

\_\_\_\_\_ 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.]**

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

## FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM / PROJECT: Government Deployment Overseas Tracking (GDOT)

BIKR FBI Unique Asset ID: 2009-033-01-P-401-122-3411

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: [REDACTED]	Name:
Reason:	Program Office: INTASU	Phone:
Declassify On:	Division: ITSD	Room Number:
	Phone: [REDACTED]	
	Room Number: 8979	

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

	Program Manager Benjamin M Scrivens	Division Privacy Officer
Program Division:	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:
FBIHQ Division:	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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

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

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

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](mailto:privacy@usdoj.gov); if classified, via hand delivery to 1331 Penn. Ave. NW, Suite 940, 20530)
- 1- OGC/PCLU intranet
- 2- FBI OCIO / OIPP [REDACTED]
- 1- FBI SecD/AU (UC [REDACTED])
- 1- RMD/RMAU [REDACTED]
- 1- Program Division POC
- 1- Division Privacy Officer

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

\_\_\_\_\_ PIA is required by the E-Government Act.

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

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

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

\_\_\_\_\_ System does not collect, maintain, or disseminate PII.

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

☒ Information in the system relates to internal government operations.

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

\_\_\_\_\_ No significant privacy issues (or privacy issues are unchanged).

\_\_\_\_\_ Other (describe):

Applicable SORN(s): 025-367/PAR-003

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](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 R. Withnell, Acting Deputy General  
Counsel  
FBI Privacy and Civil Liberties Officer

Signature:  
Date Signed:

*Elizabeth R. Withnell*  
9/12/2010

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

A) *Project Name:* Government Deployment Overseas Tracking (GDOT)

B) *Structure:*

[Redacted]

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C) *Purpose:* The CTD manages all overseas deployments (TDYs) to Afghanistan and Iraq, with personnel providing support for investigations in those countries. Currently, employees requesting an overseas deployment manually submit several pages of information in hardcopy to CTD. If accepted the hardcopy application is then forwarded for review/approval to several external groups, (e.g. Health Care, Psychological, Training, and Logistics). GDOT application will automate this process allowing the employee to enter their request online and provide data validation. GDOT will also be providing CTD with the ability to track and monitor the status of each user request in real time.

D) *Nature of Information:* Most of this information will be personnel related, e.g., SSN, name, title, office location, type of training, deployment preferences, foreign language capabilities, etc. Information will be used to determine the type of overseas deployment assignment for a particular person.

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. [Redacted]  
2. [Redacted]  
3. [Redacted]  
4. [Redacted]

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F) *Manner of transmission to all users:* Information will be sent electronically to all users who have the need to know per the user roles defined in E).

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

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

   X    YES [If yes, please continue.]

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

   X    The information directly identifies specific individuals.

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

   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?

       NO    X    YES

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

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

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

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

       NO [If no, proceed to question 7.]

☒ YES

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

☐ NO

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

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

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

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

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

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

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

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

☐ SSNs are important for other reasons. Describe:

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

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

8. Is the system operated by a contractor?

☒ No.

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

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

☒ NO If no, indicate reason; if C&A is pending, provide anticipated completion date: Pending: 10/1/2010

\_\_\_\_ YES If yes, please indicate the following, if known:

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

Confidentiality: \_\_\_\_ Low \_\_\_\_ Moderate \_\_\_\_ High \_\_\_\_ Undefined

Integrity: \_\_\_\_ Low \_\_\_\_ Moderate \_\_\_\_ High \_\_\_\_ Undefined

Availability: \_\_\_\_ Low \_\_\_\_ Moderate \_\_\_\_ High \_\_\_\_ Undefined

\_\_\_\_ Not applicable -- this system is only paper-based.

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

\_\_\_\_ NO

☒ YES If yes, please provide the date and name or title of the OMB submission: 8/17/2010 FBI Intelligence Applications Systems Support

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:

X 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.

