been previously assessed under an evaluation similar to a PIA; or where privacy issues are unchanged. Examples of when a PIA would not be required: For government-run websites, IT systems, or collections of information to the extent that they do not collect or maintain information in identifiable form about members of the general public or where the information pertains to government personnel, contractors, or consultants; for government-run public websites where the user is given the option of contacting the site operator for the limited purposes of providing feedback or obtaining additional information; when all elements of a PIA are addressed in a matching agreement governed by the computer matching provisions of the Privacy Act of 1974; when all elements of a PIA are addressed in an interagency agreement permitting the merging of data for strictly statistical purposes and the resulting data is protected under Title V of the E-Government Act of 2002; when developing IT systems or collecting non-identifiable information for a discrete purpose, not involving matching with or retrieval from other databases that generate information in identifiable form; and for minor changes to a system or collection that do not create new privacy risks.

Please send to your components Senior Privacy Officer if the system is a non-MIS or the PCLO if it is a MIS.)

(If the answer to Question 3 is "no" go to subsection 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 and proceed to Question 2.)

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

☐ YES

☐ NO

(If the answer to Question 2 is "yes" please proceed to Question 3.)

(If the answer is "no" the Threshold Analysis is complete. Please send to your components Senior Privacy Officer if the system is a non-MIS or the PCLO if it is a MIS.)

3. Is the system solely related to internal government operations?
See page 6 of the PIA Manual.

☐ YES

☐ NO

(If the answer to Question 3 is "yes" the Threshold Analysis is complete. Please send to your components Senior Privacy Officer if the system is a non-MIS or the PCLO if it is a MIS.)

(If the answer to Question 3 is "no" go to subsection 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?

☐ YES

☐ NO

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

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

2. Does the system involve routine information AND have limited use/access?
Please explain what type of information is collected and the access provided.
Please note that the reviewing official has the right to require the component
complete a full PIA.

☐ YES (Please explain what type of information is collected and the
access provided.)

<<ADD ANSWER HERE>>

If "yes", a short-form PIA is required. 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.

☐ NO (If "no", a full PIA is required. In the interim, you must
complete a short form PIA. A full PIA will be required at a later date)

[Redacted]

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Responsible Official:

[Redacted]

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[Redacted]

6/14/00

<<Sign Date>>

Federal Bureau of Investigation
Department of Justice

Please note: If any significant changes are made to the applications a new PTA should be completed.

Approval Signature Page:



1/27/2007 <<Sign Date>>

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for Senior Privacy Official, Office of the General Counsel, Federal Bureau of Investigation
Department of Justice

FBI Privacy Threshold Analysis (PTA) Cover Sheet (Rev. 10/31/06)

NAME OF SYSTEM: Tactical Call Center (TaCC)

SYSTEM DESCRIPTION: [REDACTED]

[REDACTED] It is capable of recording, rerouting, and storing information related to consensual recording cases. [REDACTED]

[REDACTED]

FBI SYSTEM POINT OF CONTACT

Name: [REDACTED]

Program Office: TICTU

Division: OTD

Phone: [REDACTED]

Room Number: Room 4C86 (ERF-E, Quantico VA)

Date PTA submitted for approval: December 01, 2006

FBI DIVISION APPROVALS:

Program Manager (or other appropriate executive as Division determines)	Signature: /s/ Date signed: December 01, 2006 Name: [REDACTED] Title: TaCC Program Manager
Program Manager (or other appropriate executive as Division determines)	Signature: /s/ Date signed: 12/1/06 Name: SSA [REDACTED] Title: Intercept Collection Manager, ESTS
Unit Chief	Signature: /s/ Date signed: 12/1/06 Name: SSA [REDACTED] Title: Unit Chief, TICTU
Assistant Section Chief	Signature: /s/

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	Date signed: 12/14/06 Name: ASC [REDACTED] Title: Assistant Section Chief, ESTS
Section Chief	Signature: /s/ Date signed: 12/14/06 Name: SC Michael Clifford, Jr. Title: Section Chief, ESTS
Assistant Director	Signature: /s/ Date signed: Name: A/AD Marcus C. Thomas Title: Acting Assistant Director, OTD
Division Privacy Officer	Signature: /s/ Date signed: 12/15/2006 Name: ASC [REDACTED] Title: Division Privacy Officer, OTD

