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ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED EXCEPT
WHERE SHOWN OTHERWISE

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

NAME OF SYSTEM / PROJECT: [REDACTED]

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Derived From: NSI SCG Classified By: Reason: Declassify On: 20340603	SYSTEM/PROJECT POC Name: [REDACTED] Program Office: STAO Division: STB Phone: [REDACTED] Room Number: FBI HQ - CH102	FBI OGC/PCLU POC Name: AGC [REDACTED] Phone: [REDACTED] Room Number: 7458 JEH
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FBI DIVISION INTERMEDIATE APPROVALS [complete as necessary]

	Program Division: Special Technologies and Applications Office (STAO)	FBIHQ Division: [insert division name]
Program Manager (or other appropriate executive as Division determines)	Signature: <i>[Signature]</i> Date signed: 07/14/2009 Name: SSA C. Todd Doss Title: Section Chief, STB	Signature: Date signed: Name: Title:
Division Privacy Officer	Signature: [REDACTED] Date signed: 7/14/2009 Name: [REDACTED] Title: Unit Chief, STAO	Signature: Date signed: Name: Title:

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

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

PIA required: No Yes: SORN/SORN revision required: No Yes:

Applicable SORN(s):

Notify FBI RMD/RIDS per MIOG 190.2.3: No Yes

Consult with RMD to identify/resolve any Federal records/electronic records issues: No Yes:

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

[REDACTED]

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David C. Larson, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: <i>[Signature]</i> Date Signed: 7/15/09
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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 Ticker

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

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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:

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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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.

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YES. If yes, please continue.

6. Access

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

b7E

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

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

_____ NO

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

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

_____ NO _____ YES

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

_____ 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):

- 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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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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:

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

_____ Don't Know

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

_____ NO _____ Don't know

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

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

_____ NO _____ YES _____ Don't know

14. Status of System/ Project:

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

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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

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

NO

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

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.

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: [REDACTED]

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BIKR FBI Unique Asset ID: 2010-021-01-P-404-262-2909

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: [REDACTED]	Name: [REDACTED]
Reason:	Program Office: [REDACTED]	Privacy Civil Liberties Unit
Declassify On:	Division: Information Technology Services Division	Phone: [REDACTED]
	Phone: [REDACTED]	Room Number:
	Room Number: JEH,9988	

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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Information Technology Services Division	Signature: [REDACTED] Date signed: 8/20/12 Name: [REDACTED] Title: Enclave Program Manager	Signature: [REDACTED] Date signed: 9/20/12 Name: Title: Unit Chief
FBIHQ Division: Customer Support Section (CSS)	Signature: Naomi Singer Date signed: 7/20/12 Name: Naomi Singer Title: Section Chief, Customer Support Section, ITSD	Signature: [REDACTED] Date signed: 9/20/12 Name: [REDACTED] Title: IT Branch Privacy Officer

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

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

PIA is required by the E-Government Act.

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

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

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

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

Applicable SORN(s): DOJ-002 (DOJ Computer Systems Activity and Access Records) for DOJ/FBI personnel user information

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

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:



<input type="checkbox"/> Acting Unit Chief Privacy and Civil Liberties Unit	Signature: <input type="checkbox"/>
Christine M. Costello, Acting Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: Date Signed: <u>1-15-2012</u>

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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.



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

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

YES [If yes, please continue.]

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

The information directly identifies specific individuals.

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

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

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

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

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

NO YES

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

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

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

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

NO [If no, proceed to question 7.]

YES

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

_____ NO

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

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

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

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

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

_____ NO _____ YES If yes, check all that apply:

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

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

_____ SSNs are important for other reasons. Describe:

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

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

8. Is the system operated by a contractor?

_____ No.

___X___ Yes. Information systems operated by contractors for the FBI may be considered Privacy Act systems of records. The Federal Acquisition Regulation

contains standard contract clauses that must be included in the event the system collects, maintains or disseminates PII and additional requirements may be imposed as a matter of Department of Justice policy. Consultations with the Office of the General Counsel may be required if a contractor is operating the system for the FBI.

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

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

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

Provide date of last C&A certification/re-certification:
July 17, 2012

Confidentiality: Low Moderate High Undefined

Integrity: Low Moderate High Undefined

Availability: Low Moderate High Undefined

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

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

NO

YES If yes, please describe the data mining function:

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

NO

YES

12. Status of System/ Project:

This is a new system/ project in development.

