

[UNCLASSIFIED//~~FOR OFFICIAL USE ONLY~~]

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

## FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM / PROJECT: [REDACTED]

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

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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: International Operations Division	Signature: [REDACTED] Date signed: 02/23/2010 Name: [REDACTED] Title: Chief, International Visits and Official Travel Unit	Signature: [REDACTED] Date signed: 2/23/10 Name: [REDACTED] Title: Management and Program Analyst
FBIHQ Division: ITOD	Signature: [REDACTED] Date signed: 2/23/2010 Name: [REDACTED] Title: IT Specialist	Signature: [REDACTED] Date signed: 2-23-10 Name: [REDACTED] Title: Chief, Process Policy and Metrics Unit

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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.)

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FBI PTA:

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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 (indicate reason): A PIA is unnecessary.

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

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

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

☒ Information in the system relates to internal government operations.

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

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

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

Applicable SORN(s): \_\_\_\_\_

Notify FBI RMD/RIDS per MIOG 190.2.3? ☒ No \_\_\_\_\_ Yes--See sample EC on PCLU intranet website 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):

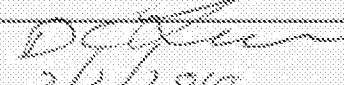
Prepare/revise/add Privacy Act (e)(3) statements for related forms? ☒ No \_\_\_\_\_ Yes (indicate forms affected):

**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:

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

Signature:   
Date Signed: 2/2/2010

FBI PTA:

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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.

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

\_\_\_\_\_ NO.

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

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

\_\_\_\_\_ NO.

\_\_\_X\_\_\_ YES.

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

\_\_\_\_\_ NO.

\_\_\_X\_\_\_ YES.

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

FBI PTA:

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\_\_\_\_\_ 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.

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

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: SSNs in the database are available only to IVOTU personnel, and access to such information is reflected in the audit log.

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

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

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

X YES.

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

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

X NO.

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

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

X YES. Identify any forms, paper or electronic, used to request such information from the information subject: A Privacy Act notice is contained on  application forms.

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

X NO. If no, indicate reason; if C&A is pending, provide anticipated completion date: C&A for the  database is pending; target completion date is April 2010.

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



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FBI PTA:

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☐ 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.]

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FBI PTA:

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## II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? 4/1996
2. Has the system/project undergone any significant changes since April 17, 2003?

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

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

- ☐ A conversion from paper-based records to an electronic system.
- ☐ A change from information in a format that is anonymous or non-identifiable to a format that is identifiable to particular individuals.
- ☐ A new use of an IT system/project, including application of a new technology, that changes how information in identifiable form is managed. (For example, a change that would create a more open environment and/or avenue for exposure of data that previously did not exist.)
- ☐ A change that results in information in identifiable form being merged, centralized, or matched with other databases.
- ☐ A new method of authenticating the use of and access to information in identifiable form by members of the public.
- ☐ A systematic incorporation of databases of information in identifiable form purchased or obtained from commercial or public sources.
- ☐ A new interagency use or shared agency function that results in new uses or exchanges of information in identifiable form.
- ☐ A change that results in a new use or disclosure of information in identifiable form.
- ☐ A change that results in new items of information in identifiable form being added into the system/project.
- ☐ Changes do not involve a change in the type of records maintained, the individuals on whom records are maintained, or the use or dissemination of information from the system/project.
- ☐ Other. [Provide brief explanation]:

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

a. Provide date/title of the PIA:

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

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

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

## FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

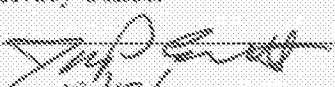
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BIKR FBI Unique Asset ID: N/A

	<b>SYSTEM/PROJECT POC</b> Name: <input type="text"/> Program Office: ITB Division: ITSD Phone: <input type="text"/> Room Number: JEH: 1714	<b>FBI OGC/PCLU POC</b> Name: <input type="text"/> Phone: <input type="text"/> Room Number: 7350, JEH
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### FBI DIVISION INTERMEDIATE APPROVALS

	<b>Program Manager (or other appropriate executive as Division determines)</b>	<b>Division Privacy Officer</b>
Program Division: ITSD	Signature: <input type="text"/> Date signed: 11 OCT, 2011 Name: <input type="text"/> Title: IT Specialist	Signature:  Date signed: 10/19/11 Name: John P. Everett Title: Section Chief
FBIHQ Division: (same)	Signature: <input type="text"/> Date signed: <input type="text"/> Name: <input type="text"/> Title: <input type="text"/>	Signature: <input type="text"/> Date signed: 10-20-11 Name: <input type="text"/> Title: ITS/Acting UC

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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:

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

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

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

\_\_\_\_\_ Information in the system relates to internal government operations.