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

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature: /s/ Date Signed: 1/8/07 Name: Patrick W. Kelley Title: Deputy General Counsel
---	---

Upon final FBI approval, distribute as follows:

Original signed copy to 66F-HQ-C1321794

Copies:

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- 1 - FBI OCIO
- 1 - FBI SecD
- 2 - Division POC /Privacy Officer
(please reproduce as needed for Program/Division file[s])
- 1 - OGC\PCLU Intranet website
- 1 - PCLU Library
- 1 - PCLU Tickler

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

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

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

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

☒ YES (If "yes," proceed to Question 1.) However, see Section II(1), below.

☐ 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 Administrative Law Unit 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 Administrative Law Unit 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," please provide a brief explanation of a) the purpose of the system, and b) quantity and type of employee/contractor information:

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 Administrative Law Unit 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.)

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

II. For systems developed after April 17, 2003.

1. What is the purpose of the system? (Answer in detail and proceed 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 Administrative Law Unit 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," please provide a brief explanation of a) the purpose of the system, and b) quantity and type of employee/contractor information:

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 Administrative Law Unit 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.)

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

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 If "yes, please explain what type of information is collected and the access provided:

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.)

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

NAME OF SYSTEM: RPO Temporary Duty (TDY) Request

FBI SYSTEM CONTACT PERSON Name: [REDACTED] Program Office: Resource Planning Office (RPO) Division: Director's Office (DO) Phone: [REDACTED] Room Number: JEH 6220 Date PTA submitted for approval: 05/13/2008	FBI OGC/PCLU POC Name: AGC [REDACTED] Phone: [REDACTED] Room Number: JEH 7338
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FBI DIVISION APPROVALS.

	Program Division: Director's Office	FBIHQ Division: Director's Office
Program Manager (or other appropriate executive as Division determines)	Signature: [REDACTED] Date signed: [REDACTED] Name: [REDACTED] Title: RPO Project Manager	Signature: [REDACTED] Date signed: 6/19/08 Name: [REDACTED] Title: RPO Project Manager
Division Privacy Officer	Signature: [REDACTED] Date signed: [REDACTED] Name: [REDACTED] Title: BPMU Acting Unit Chief	Signature: [REDACTED] Date signed: 6/19/08 Name: [REDACTED] Title: BPMU Acting Unit Chief

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: 6/26/2008 Name: David C. Larson Title: Acting Deputy General Counsel
---	--

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

1 - Signed original to 190-HQ-C1321794

Copies:

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

2 - FBI OCIO / OIPP

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

2* - Program Division POC /Privacy Officer

2*- FBIHQ Division POC /Privacy Officer

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

1 - OGC/PCLU intranet website

1 - PCLU Library

1 - PCLU Tickler

NAME OF SYSTEM: RPO Temporary Duty (TDY) Request System

A. General System Description: Please briefly describe:

Within the FBI, temporary staffing vacancies are frequently filled by the use of Temporary Duty (TDY) assignments. The FBI's Resource Planning Office (RPO) has developed the TDY Request System which allows FBIHQ Divisions and all Field Offices to electronically submit requests seeking authorization to utilize TDY assignments. Requests for TDY authorization are processed using the FBI's [REDACTED] which permits electronic workflow management of TDY requests and also permits review of pending requests to verify their approval status. Once a TDY request has been submitted, the RPO reviews the request and determines whether to approve or deny the request.

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While the TDY Request System contains limited personally identifiable information (PII) about individuals specifically involved in the request for, and approval of, authorization to utilize TDYs, the system is not utilized to track, evaluate or select applicants for TDY assignments and does not, therefore, contain any information about applicants.