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\_\_\_\_\_ 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 PIA 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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Unclassified

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

## FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: Guardian One-Way Transfer

BIKR FBI Unique Asset ID: SYS-000264

	<b>SYSTEM/PROJECT POC</b> Name: <input type="text"/> Program Office: GMU Division: CTD Phone: <input type="text"/> Room Number: <input type="text"/>	<b>FBI OGC/PCLU POC</b> Name: <input type="text"/> Phone: <input type="text"/> Room Number: 7350
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### FBI DIVISION INTERMEDIATE APPROVALS

	<b>Program Manager (or other appropriate executive as Division determines)</b>	<b>Division Privacy Officer</b>
<b>Program Division: Counterterrorism Division (CTD)</b>	Signature: <input type="text"/> Date signed: 11/7/13 Name: <input type="text"/> Title: Unit Chief, Guardian Management Unit (GMU)	Signature: <input type="text"/> Date signed: 11/7/13 Name: <input type="text"/> Title: Unit Chief, Executive Staff Communications, Policy, & Compliance Unit (ES-CPCU)
<b>FBIHQ Division: Counterterrorism Division (CTD)</b>	Signature: <input type="text"/> Date signed: 11/7/13 Name: Stephen A Bucar Title: Section Chief, Exploitation Threat Section (XTS)	Signature: <input type="text"/> Date signed: <input type="text"/> Name: <input type="text"/> Title: Unit Chief, Executive Staff Communications, Policy, & Compliance Unit (ES-CPCU)

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

**FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:**

☐ PIA is required by the E-Government Act.

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

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

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

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

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

☒ Information in the system relates to internal government operations.

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

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

☐ Other :

Applicable SORN(s): FBI-022, Data Warehouse System and DOJ-002, Department of Justice computer Systems Activity and Access Records

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](http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd)

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

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

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

Other:

☐ Acting Unit Chief  
Privacy and Civil Liberties Unit

Signature: ☐

Date Signed: ☐

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

Signature: 

Date Signed: 1-8-2013

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## I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

a. **Name:** Guardian One-Way Transfer (Guardian OWT)

b. **Structure:** The Guardian OWT [REDACTED]

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[REDACTED] The Guardian OWT is a cross-domain system that connects eGuardian to Guardian.

c. **Purpose:** The Guardian OWT is used to automatically transfer data from eGuardian to Guardian. Data is placed in a folder on the low side OWT server. It is detected within seconds and moved through the system to the high side OWT server. Once on the high side, it is detected within seconds and moved into the Guardian database.

d. **Nature of the Information:** Suspicious Activity Report records being transferred from eGuardian to Guardian. No data is retained on the OWT servers. Audit logs for the transfers are maintained in eGuardian and Guardian, not in the transfer system. There is no separate login for the transfer system.

e. **Who will have access:** Data is only accessible by system administrators and only for a very short time.

f. **Transmission to users:** Data is not transmitted to users by the Guardian OWT.

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

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

       YES [If yes, please continue.]

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

(Check all that apply.)

       The information directly identifies specific individuals.

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

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

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

\_\_\_\_\_ None of the above. If none of the above, describe why the information does not identify specific individuals either directly or indirectly.

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

\_\_\_\_\_ NO      \_\_\_\_\_ YES

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

\_\_\_\_\_ NO. [If no, skip to question 7.]

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

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

\_\_\_\_\_ NO [If no, proceed to question 7.]

\_\_\_\_\_ YES

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

\_\_\_\_\_ NO

\_\_\_\_\_ YES [If yes, proceed to question 7.]

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

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

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

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

\_\_\_\_\_ NO \_\_\_\_\_ YES If yes, check all that apply:

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

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

\_\_\_\_\_ SSNs are important for other reasons. Describe:

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

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

8. Is the system operated by a contractor?

\_\_\_\_\_ No.

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

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

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

\_\_\_\_\_ 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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FOI/PA  
DELETED PAGE INFORMATION SHEET  
FOI/PA# 1272295-0

Total Deleted Page(s) = 1  
Page 4 ~ b3; b7E;

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

## FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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BIKR FBI Unique Asset ID: SYS-0000037

