

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM: National Stolen Art File

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

FBI Privacy Threshold Analysis (PTA) Cover Sheet

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

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NAME OF SYSTEM: b7E

FBI SYSTEM CONTACT PERSON Name: <input type="text"/> Program Office: ITB Division: IT Operations Phone: <input type="text"/> Room Number: 8979 Date PTA submitted for approval: 04/24/2008	FBI OGC/PCLU POC Name: <input type="text"/> <input type="text"/> Phone: <input type="text"/> Room Number: 7338
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FBI DIVISION APPROVALS. A PIA (and/or PTA) should be prepared/approved by the cognizant program management in collaboration with IT, security, and end-user management and OGC/PCLU. (PIAs/PTAs relating to electronic forms/questionnaires implicating the Paperwork Reduction Act should also be coordinated with the RMD Forms Desk.) If the subject of a PTA/PIA is under the program cognizance of an FBIHQ Division, prior to forwarding to OGC the PTA/PIA must also be referred to the FBIHQ Division for program review and approval, if required by the FBIHQ Division.

	Program Division:	FBIHQ Division: IT Operations
Program Manager (or other appropriate executive as Division determines)	Signature: Date signed: Name: Title:	Signature: /s/ Date signed: 7/30/08 Name: <input type="text"/> Title: IT Specialist
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: /s/ Date signed: 7/30/08 Name: <input type="text"/> Title: Division Privacy Officer

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

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature: /s/ Date Signed: 7/31/08 Name: David C. Larson Title: Acting Deputy General Counsel

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

1 - Signed original to 190-HQ-C1321794

Copies:

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

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

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

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- [redacted] is part of the Investigative Mainframe Applications that run on the FBINET closed network. FBINET can only be accessed by authorized persons. b7E

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__NO

II. For systems developed after April 17, 2003.

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

(Continue to Question 2.)

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

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

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

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

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

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

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

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

III. Full or Short-Form PIA

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

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

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

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

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

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

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

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

NAME OF SYSTEM / PROJECT: FBI [REDACTED] (JEH and WFO) b7E		
Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: [REDACTED]	Name: [REDACTED]
Reason:	Program Office: FLSD	Phone: [REDACTED]
Declassify On:	Division: TSU	Room Number: 7338
	Phone: [REDACTED]	
	Room Number: 1B907	

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FBI DIVISION INTERMEDIATE APPROVALS [complete as necessary]

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: FLSD	Signature: [REDACTED] Date signed: 7/2/09 Name: [REDACTED] Title: Telecommunications Manager	Signature: [REDACTED] Date signed: 7/2/09 Name: Elton Thomas Title: CSO Resource Planning Office <i>Facilities & Log Ser.</i>
WFO	Signature: [REDACTED] Date signed: [REDACTED] Name: [REDACTED] Title: [REDACTED]	Signature: [REDACTED] Date signed: 7/17/09 Name: [REDACTED] Title: Associate Division Counsel
FBIHQ Division:	Signature: [REDACTED] Date signed: [REDACTED] Name: [REDACTED] Title: [REDACTED]	Signature: [REDACTED] Date signed: [REDACTED] Name: [REDACTED] Title: [REDACTED]

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Additional division(s) approvals may be added as warranted:

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

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

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

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

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

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

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

2 - Program Division POC /Privacy Officers

2 - FBIHQ Division POC /Privacy Officer

1 - OGC/PCLU intranet

1 - PCLU UC

1 - PCLU Library

1 - PCLU Tickler

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*For PCLU
7/2/09*

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FBI PTA: FBI

(JEH and WFO)

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

☐ PIA is required by the E-Government Act.

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

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

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

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

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

☒ Information in the system relates to internal government operations.

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

☒ Privacy issues are unchanged since 2006 PTA.

☐ Other (describe):

Applicable SORN(s): JUSTICE/FBI-002

Notify FBI RMD/RIDS per MIOG 190.2.3? ☒ No ☐ Yes (see sample EC on PCLU intranet website).