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

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

\_\_\_\_\_ Other:

Applicable SORN(s):   Computer Systems Activity and Access Records, DOJ-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\\_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?   X   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:

<div style="border: 1px solid black; width: 150px; height: 20px; display: inline-block;"></div> Unit Chief	Signature: <div style="border: 1px solid black; width: 250px; height: 40px; display: inline-block;"></div>
Privacy and Civil Liberties Unit	Date Signed: 10/27/11
James J. Landon, Deputy General Counsel	Signature: 
FBI Privacy and Civil Liberties Officer	Date Signed: 10/26/11

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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.

[Redacted area]

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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      The only information collected and maintained is audit log type information, including usernames, for the small group of  administrators.

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       YES

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?

\_\_\_\_\_ 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?

X 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:  
October 10, 2011



Confidentiality: Low Moderate X High Undefined

Integrity: Low Moderate X High Undefined

Availability: Low Moderate X 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

       YES If yes, please describe the data mining function:

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

X 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? Various layers were developed between July, 2007 and August, 2009.

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

X 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

(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: \_\_\_\_\_ SYS-0000217

Derived From: Classified By: Reason: Declassify On:	<b>SYSTEM/PROJECT POC</b> Name: [REDACTED] Program Office: [REDACTED] Division: ITB/TTSD Phone: [REDACTED] Room Number: JEH 1376	<b>FBI OGC/PCLU POC</b> Name: [REDACTED] Phone: [REDACTED] Room Number: JEH 7350
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### FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: [Information Technology Service Division]	Signature: [REDACTED] Date signed: 4-2-12 Name: [REDACTED] Title: Unit Chief	Signature: [REDACTED] Date signed: 2-28-12 Name: [REDACTED] Title: Division Privacy Contact OCIO
FBIHQ Division: [insert division name]	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 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 FTA submission. The FTA 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): DIA


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:

<div style="border: 1px solid black; width: 150px; height: 20px; display: inline-block;"></div> Unit Chief	Signature: <div style="border: 1px solid black; width: 250px; height: 20px; display: inline-block;"></div>
Privacy and Civil Liberties Unit	Date Signed: <u>3/16/12</u>
James J. Landon, Deputy General Counsel	Signature: 
FBI Privacy and Civil Liberties Officer	Date Signed: <u>3/16/12</u>

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[INSERT CLASSIFICATION/CONTROL MARKINGS,  
IF APPROPRIATE]

## L. 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)?

  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.

[INSERT CLASSIFICATION/CONTROL MARKINGS,  
IF APPROPRIATE]

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

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

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

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

\_\_\_\_\_ NO \_\_\_\_\_ 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.]

FEDERAL BUREAU OF INVESTIGATION  
FOI/PA  
DELETED PAGE INFORMATION SHEET  
FOI/PA# 1272295-0

Total Deleted Page(s) = 9

Page 1 ~ Duplicate;  
Page 2 ~ Duplicate;  
Page 3 ~ Duplicate;  
Page 4 ~ Duplicate;  
Page 5 ~ Duplicate;  
Page 6 ~ Duplicate;  
Page 7 ~ Duplicate;  
Page 8 ~ Duplicate;  
Page 9 ~ Duplicate;

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X   Deleted Page(s)         X
X   No Duplication Fee      X
X   For this Page           X
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(OGC/PCLU (Rev. 04/01/2011))

## FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

BIKR FBI Unique Asset ID:

b3  
b7E

Derived From: Classified By: Reason: Declassify On:	<b>SYSTEM/PROJECT POC</b> Name: <input type="text"/> Program Office: ITB Division: ITSD Phone: <input type="text"/> Room Number: 8979	<b>FBI OGC/PCLU POC</b> Name: <input type="text"/> Phone: <input type="text"/> Room Number: <input type="text"/>
--	--	---

b6  
b7C

### FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: DI	Signature: <input type="text"/> Date signed: 4/2/12 Name: <input type="text"/> Title: Acting Chief, HUMINT Management Unit I	Signature: <input type="text"/> Date signed: 4/13/12 Name: <input type="text"/> Title: Unit Chief, Supervisory MAPA
FBIHQ Division: ITSD	Signature: <input type="text"/> Date signed: 1/3/12 Name: <input type="text"/> Title: IT Specialist	Signature: <input type="text"/> Date signed: 1-3-12 Name: <input type="text"/> Title: Chief, Process Policy & Metrics Unit

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b7C

UNCLASSIFIED // ~~FOUO~~

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

☐ PIA is required by the E-Government Act.

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

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

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

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

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

☐ Information in the system relates to internal government operations.

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

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

☒ Other (describe):

b3  
b7E

Applicable SORN(s): JUSTICE/FBI-002 JUSTICE/FBI-002/ CRS, although a Delta SORN is planned

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:

b3  
b7E

Unit Chief  
Privacy and Civil Liberties Unit  
James J. Landon, Deputy General Counsel  
FBI Privacy and Civil Liberties Officer

Signature:  
Date Signed:

Signature:  
Date Signed:

