

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

[REDACTED]

b7E

[REDACTED] The automation of this normal day-to-day manual field office function has resulted in incalculable savings in personnel resources.

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

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

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). [REDACTED]

b7E

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?

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

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

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

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

X 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 X YES If yes, check all that apply:

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

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

[REDACTED] - that SSNs are stored to uniquely identify FBI personnel). No identifying numbers (SSN or otherwise) are maintained within [REDACTED] on members of the general public.

b7E

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

_____ 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:

No SSNs obtained from investigative data (i.e., records concerning members of the general public) are stored in [] SSNs are only used on [] in order to identify FBI personnel (including task force officers) who sought access to [] [] SSNs are only visible to system administrators and cannot be seen by general users. Beginning in 2010, records in [] identify FBI personnel by their Unique Employee Identifier (UEID), rather than by an SSN.

b7E

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

8. Is the system operated by a contractor?

No.

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

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

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

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

Provide date of last C&A certification/re-certification:
05/27/2009

Confidentiality: ___Low___Moderate___X___High___Undefined

Integrity: ___Low___Moderate___X___High___Undefined

Availability: ___Low___Moderate___X___High___Undefined

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

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

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 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? was developed in
 was developed in

b7E

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

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

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

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

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

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

_____ 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 X YES

If yes:

a. Provide date/title of the PIA:

link:

b7E

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

 X NO _____ YES

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

b7E

BIKR FBI Unique Asset ID: N/A: Application not required to be listed in BIKR

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: ITS <input type="text"/> Program Office: Division: ITSD Phone: <input type="text"/> Room Number: 1514 JEH	FBI OGC/PCLU POC Name: AGC <input type="text"/> Phone: <input type="text"/> Room Number: 7350 JEH
--	--	---

b6
b7C

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

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division:	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:
FBIHQ Division: Information Technology Services Division (ITSD)	Signature: <input type="text"/> Date signed: 3-6-2012 Name: <input type="text"/> Title: Unit Chief, Storage Management Support Unit (SMSU), ITSD	Signature: <input type="text"/> Date signed: 3-7-12 Name: UC <input type="text"/> Title: Unit Chief, Product Assurance Management Unit, Information Technology Management Division (PAMU/ITMD)

b6
b7C

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.)

UNCLASSIFIED//FOR OFFICAL USE ONLY

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):

[redacted] on the Secret Enclave. Underlying data contained in the applications [redacted] cannot be accessed from [redacted]

b7E

Applicable SORN(s): _____

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

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

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

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

Other:

[redacted] Unit Chief Privacy and Civil Liberties Unit	Signature: [redacted] Date Signed: 3/13/12
James J. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: [redacted] Date Signed: 3/15/12

b6
b7C

UNCLASSIFIED//FOR OFFICAL USE ONLY

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]

b7E

The FBI currently utilizes [Redacted] operating on the Secret Enclave, [Redacted] enables customers on the Secret Enclave [Redacted]

b7E

[Redacted]

b7E

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

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

___ YES [If yes, please continue.]

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: b7E

BIKR FBI Unique Asset ID: _____

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: <input type="text"/>	Name: <input type="text"/>
Reason:	Program Office: CIS	Phone: <input type="text"/>
Declassify On:	Division: DI	Room Number: 7350
	Phone: <input type="text"/>	
	Room Number: 3646	

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

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
		SSA <input type="text"/>
Program Division: [insert division name]	Signature: <input type="text"/> Date signed: _____ Name: <input type="text"/> Title: <input type="text"/>	Signature: <input type="text"/> Date signed: 5/18/11 Name: <input type="text"/> Title: SPECIAL AGENT TO AD
FBIHQ Division: [insert division name]	Signature: <input type="text"/> Date signed: 07/15/11 Name: <input type="text"/> Title: <input type="text"/>	Signature: _____ Date signed: _____ Name: _____ Title: _____

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b7C

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: b7E

BIKR FBI Unique Asset ID: _____

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: <input type="text"/> Program Office: CIS Division: DI Phone: <input type="text"/> Room Number: 3648	FBI OGC/PCLU POC Name: <input type="text"/> Phone: <input type="text"/> Room Number: 7350
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b6
b7C

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

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: [insert division name] <i>Directorate of Intel</i>	Signature: <input type="text"/> Date signed: <i>04/15/11</i> Name: <input type="text"/> Title: <i>Unit Chief</i>	Signature: Date signed: Name: Title:
FBIHQ Division: [insert division name]	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

b6
b7C

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

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

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

PIA is required by the E-Government Act.