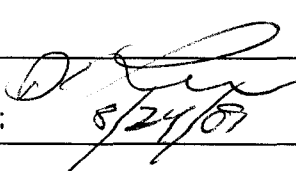
SORN/SORN revision(s) required? ☒ No ☐ Yes (indicate revisions needed):

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

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

Other:

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

Signature: 
Date Signed: 8/24/07

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FBI PTA: FBI [REDACTED] (JEH and WFO)

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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 al users.

[REDACTED]
[REDACTED]
[REDACTED] in the J. Edgar Hoover building (JEH) and Washington
Field Office (WFO) sites. [REDACTED]

[REDACTED] across the FBI headquarters at JEH and WFO. [REDACTED]

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[REDACTED] in controlled FBI spaces (JEH and WFO). [REDACTED]

[REDACTED] and is not
accessed by FBI personnel. However dedicated Telecommunications Support Unit (TSU) and select FBI
staff members can execute certain [REDACTED]

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[REDACTED] for the end users within the FBI spaces (JEH
and WFO). [REDACTED]

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FBI PTA: FBI

[Redacted]

(JEH and WFO)

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[Redacted]

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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.]

☒ YES. [If yes, please continue.]

Information in the system that is or might be PII includes: [Redacted] office locations,

[Redacted]

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

☒ NO. ☐ YES.

The system only supports government operations.

[Redacted]

[Redacted]

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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:

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FBI PTA: FBI

(JEH and WFO)

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

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

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

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

____ It is not feasible for the system/project to provide special protection to SSNs.

Explain:

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.

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. 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, provide date of last C&A certification/re-certification:** 07-21-2005 through 07-20-2008. System is currently in the process of being re-certified.

____ Don't Know.

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

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FBI PTA: FBI [REDACTED] (JEH and WFO) b7E

_____ NO. X 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)?

 X NO. _____ YES. _____ Don't know.

10. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? [REDACTED] systems for both JEH and WFO were developed and implemented well before April 2003.

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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 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.

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FBI PTA: FBI [REDACTED] (JEH and WFO) b7E

- _____ 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.

[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 Privacy Threshold Analysis (PTA) Cover Sheet

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

NAME OF SYSTEM: One Way Transfer Controlled Interface (~~Quick Wins~~ OWT)

Derived From: Classified By: Reason: Declassify On:	SYSTEM POC Name: <input type="text"/> Program Office: OIPM Division: OCIO Phone: <input type="text"/> Room Number: 6268	FBI OGC/PCLU POC Name: <input type="text"/> Phone: <input type="text"/> Room Number: <input type="text"/>
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FBI DIVISION APPROVALS. A PIA (and/or PTA) should be prepared/approved by the cognizant program management in collaboration with IT, security, and end-user management and OGC/PCLU. (PIAs/PTAs relating to electronic forms/questionnaires implicating the Paperwork Reduction Act should also be coordinated with the RMD Forms Desk.) If the subject of a PTA/PIA is under the program cognizance of an FBIHQ Division, prior to forwarding to OGC the PTA/PIA must also be referred to the FBIHQ Division for program review and approval, if required by the FBIHQ Division.

	Program Division: OIPM	FBIHQ Division: ITB
Program Manager (or other appropriate executive as Division determines)	Signature: <input type="text"/> Date signed: 12 June 08 Name: <input type="text"/> Title: IT Project Manager	Signature: <input type="text"/> Date signed: <input type="text"/> Name: <input type="text"/> Title: <input type="text"/>
Division Privacy Officer	Signature: <input type="text"/> Date signed: 6/18/08 Name: <input type="text"/> Title: IT Specialist	Signature: <input type="text"/> Date signed: <input type="text"/> Name: <input type="text"/> Title: <input type="text"/>

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

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature:  Date Signed: 7/11/08 Name: David C. Larson Title: Deputy General Counsel
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Upon final FBI approval, FBI OGC will distribute as follows:

1 - Signed original to 190-HQ-C1321794

Copies:

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

2 - FBI OCIO / OIPP

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

2* - Program Division POC /Privacy Officer

2* - FBIHQ Division POC /Privacy Officer

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

1 - OGC/PCLU intranet website

1 - PCLU UC

1 - PCLU Library

1 - PCLU Tickler

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ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 10-21-2014 BY NSICG/C32W33B91

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: One Way Transfer Controlled Interface (QuickWins OWT)

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

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

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

A. General System Description: Please briefly describe:

1. Type of information in the system:

This system transfers (one way) SF-86 background clearance information. This information is extensive and detailed.