	<b>SYSTEM/PROJECT POC</b> Name: <span style="border: 1px solid black; display: inline-block; width: 100px; height: 20px; vertical-align: middle;"></span> Program Office: GMU Division: CTD Phone: <span style="border: 1px solid black; display: inline-block; width: 100px; height: 20px; vertical-align: middle;"></span> Room Number: JEH, Rm 4933	<b>FBI OGC/PCLU POC</b> Name: <span style="border: 1px solid black; display: inline-block; width: 100px; height: 20px; vertical-align: middle;"></span> Phone: <span style="border: 1px solid black; display: inline-block; width: 100px; height: 20px; vertical-align: middle;"></span> Room Number: JEH, Rm 7350
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### FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Counterterrorism Division (CTD)	Signature: <span style="border: 1px solid black; display: inline-block; width: 150px; height: 20px; vertical-align: middle;"></span> Date signed: <u>2/4/14</u> Name: <span style="border: 1px solid black; display: inline-block; width: 100px; height: 20px; vertical-align: middle;"></span> Title: Unit Chief, Guardian Management Unit (GMU)	Signature: <span style="border: 1px solid black; display: inline-block; width: 150px; height: 20px; vertical-align: middle;"></span> Date signed: <u>2/4/14</u> Name: <span style="border: 1px solid black; display: inline-block; width: 100px; height: 20px; vertical-align: middle;"></span> Title: <u>PIO</u>
FBIHQ Division: Counterterrorism Division (CTD)	Signature: <span style="border: 1px solid black; display: inline-block; width: 150px; height: 20px; vertical-align: middle;"></span> Date signed: <u>1/2/14</u> Name: Stephen A. Bucar Title: Section Chief, Exploitation Threat Section (XTS)	Signature: <span style="border: 1px solid black; display: inline-block; width: 150px; height: 20px; vertical-align: middle;"></span> Date signed: <u>2/1/14</u> Name: <span style="border: 1px solid black; display: inline-block; width: 100px; height: 20px; vertical-align: middle;"></span> Title: Unit Chief

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

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**FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:**

☐ PIA is required by the E-Government Act.

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

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

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

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

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

☐ Information in the system relates to internal government operations.

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

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

☒ Other:

Due to the limited nature of this pilot, a PIA is not required at this time. However, if the FBI decides to continue this sharing after the 90 day period expires or significantly alters the proposed pilot, a PIA will be required.

Applicable SORN(s): DOJ/FBI-022, FBI Data Warehouse System, 77 Fed. Reg. 40630 (July 10, 2013)

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](http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd)

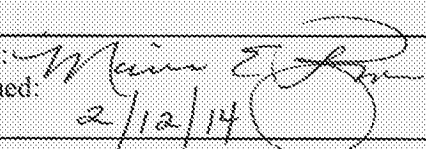
SORN/SORN revision(s) required? ☒ No ☐ Yes

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

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

Other:

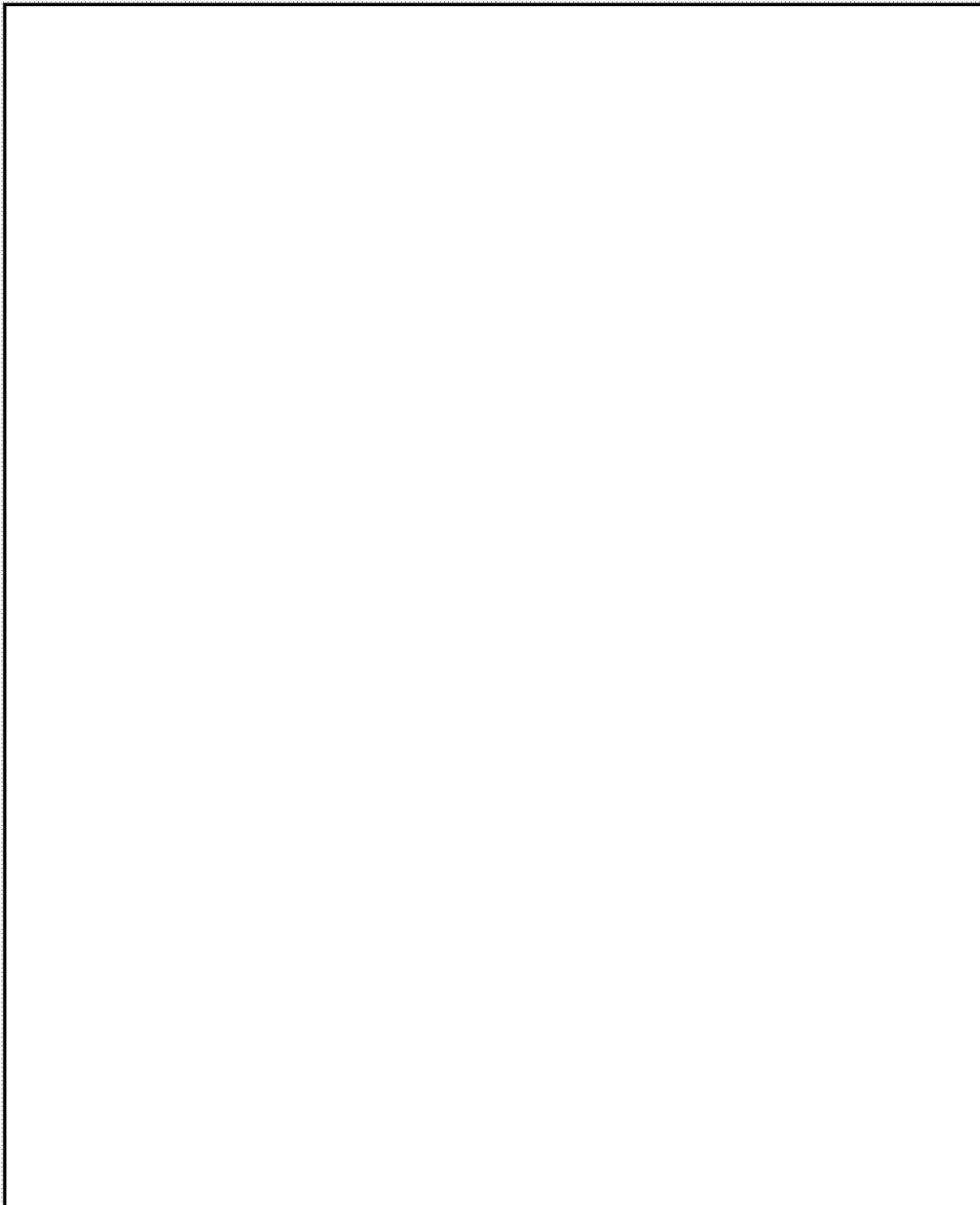
Monica E. Ryan, Unit Chief  
Privacy and Civil Liberties Unit  
FBI Privacy and Civil Liberties Officer

