

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 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. [If you checked this item, STOP here after providing the requested description.]

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

\_\_\_\_\_ NO      \_\_\_\_\_ YES

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

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

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

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

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

\_\_\_\_\_ YES

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

\_\_\_\_\_ NO

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

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

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

\_\_\_\_\_ YES Identify any forms, paper or electronic, used to request such

**information from the information subject:**

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

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

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

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

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

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

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

8. Is the system operated by a contractor?

\_\_\_\_\_ No.

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

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

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

\_\_\_\_\_ YES **If yes, please indicate the following, if known:**

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

Confidentiality: \_\_\_Low\_\_\_Moderate\_\_\_High\_\_\_Undefined

Integrity: \_\_\_Low\_\_\_Moderate\_\_\_High\_\_\_Undefined

Availability: \_\_\_Low\_\_\_Moderate\_\_\_High\_\_\_Undefined

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

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

\_\_\_\_\_ NO

\_\_\_\_\_ YES If yes, please describe the data mining function:

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

\_\_\_\_\_ NO

\_\_\_\_\_ YES

12. Status of System/ Project:

\_\_\_\_\_ This is a new system/ project in development. [If you checked this block, STOP. The 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.

(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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## FBI Privacy Threshold Analysis (PTA) Cover Sheet

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

NAME OF SYSTEM: ELSUR

Derived From: Classified By: Reason: Declassify On:	<b>SYSTEM POC</b> Name: <input style="width: 150px;" type="text"/> Program Office: Division: RMD Phone: <input style="width: 100px;" type="text"/> Room Number: ICRC-2, C-19	<b>FBI OGC/PCLU POC</b> Name: <input style="width: 100px;" type="text"/> <input style="width: 100px;" type="text"/> Phone: <input style="width: 100px;" type="text"/> Room Number: 7338
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**FBI DIVISION APPROVALS.** A PIA (and/or PTA) should be prepared/approved by the cognizant program management in collaboration with IT, security, and end-user management and OGC/PCLU. (PIAs/PTAs relating to electronic forms/questionnaires implicating the Paperwork Reduction Act should also be coordinated with the RMD Forms Desk.) If the subject of a PTA/PIA is under the program cognizance of an FBIHQ Division, prior to forwarding to OGC the PTA/PIA must also be referred to the FBIHQ Division for program review and approval, if required by the FBIHQ Division.

	Program Division: RMD	FBIHQ Division:[insert division name]
Program Manager (or other appropriate executive as Division determines)	Signature: _____ Date signed: _____ Name: <input style="width: 100px;" type="text"/> Title: SSA, Unit Chief, ELSUR Operations Unit	Signature: /s/ _____ Date signed: 5/21/08 Name: <input style="width: 100px;" type="text"/> Title: A/UC HQISDU
Division Privacy Officer	Signature: _____ Date signed: _____ Name: _____ Title: _____	Signature: /s/ _____ Date signed: 5/21/08 Name: <input style="width: 100px;" type="text"/> Title: Division Privacy Officer

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

**FINAL FBI APPROVAL:**

FBI Privacy and Civil Liberties Officer	Signature: /s/ _____ Date Signed: 6/26/08 Name: David C. Larson Title: Deputy General Counsel

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

1 - Signed original to 190-HQ-C1321794

Copies:

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

- 1 - OGC\PCLU intranet website
- 1 - PCLU UC
- 1 - PCLU Library
- 1 - PCLU Tickler

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

**FBI PRIVACY THRESHOLD ANALYSIS (PTA)**

**NAME OF SYSTEM:** ELSUR

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

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

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

**A. General System Description:** Please briefly describe:

1. Type of information in the system:

ELSUR contains the names of all persons, businesses, organizations, locations and facilities for which electronic surveillance has been sought or administered by the FBI in a court order.

ELSUR also contains the true name or best known name of all persons, businesses and organizations who have been a party to a communication intercepted by the FBI as authorized by a court order or via consensual monitoring.

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

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

Primary Purpose: For reporting by the Declarant to the Judge (Title III or FISA cases) whether any subject(s) for which the FBI is requesting authorization to conduct electronic surveillance has ever been surveilled before and, if so, when.

Secondary Purposes: Unknown - check with the ELSUR Operations Unit (EOU).

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

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

Records are keyed by hand or uploaded electronically into ELSUR. Records are queried online and printed in reports.