1. Type of information in the system:

The TDY Request System contains information pertaining to requests for authorization to meet a staffing need through a TDY assignment as well as the approval process for specific TDY requests. The information included in the system includes:

- name of individual requesting TDY authorization
- name of the Assistant Director overseeing the relevant investigative program
- whether the request is from HQ or a Field Office
- whether the position will be filled by an Agent or Support employee
- Branch/Division/Section/Unit making the request
- the purpose of the TDY
- the justification for the TDY
- duties to be performed in the TDY assignment
- evaluation of negative impact on FBI mission if TDY not approved
- specialized skills required in the TDY
- start date for the TDY

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

The Temporary Duty (TDY) Request System will be used solely for internal FBI operations - to evaluate the need for TDY assignments and track the approval process for such requests. The overall quantity of information will vary depending on the number of TDY requests that have been made. The types of information about each request were identified above.

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

As explained above, the system is used to collect, evaluate and process requests from FBIHQ and Field Offices to utilize a TDY to fill a staffing vacancy. The system, through its electronic workflow

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM: RPO Temporary Duty (TDY) Request System

procedures, provides a uniform process for submission, evaluation and approval of TDY requests.

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

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

An individual submitting a request for TDY authorization electronically completes form FD-1024, Request for Temporary Duty Assignment.

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:

Individuals involved in the submission or approval of specific TDY requests within the system have access to those requests in order to facilitate review and approval and to verify the status of a pending request. Designated employees within the RPO's Resource Analysis Unit (RAU), which processes and approves TDY requests, also serve as system administrators and have access to all TDY requests within the system.

This will be accomplished through review of audit logs.

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:

Access to the system is limited to FBI employees and authorized contractors; there is no external access to information in the system.

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

The Security Division has determined that this system does not require certification and accreditation

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

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

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM: RPO Temporary Duty (TDY) Request System

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

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

(Continue to Question 2.)

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

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

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

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

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

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

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

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

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

II. For systems developed after April 17, 2003.

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

The purpose of the RPO TDY system is to facilitate the electronic submission, evaluation and approval of requests to utilize a TDY assignment to fill a temporary staffing need within the FBI. See also Section A.2 above.

(Continue to Question 2.)

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

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

____ 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 PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM: RPO Temporary Duty (TDY) Request System

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.)

FBI Privacy Threshold Analysis (PTA) Cover Sheet

(Rev. 10/31/06)

NAME OF SYSTEM:

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FBI SYSTEM CONTACT PERSON

Name:
Program Office: Washington Field Office
Division: Security
Phone:
Room Number: 8th Fl
Date PTA submitted for approval: 12/29/2006

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FBI DIVISION APPROVALS:

Program Manager (or other appropriate executive as Division determines)	Signature: /s/ Date signed: 12/7/06 Name: <input type="text"/> Title: SA
Division Privacy Officer	Signature: /s/ Date signed: 12/7/06 Name: <input type="text"/> Title: CDC

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

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature: /s/ Date Signed: 8/6/07 Name: David C. Larson for Patrick W. Kelley Title: Deputy General Counsel
---	---

Upon final FBI approval, distribute as follows:

Original signed copy to 66F-HQ-C1321794

Copies:

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- 1 - FBI SecD
- 2 - Division POC /Privacy Officer
(please reproduce as needed for Program/Division file(s))
- 1 - OGC\PCLU Intranet website
- 1 - PCLU Library
- 1 - PCLU Tickler

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

b7E

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

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

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

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

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

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

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

(Continue to Question 2.)

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

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

NAME OF SYSTEM: [REDACTED]

SENSITIVE BUT UNCLASSIFIED/FOR OFFICIAL USE ONLY

FBI Privacy Threshold Analysis (PTA) Cover Sheet (OGC/PCLU (Rev. 05/02/07))

NAME OF SYSTEM: [REDACTED]

Derived From: Classified By: Reason: Declassify On:	SYSTEM POC Name: [REDACTED] Program Office: NEU Division: ITOD Phone: [REDACTED] Room Number: 1B964	FBI OGC/PCLU POC Name: [REDACTED] Phone: [REDACTED] Room Number: 7338
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FBI DIVISION APPROVALS. A PIA (and/or PTA) should be prepared/approved by the cognizant program management in collaboration with IT, security, and end-user management and OGC/PCLU. (PIAs/PTAs relating to electronic forms/questionnaires implicating the Paperwork Reduction Act should also be coordinated with the RMD Forms Desk.) If the subject of a PTA/PIA is under the program cognizance of an FBIHQ Division, prior to forwarding to OGC the PTA/PIA must also be referred to the FBIHQ Division for program review and approval, if required by the FBIHQ Division.