PIA is to be completed as a matter of FB/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): De minimis privacy concerns. [REDACTED]

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Applicable SORN(s): CRS, Justice/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 (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: [REDACTED]

b7E

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

Signature: [Handwritten Signature]
Date Signed: 5/29/11

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

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; [redacted]

[redacted]

b7D
b7E

(b) structure of the system/project, including interconnections with other projects or systems; [redacted]

[redacted]

b7E

(c) purpose of the system/project; [redacted]

[redacted]

b7E

(d) nature of the information in the system/project and how it will be used;

[redacted]

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[redacted]

b7E

(e) who will have access to the information in the system/project; [redacted]

[redacted] The FBI
project manager will have access [redacted]

b7E

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

(f) and the manner of transmission to all users.

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b7E

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

_____ NO

YES

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

(Check all that apply.)

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.]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

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 (This is an option).

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:

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

_____ 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:

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and no separate C&A is required.

_____ 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.

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

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

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

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

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

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

(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.]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

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

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

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X Deleted Page(s) X  
X No Duplication Fee X  
X For this Page X  
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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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BIKR FBI Unique Asset ID: 2009-037-01-P-113-264-9999

SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Name: 	Name:
Program Office: 	Phone:
Division: CTD	Room Number: JEH, 7350
Phone: 	
Room Number: JEH/LX 3S-440	

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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive)	Division Privacy Officer
Program Division: 	Signature: Date signed: 3/2/11 Name: Title: Acting Unit Chief	Signature: Date signed: 4-16-11 Name: Title: Unit Chief
FBIHQ Division: CTD	Signature: Date signed: 3/2/11 Name: Title: Assistant Section Chief	Signature: Date signed: 4/15/11 Name: Title: Unit Chief
FBIHQ Division: CTD	Signature: <i>Michael A. Clancy</i> Date signed: 3-21-2011 Name: Michael A. Clancy Title: Section Chief	

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

UNCLASSIFIED//FOR OFFICIAL USE ONLY

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):

is a National Security system and as such, will not be published.

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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): Central Records System, DOJ/FBI-002

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

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

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

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

Other:

Elizabeth Withnell, Acting Deputy General Counsel
Acting FBI Privacy and Civil Liberties Officer

Signature:
Date Signed:

Elizabeth Withnell 3/1/10

UNCLASSIFIED//FOR OFFICIAL USE ONLY

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.

This is a Privacy Threshold Analysis (PTA) on the [redacted]
[redacted] developed by the [redacted]
[redacted] within the Counterterrorism
Division (CTD). [redacted]
[redacted]

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[redacted]
[redacted]

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[redacted]
[redacted]

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[redacted]
[redacted]

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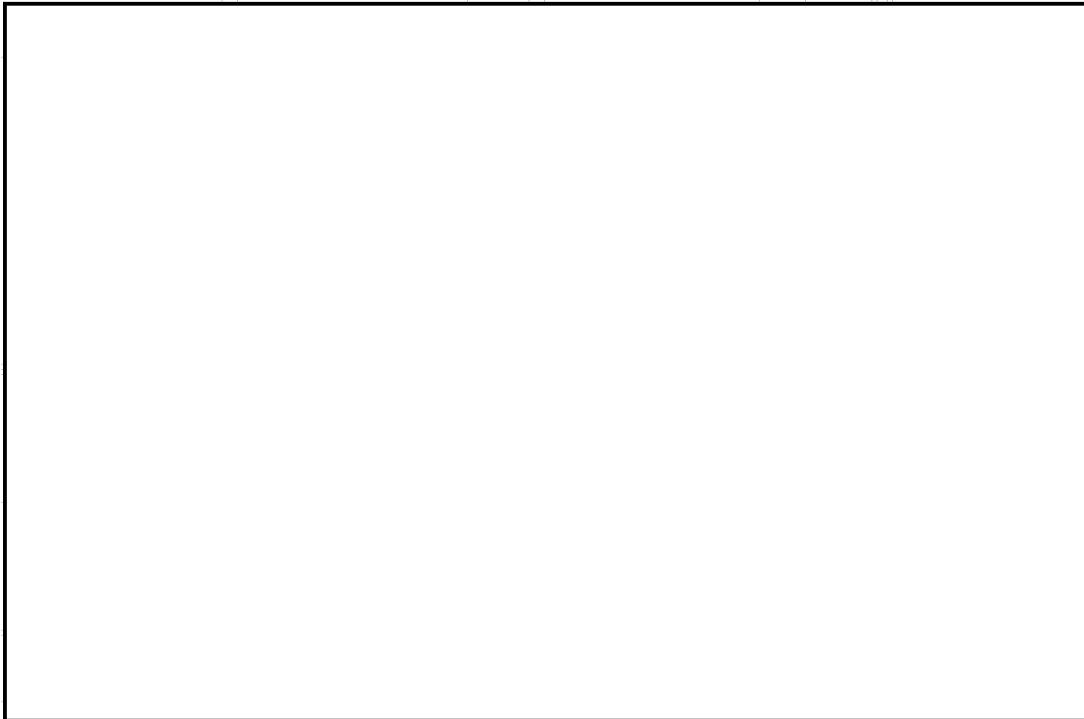
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b3
b7E

The following user groups (and their described role-based access) have been designed for and incorporated into 

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b3
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- ♦ "Administrators:" The "Administrators" will be restricted to members of the information technology department. Members of this user group will be able to perform any and all functionality within the system in addition to maintaining user accounts.