Signature:   
Date Signed: 2/12/14



## **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.**



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

  X   YES [If yes, please continue.]

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

  X   The information directly identifies specific individuals.

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

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

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

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

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

☒ NO ☐ YES

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

☐ NO. [If no, skip to question 7.]

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

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

☒ NO [If no, proceed to question 7.]

☐ YES

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

☐ NO

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

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

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

☐ 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:**

  X   It is not feasible for the system/project to provide special protection to SSNs. **Explain:** SSNs are entered into \_\_\_\_\_ when available to assist investigations. \_\_\_\_\_

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**8. Is the system operated by a contractor?**

  X   No.

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

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

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

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

Provide date of last C&A certification/re-certification:  
February 11, 2013

Confidentiality: Low X Moderate High Undefined

Integrity: Low X Moderate High Undefined

Availability: Low X 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)?

X NO

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       YES If yes, please describe the data mining function:

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

       NO

X 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? 2005

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

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

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

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

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

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

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

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

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

X 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 X YES

If yes:

a. Provide date/title of the PIA:

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

\_\_\_\_\_ NO X YES

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

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

## FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM / PROJECT: Hiring Management System

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: [REDACTED]	Name: [REDACTED]
Reason:	Program Office:	Phone: [REDACTED]
Declassify On:	Division: HRD	Room Number: JEH, Rm 7350
	Phone: [REDACTED]	
	Room Number: GP 702B	

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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: Human Resources Division	Signature: [REDACTED] Date signed: 5/17/10 Name: [REDACTED] Title: UC HRIS	Signature: [REDACTED] Date signed: 5/13/2010 Name: [REDACTED] Title: UC PAMO
FBIHQ Division: Human Resources Division	Signature: [REDACTED] Date signed: 5/17/10 Name: [REDACTED] Title: UC HRIS	Signature: [REDACTED] Date signed: 5/13/2010 Name: [REDACTED] Title: UC PAMO

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

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

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

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

- |   |  |
|---|--|
| 1 - DOJ Office of Privacy and Civil Liberties (via e-mail to<br>privacy@usdoj.gov)<br>(if classified, via hand delivery to 1331 Penn. Ave. NW, Suite 940,<br>20530) | 1 - OGC/PCLU intranet<br>1 - PCLU UC<br>1 - PCLU Library<br>1 - PCLU Tickler |
| 2 - FBI OCIO / OIPP (JEH 9376, attn: [REDACTED])  |  |
| 1 - FBI SecD/AU (elec. copy: via e-mail to UC [REDACTED])   |  |
| 1 - RMD/RMAU (attn: [REDACTED])   |  |
| 2 - Program Division POC /Privacy Officer   |  |
| 2 - FBIHQ Division POC /Privacy Officer   |  |

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**FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:**

\_\_\_\_\_ PIA is required by the E-Government Act.

\_\_\_X\_\_\_ PIA is to be completed as a matter of FBI/DOJ discretion.