	Program Division: ITOD [REDACTED]	FBIHQ Division:[insert division name]
Program Manager (or other appropriate executive as Division determines)	Signature: [REDACTED] Date signed: 6/11/08 Name: [REDACTED] Title: NEU Unit Chief	Signature: Date signed: Name: Title:
Division Privacy Officer	Signature: [REDACTED] Date signed: 6/26/08 Name: [REDACTED] Title: DPO Room # 9911 Phone [REDACTED]	Signature: Date signed: Name: Title:

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: 7/27/08 Name: David C. Larson Title: Deputy General Counsel
---	---

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

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| 1 - FBI SecD (electronic copy via e-mail) | 1 - PCLU Library |
| 2* - Program Division POC /Privacy Officer | 1 - PCLU Tickler |
| 2* - FBIHQ Division POC /Privacy Officer | |

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

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM: **b7E**

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

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

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

A. General System Description: Please briefly describe:

1. Type of information in the system:

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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:

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

NAME OF SYSTEM:

b7E

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

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:

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:

b7E

7. Has this system been certified and accredited by the FBI Security Divisions? ☒ Yes ☐ No8. Is this system encompassed within an OMB-300? ☒ Yes ☐ No ☐ Don't Know
(If yes, please attach copy of latest one.)

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

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

(OGC/PCLU (Rev. 07/06/2010))

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


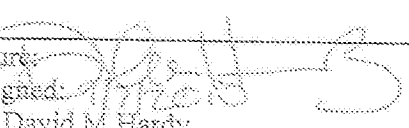
NAME OF SYSTEM / PROJECT: RMD Document Processing System (RDPS)

BIKR FBI Unique Asset ID: SYS- 0000072

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: <input type="text"/> Program Office: RMD Division: 17 Phone: <input type="text"/> Room Number: J-24	FBI OGC/PCLU POC Name: <input type="text"/> Phone: <input type="text"/> Room Number: JEH 7350
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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: Name: Title:
FBIHQ Division: Records Management Division	Signature:  Date signed: 7/16/10 Name: David M Hardy Title: RIDS Section Chief	Signature:  Date signed: 7/16/10 Name: David M Hardy Title: RIDS Section 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.)

RMD Document Processing System (RDPS)

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS: N/A

- ☒ 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): FBI-002, The FBI Central Records System, 63 Fed. Reg. 8671 (Feb. 20, 1998), as amended 66 Fed. Reg. 8425 (Jan. 31, 2001), 66 Fed. 17,200 (Mar. 29, 2001), 66 Fed. Reg. 33,558 (June 22, 2001), 70 Fed. Reg. 7513, 17 (Feb. 14, 2005), 72 Fed. Reg. 3410 (Jan. 25, 2007).

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

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

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

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

Other:

Elizabeth Withnell, Acting Deputy General
 Counsel
 Acting FBI Privacy and Civil Liberties Officer

Signature:
 Date Signed:

Elizabeth W. Withnell
 12/3/10

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 RMD Document Processing System (RDPS) contains a work flow system that performs three functions: (1) tracks and manages Freedom of Information/Privacy Act (FOIPA) requests; (2) tracks and manages name check requests; [REDACTED]

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Specifically, RDPS contains a single data repository that is accessed through one of three applications supported by RDPS:

1. FOIPA Document Processing System (FDPS)

FDPS processes documents electronically, tracks workload, and streamlines the collaboration and review process associated with complex FOIPA requests. The system maintains imaged requests for information and scanned images of original documents, both of which may contain personally identifiable information. [REDACTED]

[REDACTED] FDPS is responsible for managing the internal government function of responding to FOIA and Privacy Act requests.