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? Fall 2001

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

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

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

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

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

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

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

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

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

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

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

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

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

_____ Other [Provide brief explanation]:

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

NO YES

If yes:

a. Provide date/title of the PIA:

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

NO YES

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

NAME OF SYSTEM / PROJECT: [REDACTED]

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BIKR FBI Unique Asset ID: APP-0000285

SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Name: [REDACTED] Program Office: ITB Division: ITSD Phone: [REDACTED] Room Number: 8979	Name: [REDACTED] Phone: [REDACTED] Room Number: JEH 7350

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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: OGC	Signature: [Handwritten Signature] Date signed: 5/19/2011 Name: Steven N. Siegel Title: Deputy General Counsel	Signature: [REDACTED] Date signed: 5/27/2011 Name: [REDACTED] Title: Unit Chief, Privacy and Civil Liberties Unit
FBIHQ Division: ITSD	Signature: [REDACTED] Date signed: 5/13/2011 Name: [REDACTED] Title: IT Specialist	Signature: [REDACTED] Date signed: 5-16-11 Name: [REDACTED] Title: Chief, Process Policy and Metrics Unit

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

[Redacted]

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FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

_____ PIA is required by the E-Government Act.

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

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

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

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

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

Information in the system relates to internal government operations.

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

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

_____ Other:

Applicable SORN(s): Central Records System, FBI-002

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

SORN/SORN revision(s) required? No _____ Yes:

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

[Redacted] will work with PCLU to develop a Privacy Act (e)(3) statement to appear on the welcome page immediately after a user logs into the [Redacted]

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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:

[Redacted] Unit Chief
Privacy and Civil Liberties Unit

Signature: [Redacted]

Date Signed: [Redacted]

5/27/11

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

Signature: [Handwritten Signature]

Date Signed: 5/27/11

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

[REDACTED]

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[REDACTED] is an administrative application that serves as a central repository to track all [REDACTED] provided by [REDACTED] personnel. The information contained in the database identifies [REDACTED] employees providing [REDACTED] and the type of [REDACTED] provided, but does not contain specific details of the [REDACTED] also contains [REDACTED]

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[REDACTED] will only be available on FBI workstations, accredited to the SECRET level, used by [REDACTED] personnel and accessed through an internal web browser. Users must be authenticated before viewing or modifying data. [REDACTED]

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[REDACTED]

[REDACTED] and require a unique id and password for login.

[REDACTED] user roles consist of:

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- General user - is assigned specific information use permissions (such as view only, or create, modify, or delete) upon login and authentication against the [REDACTED] Users Table. Some general users may access the records of any [REDACTED] but may not create, modify or delete user accounts or permissions.
- Owner -- is a privileged user. Owners have the same permissions as General users; owners may also create User accounts and establish (or remove) access permissions for Users as well as for other Owners.

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- Administrator (Admin) -- is also a privileged user. Admin users have the same permissions as Owners; in addition, Admin users may also access and view auditing information (time of user access, creation, modification, or deletion of database transactions). Admin users may also create other Admin or Owner accounts.

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Only personnel will have access to the database, although the database may eventually be expanded for use by all of with modifications required by each All categories of Users who no longer require access to will be removed from the User Table. Once removed, users are unable to login; however, their account transaction records will be retained in for reference purposes. has been in contact with Records Management Division regarding the retention of records.

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audits seven types of user activities: successful login, unsuccessful login, authentic user-but no valid role (users without a valid role are not allowed past the login screen), data created, data modified, data deleted and data accessed. Audit logs will be reviewed by the Information Systems Security Officer (ISSO) as required. All audit records are accessible only by the ISSO and system developers; they are not accessible by General Users, Owners or Admins. The audit logs are read-only and may not be modified or deleted.

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

_____ NO

X YES The information in the tracks the workload of

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

(Check all that apply.)

X The information directly identifies specific individuals.

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

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

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

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

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

NO YES

However, the only information in the system that pertains to non-government employees, contractors or consultants is the [redacted]

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

NO.

YES. [redacted] has the ability to compile information regarding the workload and effort of [redacted]

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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 As part of the [redacted] users enter their names in association with the [redacted]

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

NO

YES [If yes, proceed to question 7.]

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

NO PCLU will work with [redacted] to ensure that an appropriate Privacy Act (e)(3) statement is posted on the [redacted] home page.

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

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

NO YES If yes, check all that apply:

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

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

SSNs are important for other reasons. Describe:

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

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

8. Is the system operated by a contractor?

No.

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

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

NO If no, indicate reason; if C&A is pending, provide anticipated completion date: Pending, completion anticipated 05/31/2011

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

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

Confidentiality: Low Moderate High Undefined

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Integrity: ___Low ___Moderate ___High ___Undefined

Availability: ___Low ___Moderate ___High ___Undefined

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

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

NO

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

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

NO

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

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

NO _____ YES

13. Status of System/ Project:

_____ This is a new system/ project in development.

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? 2001

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

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

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

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

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

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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.)

