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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 / PI	ROJECT:		b7	
Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: Program Office; ITB Division: ITOD Phone:	FBI OGC/PCLU POC Name Phone Room Number: 7458	b6 b7	
FBI DIVISION INTERM	EDIATE APPROVALS [complete as necessal Program Manager (or other appropriate executive as Division determines)	ry consonant with Division policy] Division Privacy Officer	T	
Program Division: International Operations Division	Signature: Date signed: 02/23/20/0/ Name: Title: Chief, International Visits and Official Travel Unit	Signature: Date signed: 2/2//// Name: Title: Management and Program Analyst		
FBIHQ Division: ITOD	Signature: Date signed: \$ / & 3 / \$ & / 0 Name: Title: IT Specialist	Signature: Date signed? 523-7 () Name Title: Chief, Process Policy and Metrics Unit	7	

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:

	net.		
PIA is to be completed as a matter of F	BI/DOJ discretion.		
Is PIA to be published on FBLGOV (after an IA is unnecessary.	y RMD FOIA redactions)?	Yes	No (indicate reason): A
X_PIA is not required for the following ofSystem does not collect, maintainSystem is grandfathered (in existe Information in the system relates to System has been previously assess No significant privacy issues (or page of the control of the contro	, or disseminate PII. noe before 4/17/2003; no later o internal government operatio sed under an evaluation similar	ms.	osing significant privacy risks).
Applicable SORN(s): Notify FBI RMD/RIDS per MIOG 190.2.3? http://home/DO/OGC/LTB/PCLU/PrivacyC SORN/SORN revision(s) required?No	X No YesSee sam	orm for r	PCLU intranet website here: niog190-2-3_ec.wpd
Prepare/revise/add Privacy Act (e)(3) statem			Yes (indicate forms affected):
ECORDS. The program should consult with the system may contain Federal records wheth chedule approved by the National Archives arits as well as on compliance with requirement.	er or not it contains Privacy A ad Records Administration is n	ct requests ecessary.	and, in any event, a records RMD can provide advice on
he system may contain Federal records wheth chedule approved by the National Archives ar	er or not it contains Privacy A ad Records Administration is n	ct requests ecessary.	and, in any event, a records RMD can provide advice on

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I. INFORMATION	ABOUT THE SYSTEM / PROJECT
including associated	description of the system or project that includes: name of the system/project, acronyms; structure of the system/project, purpose; nature of the information wit will be used; who will have access to the information in the system and the ion to all users.
	oject collect, maintain, or disseminate any information about individuals in is information linked to or linkable to specific individuals (which is the definition ble information (PII))?
identifiable form, i.e.,	is information linked to or linkable to specific individuals (which is the definition
identifiable form, i.e., of personally identifia	is information linked to or linkable to specific individuals (which is the definition
identifiable form, i.e., of personally identifiaNOX_YES.	is information linked to or linkable to specific individuals (which is the definition ble information (PII))?

____NO. X....YES.

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

FBI PTA:

FBI PTA:	UNCLASSIFIED/FOROLUGAL USE ONLY	b7E
NO	X YES. If yes, check all that apply:	
or —	SSNs are necessary to establish/confirm the identity of subjects, victims, witnesses sources in this law enforcement or intelligence activity.	
	XSSNs are necessary to identify FBI personnel in this internal administrative system.	
	SSNs are important for other reasons. Describe:	
hic SS	XThe system/project provides special protection to SSNs (e.g., SSNs are encrypted, liden from all users via a look-up table, or only available to certain users). Describe: Ns in the database are available only to IVOTU personnel, and access to such formation is reflected in the audit log.	
Ex	It is not feasible for the system/project to provide special protection to SSNs. plain:	
6. Does the syste information?	m/project collect any information directly from the person who is the subject of the	
NO	. [If no, proceed to question 7.]	
XYE	is.	
a. Does th	ne system/project support criminal, CT, or FCI investigations or assessments?	
	YES. [If yes, proceed to question 7.]	
	<u>C</u> NO.	
b. Are sui Privacy A	ojects of information from whom the information is directly collected provided a written ct (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 cessary form(s).]	
	XYES. Identify any forms, paper or electronic, used to request such formation from the information subject: A Privacy Act notice is contained on application forms.	b7E
7. Has the systen	n undergone Certification & Accreditation (C&A) by the FBI Security Division (SecD)?	
	O. 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	3. If yes, provide date of last C&A certification/re-certification;	

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FBI PTA:	<u>[U</u>	NCLASSIFIED/FOR	OFFICIAL USE ONLY
	_Don't Know.		
8. Is this sy	stem/project the s	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 n	ational security s	ystem (as determined by	the SecDy?
X	_NO.	YES	Don't know.
10. Status of	f System/ Project	;	
	PTA is now co	mplete and after divisi	pment. [If you checked this block, STOP. The on approval(s) should be submitted to FBI and/or other actions are