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

The One Way Transfer Controlled Interface (QuickWins OWT) supports the OPM Electronic Questionnaires for Investigation Process (e-QIP) to automate the clearance process. This information will be used to identify candidates for positions within the FBI.

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

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

This is a conduit only. The information is not stored in the OWT. The OWT is only a conduit that the e-QIP uses to pass information from the OPM server to the Secret Enclave. There is no remote access to the system. The only access to the system is within the OWT itself. Passwords are tightly controlled.

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

Currently only personnel have passwords to access the system. Once a determination is made as to who the owner of the system will be then the passwords and access will be maintained by that stakeholder.

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

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)
NAME OF SYSTEM: One Way Transfer Controlled Interface (QuickWins OWT)

No one outside of the FBI has access to the OWT.

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

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

I don't believe an OMB-300 was completed on this system. It originated from the OCTO and was handed over to OIPM recently to properly manage the project.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sensitive But Unclassified
FBI PRIVACY THRESHOLD ANALYSIS (PTA)
NAME OF SYSTEM: One Way Transfer Controlled Interface (QuickWins OWT)

II. For systems developed after April 17, 2003.

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

See details in General System Description A.2

(Continue to Question 2.)

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

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

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

This system does not maintain information it is only a conduit used to transfer information from the unclassified environment to the classified environment.

FBI Privacy Threshold Analysis (PTA) Cover Sheet (OGC/PCLU (Rev. 1/5/07))

NAME OF SYSTEM:

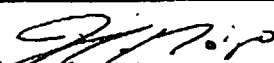
[Redacted Box]

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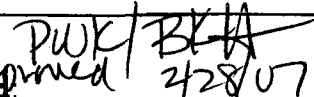
FBI SYSTEM CONTACT PERSON

Name: Jennifer F. Toigo
Program Office: Section Chief, Research and Development Section
Division: Office of the Chief Technology Officer
Phone: (202) 324-8537
Room Number: JEH Room 9959
Date PTA submitted for approval:

FBI DIVISION APPROVALS.

	Program Division: Office of Chief Technology Officer (OCTO)	FBIHQ Division: Office of Chief Technology Officer (OCTO)
Program Manager (or other appropriate executive as Division determines)	Signature:  Date signed: 01/06/2007 Name: Jennifer F. Toigo Title: Section Chief	Signature: Date signed: Name: Jack W. Israel Title: Section Chief
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature:  Date Signed: 4/28/07 Name: Patrick W. Kelley Title: Deputy General Counsel
---	---

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

1 - Original signed copy to 190-HQ-C1321794

Copies:

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

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

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)**NAME OF SYSTEM:** [REDACTED]

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

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

A. General System Description: [REDACTED]

[REDACTED]

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1. Type of information in the system:

FBI employees and Joint Terrorism Task Force members will access Sensitive But Unclassified information using the system.

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

[REDACTED]

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[REDACTED] The information will be used to support on going investigations.

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

The system utilizes [REDACTED]

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

The system uses [REDACTED]

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

[REDACTED]

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

None

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)**NAME OF SYSTEM:**

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☐ YES (If "yes," proceed to Question 1.)☒ NO (If "no," proceed to Section II.)

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

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

(Continue to Question 2.)

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

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

☐ YES (If "yes," please proceed to Question 3.)☐ NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

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

☐ YES If "yes," is this a Major Information System (as listed on OGC's FBINET website)?:☐ Yes. (If "yes," a full PIA is required.. PTA is complete.)☐ No. (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required. (FBI and DOJ reviewing officials reserve the right to require a PIA.))☐ NO (If "no," go to section III to determine if a full or short-form PIA is required.)**II. For systems developed after April 17, 2003.**

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

b7E

FBI PRIVACY THRESHOLD ANALYSIS (PTA)**NAME OF SYSTEM:**

b7E

(Continue to Question 2.)