**FBI PRIVACY THRESHOLD ANALYSIS (PTA)**

**NAME OF SYSTEM:** ELSUR

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

ELSUR Operations Technicians (EOTs), EOT Supervisors, Management & Program Analysts assigned to the ELSUR Operations Unit, and programmers in HQISDU assigned to the ELSUR application; around  in all.

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

Nobody outside the FBI will have direct access to this information, however reports generated by EOTs are provided to Case Agents. Additionally, the Declarant (mentioned above) may provide information of some type to the Judge, which may or may not come directly from the ELSUR application. Check with EOU for more details.

7. Has this system been certified and accredited by the FBI Security Divisions? \_X\_Yes \_No

8. Is this system encompassed within an OMB-300? \_Yes \_No \_X\_Don't Know  
(if yes, please attach copy of latest one.)

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

\_X\_YES (If "yes," proceed to Question 1.)

\_NO (If "no," proceed to Section II.)

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

\_YES If "yes," please explain the nature of those changes:

(Continue to Question 2.)

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

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

\_X\_YES (If "yes," please proceed to Question 3.)

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

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



**FBI PRIVACY THRESHOLD ANALYSIS (PTA)**

**NAME OF SYSTEM:** ELSUR

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

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

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

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

**II. For systems developed after April 17, 2003.**

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

(Continue to Question 2.)

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

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

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

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

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

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

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

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

**III. Full or Short-Form PIA**

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

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**FBI PRIVACY THRESHOLD ANALYSIS (PTA)**

**NAME OF SYSTEM:** ELSUR

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

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

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

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

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

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

## FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: eSubpoena (OTD/ETMU)

BIKR FBI Unique Asset ID: SYS-0000221

Derived From: Classified By: Reason: Declassify On:	<b>SYSTEM/PROJECT POC</b> Name: ITS [redacted] Program Office: ELSUR Technology Management Unit (ETMU) Division: OTD Phone: [redacted] Room Number: 1A82-E, ERF	<b>FBI OGC/PCLU POC</b> Name: AGC [redacted] Phone: [redacted] Room Number: 7350 JEH
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### FBI DIVISION INTERMEDIATE APPROVALS

	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: Operational Technology Division (OTD)	Signature: [redacted] Date signed: 03/21/2012 Name: [redacted] Title: Supervisory Special Agent (SSA), ETMU	Signature: [Signature] Date signed: 03/21/2012 Name: Section Chief R. K. Voss Title: SC, Data Acquis./Intercept Section

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*Div. Privacy Officer*

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

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

PIA is required by the E-Government Act.

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

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

*eSubpoena* consists of a [redacted] administrative subpoenas [redacted]. The PII in *eSubpoena* consists of the names and identifiers of FBI personnel associated with specific subpoenas. [redacted]

Applicable SORN(s): FBI Central Records System, Justice/FBI-002, 63 Fed. Reg. 8671 (Feb. 20, 1998), as modified by 66 Fed. Reg. 17200 (Mar. 29, 2001) and 66 Fed. Reg. 29994 (June 4, 2001)

Notify FBI RMD/RIDS per MIOG 190.2.3?  No  Yes--See sample EC on PCLU intranet website here: [http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form\\_for\\_miog190-2-3\\_ec.wpd](http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd)

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

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

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

Other: *eSubpoena* is one of several applications contained in the overall [redacted] being developed by ITSD. In lieu of separate PIAs for each [redacted] component, a PIA for the overall [redacted] will be completed prior to its full deployment. A System of Records Notice (SORN) for [redacted] also be required.

[redacted] Unit Chief Privacy and Civil Liberties Unit	Signature: [redacted] Date Signed: 3/16/12
James J. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: [redacted] Date Signed: 3/21/12

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FBI PTA for eSubpoena

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.

As part of its [redacted] project, OTD has developed the *eSubpoena* application to electronically prepare, deliver, track and report on legal demands (such as subpoenas)

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The pilot phase of *eSubpoena*, underway at three Field Offices, involves administrative subpoenas [redacted] Future development plans include Bureau-wide deployment

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Users access *eSubpoena* from their FBINET account.

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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)?

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**FBI PTA for eSubpoena**

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

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**UNCLASSIFIED//FOR OFFICIAL USE ONLY**

**FBI PTA for eSubpoena**

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

NO

YES [If yes, proceed to question 7.]