Is PIA to be published on FBI.GOV (after any RMD FOIA redactions)? \_\_\_X\_\_\_ 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): CRS, FBI-002

Notify FBI RMD/RIDS per MIOG 190.2.3? \_\_\_X\_\_\_ No \_\_\_\_\_ Yes--See sample EC on PCLU intranet website here:  
[http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form\\_for\\_milog190-2-3\\_ec.wpd](http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_milog190-2-3_ec.wpd)

SORN/SORN revision(s) required? \_\_\_X\_\_\_ No \_\_\_\_\_ Yes (indicate revisions needed):

Prepare/revise/add Privacy Act (e)(3) statements for related forms? \_\_\_X\_\_\_ No \_\_\_\_\_ Yes (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: \_\_\_\_\_  
 Date Signed: 6/30/2011

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### I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

The Hiring Management Suite is an internet web application comprised of the following components: Hiring Management Component, Hiring Management Analytics Component, and Hiring Management Position Classification Component. All data used by these components are contained in electronic format, stored on a group of relational database servers. The Hiring Management Suite relies on a computer network (both LAN and public Internet), hardware and supporting infrastructure components, to operate with reliability and perform daily business functions.

The purpose of the FBI's Hiring Management System is to automate minimum qualification determinations, veteran's preference adjudications, and the rating and ranking processes. The FBI's Hiring Management System is a commercial off-the-shelf tool that meets current and future strategic workforce hiring goals and improves the quality of the candidate selection process. There is a requirement imposed on the FBI, by the Department of Justice and the Office of Personnel Management, to use a hiring management system that utilizes the power of the Internet and automation that improves the recruiting and staffing process.

The FBI's Hiring Management System collects information from individuals inside and outside of the FBI who wish to be considered for Special Agent and Professional Staff positions being filled by the FBI. The FBI Hiring Management System is integrated with the Office of Personnel Management's USAJOBS Web site. On the OPM website, applicants initially enter personal identifying information, answer a series of registration questions and enter resume information covering periods of current and past employment. Thereafter, using the Hiring Management System, applicants must enter user information, which includes personally identifiable information and must answer a series of questions that are specifically related to the position for which the individual is applying to complete the FBI's online job application process. The sources of applicant information are the general public (including all Federal employees and U. S. citizens) and internal FBI Support employees. The information collected includes the following:

#### Personal Identifying Information

- (1) Name
- (2) Social Security Number
- (3) Date of Birth
- (4) Home Address

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- (5) Home and Cellular Telephone Numbers
- (6) Fax Number
- (7) Electronic Mail Address

Core Registration Questions

- (1) Are you a veteran who was separated from the armed forces under honorable conditions after completing an initial continuous tour of duty of three (3) years or released just a few days short of three (s) years? *(Must Answer)*
- (2) Are you a veteran with a compensable service-connected disability of 30% or more? *(Must Answer)*
- (3) Are you now, or have you have been, a civilian Federal employee? *(Must Answer)*
- (4) If you are/were a civilian Federal employee, by what agency and organization are/were you employed? *(Must Answer)*
- (5) If you selected "Other", please enter the agency and organization.
- (6) If you are a current Federal employee, what is your duty station? [City, State] (Enter N/A if Not Applicable) *(Must Answer)*
- (7) If you are a currently a Federal employee, under what type of appointment are you serving? *(Must Answer)*
- (8) If you are NOT currently serving as a permanent Federal employee, have you previously held a permanent appointment or time-limited appointment eligible for conversion to a permanent appointment in the Federal government? *(Must Answer)*
- (9) If you are, or ever were a Federal civilian employee, please indicate pay plan, series and grade of the highest graded position you held (i.e., GS 0343-14). *(Must Answer)*
- (10) If you are a current civilian Federal employee, please indicate the level of security clearance you hold (Enter NA if Not Applicable): *(Must Answer)*
- (11) Are you a retiree receiving a Federal annuity, either military or civilian? *(Must Answer)*
- (12) Have you accepted a buyout from a Federal agency within the past 5 years? *(Must Answer)*
- (13) May we contact your current supervisor for a reference? *(Must Answer)*
- (14) If you are a male at least 18 years of age, born after December 31, 1959, have you registered with the Selective Service System? *(Must Answer)*

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(15) I understand that my answers to the following questions determine my suitability for application to ANY position with the FBI? *(Must Answer)*

(16) I am willing to undergo a comprehensive background investigation which includes, but is not limited to: contact with all references, employers, coworkers, close personal associates, etc.; review of driving record; credit history; criminal history; and service in the military. *(Must Answer)*