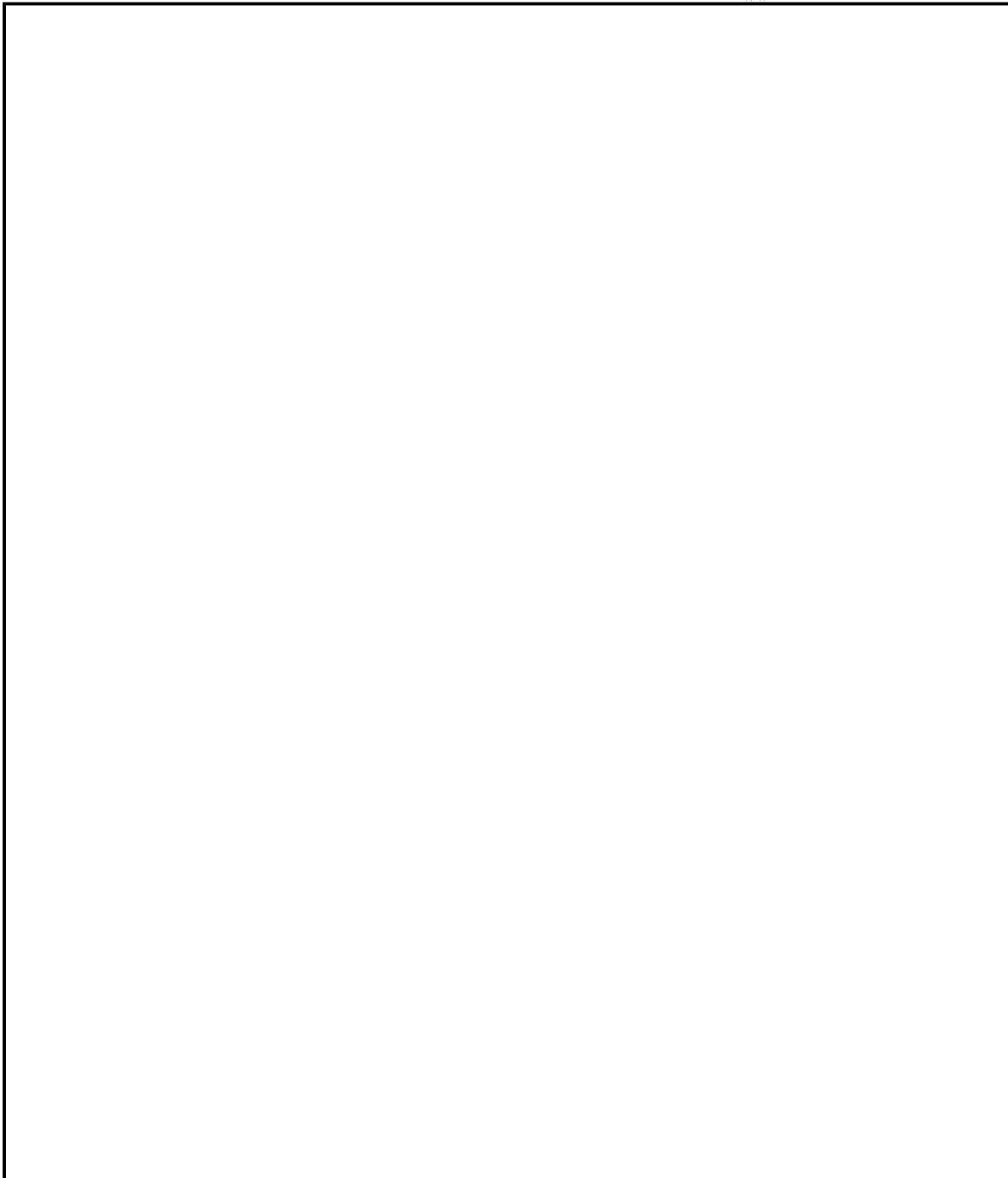
3/26/12

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b7C

UNCLASSIFIED // ~~FOUO~~

## 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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b7E



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.)

  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.]

  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.

b3  
b7E

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:  
04/26/2010

Confidentiality:   Low   Moderate   X  High   Undefined

Integrity:   Low   Moderate   X  High   Undefined

Availability:   Low   Moderate   X  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

       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.

**II. EXISTING SYSTEMS / PROJECTS**

1. When was the system/project developed? 10/26/1998

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

  X   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?

<input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES	

b3  
b7E

If yes:

a. Provide date/title of the PIA:

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

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

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

## FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

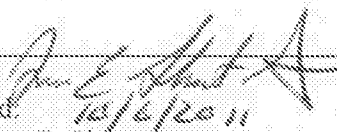
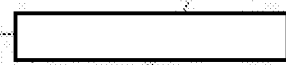
b3  
b7E

BIKR FBI Unique Asset ID:

	<b>SYSTEM/PROJECT POC</b> Name: <input type="text"/> Program Office: SSS/CMSU Division: Information Technology Services Division (ITSD) Phone: <input type="text"/> Room Number: JEH 8998	<b>FBI OGC/PCLU POC</b> Name: AGC <input type="text"/> Phone: <input type="text"/> Room Number: JEH 7350
--	---	---

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### FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: (Not Applicable)	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:
FBIHQ Division: ITSD	Signature:  Date signed: 10/16/11 Name: James E. Short, Jr. Title: Section Chief, Systems Support	Signature:  Date signed: 10-14-11 Name: <input type="text"/> Title: IT Branch Privacy Officer

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b7C

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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:

Applicable SORN(s): Central Records System, 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](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:

<input type="checkbox"/> Unit Chief	Signature: <input type="checkbox"/>
Privacy and Civil Liberties Unit	Date Signed: 11/14/11
James J. Landon, Deputy General Counsel	Signature: 
FBI Privacy and Civil Liberties Officer	Date Signed: 11/16/11

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b7C

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**I. INFORMATION ABOUT THE SYSTEM / PROJECT**

1. Provide a general description of the system or project that includes: (s) 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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b7E



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, please stop.]

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.

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. Some, but not all, of the information is collected directly.

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).]

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

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

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

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

  X   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:

b3  
b7E

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:

b3  
b7E

(U//FOUO) Confidentiality: \_\_\_Low \_\_\_Moderate   X  High

(U//FOUO) Integrity: \_\_\_Low \_\_\_Moderate   X  High

(U//FOUO) Availability: \_\_\_Low \_\_\_Moderate   X  High

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

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

☒ NO

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

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

☒ NO

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

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

☐ NO ☒ YES

13. Status of System/ Project:

☐ This is a new system/project in development.

## II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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b7E

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.

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

Select individuals from the National Counterterrorism Center (NCTC) have been given limited access to ACS to search terrorism-related case information.

\_\_\_\_\_ 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?