3. Name Check Dissemination Database (NCDD)

NCDD processes documents electronically, tracks workload, and streamlines the collaboration and review process associated with complex name check requests from other agencies. National Name Check Program Section¹

¹ The mission of the National Name Check Program (NNCP) is to disseminate information from FBI files in response to name check requests received from Federal agencies including internal offices within the

RMD Document Processing System (RDPS)

(NNCPS) personnel track cases proposed for dissemination, store all communications generated for each, and retrieve previously completed cases as well as detect cases already in process, by searching names and case numbers. Additionally, NNCPS personnel are able to redact information from documents that are scanned directly into the system or downloaded to the user's computer from ACS and imported into NCDD.



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Documents in FBI files associated with the name check are scanned and imported into the case file. The case is then forwarded through the workflow to individuals who review the images associated with the request for pertinent information regarding the name check. Information that is not pertinent is redacted to prevent sensitive non-related FBI information from being disseminated to other government agencies. When the case is completed, a summary is prepared with information from FBI files pertaining to the name check request and sent to the appropriate agency.

All RDPS supported applications are executed from [REDACTED]

[REDACTED] RDPS relies on [REDACTED]

[REDACTED] Users will be granted rights to the RDPS servers via [REDACTED]

[REDACTED]

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

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

☒ YES [If yes, please continue.]

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

(Check all that apply.)

☒ The information directly identifies specific individuals.

FBI; components within the Legislative, Judicial, and Executive branches of the Federal Government; friendly foreign police and intelligence agencies; and state and local law enforcement agencies within the criminal justice system for the purpose of protecting the United States from espionage and terrorism.

Unclassified

EPIC-246

RMD Document Processing System (RDPS)

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

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

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

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

☒ NO ☐ YES

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

☐ NO. [If no, skip to question 7.]

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

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

☒ NO [If no, proceed to question 7.]

☐ YES

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

☐ NO

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

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

RMD Document Processing System (RDPS)

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

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

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

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

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

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

_____ SSNs are important for other reasons. Describe:

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

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

8. Is the system operated by a contractor?

_____ No.

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

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:

RMD Document Processing System (RDPS)

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

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

10/6/2008

Confidentiality: ☐ Low ☐ Moderate ☒ High ☐ Undefined

Integrity: ☐ Low ☒ Moderate ☐ High ☐ Undefined

Availability: ☐ Low ☒ Moderate ☐ High ☐ Undefined

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

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

☒ NO

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

11. Does the system conduct data mining as defined in Section 804 of the Implementing Recommendations of the 9/11 Commission Act of 2007, P.L. 110-53 (codified at 42 USC 2000ee-3)?

☒ NO

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

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

☒ NO

☐ YES

13. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

9/12/2007

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

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

RMD Document Processing System (RDPS)

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

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

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

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

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

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

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

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

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

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

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

☐ Other [Provide brief explanation]:

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

☒ **NO** ☐ **YES**

[The last PTA was completed on 8/14/08. This PTA was drafted in order to align the FBI's policy requirement for PTA completion. Although the system has undergone significant changes since the last PTA, these changes were related to hardware and software upgrades and not how the information is kept or disseminated.]

RMD Document Processing System (RDPS)

If yes:

a. Provide date/title of the PIA:

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

_____ NO _____ YES

Unclassified

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM / PROJECT

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: <input type="text"/> Program Office: Tracking Technology Division: OTD Phone: <input type="text"/> Room Number: ERF B	FBI OGC/PCLU POC Name: Phone: Room Number:
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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division:	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:
FBIHQ Division: OTD	Signature: Date signed: Name: <input type="text"/> Title: Program Manager	Signature: Date signed: Name: J. Clay Price Title: Section Chief

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

Unclassified

EPIC-252

FBI PTA

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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. UCFN is linkable to an individual in many cases and, in any event, we ought to have a PIA for our geospatial analysis tools, of which this is one.

☐ 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):
Unclear at this time.

☐ 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): CRS

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:

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

Signature: /s/
Date Signed: 5/20/2010

FBI PTA:

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

1. Description

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FBI PTA:

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

YES. [If yes, please continue.]

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

NO.

FBI PTA

b7E

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

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

NO.

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

NO.

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

YES.:

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

NO

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

NO.

10. Status of System/ Project:

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? October 2007

FBI PTA

b7E

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

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

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

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

NO.