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II. EXISTING SYSTEMS / PROJECTS

2. F		m/project undergone any significant changes since April 17, 2003?
	X_ N	O. [If no, proceed to next question (II.3).]
	· · · · · · · · · · · · · · · · · · ·	ES. If yes, indicate which of the following changes were involved (mark all boxes that pply):
		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. I	Does a PIA fo	or this system/project already exist?XNOYES. If yes:
	a. Provid	de date/title of the PIA:

[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)

	SYSTEM/PROJECT POO Name: Program Office: ITB	Name: Phone	
	Division: ITSD Phone Room Number: JEH: 1714	Room Number: 7350, JEH	
BI DIVISION INTERM	Program Manager (or other appropriate	Division Privacy Officer	
FBI DIVISION INTERN Program Division: ITSD	<u>,</u>	Division Privacy Officer Signature: Date signed: /6//9/// Name: John P. Everett Title: Section Chief	

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

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FINAL FBI APPROVAL / DETERMINATIO	NS / CONDITIONS:	
PIA is required by the E-Government A		
PIA is to be completed as a matter of FI	3I/DOJ discretion.	
Is PIA to be published on FBI.GOV (after any	/ RMD FOIA redactions)? Yes.	N•
XPIA is not required for the following rSystem does not collect, maintain,System is grandfathered (in existenInformation in the system relates toSystem has been previously assesseX_No significant privacy issues (orOther:	or disseminate PII. ice hefore 4/17/2003; no later changes) internal government operations, ed under an evaluation similar to a PIA	
Applicable SORN(s): <u>Computer Systems As</u> Notify FBI RMD/RIDS per MIOG 190.2.3? http://home/DO/OGC/LTB/PCLU/PrivacyCi SORN/SORN revision(s) required? X No	X_NoYes-See sample FC	on PCLU intranet website here: miog190-2-3_ec.wpd
Prepare/revise/add Privacy Act (e)(3) statemer	its for related forms? X No	Yes:
RECORDS. The program should consult with The system may contain Federal records whethe schedule approved by the National Archives and as well as on compliance with requirements for	r or not it contains Privacy Act request I Records Administration is necessary.	s and, in any event, a records RMD can provide advice on this
Other		
Unit Chief	Signature:	<u> </u>
Privacy and Civil Liberties Unit	Date Signed:	10/24//
James J. Landon, Deputy General Counsel	Signature: ////	
FBI Privacy and Civil Liberties Officer	Date Stened / / / / / /	

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

	o will have access to the information in the oner of transmission to all users.	
	· · · · · · · · · · · · · · · · · · ·	
	ct, maintain, or disseminate any information ab π natural person, regardless of nationality)?	
	tion collected and maintained is audit log type	
information, inclu	ding usernames, for the small group of	
administrators.		
XEX		
. Please indicate if any of the fo	ollowing characteristics apply to the informatio	n in the
ystem about individuals: Bear i inkable to an individual.	n mind that log-on information may identify or	
Check all that apply.)		
	identifies specific individuals.	

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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., i 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?
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.]
a. Does the system/project support criminal, CT, or FCI investigations or
assessments?
YES [If yes, proceed to question 7.]
b. Are subjects of information from whom the information is directly collected provided a written Privacy Act (e)(3) statement (either on the collection form or via a
separate notice)?
NO [The program will need to work with PCLU to develop/implement the necessary form(s).]
YES Identify any forms, paper or electronic, used to request such information from the information subject:
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X NO YES If yes, check all that apply:
SSNs are necessary to establish/confirm the identity of subjects, victims, witnesses or sources in this law enforcement or intelligence activity.
SSNs are necessary to identify FBI personnel in this internal administrati-system.
SSNs are important for other reasons. Describe:
The system/project provides special protection to SSNs (e.g., SSNs are encrypted, hidden from all users via a look-up table, or only available to certain users). Describe :
It is not feasible for the system/project to provide special protection to SSNs. Explain:
Is the system operated by a contractor? 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.
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:

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	Integrity	r:Low_	_Moderate_X_High	Undefined
	Availabi	ility:Low_	_Moderate <u>X</u> High	Undefined
	Not applicable -	this system is on	ly paper-based.	
Imp		endations of the 9	lefined in Section 804 /11 Commission Acto	
	<u>C</u> NO			
	YES If yes, pl	lease describe th	e data mining functio	
II. Is this	s a national security s	ystem (as determ	ined by the SecDy?	
	X NO	XES		
12. Status	s of System/ Project:			
	1 015 18 & 00 W 5y;	stem/ project in d	evenjanem.	
II. EXISI	TING SYSTEMS / P	ROJECTS		
I. When v	vas the system/projec	it developed? Va	rious layers were devel	loped between Ju
	August, 2009.			
2. Has the	system/mmeet unde	roome sny sionifi	cant changes since Api	AL 17 708137
X NO	(If no, proceed to no	ext question (II.3)		
			ng changes were invol xplanation for each n	
	A conver	sion from paper-	based records to an ele	ctronic system.
			n in a format that is an stifiable to particular in	
			n/project, including appromation in identifiable	

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	(For example, a change that would create a more open environment and/or avenue for exposure of data that previously did not exist.)
	A change that results in information in identifiable form being merged, centralized, or matched with other databases.
	A new method of authenticating the use of and access to information in identifiable form by members of the public.
	A systematic incorporation of databases of information in identifiable form purchased or obtained from commercial or public source
	A new interagency use or shared agency function that results in new uses or exchanges of information in identifiable form.
	A change that results in a new use or disclosure of information in identifiable form.
	A change that results in new items of information in identifiable form being added into the system/project.
	Changes do not involve a change in the type of records maintained the individuals on whom records are maintained, or the use or dissemination of information from the system/project.
	Other [Provide brief explanation]:
Does	a PIA for this system/project already exist?
a. Pro	rvide date/title of the PIA:
b. Ha	s the system/project undergone any significant changes since the PIA?
)	

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If yes:

NAME OF SYSTEM / PROJECT: [

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

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POS Name: Program Office Division: ITB/ITSD Phone: Room Number: JEH 1376	FBI OGC/PCLU/POC Name: Phone Room Number: JEH 7350
BI DIVISION INTER!	AEDIATE APPROVALS Program Manager (or other appropriate executive as Division, determines)	Division Privacy Officer
.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	2	5N
Program Division: Information Technology Service Division	Signature Date signed: 4/2//7/ Name: Title: Unit Chief	Signature: Date signed: 2 - 28 - 7 Z Name Title: Division Privacy Contact OCIO

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: | [This section will be completed by the FBI PCLU/PCLO following PTA submission. The PTA drafter should skip to the next page and continue. I 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 FBLGOV (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 PIL System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).

X 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 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 Signature: 346/12. Privacy and Civil Liberties Unit Date Signed: James J. Landon, Deputy General Counsel Signature:

b6 b7C

FBI Privacy and Civil Liberties Officer

Date Signed:

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

L. INFORMATION ABOUT THE SYSTEM / PROJECT

the system system/pro purpose o and bow i	e a general description of the system or project that includes: (a) name of l/project, including associated acronyms; (b) structure of the oject, including interconnections with other projects or systems; (c) of the system/project; (d) nature of the information in the system/project twill be used; (e) who will have access to the information in the oject; (f) and the manner of transmission to all users.
:	
	e system/project collect, maintain, or disseminate any information about (i.e., a human being or natural person, regardless of nationality)?
should be s	[If no, STOP. The PTA is now complete and after division approval(s) whmitted to FBI OGC/PCLU for final FBI approval. Unless you are idvised, no PIA is required.]
YE!	S [If yes, please continue.]
system abo linkable to	ndicate if any of the following characteristics apply to the information in the out individuals: Bear in mind that log-on information may identify or be an individual. that apply.)
The	information directly identifies specific individuals.
***************************************	information is intended to be used, in conjunction with other data elements, indirectly identify specific individuals.
	e information can be used to distinguish or trace an individual's identity (i.e., it inked or linkable to specific individuals).
If you mai	ked any of the above, proceed to Question 4.

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE] b7E

	information can be used to distinguish or trace an individual's identity (i.e., it nked or linkable to specific individuals).
If you mar	ked any of the above, proceed to Question 4.
identify spe	e of the above. If none of the above, describe why the information does not cific individuals either directly or indirectly. [If you checked this item, after providing the requested description.]
4. Does the consultants	e system/project pertain only to government employees, contractors, or ?
	NOYES
	nation about United States citizens or lawfully admitted permanent resident ved 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.]
	e system/project collect any information directly from the person who is the re information?
	NO [If no, proceed to question 7.]
a. D assessments	oes the system/project support criminal, CT, or FCI investigations or ?
	YES [If yes, proceed to question 7.]
	re subjects of information from whom the information is directly collected written Privacy Act (e)(3) statement (either on the collection form or via a ice)?
	NO [The program will need to work with PCLU to develop/implement the necessary form(s).]