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

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

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

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

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

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

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

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

III. Full or Short-Form PIA

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

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

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

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

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

does not collect any information but provides

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

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

NAME OF SYSTEM / PROJECT: 		
Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: Program Office: Information Assurance Technology Infusion Division: Security Division Phone: Room Number: SpyB-601	FBI OGC/PCLU POC Name: Phone: Room Number: 7338

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FBI DIVISION INTERMEDIATE APPROVALS

	Program Division: Security Division	FBIHQ Division: Security Division
Program Manager (or other appropriate executive as Division determines)	Signature: Date signed: 10-16-08 Name: Title: Information Assurance Technology Unit Chief	Signature: Date signed: 10-16-08 Name: Title: Information Assurance Technology Unit Chief
	Division Privacy Officer	Signature: <i>Michael F.A. Morehart</i> Date signed: 10/21/08 Name: Michael F.A. Morehart Title: Deputy Assistant Director Security Division

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

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

PIA required: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes: SORN/SORN revision required: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes:	
Applicable SORN(s): CRS - FBI/DOJ-002	
Notify FBI RMD/RIDS per MIOG 190.2.3: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	
Consult with RMD to identify/resolve any Federal records/electronic records issues: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes:	
Prepare/revise/add Privacy Act (e)(3) statements for related forms? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes-forms affected:	
Other:	
David C. Larson, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: <i>[Signature]</i> Date Signed: 11/10/08

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ALU/OGC OCT 23, 2008

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: [REDACTED]

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

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

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

1 - DOJ Office of Privacy and Civil Liberties (via e-mail to privacy@usdoj.gov)

(if classified, via hand delivery to 1331 Penn. Ave. NW, Suite 940, 20530)

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

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

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

2 - Program Division POC /Privacy Officer

2 - FBIHQ Division POC /Privacy Officer

1 - OGC\PCLU intranet

1 - PCLU UC

1 - PCLU Library

1 - PCLU Tickler

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

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

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

[REDACTED]

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[REDACTED]

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

The purpose of this system is to provide FBI Employees who have authorized Investigative Data Warehouse (IDW) accounts and SCION accounts [REDACTED] IDW system [REDACTED] SCION [REDACTED]

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

This system does not contain a database. The system does create system logs and logs of user

[REDACTED] These logs are created from user use [REDACTED]
[REDACTED]

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

___ 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.

Note: The log that is created [REDACTED]

☐ IDW [REDACTED] with the username of that user contained within that log.

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6. Access

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

To access and utilize the system a user must meet the following pre-requisites:

- The user must have a SCION network logon account valid username and password

[REDACTED]

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- The user must have a IDW valid username and password

[REDACTED]

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

[REDACTED]

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[REDACTED]

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

[REDACTED] administrative staff/privileged users will have access to the system [REDACTED] and username and password to system components. The administrative staff will be identified on the [REDACTED] Access form and will hold TS/SCI clearances. The Information System Security Officer will have access to monitoring log data [REDACTED]

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

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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No one outside of the FBI will have access to the information in the system.

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

☐ NO

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

This system is utilized by authorized government employees, contractors, or consultants who are SCION and IDW account holders.

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

☒ NO ☐ YES

No, this system

IDW application. This system on its own is not a datasource for information of the IDW application or information about United States citizens or lawfully admitted permanent resident aliens.

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

☒ NO

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

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

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

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

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

☒ NO

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

- Indicate how such information is collected:

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

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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- Are information subjects from whom information is directly collected provided a written Privacy Act (e)(3) statement (either on the collection form or via a separate notice)? ☐ Yes ☐ No

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

☐ NO. If no, please indicate reason; if C&A is pending, provide anticipated completion date: This system is pending Certification testing for an ATO decision by 28 Nov 2008.

☒ YES. If yes, please:
- Provide date of last C&A certification/re-certification:
Approval to Test (ATT) has been granted for the period of 04/23/2008 to 10/23/2008. C&A effort commencing for Approval to Operate decision.