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

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:

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8. Is the system operated by a contractor?

No.

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

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

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

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

Provide date of last C&A certification/re-certification:
October 26, 2010

Confidentiality: Low Moderate High Undefined

Integrity: Low Moderate High Undefined

Availability: Low Moderate High Undefined

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

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

NO

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

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?

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

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

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

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

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

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

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

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

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

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

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

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

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

_____ Other [Provide brief explanation]:

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

_____ NO _____ YES

If yes:

a. Provide date/title of the PIA:

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

_____ NO _____ YES

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: Virtual Career Event

BIKR FBI Unique Asset ID: _____

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: [REDACTED] Program Office: PRU Division: HRD Phone: [REDACTED] Room Number: GP 702 A	FBI OGC/PCLU POC Name: Phone: Room Number:
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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: HRD	Signature: [REDACTED] Date signed: 7/26/12 Name: [REDACTED] Title: <i>Chief, PRU</i>	Signature: Date signed: Name: Title:
FBIHQ Division: HRD	Signature: <i>Guendelyn Hubbard</i> Date signed: <i>7/26/12</i> Name: <i>Guendelyn Hubbard</i> Title: <i>Acting Section Chief</i>	Signature: Date signed: Name: Title:

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

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS: [This section will be completed by the FBI PCLU/PCLO following 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): DR5 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 (indicate revisions needed):

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

on the website

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"/> Date Signed: <i>5/1/12</i>
James J. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: <i>[Signature]</i> Date Signed: <i>5/7/12</i>

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

The Personnel Recruitment Unit in the FBI's Human Resources Division intends to create a website for a Virtual Career Event (VCE). The website may be used to host one or more of these events, which are intended as a recruitment tool to create talent pools for future FBI vacancies. The VCE is interactive; potential candidates can interface with FBI subject matter experts. In order to participate, individuals register on the site and provide sufficient information not only to identify who they are, but also to identify their skills and abilities. Having this information helps align the skills of potential applicants with FBI vacancies. Participants will use instant messaging, videos, and chat rooms to ask questions or and interact with recruiters and subject matter experts to learn more about specific FBI career opportunities.

Data elements to be collected from participants in the VCE consist of the following:

1. Recruitment Source (Event, Referrals, etc.)
2. Race, National Origin (this is optional)
3. Education/Skills
4. Veterans Status
5. FBI Suitability
6. Last 4 of SSN
7. Resumes
8. Name
9. Email Address
10. Address
11. Phone

The last digits of an individual's SSN will be collected in order to be able to trace back, in the event a VCE participant gets hired, the fact that the VCE was used as a gateway for the hiring of the individual. This will help HRD determine its return on investment for this kind of activity. FBI suitability questions are intended to ensure that the individual doesn't have any disqualifiers that would preclude employment, such as recent drug use. The other data elements are being requested to enhance the user experience on the VCE and to provide HRD with some information about the efficacy of its recruitment efforts. In addition to this data, when an individual participates in the VCE, certain information will be collected about the visit for statistical purposes and to improve the technical aspects of the site. A robust privacy policy will explain the rationale for the collection of the personally identifiable information.

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

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

YES [If yes, please continue.]

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

The information directly identifies specific individuals.

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

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

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

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

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

NO YES

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

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

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

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

NO [If no, proceed to question 7.]

YES

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

NO

YES [If yes, proceed to question 7.]

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

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

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

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

NO YES If yes, check all that apply: Note that only the last four digits of the SSN are being requested.

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 last four digits will be helpful to link applicant information to employee information (as the SSN is used in BPMS as an identifier) in order to see whether VCEs are an effective recruitment tool.

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: Access to the last four digits only will be restricted to HRD personnel working on the VCE.

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

8. Is the system operated by a contractor?

_____ No.

XX 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)?

The VCE will sit on UNET which has been accredited by SecD. C&A date is 1/18/2011.

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

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

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

Confidentiality: ___ Low ___ Moderate ___ High ___ Undefined

Integrity: ___ Low ___ Moderate ___ High ___ Undefined

Availability: ___ Low ___ Moderate ___ High ___ Undefined

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

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

XX NO

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

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

XX NO _____ YES

12. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

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

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

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

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

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

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

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

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

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

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

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

_____ Other [Provide brief explanation]:

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

_____ NO _____ YES

If yes:

a. Provide date/title of the PIA:

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

_____ NO _____ YES

[The FTA 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.]