		Identify any forms, paper or electronic, used to request such information from the information subject:
		ity Numbers (SSNs) collected, maintained or disseminated from the I SSNs should only be used as identifiers in limited instances.
		YES If yes, check all that apply:
		are necessary to establish/confirm the identity of subjects, victims, ources in this law enforcement or intelligence activity.
	SSNs system	are necessary to identify FBI personnel in this internal administrativ
	SSNs	are important for other reasons. Describ e:
		stem/project provides special protection to SSNs (e.g., SSNs are iden from all users via a look-up table, or only available to certain ribe:
	It is no SSNs. Expla	ot feasible for the system/project to provide special protection to in:
8.	Is the system	operated by a contractor?
	<u> </u>	
	considered Pr contains stand collects, main imposed as a	ormation systems operated by contractors for the FBI may be ivacy Act systems of records. The Federal Acquisition Regulation and contract clauses that must be included in the event the system tains or disseminates PII and additional requirements may be matter of Department of Justice policy. Consultations with the General Counsel may be required if a contractor is operating the FBI.
9 .	Has the system Security Divis	n undergone Certification & Accreditation (C&A) by the FBI ion (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	y:Low_	_Moderate_	_High_	_Undefined
Integrity:	Low_	Moderate _	High	Undefined
Availability:	Low	Noderate	High	Undefined
Not applicable – this sy	stem is on	ly paper-base	d.	

	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 TES
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. 3	When was the system/project developed?
2. ł	fas 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 source
	A new interagency use or shared agency function that results in new uses or exchanges of information in identifiable form.
	A change that results in a new use or disclosure of information in identifiable form.
	A change that results in new items of information in identifiable form being added into the system/project.
	Changes do not involve a change in the type of records maintained, the individuals on whom records are maintained, or the use or dissemination of information from the system/project.
	Other [Provide brief explanation]:
3. Does:	a PIA for this system/project already exist?
	NOYES
If yes:	
a. Pro	vide date/title of the PIA:
b, Has	the system/project undergone any significant changes since the PIA?
NO	
The PTA is i BI OGC/PC ctions are re	now complete and after division approval(s) should be submitted to LU for final FBI approval and determination if PIA and/or other equired.]

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FEDERAL BUREAU OF INVESTIGATION FOI/PA

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PF BIKR FBI Unique Asset l				b3 b7
Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT PO Name Program Office: ITB Division: ITSD Phone Room Number: 8979		FBI OGC/PCLU POC Name: Phone: Room Number:	b6 b7
FBI DIVISION INTERM	(EDIATE APPROVALS Program Manager (or other appropriate executive as Division determines)	Division Pri	vacy Officer	
Program Division: DI	Signature: Date signed: 4/2/2 Name: Title: Acting Chief, HUMINT Management Unit I	Signature: Date signed Name: Title: Unit	Shief, Supervisory MAPA	be b
FBIHQ Division: ITSD	Signature: Date signed: 1/3/12 Name: Title: IT Specialist	Signature: Date signed Name: Title: Chief	Process Policy & Metrics Unit	

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INAL FBI APPROVAL / DETERMINATIO	NS / CONDITIONS:	
PIA is required by the E-Government A	et.	
PIA is to be completed as a matter of FI	BI/DOJ discretion.	
Is PIA to be published on FBI.GOV (after an	y RMD FOIA redactions)? Yes	No (indicate reason):
_x PIA is not required for the following reasons and solution of the system does not collect, maintain, System is grandfathered (in existen Information in the system relates to System has been previously assess No significant privacy issues (or not the system);	or disseminate PII. ace before 4/17/2003; no later chang o internal government operations. aed under an evaluation similar to a l	
planned Notify FBI RMD/RIDS per MIOG 190.2.3? http://home/DO/OGC/LTB/PCLU/PrivacyC SORN/SORN revision(s) required?x_No	ivil%20Liberties%20Library/form_ Yes (indicate revisions nee	for_miog190-2-3_ec.wpd
Prepare/revise/add Privacy Act (e)(3) stateme	ents for related forms?x_No	Yes (indicate forms affected):
RECORDS. The program should consult with The system may contain Federal records wheth	er or not it contains Privacy Act req	lests and, in any event, a records
schedule approved by the National Archives an as well as on compliance with requirements for Other.	Electronic Recordkeeping Certification	tion and any necessary updates.
schedule approved by the National Archives an as well as on compliance with requirements for	ed Records Administration is necessive Electronic Recordkeeping Certification	tion and any necessary updates.
schedule approved by the National Archives an as well as on compliance with requirements for	Signature: Date Signed	tion and any necessary updates.