(17) I am willing to undergo a pre-employment polygraph, physical examination, and a urinalysis drug test? Refusal to submit to an FBI urinalysis (drug test) or polygraph examination is grounds for disqualification for the applicant process.  
*(Must Answer)*

(18) Are you currently in default (failing to make payments) on a student loan insured by the U.S. Government?  
*(Must Answer)*

(19) Have you ever been convicted of a felony? *(Must Answer)*

(20) Have you used marijuana/cannabis during the last three (3) or have you extensively used marijuana/cannabis over a substantial period of time? *(Must Answer)*

(21) Have you used any illegal drug(s) or combination of illegal drugs, other than marijuana, during the past ten (10) years or engaged in more than minimal experimentation in your lifetime? (For purposes of this question, the term "illegal drugs" includes the use of anabolic steroids after February 27, 1991, unless the steroids were prescribed by a physician for your use alone to alleviate a medical condition.) *(Must Answer)*

(22) Have you used an illegal drug(s) while employed in any law enforcement or prosecutorial position; or while employed in a position which carries with it a high level of responsibility or public trust; or while holding a security clearance? *(Must Answer)*

(23) Have you distributed or sold any illegal drugs for profit? *(Must Answer)*

(24) Are you a member of any foreign or domestic organization, association, movement, group, or combination of persons which is totalitarian, fascist, communist, or subversive, or which has adopted, or shows a policy of advocating or approving, the commission of acts of force or violence to deny other persons their rights under the Constitution of the United States, or which seeks to alter the form of Government of the U.S. by unconstitutional means? *(Must Answer)*

(25) Are you eligible to be appointed pursuant to a special hiring authority? If so, you may eligible to apply for a non-competitive appointment with the FBI if you meet certain

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eligibility requirements, such as veterans preference status, eligibility for a Veterans Recruitment Appointment, or are a person with a covered disability. (*Must Answer*)

Resume Information

- (1) Title of Position Held
- (2) Pay Plan, Series and Grade (if Federal position)
- (3) Dates Employed in Position
- (4) Salary
- (5) Employer's Name and Address
- (6) Supervisor's Name and Phone Number
- (7) Duties and Responsibilities of Position

Vacancy-Specific Questions

These questions vary from position to position, and are designed to elicit information from the individual regarding the alignment of their education, training, and work experience with the requirements of the position for which he/she is applying, and the strength of his/her qualifications for the position. The information is used to make decisions regarding the selection of individuals to fill Special Agent and Support positions in the Federal Bureau of Investigation.

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

\_\_\_\_\_ NO [If no, STOP. The FIA 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 FIA is required.]

\_\_\_X\_\_\_ YES [If yes, please continue.]

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

\_\_\_X\_\_\_ NO \_\_\_\_\_ YES

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

\_\_\_\_\_ NO \_\_\_X\_\_\_ YES

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

\_\_\_\_\_ NO    X 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.

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

X SSNs are important for other reasons. Describe: **SSNs are necessary to establish/confirm the identity of applicants in the system.**

X The system/project provides special protection to SSNs (e.g., SSNs are encrypted, hidden from all users via a look-up table, or only available to certain users). Describe: **Individuals with access to the system will only see the last four digits of the SSN. The rest of it is masked.**

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

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

\_\_\_\_\_ NO    [If no, proceed to question 7.]

X YES

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

\_\_\_\_\_ YES    [If yes, proceed to question 7.]

X NO    The system indirectly supports such investigations or assessments only to the extent that a Universal Name Index (UNI) check may show that the person under investigation applied to an FBI job via Munster Government Solutions (MGS).

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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: Applicants are provided a Privacy Act (e)(3) statement via USAJOBS.

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

☒ NO If no, indicate reason; if C&A is pending, provide anticipated completion date: The Security Division determined that C&A was not required because the servers are not owned by the FBI.

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

\_\_\_\_\_ Don't Know.

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

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

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

☒ NO \_\_\_\_\_ YES \_\_\_\_\_ Don't know

10. Status of System/ Project:

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

## II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? April 2004

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

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

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

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

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

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

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

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

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

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

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

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

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

☐ Other [Provide brief explanation]:

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

☐ NO ☒ YES

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If yes:

a. **Provide date/title of the PIA:** Administrative Law Unit Correspondence Privacy Impact Assessment (PIA), 05/10/2004

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

☒ NO ☐ YES

[The PIA is now complete and after division approval(s) should be submitted to FBI OGC/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: Hewlett Packard Multi-Function Printer Digital Sending Software  
(HP MFP DSS) [REDACTED]

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BIKR FBI Unique Asset ID: \_\_\_\_\_