☐ Don't Know

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

☒ NO ☐ Don't know

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

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

☐ NO ☒ YES ☐ Don't know

14. Status of System/ Project:

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

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM / PROJECT: [REDACTED] b3 b7E		
Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: [REDACTED] Program Office: NSPU Division: OIPM Phone: [REDACTED] Room Number: 9664	FBI OGC/PCLU POC Name: [REDACTED] Phone: [REDACTED] Room Number: 7338

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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer [REDACTED]
Program Division: WMDD	Signature: [REDACTED] Date signed: 7/23/09 Name: [REDACTED] Title: [REDACTED] Unit Chief	Signature: [REDACTED] Date signed: 08/03/2009 Name: [REDACTED] Title: WMDD Privacy Officer
FBIHQ Division: OIPM	Signature: [REDACTED] Date signed: [REDACTED] Name: [REDACTED] Title: NSPU Unit Chief 7/22/09	Signature: [REDACTED] Date signed: 7/22/09 Name: [REDACTED] Title: OIPM Privacy Officer

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

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

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

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

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

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FBI PTA: b3
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FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS: [This section will be completed by the FBI PCLU/PCLO following PTA submission. The PTA drafter should skip to the next page and continue.]

☐ PIA is required by the E-Government Act.

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

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

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

- ☐ System does not collect, maintain, or disseminate PII.
- ☒ System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).
- ☐ Information in the system relates to internal government operations.
- ☐ System has been previously assessed under an evaluation similar to a PIA.
- ☐ No significant privacy issues (or privacy issues are unchanged).
- ☐ Other (describe):

Applicable SORN(s): FBI-002

Notify FBI RMD/RIDS per MIOG 190.2.3? ☐ No ☒ Yes (see sample EC on PCLU intranet website).

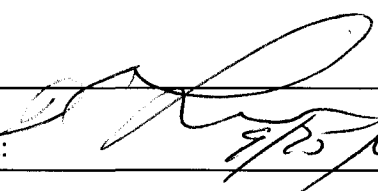
SORN/SORN revision(s) required? ☒ No ☐ Yes (indicate revisions needed):

Prepare/revise/add Privacy Act (e)(3) statements for related forms? N/A

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

Other:

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

Signature: 
Date Signed: 9/25/09

FBI PTA: [REDACTED]

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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. (This kind of information may be available in the System Security Plan, if available, or from a Concept of Operations document, and can be cut and pasted here.):

[REDACTED]

[REDACTED] The nature of the information in the system identifies [REDACTED] Occasionally, names of individuals and related Personally Identifiable Information (PII) appear. [REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED] Access to the information contained within this system will be restricted to those cleared by the program manager and must possess appropriate level of security clearance necessary (i.e. Sensitive Compartmented Information). The number of individuals with access to information on this system is approximately [REDACTED] individuals. The general public will not have access to data residing on this system.

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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))?

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FBI PTA:

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____ NO.

☒ YES. [If yes, please continue.]

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

☒ NO. ____ YES.

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

____ NO. ☒ 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: The possibility exists that due to PII may be collected and appear in the system and cannot be blocked so that the identification of potential subjects may occur.

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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.

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)?

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

☒ NO. The legacy system has conducted a C&A assessment. The new system will undergo a C&A review within 6 months of release.

____ 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.]

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? 1998

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

FBI PTA:

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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? ☒ 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.

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

NAME OF SYSTEM: SF-52 Process (Automated Workflow)

FBI SYSTEM CONTACT PERSON

Name: [REDACTED]
Program Office: RPO
Division: RPO
Phone: [REDACTED]
Room Number: 6212
Date PTA submitted for approval: 5/8/2007

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

	Program Division: RPO	FBIHQ Division: RPO
Program Manager (or other appropriate executive as Division determines)	Signature: [REDACTED] Date signed: 5/8/07 Name: [REDACTED] Title: PM	Signature: [REDACTED] Date signed: 5/8/2007 Name: Anthony Bialer Title: DAD
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature: [REDACTED] Date Signed: 5/14/07 Name: Patrick W. Kelley Title: Deputy General Counsel
---	---

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

1 - Original signed copy to 190-HQ-C1321794

Copies:

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: SF-52 Process (Automated Workflow)

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

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

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

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

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

(Continue to Question 2.)