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

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

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

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

NO  YES If yes, check all that apply:

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

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

SSNs are important for other reasons. Describe:

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

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

8. Is the system operated by a contractor?

No.

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

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**FBI PTA for eSubpoena**

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:

such as eSubpoena, was certified on August 31, 2010, and granted authority to operate (ATO) for three years.

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Confidentiality:  Low  Moderate  High  Undefined

Integrity:  Low  Moderate  High  Undefined

Availability:  Low  Moderate  High  Undefined

Not applicable – this system is only paper-based.

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

NO

YES If yes, please describe the data mining function:

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

NO  YES

12. Status of System/ Project:

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



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**FBI PRIVACY THRESHOLD ANALYSIS (PTA)** (OGC/PCLU (Rev. 07/06/07))  
**NAME OF SYSTEM:** [REDACTED] b3  
b7E

**FBI Privacy Threshold Analysis (PTA) Cover Sheet** (OGC/PCLU (Rev. 07/06/07))

**NAME OF SYSTEM:** [REDACTED] b3  
b7E

<b>FBI SYSTEM CONTACT PERSON</b> Name: [REDACTED] Program Office: [REDACTED] Division: WMD Directorate Phone: [REDACTED] Room Number: 4371 Date PTA submitted for approval: 03/15/08	<b>FBI OGC/PCLU POC</b> Name: [REDACTED] Phone: [REDACTED] Room Number: 7338
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**FBI DIVISION APPROVALS.** A PIA (and/or PTA) should be prepared/approved by the cognizant program management in collaboration with IT, security, and end-user management and OGC/PCLU. (PIAs/PTAs relating to electronic forms/questionnaires implicating the Paperwork Reduction Act should also be coordinated with the RMD Forms Desk.) If the subject of a PTA/PIA is under the program cognizance of an FBIHQ Division, prior to forwarding to OGC the PTA/PIA must also be referred to the FBIHQ Division for program review and approval, if required by the FBIHQ Division.

	Program Division: WMD Directorate	FBIHQ Division: WMD Directorate
Program Manager (or other appropriate executive as Division determines)	Signature: /S/ Date signed: 3/15/08 Name: [REDACTED] Title: Unit Chief	Signature: Date signed: Name: Title:
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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

**:FINAL FBI APPROVAL:**

FBI Privacy and Civil Liberties Officer	Signature: /S/ Date Signed: 4/22/2008 Name: David C. Larson Title: Acting Deputy General Counsel

Upon final FBI approval, FBI OGC will distribute as follows:  
1 - Signed original to 190-HQ-C1321794  
Copies:

~~SECRET//NOFORN~~

**FBI PRIVACY THRESHOLD ANALYSIS (PTA)**

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

**NAME OF SYSTEM:** [Redacted]

b3  
b7E

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

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

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

**A. General System Description:** Please briefly describe:

1. Type of information in the system:

(S)

(S//NF) [Redacted]  
[Redacted]  
[Redacted] The system does not store any personal identifiers.

b1  
b3  
b7E

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

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

(S)

(S//NF) [Redacted]  
[Redacted] This program is consistent with Executive order 12333 and FBI [Redacted] statutory regulatory authorities.

b1  
b3  
b7E

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

(U) [Redacted] This system is solely used by cleared FBI employees.

b3  
b7E

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

(S)

(S//NF) [Redacted] is operated and maintained within FBI headquarters by the [Redacted]  
[Redacted]

b1  
b3  
b7E

**FBI PRIVACY THRESHOLD ANALYSIS (PTA)** (OGC/PCLU (Rev. 07/06/07))

**NAME OF SYSTEM:** [redacted] b3  
b7E

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

[redacted] Information Security Officer, FBIHQ b6  
b7C

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

(S) [redacted] b1  
b3  
b6  
b7C

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

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

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

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

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

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

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

(Continue to Question 2.)

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

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

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

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

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

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

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

**FBI PRIVACY THRESHOLD ANALYSIS (PTA)** (OGC/PCLU (Rev. 07/06/07))

**NAME OF SYSTEM:**

b3  
b7E

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

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

**II. For systems developed after April 17, 2003.**

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

(Continue to Question 2.)