Derived From: Classified By: Reason: Declassify On:	<b>SYSTEM/PROJECT POC</b> Name: [REDACTED] Program Office: FBI/ITB Division: ITSD Phone: [REDACTED] Room Number: 9342 (FBIHQ)	<b>FBI OGC/PCLU POC</b> Name: [REDACTED] Phone: [REDACTED] Room Number: 7350
--	--	---

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### FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: ITSD/CSS/HQSUI	Signature: [REDACTED] Date signed: 5/29/12 Name: [REDACTED] Title: Unit Chief	Signature: [REDACTED] Date signed: [REDACTED] Name: [REDACTED] Title: IT Specialist
FBIHQ Division: ITSD / CSS	Signature: [REDACTED] Date signed: 5/29/12 Name: Naomi E. Singer Title: Section Chief	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 7350).  
(The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)

**FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:**

\_\_\_\_ PIA is required by the E-Government Act.

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

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

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

X 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): \_\_\_\_\_ N/A \_\_\_\_\_

Notify FBI RMD/RIDS per MIOG 190.2.3? \_\_\_\_ No \_\_\_\_ Yes--See sample EC on PCLU intranet website here:  
[http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form\\_for\\_miog190-2-3\\_ec.wpd](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:

____ Unit Chief Privacy and Civil Liberties Unit	Signature: _____ Date Signed: _____	6/14/12
James J. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: _____ Date Signed: _____	6/14/12

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## I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

- Name of the system/project, including associated acronyms: Hewlett Packard Multi-Function Printer Digital Sending Software (HP MFP DSS)

[REDACTED]

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- Structure of the system/project, including interconnections with other projects or systems / purpose of the system/project / nature of the information in the system/project and how it will be used / who will have access to the information in the system/project / the manner of transmission to all users:

This Privacy Threshold Analysis concerns the [REDACTED] of multi-function printers.

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As of this date, there are [REDACTED] HP Multi-Function Printers that are utilized on the FBINET enclave. The devices, which are used throughout the 56 field and Legat offices, have the ability to print, copy and scan to FBINET workstations. The services that the DSS instance provides has become a "mission critical" need for the users throughout the enterprise.

The current instance / infrastructure to support the DSS servers are physical devices [REDACTED]

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[REDACTED]

[REDACTED]

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The best practice as recommended by the HP subject matter experts is to have a

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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)?

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

       YES    [If yes, please continue.]

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

       The information directly identifies specific individuals.

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

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

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

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

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

       NO                             YES

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

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

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

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

\_\_\_\_\_ NO [If no, proceed to question 7.]

\_\_\_\_\_ YES

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

\_\_\_\_\_ NO

\_\_\_\_\_ YES [If yes, proceed to question 7.]

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

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

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

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

\_\_\_\_\_ NO \_\_\_\_\_ YES If yes, check all that apply:

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

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

\_\_\_\_\_ SSNs are important for other reasons. Describe:

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

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

8. Is the system operated by a contractor?

\_\_\_\_\_ No.

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

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

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

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

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

**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 PIA 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: Hair Comparison Review (HCR) application (resides on TACNET)

BIKR FBI Unique Asset ID: NEN-0000073 (TACNET)

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By: N/A	Name: ITS [REDACTED]	Name: AGC [REDACTED]
Reason:	Program Office: Advanced Concepts Unit	Phone: [REDACTED]
Declassify On:	Division: STAS	Room Number: 7350 JEH
	Phone: [REDACTED]	
	Room Number: CHI01, 14800CCD	

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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: Laboratory Division	Signature: [REDACTED] Date signed: 12/20/12 Name: [REDACTED] Title: Unit Chief, Trace Evidence Unit	Signature: [REDACTED] Date signed: 12/20/12 Name: John J. Behun Title: Section Chief, Laboratory Division
FBIHQ Division:	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7350).

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

## FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

\_\_\_\_ PIA is required by the E-Government Act.

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

Is PIA to be published on FBI.GOV (after any RMD FOIA redactions)? \_\_\_\_ Yes. X No: This application comprises a routine FBI database. A Routine Database Checklist will be posted on the PCLU website.

\_\_\_\_ 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): \_\_\_\_ The FBI Central Records System, JUSTICE/FBI-002, published at 63 Fed. Reg. 8671 (Feb. 20, 1998), as amended at 66 Fed. Reg. 17200 (Mar. 29, 2001) and 66 Fed. Reg. 29994 (June 4, 2001).