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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 and the manner of transmission to all users.					
<u> </u>	<u> </u>			<u> </u>	

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	3
2. Does the system/project collect, maintain, or disseminate any infindividuals (i.e., a human being or natural person, regardless of national person	
NO	
X YES [If yes, please continue.]	
3. Please indicate if any of the following characteristics apply to the system about individuals: Bear in mind that log-on information may 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 to indirectly identify specific individuals.	other data elements,
X The information can be used to distinguish or trace an indivision is linked or linkable to specific individuals).	dual's identity (i.e., it
If you marked any of the above, proceed to Question 4.	
None of the above. If none of the above, describe why the identify specific individuals either directly or indirectly.	nformation does not
4. Does the system/project pertain only to government employees, consultants?	contractors, or
X_NOYES	
5. Is information about United States citizens or lawfully admitted aliens retrieved from the system/project by name or other personal i	•
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	ne person who is the

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subject of the information?	
NO [If no, proceed to question 7.]	
X_YES	
a. Does the system/project support criminal, CT, or FCI inventes assessments?	estigations or
NO	
X YES [If yes, proceed to question 7.]	
b. Are subjects of information from whom the information is provided a written Privacy Act (e)(3) statement (either on the collect separate notice)?	
NO [The program will need to work with PCLU to the necessary form(s).]	o develop/implement
YES Identify any forms, paper or electronic, used information from the information subject:	l to request such
7. Are Social Security Numbers (SSNs) collected, maintained or c system/project? Full SSNs should only be used as identifiers in lin	lisseminated from the nited instances.
NO X_YES If yes, check all that apply:	
X SSNs are necessary to establish/confirm the identity witnesses or sources in this law enforcement or intelligence	of subjects, victims, activity.
SSNs are necessary to identify FBI personnel in this system.	internal administrative
SSNs are important for other reasons. Describe:	
The system/project provides special protection to SS encrypted, hidden from all users via a look-up table, or only users). Describe:	Ns (e.g., SSNs are available to certain
$\underline{\underline{X}}$ It is not feasible for the system/project to provide sp SSNs.	ecial protection to
*	

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Is the system oper	ated by a contracto	r?			
X_No.					
considered Pri contains stand collects, main imposed as a	ormation systems of vacy Act systems of ard contract clause aims or disseminate atter of Departme Jeneral Counsel marker.	of record s that mu es PII an nt of Jus	s. The Feder ast be included d additional tice policy.	ral Acquisi ed in the ev requiremer Consultation	tion Regulation rent the system of the system of the may be one with the
Has the system un	dergone Certificati	on & Ac	creditation (C&A) by tl	he FBI Security
rision (SecD)?	.v				
NO	If no, indicate re completion date		C&A is per	iding, pro	vide anticipated
X_YES	If yes, please inc	licate th	e following,	if known:	
	Provide date of 04/26/2010	last C&	A certificati	on/re-cert	ification:
	Confidentiality:	Low_	_Moderate	X_High_	_Undefined
	Integrity:	Low_	Moderate	X_High	Undefined
	Availability:	Low	Moderate	_X_High	Undefined
Not ap	plicable – this sys	tem is or	ıly paper-bas	ed.	
. Does the system commendations o 00ee-3)?	conduct data minis f the 9/11 Commis	ng as def sion Act	ined in Secti of 2007, P.I	on 804 of t 110-53 (c	he Implementing codified at 42 US
<u>X</u> NO					
YES	If yes, please de	scribe t	ie data mini	ng functio	n:
le this a nationa	l security system (a	ıs determ	ined by the !	SecD)?	

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NO	XYES	
12. Status of System/ Pro	oject:	
This is a n	ew system/ project in development.	
II. EXISTING SYSTE	MS / PROJECTS	
1. When was the system	/project developed? 10/26/1998	
2. Has the system/projec	t undergone any significant changes since A	pril 17, 2003?
X NO [If no, proce	ed to next question (II.3).]	
YES If yes, indicated that app	ate which of the following changes were inv ly, and provide brief explanation for each	olved (mark all marked change):
A	conversion from paper-based records to an e	electronic system.
Å identifiabl	change from information in a format that is e to a format that is identifiable to particular	anonymous or non- individuals.
technology (For exam	new use of an IT system/project, including a y, that changes how information in identifiable, a change that would create a more open exposure of data that previously did not exi	ole form is managed. environment and/or
	change that results in information in identification and attacks of matched with other databases.	iable form being
	new method of authenticating the use of and on in identifiable form by members of the pu	
	systematic incorporation of databases of inf e form purchased or obtained from commer	
A new uses o	new interagency use or shared agency funct or exchanges of information in identifiable for	tion that results in form.
A identifiabl	change that results in a new use or disclosur le form.	re of information in