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

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

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

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

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

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

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

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

**III. Full or Short-Form PIA**

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

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

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

**FBI PRIVACY THRESHOLD ANALYSIS (PTA)** (OGC/PCLU (Rev. 07/06/07))

**NAME OF SYSTEM:**

b3  
b7E

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

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

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

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**FBI Privacy Threshold Analysis (PTA) Cover Sheet**

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

NAME OF SYSTEM:  b3  
 b7E

<p><del>Derived From: Multiple Sources</del>  <del>Classified By: DP35013, SPTU, D-18</del>  <del>Reason: 1.5 (c)</del>  <del>Declassify On: 1</del></p>	<p><b>SYSTEM POC</b>          Name: <input type="text"/>          Program Office: Special Projects Technology          Unit          Division: Operational Technology Division          Phone: <input type="text"/>          Room Number: ERF Annex</p>	<p><b>FBI OGC/PCLU POC</b>          Name: AGC <input type="text"/>  <input type="text"/> Phone: <input type="text"/>          Room Number: 7338 JEH</p>
--	---	---

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b7C

**FBI DIVISION APPROVALS.**

	Program Division: Special Projects Technology Unit	FBIHQ Division: Operational Technology Division
Program Manager (or other appropriate executive as Division determines)	Signature: /S/ Date signed: 05/09/2008 Name: <input type="text"/> Title: Program Manager	Signature: /S/ Date signed: 05/09/2008 Name: <input type="text"/> Title: Program Manager
Division Privacy Officer	Signature: /S/ Date signed: 05/16/2008 Name: SSA Charles Barry Smith Title: Section Chief, OTD	Signature: /S/ Date signed: 05/16/2008 Name: SSA Charles Barry Smith Title: Section Chief, OTD

b6  
b7C

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

**FINAL FBI APPROVAL:**

FBI Privacy and Civil Liberties Officer	Signature: /S/ Date Signed: 05/28/2008 Name: David C. Larson Title: Deputy General Counsel
---	---

1 - Signed original to 190-HQ-C1321794

Copies:

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

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

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2\* - Program Division POC /Privacy Officer

1 - PCLU Tickler

2\*- FBIHQ Division POC /Privacy Officer

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

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

b3  
b7E

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

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

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

(U) A. **General System Description:** Please briefly describe:

(U) 1. Type of information in the system:

(S)

b1  
b3  
b7E

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

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

(S)

b1  
b3  
b7E

(S)

b1  
b3  
b7E

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

[Redacted]

b3  
b7E

[Redacted]

(b1  
b3  
b7E)

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

[Redacted]

(S) b1  
b3  
b7E

(S) [Redacted]

b1  
b3  
b7E

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

[Redacted]

(S) b1  
b3  
b7E

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

(U) Only FBI employees with the requisite "need to know" are allowed access to the [Redacted]<sup>2</sup> Individuals designated as system administrators or end-users are the only persons with the ability to log on to the [Redacted] Each Case Manager/Case Agent for a specific investigation within an FBI Division determines who will have access to information pertaining to his/her case.

b3  
b7E

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

<sup>2</sup> DOJ Order 2640.2e incorporates need-to-know access principles for high mode systems. "Need-to-know" is defined as the "necessity for access to, or knowledge or possession of, specific official information required to carry out official duties" by the Committee on National Security Systems (CNSS), National Information Assurance Glossary, CNSS No. 4009 (revised May 2003).

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

[Redacted]

b3  
b7E

No one outside of the FBI will have the capability to access [Redacted] and extract information. The Case Manager/Case Agent has the responsibility of disseminating case-related information, if appropriate. [Redacted]

[Redacted]

b1  
b3  
b7E

(U) 7. Has this system been certified and accredited by the FBI Security Division?  Yes  No

(U) 8. Is this system encompassed within an OMB-300?  Yes  No  Don't Know

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

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

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

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

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

(Continue to Question 2.)

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

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

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

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

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

b3  
b7E

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

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

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

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

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

(U) II. For systems developed after April 17, 2003.

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

(Continue to Question 2.)

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

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

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

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

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

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

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

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

(U) III. Full or Short-Form PIA

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

b3  
b7E

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

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

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

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

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

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

~~SECRET~~

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

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

### 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: ITSD Division: ITSD Phone: <input type="text"/> Room Number: G-480	FBI OGC/PCLU POC Name: <input type="text"/> Phone: <input type="text"/> Room Number: 735D
--	---	--

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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] ITSD	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:
FBIHQ Division: [insert division name] ITSD	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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.)