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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.

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

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

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

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

Other [Provide brief explanation]:

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

NO YES

If yes:

a. Provide date/title of the PIA:

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

..... NO YES

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM/PROJECT: [redacted] b7E

BIKR FBI Unique Asset ID: N/A

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: [redacted]	Name: [redacted]
Reason:	Program Office: Financial Application	Phone: [redacted]
Declassify On:	Support	Room Number: JEH 7350
	Division: ITSD	
	Phone: [redacted]	
	Room Number: 1314	

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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: n/a	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:
FBIHQ Division: ITSD	Signature: [redacted] Date signed: 3/30/2011 Name: [redacted] Title: Unit Chief	Signature: [redacted] Date signed: 3/31/2011 Name: [redacted] Title: Division Privacy Officers for ITD

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

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FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS: [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): DOJ-002, Department of Justice Computer Systems Activity and Access Records, 64 Fed. Reg. 73,585 (Dec. 30, 1999), as amended 66 Fed. Reg. 8425 (Jan. 31, 2001) and 72 Fed. Reg. 3410 (Jan. 25, 2007).

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 Privacy and Civil Liberties Unit	Signature: _____ Date Signed: _____
James L. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: _____ Date Signed: 4/2/11

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

[redacted] hosts software development and software testing tools for the Financial Applications Support Unit (FASU). Software developers use [redacted] to develop and test new software before the software is implemented for operational use. In addition to serving as a hosting environment for software development and testing, [redacted] within the purview of FASU [redacted]

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In order to develop and test software, users of [redacted] may need to import information that will serve as test or development data. The test or development data is used only for the purpose of testing or developing the software or tools hosted on [redacted]. The data will not be used for any purpose beyond testing or developing software or tools. In the unlikely event that PII is used as test data, the PII will consist of information such as employee name, FBI business unit, [redacted]

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[redacted] The data used is never related to FBI cases and/or investigations. Users of the system consist of software engineer and technology support personnel located in FASU, [redacted]

This PTA is specific to [redacted] and is not intended to supersede higher level information in the [redacted] PTA, which was approved on January 19, 2011. There are no audit logs other than logs specified in the [redacted] PTA. Some hosted software may utilize user login names (identical to each user's FBINET login name) and a password; however, no full names or other user specific data is used.

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

X NO

Other than user login names and the remote possibility of test data that may consist of employee name, business unit, [redacted] PII will not be stored in the system.

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[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.]

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

- The information directly identifies specific individuals.
- The information is intended to be used, in conjunction with other data elements, to indirectly identify specific individuals.
- The information can be used to distinguish or trace an individual's identity (i.e., it is linked or linkable to specific individuals).

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

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

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

- NO
- YES

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

- NO. [If no, skip to question 7.]
- YES. [If yes, proceed to the next question.]

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

- NO [If no, proceed to question 7.]
- YES

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

- NO
- YES [If yes, proceed to question 7.]

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

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

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

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

NO YES If yes, check all that apply:

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

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

SSNs are important for other reasons. Describe:

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

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

8. Is the system operated by a contractor?

No.

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

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

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

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

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

Confidentiality: Low Moderate High Undefined

Integrity: Low Moderate High Undefined

Availability: Low Moderate High Undefined

Not applicable - this system is only paper-based.

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

_____ NO

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

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

_____ NO

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

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

_____ NO

_____ YES

13. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

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

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

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

_____ A new use of an IT system/project, including application of a new technology, that changes how information in identifiable form is managed.

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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 sources.

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

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

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

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

_____ Other [Provide brief explanation]:

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

_____ NO _____ YES

If yes:

a. Provide date/title of the PIA:

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

_____ NO _____ YES

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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BIKR FBI Unique Asset ID: _____

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

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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: [insert division name] ITED/NEU	Signature: <input type="text"/> Date signed: 01/05/2012 Name: <input type="text"/> Title: Network Engineering	Signature: Date signed: Name: Title:
FBIHQ Division: [insert division name]	Signature: Unit Chief Date signed: Name: Title:	Signature: Date signed: Name: Title:

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

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

PIA is required by the E-Government Act.

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): N/A


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

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

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

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

Other:

<input type="checkbox"/> Unit Chief Privacy and Civil Liberties Unit	Signature: <input type="checkbox"/>
James J. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature:  Date Signed: 1/2/12

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

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

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