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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. D	oes a PIA for this system/project already exist?	
- 150 150 - 150 150		L 2
	X NO YES	b3 b7E
If yes:		
,		
a.	Provide date/title of the PIA:	
b.	. Has the system/project undergone any significant changes since the PIA?	
ينفنو	NOYES	

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

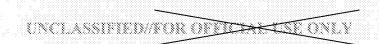
Name Program Office: SSS/CMSU Phone: Room Number: JEH 7350 Services Division (ITSD) Phone: Room Number: JEH 8998 BI DIVISION INTERMEDIATE APPROVALS Program Manager (or other appropriate executive as Division determines) Program Division: Signature: Signature: Name: Title: Title: Signature: Signature:			C FBI OGC/PCLU POC
Phone: Room Number: JEH 8998 Room Number: JEH 8998		Program Office: SSS/CMS Division: Information Tech	Name: AGC U Phone:
Program Manager (or other appropriate Division Privacy Officer executive as Division determines) Program Division: Signature: Signature: Date signed: Date signed: Name: Title: Title: Signature: Sig	BINVICION INTE	Phone: Room Number: JEH 8998	
Program Division: Signature: (Not Applicable) Date signed: Date signed: Name: Name: Title: Title: Signature: Signature:		Program Manager (or other appropriate	Division Privacy Officer
- $ -$		executive as Division determines)	
Title: Section Chief, Systems Support Title: IT Branch Privacy Officer		Signature Date signed: Name:	Date signed: Name:

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FINAL FBI APPROVAL / DETERMINATIO	NS / CONDITIONS:
X PIA is required by the E-Government Ac	
PIA is to be completed as a matter of FB	I/DOJ discretion.
Is PIA to be published on FBLGOV (after any	v RMD FOIA redactions)? <u>X</u> Yes. No:
PIA is not required for the following rea System does not collect, maintain, System is grandfathered (in existen Information in the system relates to System has been previously assesse No significant privacy issues (or pr	or disseminate PH. Lee before 4/17/2003; no later changes posing significant privacy risks). Let internal government operations. Ed under an evaluation similar to a PIA.
	X_NoYesSee sample EC_on PCLU intranet website liere; vil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd
Prepare/revise/add Privacy Act (e)(3) statemer	ots for related forms? X No Yes
The system may contain Federal records whethe schedule approved by the National Archives and	RMD to identify/resolve any Federal records/electronic records issues, r or not it contains Privacy Act requests and, in any event, a records Records Administration is necessary. RMD can provide advice on this Electronic Recordkeeping Certification and any necessary updates.
Ottween:	
Unit Chief	
Privacy and Civil Liberties Unit	Signature: Date Signest: > 11/4/11
James J. Landon, Deputy General Courise!	Signature / / / /
FBI Privacy and Civil Liberties Officer	Date Signed: // 1/4///

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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.

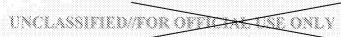


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2. Does the system/project collect, maintain, or disseminate any information about individuals (i.e., a human being or natural person, regardless of nationality)?
NO [If no, please stop.]
X YES [If yes, please continue.]
3. Please indicate if any of 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.)
XThe 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?
<u>X</u> NO YES

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		bout United States citizens or lawfully admitted permanent resident in 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 s subject of the		/project collect any information directly from the person who is the mation?
	NO	[If no, proceed to question 7.]
- X	YES	Some, but not all, of the information is collected directly.
a. Do assessments?	es the	system/project support criminal, CT, or FCI investigations or
	NO	
X	YES	[If yes, proceed to question 7.]
	iuen)	ects of information from whom the information is directly collected Privacy Act (e)(3) statement (either on the collection form or via a
	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:
		rity Numbers (SSNs) collected, maintained or disseminated from the If SSNs should only be used as identifiers in limited instances.
	NO	X YES If yes, check all that apply:
		s are necessary to establish/confirm the identity of subjects, victims, sources in this law enforcement or intelligence activity.
		s are necessary to identify FBI personnel in this internal e system.
	SSN	are important for other reasons. Describe:



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	ystem/project provides special protection to SSNs (e.g., SSNs are dden from all users via a look-up table, or only available to certain ribe:	
<u>X</u> It is r SSNs. Expl a	not feasible for the system/project to provide special protection to in:	
		b3 b7I
8. Is the system ope	rated by a contractor?	
<u> </u>		
considered Pr contains stand collects, mair imposed as a	nformation systems operated by contractors for the FBI may be ivacy Act systems of records. The Federal Acquisition Regulation dard contract clauses that must be included in the event the system stains or disseminates PII and additional requirements may be matter of Department of Justice policy. Consultations with the General Counsel may be required if a contractor is operating the FBI.	
9. Has the system u Division (SecD)?	ndergone Certification & Accreditation (C&A) by the FBI Security	
X	If no, indicate reason; if C&A is pending, provide anticipated completion date:	
XYES	If yes, please indicate the following, if known:	
	Provide date of last C&A certification/re-certification:	
		b3 b71
	(U/FOUO) Confidentiality: Low Moderate X High	
	(U//FOUO) Integrity:LowModerate X_High	
	(U//FOUO) Availability:LowModerate X_High	
Not at	plicable – this system is only paper-based.	