ALL INFORMATION CONTAINED  
HEREIN IS UNCLASSIFIED  
DATE 11-06-2014 BY NSICG/C32W33B91

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

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

### FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

b7E

BULK FBI Unique Asset ID: \_\_\_\_\_

Derived From: Classified By: Reason: Declassify On:	<b>SYSTEM/PROJECT POC</b>	<b>FBI OGC/PCLU POC</b>
	Name: <span style="border: 1px solid black; display: inline-block; width: 100px; height: 15px;"></span>	Name:
	Program Office: ITSD	Phone:
	Division: ITSD	Room Number:
	Phone: <span style="border: 1px solid black; display: inline-block; width: 100px; height: 15px;"></span>	
	Room Number: G-480	

b6  
b7C

#### FBI DIVISION INTERMEDIATE APPROVALS (complete as necessary consonant with Division policy)

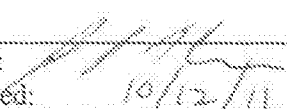
	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: [insert division name] ITSD	Signature: <span style="border: 1px solid black; display: inline-block; width: 100px; height: 15px;"></span> Date signed: 7/18/11 Name: <span style="border: 1px solid black; display: inline-block; width: 100px; height: 15px;"></span> Title: <i>IC - Tech Support Unit</i>	Signature: Date signed: Name: Title:
FBIHQ Division: [insert division name] ITSD	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 (JEN 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

<p><input type="checkbox"/> PIA is required by the E-Government Act.</p> <p><input type="checkbox"/> PIA is to be completed as a matter of FBI/DOJ discretion.</p> <p>Is PIA to be published on FBLGOV (after any RMD FOIA redactions)? <input type="checkbox"/> Yes. <input type="checkbox"/> No (indicate reason):</p> <p><input checked="" type="checkbox"/> PIA is not required for the following reason(s):</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> System does not collect, maintain, or disseminate PII.</li><li><input type="checkbox"/> System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).</li><li><input type="checkbox"/> Information in the system relates to internal government operations.</li><li><input type="checkbox"/> System has been previously assessed under an evaluation similar to a PIA.</li><li><input checked="" type="checkbox"/> No significant privacy issues (or privacy issues are unchanged).</li><li><input type="checkbox"/> Other (describe):</li></ul>	
<p>Applicable SORN(s): <u>N/A</u></p>	
<p>Notify FBI RMD/RIDS per MIOG 190.2.3? <input type="checkbox"/> No <input type="checkbox"/> Yes--See sample EC on PCLU intranet website here: <a href="http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd">http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd</a></p>	
<p>SORN/SORN revision(s) required? <input type="checkbox"/> No <input type="checkbox"/> Yes (indicate revisions needed):</p>	
<p>Prepare/revise/add Privacy Act (e)(3) statements for related forms? <input type="checkbox"/> No <input type="checkbox"/> Yes (indicate forms affected):</p>	
<p>N/A</p>	
<p>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.</p>	
<p>Other:</p>	
<p>James J. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer</p>	<p>Signature:  Date Signed: 10/12/11</p>

[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; (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 PTA is being drafted in connection with the [redacted]  
[redacted] within the  
FBI. In connection with [redacted]  
[redacted]

b7E

The primary function of [redacted] for all the Legat offices,  
[redacted] for the Legat offices.

b7E

[redacted] by the Legat offices, [redacted]  
[redacted] all Legat offices [redacted]  
It will continue to be used as a [redacted] for the Legat offices and as a [redacted]  
[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)?

**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).

[INSERT CLASSIFICATION/CONTROL MARKINGS,  
IF APPROPRIATE]



[INSERT CLASSIFICATION/CONTROL MARKINGS,  
IF APPROPRIATE]

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:

[INSERT CLASSIFICATION/CONTROL MARKINGS,  
IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,  
IF APPROPRIATE]

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

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

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

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

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

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

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

8. Is the system operated by a contractor?

\_\_\_\_\_ No.

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

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

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

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

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

Confidentiality: \_\_\_ Low \_\_\_ Moderate \_\_\_ High \_\_\_ Undefined

[INSERT CLASSIFICATION/CONTROL MARKINGS,  
IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,  
IF APPROPRIATE]

Integrity: \_\_\_Low\_\_\_Moderate\_\_\_High\_\_\_Undefined

Availability: \_\_\_Low\_\_\_Moderate\_\_\_High\_\_\_Undefined

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

[INSERT CLASSIFICATION/CONTROL MARKINGS,  
IF APPROPRIATE]