  X   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

Unclassified//~~FOUO~~

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

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

NAME OF SYSTEM / PROJECT: Aviation Safety Management System (ASMS)

BIKR Unique Identification No. 2010-012-01-P-401-119-9999

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: SSA [REDACTED]	Name: [REDACTED]
Reason:	Program Office:	Phone: [REDACTED]
Declassify On:	Division: CIRG/SAS/ASU	Room Number: 7350 JEH
	Phone: [REDACTED]	
	Room Number: Manassas Airport	

b6  
b7C

### FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	FBIHQ Division: CIRG
Program Division: CIRG	Signature: /s Date signed: 10/18/2010 Name: [REDACTED] Title: Supervisory Special Agent, Aviation Support Unit, ASB, SAS, CIRG	Signature: /s Date signed: Name: J. Britt Johnson Title: Section Chief, Surveillance and Aviation Section (SAS)
Division Privacy Officer	Signature: /s Date signed: 10/21/2010 Name: [REDACTED] Title: SSA/CDC	Signature: Date signed: Name: Title:

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b7C

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)

FBI PTA: ASMS

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)

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

1 - OGC/PCLU intranet

1 - PCLU UC

1 - PCLU Library

1 - PCLU Tickler

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b7C



FBI PTA: ASMS

**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): \_\_\_\_\_ FBI-002 \_\_\_\_\_ 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):

**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. Withmell, (Acting) Deputy General Counsel  
(Acting) FBI Privacy and Civil Liberties Officer

Signature:

Date Signed: 2/3/2011

FBI PTA: ASMS

## 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 Critical Incident Response Group (CIRG), Surveillance and Aviation Section (SAS) is responsible for providing management oversight of the FBI's Aviation Program. One element of this program is aviation safety and quality assurance. Aviation safety programs in commercial air carrier, corporate, and military organizations follow aviation safety standards set by the International Civil Aviation Organization and the Federal Aviation Administration. These standards are commonly referred to as the Aviation Safety Management Systems (ASMS). The FBI's Aviation Safety Management System Program (ASMS Program) will help measure the FBI's Aviation Safety Program against the industry's various ASMS standards.

The ASMS Program will facilitate performance of various duties and responsibilities of the Program Manager (PM) for Aviation Safety required by Bureau Aviation Regulations (BAR) Policy Manual, Section 8.0. These duties and responsibilities generally fall within one of three categories: (1) hazard reporting; (2) aviation safety meetings; and (3) audit scheduling. Towards this end, among other things, the ASMS Program will allow for more efficient receipt, review, evaluation, and assignment for investigation of reported potential aviation safety hazards or events. [REDACTED]

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FBI PTA: ASMS

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

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

  X   YES. [If yes, please continue.]

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

       NO.   X   YES.

FBI/PTA: ASMS

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

☒ NO. ☐ YES.

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

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

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

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

☐ SSNs are important for other reasons. Describe:

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

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

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

☐ NO. [If no, proceed to question 7.]

☒ YES.

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

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

☒ NO.

FBI PTA: ASMS

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).] Individuals who may be identified in reports are named only incidentally since the the subject of the report is typically an event. The individual will be referenced to the extent that he or she had a role in observing and/or alleviating the problem. No Privacy Act (e)(3) statement is warranted.

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

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

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

date:

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☐ 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

~~Unclassified//FOUO~~

FBI PTA: ASMS

to FBI OGC/PCLU for final FBI approval and determination if PIA and/or other actions are required.]

FBI PTA: ASMS

## II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

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

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

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

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

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

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

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

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

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

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

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

\_\_\_\_\_ Other. [Provide brief explanation]:

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

FBI PTA: ASMS

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. 04/01/2011))

## FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

BIKR FBI Unique Asset ID: Bank Robbery Statistical Application (BRSA)

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: [REDACTED]	Name: [REDACTED]
Reason:	Program Office: ITB	Phone: [REDACTED]
Declassify On:	Division: ITSD	Room Number: 710 J&J
	Phone: [REDACTED]	
	Room Number: 8979 [JEH]	

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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: CID	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:
FBIHQ Division: ITSD	Signature: [REDACTED] Date signed: 8/4/2011 Name: [REDACTED] Title: IT Specialist	Signature: Date signed: Name: [REDACTED] Title: IT Specialist

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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.)

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

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

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

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

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

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

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

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

\_\_\_\_\_ Information in the system relates to internal government operations.

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

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

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

Applicable SORN(s): \_\_\_\_\_

Notify FBI RMD/RIDS per MIOG 190.2.3? \_\_\_\_\_ No \_\_\_\_\_ Yes--See sample EC on PCLU intranet website 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:

_____ Unit Chief Privacy and Civil Liberties Unit	Signature: _____ Date Signed: 9/27/11
James J. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: _____ Date Signed: 9/27/11

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[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]