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10. Is this system/pr	oject the subject of an OMB-300 budget submission?
<u>X</u> NO	
YES	If yes, please provide the date and name or title of the OMB submission:
	conduct data mining as defined in Section 804 of the Implementing fithe 9/11 Commission Act of 2007, P.L., 110-53 (codified at 42 USC)
_X_NO	
YES	If yes, please describe the data mining function:
12. Is this a national	security system (as determined by the SecD)?
NO	_X_YES
13. Status of System	/ Project:
This is	a new system/project in development.
IL EXISTING SYS	TEMS/PROJECTS
i. When was the sys	tem/project developed?
_	
2. Has the system/pr	oject undergone any significant changes since April 17, 2003?
NO [if no, p	proceed to next question (II.3).)
	indicate which of the following changes were involved (mark all apply, and provide brief explanation for each marked change):
	A conversion from paper-based records to an electronic system.
identif	A change from information in a format that is anonymous or non- table to a format that is identifiable to particular individuals.
(For ex	A new use of an IT system/project, including application of a new logy, that changes how information in identifiable form is managed. Sample, a change that would create a more open environment and/or for exposure of data that previously did not exist.)

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	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_NOYES
	lifyes;
	a. Provide date/title of the PIA:
	b. Has the system/project undergone any significant changes since the PIA?
	NOYES

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(equivalent to the DOI 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	Name	b6
Reason:	Program Office:	Phone	b7 C
Declassify On:	Division: CIRG/SAS/ASU	Room Number: 7350 JEH	
	Phone Room Number: Manassas Airport		
FBI DIVISION INTERMEDIATE AP	PROVALS		a si
	mager (or other appropriate FBIHC	Division: CIRG	

Program Division: Signature: /s Signature: /s CIRG Date signed: 10/18/2010 Date signed: Name Name: J. Britt Johnson Title: Supervisory Special Agent, Aviation Title: Section Chief, Surveillance and Support Unit, ASB, SAS, CIRG Aviation Section (SAS). Division PrivacyOfficer Signature: /s Signature: Date signed: 10/21/2010 Date signed: Name: Name: Title: SSA/CDC Title:

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)

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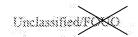


2 - FBIHQ Division POC /Privacy Officer

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)		1 - OGC/PCLU intranet 1 - PCLU UC
(if classified, via hand delivery to 1331 Penn. Ave. NV 20530)	7, Suite 940,	1 - PCLU Library 1 - PCLU Tickler
2 - FBI OCIO / OIPP (JEH 9376, attn: 1 - FBI SecD/AU (elec. copy: via e-mail to UC		A - MARKAR I KININI
1 - RMD/RMAU (attn:		

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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 FBVDOI dis	scretion
Is PIA to be published on FBLGOV (after any RMD FC	OIA redactions)? Yes No (indicate reason):
XPIA is not required for the following reason(s):	
System does not collect, maintain, or dissemi	
	4/17/2003; no later changes posing significant privacy risks).
X Information in the system relates to internal	
System has been previously assessed under a	
X_No significant privacy issues (or privacy issues	ies are unchangeo).
Other (describe):	
Applicable SORN(s): FBI-002	N/A
Notify FBI RMD/RIDS per MIOG 190.2.3? No	_X_YesSee sample EC on PCLU intranet website here:
http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Lib	그렇게 하는 사람들이 살아보고 있다면 하는 사람들이 되었다면 하는 것이 되었다면 하는 것이 없는 것이 없는 것이 없다면 하는 것이 없다면 하는 것이다면 하는데 하는데 되었다면 하는데
SORN/SORN revision(s) required? X_NoY	es (indicate revisions needed):
Prepare/revise/add Privacy Act (e)(3) statements for relat	ted forms? X_NoYes (indicate forms affected):
The system may contain Federal records whether or not it can schedule approved by the National Archives and Records /	
Elizabeth R. Withnell, (Acting) Deputy General Counsel	Signature: Glighth W. Accell Date Signed: 2/3/2011



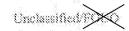
I. INFORMATION ABOUT THE SYSTEM / PROJECT

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.