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

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

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

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

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

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

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

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

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

II. For systems developed after April 17, 2003.

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

(Continue to Question 2.)

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: SF-52 Process (Automated Workflow)

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

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

A. General System Description: Please briefly describe: The hiring process will be automated using workflow to enhance the current paper-based, manual hiring process and personnel actions of FBI employees.

1. Type of information in the system: Workflow data related to the processing of form SF-52, Request for Personnel Action.

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

Employee names, social security numbers, and other information generally found on the SF-52 form.

2. Purpose for collecting the information and how it will be used: The purpose for collecting information is to facilitate the automated workflow of the hiring process. The hiring process in its entirety is yet to be fully understood. Currently this process is believed to consist of submitting requests from field offices and FBIHQ divisions to the Resource Planning Office (RPO) for considered approval. If approved by RPO, a notification is sent to HRD to begin to canvas, interview, and select suitable candidates. The information pertaining to these candidates is sent to Security Division (SecD) to perform the required Top Secret security clearance process. Once successfully completed, approved candidate information is sent to HRD to compile an appointment letter and an SF-52 personnel action request form.

3. The system's structure (including components/subsystems): The hiring process will be [REDACTED]

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

The system will be accessed by authorized users through the FBI intranet using the baseline standard Internet Explorer web browser.

5. Who within FBI will have access to the information in the system and controls for ensuring that only authorized persons can access the information: AOs in the field, FBIHQ division admin executives, RPO analysts, HRD - CSSV employees who typically handle SF-52 modifications???

6. Who outside the FBI will have access to the information in the system and controls for ensuring that only authorized persons can access the information: N/A

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: SF-52 Process (Automated Workflow)

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

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

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

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

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

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

Note: Although no PIA is required at this point, FBI PCLO requests that program office apprise FBI PCLO quarterly of significant developments/milestones; FBI PCLO may reassess need/desirability of PIA as developments might warrant.

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

III. Full or Short-Form PIA

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

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

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

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

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

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

[U//FOUO]

FBI Privacy Threshold Analysis (PTA) Cover Sheet

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

NAME OF SYSTEM: [REDACTED]

b7E

Derived From: Classified By: Reason: Declassify On:	SYSTEM POC Name: [REDACTED] Prog. Manager Program Office: Data Intercept Technology Unit (DITU) Division: Operational Technology Division (OTD) Phone: [REDACTED] Room Number: 4C05	FBI OGC/PCLU POC Name: AGC [REDACTED] Phone: [REDACTED] Room Number: JEH 7338
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b7C

FBI DIVISION APPROVALS.

	Program Division: OTD	FBIHQ Division: OTD
Program Manager (or other appropriate executive as Division determines)	Signature: [REDACTED] Date signed: 07/14/08 Name: SSA [REDACTED] Title: Unit Chief, DITU	Signature: [REDACTED] Date signed: 07/14/08 Name: SSA [REDACTED] Title: Unit Chief, DITU
Division Privacy Officer	Signature: [Signature] Date signed: 7/14/08 Name: SSA Charles Barry Smith Title: Section Chief, Technical Program Section	Signature: [Signature] Date signed: 7/14/08 Name: SSA Charles Barry Smith Title: Section Chief, Technical Program Section

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b7C

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

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature: [Signature] Date Signed: 8/17/08 Name: David C. Larson Title: Deputy General Counsel
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Upon final FBI approval, FBI OGC will distribute as follows:

1 - Signed original to 190-HQ-C1321794

Copies:

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

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

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: [REDACTED] b7E

A. General System Description: Please briefly describe:

1. Type of information in the system:

[REDACTED] a Sensitive but Unclassified [REDACTED]
[REDACTED]
[REDACTED] A separate PTA for
[REDACTED] was approved May 15, 2007.

b7E

No data is permanently stored in [REDACTED]
[REDACTED] however, the data may be maintained temporarily in [REDACTED] for up to 30
days, in case it is needed for [REDACTED] Data in [REDACTED] is automatically deleted
after 30 days, but data is typically stored in the system only for approximately four days
before being manually deleted. While in [REDACTED]
[REDACTED]

b7E

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

N/A

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

The data that is [REDACTED]
[REDACTED] No data is stored in the system for more than
a brief period of time [REDACTED]
[REDACTED]

b7E

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

[REDACTED]
[REDACTED] and Network Management (which contains

b7E

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: [REDACTED]

b7E

audit log centralization along with other administrative functions).

