

☒ NO ☐ YES

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

☐ NO. [If no, skip to question 7.]

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

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

☒ NO [If no, proceed to question 7.]

☐ YES

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

☐ NO

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

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

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

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

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

☒ NO ☐ YES If yes, check all that apply:

It is not anticipated that users would provide their SSNs [redacted]
However, should they do so, and the SSN is relevant to the FBI's [redacted] it
will be collected.

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

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

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

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

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

8. Is the system operated by a contractor?

X No.

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

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

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

has not undergone C&A by the FBI SecD as is not connected to any FBI networks.

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

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

Confidentiality: Low Moderate High Undefined

Integrity: Low Moderate High Undefined

Availability: Low Moderate High Undefined

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

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

☒ NO ☐ YES **If yes, please describe the data mining function:**

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

☐ NO ☒ YES

12. Status of System/ Project:

☒ This is a new system/ project in development.

II. EXISTING SYSTEMS / PROJECTS

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

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

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

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

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

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

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

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

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

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

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

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

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

_____ Other [**Provide brief explanation**]:

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

_____ NO _____ YES

If yes:

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

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

___ NO ___ YES

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

NAME OF SYSTEM / PROJECT: [REDACTED]

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Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: [REDACTED] Program Office: CIRG/CITU Division: CIRG Phone: [REDACTED] Room Number: Aquia, Stafford	FBI OGC/PCLU POC Name: [REDACTED] Phone: [REDACTED] Room Number:
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FBI DIVISION INTERMEDIATE APPROVALS

	Program Division: CIRG	FBIHQ Division: CIRG
Program Manager (or other appropriate executive as Division determines)	Signature: [REDACTED] Date signed: 7/8/2009 Name: [REDACTED] Title: Information Technology Specialist (ITS)	Signature: [REDACTED] Date signed: 08/04/2009 Name: Lewis M. Chapman L.M.H. TILTON Title: Section Chief Acting
Division Privacy Officer	Signature: [REDACTED] Date signed: 8/04/2009 Name: [REDACTED] Title: CIRG SSA/CDC/Division Privacy Officer	Signature: [REDACTED] Date signed: [REDACTED] Name: [REDACTED] Title: [REDACTED]

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

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

PIA required: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes:	SORN/SORN revision required: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes:
Applicable SORN(s):	
Notify FBI RMD/RIDS per MIOG 190.2.3: <input type="checkbox"/> No <input type="checkbox"/> Yes	
Consult with RMD to identify/resolve any Federal records/electronic records issues: <input type="checkbox"/> No <input type="checkbox"/> Yes:	
Prepare/revise/add Privacy Act (e)(3) statements for related forms? <input type="checkbox"/> No <input type="checkbox"/> Yes-forms affected:	
Other: This PTA involved infrastructure and therefore does not require a PIA.	
David C. Larson, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: [REDACTED] Date Signed: 8/10/09

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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

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

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

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

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

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

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

2 - Program Division POC /Privacy Officer

2 - FBIHQ Division POC /Privacy Officer

1 - OGC/PCLU intranet

1 - PCLU UC

1 - PCLU Library

1 - PCLU Ticker

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

[Redacted]

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

1. Name of the system/project. Provide current name, any previous or anticipated name changes, and any associated acronyms:

[Redacted]

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2. Briefly describe the system's/project's structure (including identification of any components/subsystems or parent system, if applicable):

[Redacted]

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The current authority-to-operate expires June 2, 2012.

3. What is the purpose for the system/project?

[Redacted] main purpose is to provide the infrastructure for the [Redacted]
[Redacted] is in the process of migrating from the [Redacted]
[Redacted] to the [Redacted]
[Redacted] covers all the [Redacted]
[Redacted] The mission of the [Redacted] is to provide support [Redacted]

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[Redacted]

[Redacted]

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4. Please provide a general summary of the nature of information in the system/project and how it will be used:

Generally, the information that is collected [Redacted]
[Redacted]
[Redacted] does not store any information. [Redacted]
[Redacted]

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)
NAME OF SYSTEM / PROJECT:

[REDACTED]

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[REDACTED] is simply the infrastructure used to [REDACTED]

[REDACTED]

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[REDACTED] in

accordance with approved standard operating procedures (SOP).

[REDACTED]

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5. 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))?

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

[REDACTED]

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

Any PII is maintained on the system that [REDACTED] has a PIA awaiting approval.

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_____ **YES.** If yes, please continue.

6. Access

a. Describe the means of accessing the system/project and transmitting information to and from the system/project.

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

c. Describe who outside the FBI will have access to the information in the system/project and the controls for ensuring that only authorized persons can access the information:

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

_____ **NO.**

_____ **YES.** If yes, provide a brief explanation of the quantity and type of information:

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

_____ **NO**

_____ **YES**

9. Are Social Security Numbers collected, maintained or disseminated from the system/project?

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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_____ NO

_____ YES. This system supports law enforcement and/or intelligence activities. Every deployment is unique and may collect different types of information to support the current mission requirements.

If yes, for systems/projects **other than** those supporting law enforcement or intelligence activities:

- What is the purpose for the collection, maintenance or dissemination of SSNs?