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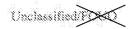


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Trans	the system oro	ject collect, maintaí	in ar dissemins	de anv informa	ition shout ind	ividuals in	
5.5X3X3X		s information linked					
				an Stranger			*
mtifia	nally identifiabl	le information (PH)	2.0				Ì
mtifia	nally identifiabl	le information (PII)					
mtifia							
mtifia perso	NO III :	10, STOP. The PT	A is now comp				be
mtifia perso: s	NO. [If submitted to FI	20, STOP. The PT 31 OGC/PCLU for	A is now comp				be
mtifia perso: s	NO III :	20, STOP. The PT 31 OGC/PCLU for	A is now comp				be
mtifia perso: s	NO. [If submitted to FI	20, STOP. The PT 31 OGC/PCLU for	A is now comp				be
mtifia perso: s	NO. [If is ubmitted to FITA is required	no, STOP. The PT 31 OGC/PCLU for -}	'A is now comp final FBI app				be
mtifia perso: s	NO. [If is ubmitted to FITA is required	20, STOP. The PT 31 OGC/PCLU for	'A is now comp final FBI app				be
miifia perso: s	NO. [If is ubmitted to FITA is required	no, STOP. The PT 31 OGC/PCLU for -}	'A is now comp final FBI app				be
mtifia persoi 	NO. [If is ubmitted to FITA is required XXES. [1	10, STOP. The PT 31 OGC/PCLU for -1 If yes, please contin	A is now comp final FBI app	roval. Unless	you are othe	rwise advised, b	be
mtifia persoi 	NO. [If is ubmitted to FITA is required XXES. [1	no, STOP. The PT 31 OGC/PCLU for -}	A is now comp final FBI app	roval. Unless	you are othe	rwise advised, b	be
mtifia persoi 	NO. [If is ubmitted to FITA is required XXES. [1	10, STOP. The PT 31 OGC/PCLU for -1 If yes, please contin	A is now comp final FBI app	roval. Unless	you are othe	rwise advised, b	be
mtifia persoi 	NO. [If is ubmitted to FITA is required XXES. [1	10, STOP. The PT 31 OGC/PCLU for -1 If yes, please contin	'A is now comp final FBI app us.]	roval. Unless	you are othe	rwise advised, b	be

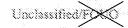
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from the system/project by name or other personal identifier? X NO. YES. 5. Are Social Security Numbers (SSNs) collected, maintained or disseminated from the system/project? X NO. YES. If yes, check all that apply: SSNs are necessary to establish/confirm the identity of subjects, victims, witnesses or sources in this law enforcement or intelligence activity. SSNs are necessary to identify FBI personnel in this internal 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?	from the system/project by name or other personal identifier?	4. Is inform	ation about United Sta	tes citizens or law	fully admitted [permanent resider	nt aliens retrieved
5. Are Social Security Numbers (SSNs) collected, maintained or disseminated from the system/project? X NO. YES. If yes, check all that apply: SSNs are necessary to establish/confirm the identity of subjects, victims, witnesses or sources in this law enforcement or intelligence activity. SSNs are necessary to identify FBI personnel in this internal 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?	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: 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?						
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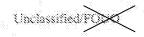
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to FBI OGC/PCLU for final FBI approval and determination if PIA and/or other actions are required.]

II. EXISTING SYSTEMS / PROJECTS

NO. [If no, proceed to next question (IL3).] 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 proviously did not exist.) A change that results in information in identifiable form being morged, centralized or matched with other databases. A new method of authenticating the use of and access to information in identifiable form by theinbers 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 is 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 whim records are results in new items of information in identifiable form being added into the system/project a change in the type of records maintained, the individuals on whim records are results and, or the use or dissemination of information from the system/project already exist? NO: YES, If yes:	l. When was the sv	stem/project developed?
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ä.	Provide	date/titi	e 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:	SYSTEMPRO	DIECT POC	FBI OGC/PC	LUPOC
Classified By:	Name:		Name:	
Reason:	Program Office	:IIB	Phone:	
Declassify On:	Division: ITSD		Room Number:	730
	Phone			7 3 34 3 4 7 1
	Room Number:	8979 (JEH)		

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:	Signature:
	Date signed:	Date signed:
	Name:	Name:
	Title:	Title
FBIHQ Division: ITSD	Signature:	Signature:
	Date signed. 8/4/2001	Date signed:
	Name:	Name
	Title: IT Specialist	Title: IT Specialist

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.)

b6 b7С

b6 b7C

(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/DOI discretion Is PIA to be published on FBLGOV (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 PIL 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 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 Signature: Privacy and Civil Liberties Unit Date Signed: James J. Landon, Deputy General Counsel Sienature: FBI Privacy and Civil Liberties Officer Date Signed:

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

b6 b7С