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

[REDACTED]

b7E

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

Access to [REDACTED] is restricted to DITU technicians. Access is controlled by the system administrator and Information Systems Security Officer (ISSO) in accordance with the [REDACTED] Audit logs are reviewed on a regular basis in accordance with the [REDACTED]

b7E

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

No one outside of the FBI has access to [REDACTED]

b7E

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

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

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

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

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

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

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

(Continue to Question 2.)

☒ NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: b7E

Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

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

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

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

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

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

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

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

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

II. For systems developed after April 17, 2003.

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

(Continue to Question 2.)

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

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

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

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

[U//FOUO]

[U//FOUO]

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

b7E

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

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

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

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

III. Full or Short-Form PIA

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

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

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

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

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

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

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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
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Page 4 ~ b7E;

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SENSITIVE BUT UNCLASSIFIED-FOR OFFICIAL USE ONLY

(OGC/PCLU (Rev. 01/05/09))

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

NAME OF SYSTEM / PROJECT: [REDACTED]

b7E

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: [REDACTED] Program Office: Office for Victim Assistance Division: 6 (CID) Phone: [REDACTED] Room Number: 3329	FBI OGC/PCLU POC Name: [REDACTED] Phone: [REDACTED] Room Number: JEH 7338
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b7C

FBI DIVISION INTERMEDIATE APPROVALS [complete as necessary]

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: [insert division name]	Signature: [REDACTED] Date signed: 2/29/2009 Name: [REDACTED] Title: FBI VNS Coordinator	Signature: [REDACTED] Date signed: 5/8/09 Name: BRIAN A. TRUCTION Title: SECTION CHIEF CID, OSS
FBIHQ Division: [insert division name]	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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b7C

Additional division(s) approvals may be added as warranted:

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

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

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

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

1 - DOJ Office of Privacy and Civil Liberties (via e-mail to 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 (electronic copy: via e-mail to UC [REDACTED])

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

2 - Program Division POC /Privacy Officer

2 - FBIHQ Division POC /Privacy Officer

1 - OGC/PCLU intranet

1 - PCLU UC

1 - PCLU Library

1 - PCLU Tickler

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b7C

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FBI PTA: [REDACTED]

b7E

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:PIA required: ☒ No ☐ Yes: SORN/SORN revision required: ☒ No ☐ Yes:

Applicable SORN(s): N/A

Notify FBI RMD/RIDS per MIOG 190.2.3: ☒ No ☐ Yes

Prepare/revise/add Privacy Act (e)(3) statements for related forms? N/A

The program should consult with RMD to identify/resolve any Federal records/electronic records issues (for the underlying VNS, but not for the [REDACTED] itself). b7E

Other:

This system does not need to complete a PIA because it is grandfathered.

In addition, the system does not need to complete a PIA because the system itself does not maintain personally identifiable information related to the content of the main Victim Notification System (VNS). The VNS is a separate system maintained by DOJ, for which the EOUSA is responsible for and has completed Privacy Impact Assessments. The [REDACTED] is merely a [REDACTED] VNS information

b7E

The [REDACTED] may maintain limited information that arguably may constitute PII comprising the user names and passwords of authorized FBI users (approximately 150) and transaction logs and audit information including the date and time of each audit event, such as successful and failed logon and logoff, access to security relevant objects, "dirty-word" hits, and activities of privileged users. However, any such PII is solely related to the internal operations of the FBI (ensuring classified information is not transmitted beyond the FBINET network) and is not of any quantity or significant privacy sensitivity to warrant a PIA. To the extent that any PII maintained in the [REDACTED] might be subject to the Privacy Act, it would be covered by the system of records notice for the FBI Central Records System (FBI-002) (http://30.30.204.57/pclu/privacy_civil_liberties/fbi_systems/fbi-002.htm) and/or for the DOJ Computer Systems Activity and Access Records (DOJ-002) (http://30.30.204.57/pclu/privacy_civil_liberties/doj_systems/doj-002.htm).

b7E

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

Date Signed: 5/27/09

FBI PTA: [REDACTED]

b7E

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.