Notify FBI RMD/RIDS per MIOG 190.2.3? X No \_\_\_\_ Yes--See sample EC on PCLU intranet website here: [http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form\\_for\\_miog190-2-3\\_ec.wpd](http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd)

SORN/SORN revision(s) required? X No \_\_\_\_ Yes

Prepare/revise/add Privacy Act (e)(3) statements for related forms? \_\_\_\_ No \_\_\_\_ Yes  
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: The HCR application is encompassed by the PIA for FBI Routine Databases previously sent to DOJ. A Routine Database Checklist for the application will be posted on PCLU's website.

____ Acting Unit Chief Privacy and Civil Liberties Unit	Signature: _____ Date Signed: 2/24/2012
Brian Binney, Acting Deputy General Counsel/ FBI Privacy and Civil Liberties Officer	Signature: _____ Date Signed: 2/26/12

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## I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

The FBI is reviewing approximately 20,000 cases in which Laboratory Division (LD) examiners may have conducted microscopic analysis of hair evidence. The review is intended to ensure that lab reports in which the FBI determined there was a positive association between probative hair evidence and a known sample, as well as any related trial testimony, appropriately reflected the underlying science. The FBI has not yet determined whether to provide information regarding case reviews to the Innocence Project (IP) and the National Association of Criminal Defense Attorneys (NACDL) and, if so, what information to provide. In the event that the FBI provides those entities with review information, it is anticipated that the information provided will consist of a copy of the FBI Laboratory hair report, a transcript of the FBI expert's trial testimony, and the assessment of the FBI Scientific Review Committee (SRC) regarding the report and testimony.

When a case under review by the FBI involves a positive association between hair evidence and a known hair sample, the FBI will contact the contributing agency and the relevant prosecutor's office. These entities will be asked whether there was a trial or plea agreement in the case, whether the defendant was convicted, and whether an FBI lab report was used or an FBI examiner testified. If an FBI examiner testified, the FBI will also request a transcript of that testimony. The SRC will review the lab report and transcript, if any, to determine whether any statements made during the FBI testimony or contained in the lab report exceeded scientific limitations. The FBI will provide DOJ with the results of the SRC review and, as noted above, may also provide those results to the IP and NACDL.

The Special Technologies and Applications Section (STAS) is developing and deploying the Hair Comparison Review (HCR) application, backed by an Oracle database, to document review activities. The HCR is replacing the Excel Spreadsheets, Microsoft Access Database, and a SharePoint application previously used by review team personnel for data maintenance and workflow management. The HCR application will utilize the Technical Analysis and Computing Network (TACNET), an investigative and intelligence analysis network that resides on the Secret Enclave.

Relevant information from each file under review will be added to the HCR database. The data will include: the FBI case classification and file number; the names of the FBI personnel reviewing the case; the law enforcement agency that submitted the evidence for review; the names of any suspects or victims (as provided by the contributing agency); and any additional relevant information obtained or developed

during the course of the review (this may include the date of birth or Social Security numbers of some individuals). Access to HCR will be limited to approximately 35 FBI employees assigned to the review team, the Laboratory Division, STAS, and the Office of the General Counsel.

The first version of the HRC was deployed in September, 2012. STAS is utilizing an agile development approach, so that each subsequent HRC release builds on and enhances existing capabilities.

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

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

  X   YES     **[If yes, please continue.]**

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

(Check all that apply.)

  X   The information directly identifies specific individuals.

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

  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.

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.]**

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

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

☒ NO [If no, proceed to question 7.]

☐ YES

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

☐ NO

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

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

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

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

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

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

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

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

☐ SSNs are important for other reasons. Describe:

☒ The system/project provides special protection to SSNs (e.g., SSNs are encrypted, hidden from all users via a look-up table, or only available to certain users). Describe: Role-based access to HCR is restricted to FBI personnel participating in the hair evidence review, based on a need-to-know. An HCR Program Administrator must approve requests for system access and use privileges.



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

8. Is the system operated by a contractor?

**X** No.

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

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

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

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

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

HCR is an Oracle application residing on TACNET and is not separately accredited. TACNET was re-accredited on March 15, 2012, and has Authority to Operate (ATO) through March 22, 2015 at the following risk levels.

Confidentiality: \_\_\_Low \_\_\_Moderate **X** High

Integrity: \_\_\_Low **X** Moderate \_\_\_High

Availability: \_\_\_Low **X** Moderate \_\_\_High

\_\_\_\_\_ 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)?

**X** NO

\_\_\_\_\_ YES If yes, please describe the data mining function:

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