- Is it feasible to eliminate SSNs from the system/project (please indicate why or why not)?

- In light of Federal policy to reduce the use of SSNs, is it feasible to minimize system/project-user access to SSNs in the system/project (why or why not)?

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

_____ NO

_____ YES.

If yes, for systems/projects **other than** those relating to criminal investigations, CT, or CI:

- Indicate how such information is collected:

- Identify by name and form number any forms used to request such information from the information subject (this includes paper or electronic forms):

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

_____ Yes _____ No

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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

_____ Don't Know

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

_____ NO _____ Don't know

_____ YES. If yes, if the name of the OMB 300 is not the same as the name of the system/project, please provide OMB name:

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

_____ NO _____ YES _____ Don't know

14. Status of System/ Project:

_____ This is a new system/ project in development. [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.]

_____ This is an existing system/project. [Continue to Section II.]

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

b7E

- _____ 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. [Please provide brief explanation]:

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

_____ NO

_____ YES. If yes, please provide date/title of the PIA:

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: [REDACTED]

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BIKR FBI Unique Asset ID: 209-061-01-P-113-215-3411

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: [REDACTED] Program Office: ITB Division: ITSD Phone: [REDACTED] Room Number: 8979	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: WMD	Signature: [REDACTED] Date signed: 10-14-12 Name: [REDACTED] Title: Management & Program Analyst	Signature: [REDACTED] Date signed: 11/5/2012 Name: [REDACTED] Title: Management & Program Analyst
FBIHQ Division: ITSD	Signature: [REDACTED] Date signed: 10/15/12 Name: [REDACTED] Title: IT Specialist	Signature: [REDACTED] Date signed: 10/16/12 Name: [REDACTED] Title: Chief, [REDACTED] [REDACTED]

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

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

☐ PIA is required by the E-Government Act.

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

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

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

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

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

☐ Information in the system relates to internal government operations.

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

☐ No significant privacy issues (or privacy issues are unchanged).

☒ Other (describe): This system meets the requirements of the Routine Database PIA.

Applicable SORN(s): CRS/Justice/FBI-002

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

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

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

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

Other:

Elizabeth W. [Signature] Deputy General Counsel
FBI Privacy and Civil Liberties Officer

Signature:
Date Signed:

[Signature] 9/6/12

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

- A) *Project Name:* [REDACTED]
Acronyms: [REDACTED]
- B) *Structure:* [REDACTED] has been developed in the [REDACTED] environment, which has been certified separately. [REDACTED] Environment received its Authority To Operate (ATO) via the C&A process on 11/17/2008 (Reference EC 319U-HQ-A1487677-SECD Serial 1455). See the [REDACTED] for the [REDACTED]
- C) *Purpose:* The purpose of the [REDACTED]
[REDACTED] by interviewing the subjects of these cases. WMD Operations Unit (WMDOU) has currently identified more than [REDACTED] for potential interviews.
- D) *Nature of Information:* Most of this information will be case related and will contain limited biographical data. Name, Social Security Number and specific identifiers will not be included per IRB regulations.
- E) *Who will have access:* Users will be assigned to a group based on their role in the system with specific privileges given for that group. The following is a brief summary of role types and privileges:
1. WMD Admin - For select WMDOU and Behavioral Analysis Unit (BAU) personnel to review and modify the protocol as well as any information entered into the database. These individuals will also be able to add Users/Reviewers to the database.
 2. Information Technology Services Division (ITSD) Admin - For select ITSD personnel to modify the protocol or information as requested by WMDOU personnel.
 3. User - For the Coders/Interviewers to enter the information for their assigned cases. They will also be given Read Only access to all of the information in the database.
 4. Reviewer - Read Only access to all of the information in the database (this access will be given on a case by case basis).
- F) *Manner of transmission to all users:* [REDACTED] will only be available on FBI workstations accredited to the SECRET level and will be accessed through an internal web browser.

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

____ NO

X YES [If yes, please continue.]

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

(Check all that apply.)

_____ The information directly identifies specific individuals.

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

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

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

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

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

 X NO _____ YES

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

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

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

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

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

 X YES

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

_____ NO

 X YES **[If yes, proceed to question 7.]**

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

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

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

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

☒ NO ☐ YES If yes, check all that apply:

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

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

☐ SSNs are important for other reasons. Describe:

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

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

8. Is the system operated by a contractor?

☒ No.

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

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

☒ NO If no, indicate reason; if C&A is pending, provide anticipated completion date: Pending, completion anticipated 03/29/2012

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

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

Confidentiality: ☐ Low ☐ Moderate ☐ High ☐ Undefined

Integrity: ☐ Low ☐ Moderate ☐ High ☐ Undefined

Availability: ☐ Low ☐ Moderate ☐ High ☐ Undefined

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

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

☒ NO

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

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

☒ NO ☐ YES

12. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

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

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

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

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

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

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

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

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

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

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

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

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

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

_____ Other [Provide brief explanation]:

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

_____ NO _____ YES

If yes:

a. Provide date/title of the PIA:

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

___ NO ___ YES

[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.]