[REDACTED] also known as [REDACTED]
[REDACTED]
Department of Justice (DOJ) VNS system, which is a DOJ-controlled system¹ in which the FBI and other DOJ components participate (along with the U.S. Postal Service). The DOJ developed the VNS to manage victim contact information and disseminations in support of DOJ mission requirements to notify victims of significant stages in the criminal justice process, procedural developments, and, if appropriate, the location and status of an offender while incarcerated and/or released.. Underlying authorities for the VNS include the following: The Victim and Witness Protection Act of 1982, the Crime Control Act of 1990, the Violent Crime Control and Law Enforcement Act of 1994, and the Attorney General's (AG) Guidelines for Victim and Witness Assistance.

b7E

This PTA is limited to the [REDACTED] and does not encompass the main VNS system.² The purpose of the [REDACTED] is to [REDACTED]
[REDACTED] The FBI has approximately 150 individuals (most working full time on victim assistance) who require access to the VNS application, from their FBI workstations on the FBI computer network (FBI/NET), which operates at the SECRET classification level. However, the [REDACTED] operates on the DOJ network, at the Sensitive But Unclassified (SBU) level. [REDACTED] in essence serves as a [REDACTED]
[REDACTED]
[REDACTED] does not maintain any VNS information, but instead merely [REDACTED]
[REDACTED] encompassed by the main VNS system.

b7E

[REDACTED] J. Edgar Hoover Building, FBI Headquarters (FBIHQ), 935 Pennsylvania Avenue, NW, Washington, DC 20535 [REDACTED]
The building is protected by an armed FBI police force, as well as physical barriers and monitoring devices. [REDACTED]
[REDACTED] classified communications/information to at least the TS/SCI level.

b7E

¹ The VNS application [REDACTED]
[REDACTED]

b7E

² DOJ's Executive Office of U.S. Attorneys (EOUSA) completed Privacy Impact Assessments on the main VNS and the Victim Internet System (VIS) (Part of VNS) in June 2006.

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FBI PTA:

b7E

An FBI user requesting connectivity to the VNS application [redacted] will require three unique User IDs and associated passwords. First, the FBI user will require a FBI network user account. Documented procedures exist for requesting an FBI network user account. The second and third user accounts will be requested through the FBI Office of Victim Assistance, Criminal Investigative Division. That Office will forward the account requests to two different organizational entities. The FBI [redacted] Security Administrator will create the second user account required [redacted]. The third and final account required will be created by the DOJ VNS application system administrators.

b7E

All FBI employees are subjected to a Full Field Background Investigation (FFBI) and must possess a TOP SECRET security clearance. All FBI employees are re-investigated and have credit checks performed every 5 years. All FBI employees working on the development, operation, or maintenance of [redacted] have had security awareness training. Personnel providing maintenance and technical and consultation support require an [redacted] Top Secret clearance and authorization from the FBI Security Program Manager (SPM). The FBI will maintain a list of vendor employees who have been authorized access. The vendor must provide personnel from this list to perform services. Vendor personnel will be escorted at all times while in the FBIHQ Data Center.

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Extensive auditing is performed [redacted]. Audit files record the date and time of each audit event. The audits capture information concerning successful and failed logon and logoff events, access to security relevant objects and activities of privileged users. [redacted] also contains an audit reduction tool that can be used to quickly examine audit files. [redacted] monitor auditable events for security violations.

b7E

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. The [redacted] does not contain any VNS PII.

b7E

☒ YES. [If yes, please continue.] As noted above, the [redacted] may maintain limited information that arguably may constitute PII comprising the user names and passwords of authorized FBI users (approximately 150) and transaction logs and audit information.

b7E

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

☐ NO. ☒ YES. (As to any PII maintained by the system.)

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

SENSITIVE BUT UNCLASSIFIED-FOR OFFICIAL USE ONLY