

[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]

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

NAME OF SYSTEM:  b3  
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<b>FBI SYSTEM CONTACT PERSON</b> Name: <input type="text"/> Program Office: OCTO Division: OCIO Phone: <input type="text"/> Room Number: 1636 Date PTA submitted for approval:	<b>FBI OGC/PCLU POC</b> Name: <input type="text"/> Phone: <input type="text"/> Room Number: 7338
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**FBI DIVISION APPROVALS.** A PIA (and/or PTA) should be prepared/approved by the cognizant program management in collaboration with IT, security, and end-user management and OGC/PCLU. (PIAs/PTAs relating to electronic forms/questionnaires implicating the Paperwork Reduction Act should also be coordinated with the RMD Forms Desk.) If the subject of a PTA/PIA is under the program cognizance of an FBIHQ Division, prior to forwarding to OGC the PTA/PIA must also be referred to the FBIHQ Division for program review and approval, if required by the FBIHQ Division.

	Program Division: CID	FBIHQ Division: OCIO
Program Manager (or other appropriate executive as Division determines)	Signature: <i>2/8/2008</i> Date signed: <i>Michael Brunton</i> Name: Michael Brunton Title: Director, NGIC	Signature: <input type="text"/> Date signed: <i>3/4/2008</i> Name: <input type="text"/> Title: NGIC Program Manager
Division Privacy Officer	Signature: <input type="text"/> Date signed: <i>3/4/08</i> Name: <input type="text"/> Title: CID Privacy Officer	Signature: <input type="text"/> Date signed: <i>3/4/08</i> Name: <input type="text"/> Title: OCIO 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: Date Signed: Name: David C. Larson Title: Acting Deputy General Counsel
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Upon final FBI approval, FBI OGC will distribute as follows:

1 - Signed original to 190-HQ-C1321794

Copies:

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

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

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

FBI PTA: [Insert name of system/project]



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FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

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

Applicable SORN(s):

Notify FBI RMD/RIDS per MIOG 190.2.3:  No  Yes

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

The program should consult with RMD to identify/resolve any Federal records/electronic records issues.

Other:

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

Signature:  
Date Signed:

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

FBI PTA: [Insert name of system/project]

I. INFORMATION ABOUT THE SYSTEM / PROJECT

1. Provide a general description of the system or project that includes: name of the system/project, including associated acronyms; structure of the system/project, purpose; nature of the information in the system and how it will be used; who will have access to the information in the system and the manner of transmission to all users. (This kind of information may be available in the System Security Plan, if available, or from a Concept of Operations document, and can be cut and pasted here.):

The FBI intends to acquire [redacted] a commercial off-the-shelf product that will facilitate information sharing [redacted]

[redacted]

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The FBI's use of [redacted] is similar to the use of this product by the Bureau of Alcohol, Tobacco, Firearms and Explosives [redacted] The major difference between ATF's and the FBI's use of [redacted] is that [redacted]

[redacted] The difference is in the way [redacted]

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[redacted]

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[redacted]

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[redacted]

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[redacted]

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[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

FBI PTA: [Insert name of system/project]

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

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

YES. [If yes, please continue.]

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

NO. \_\_\_\_\_ YES.

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

\_\_\_\_\_ NO.  YES.

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

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

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

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

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

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

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

Explain:

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.]

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

FBI PTA: [Insert name of system/project]

\_\_\_\_\_ YES.

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

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

\_\_\_\_\_ NO.

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

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

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

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

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

YES. If yes, provide date of last C&A certification/re-certification: The FBI [redacted] received an Authority to Operate for 3 years from the Security Division on 1/25/08.

\_\_\_\_\_ Don't Know.

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

NO.

\_\_\_\_\_ Don't know.

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

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

\_\_\_\_\_ NO.

YES.

\_\_\_\_\_ Don't know.

10. Status of System/ Project:

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

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]



[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

FBI PIA: [Insert name of system/project]

1. When was the system/project developed?

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

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

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

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

\_\_\_\_\_ 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. \_\_\_\_\_X\_\_\_\_\_ YES. If yes:

is described in a PIA

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]



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

### FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: GRB (Government Retirement Benefits) Assist

BIKR FBI Unique Asset ID: \_\_\_\_\_

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: [Redacted] Program Office: Retirement Unit Division: Human Resources Phone: [Redacted] Room Number: 10975	FBI OGC/PCLU POC Name: [Redacted] Phone: [Redacted] Room Number: JEH 7350
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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
Program Division: Human Resources Division	Signature: [Redacted] Date signed: 10/27/12 Name: [Redacted] Title: Supvy HR Specialist (Unit Chief)	Signature: [Redacted] Date signed: 10/27/12 Name: [Redacted] Title: Supvy Mgmt & Program Analyst (Unit Chief)
FBIHQ Division: Human Resources Division	Signature: Date signed: Same as Program Division Name: Title:	Signature: Date signed: Same as Program Division Name: Title:

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

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

<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 FBI.GOV (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 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 checked="" 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 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>CRS FBI 002</u></p>	
<p>Notify FBI RMD/RIDS per MIOG 190.2.3? <input checked="" 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 checked="" type="checkbox"/> No <input type="checkbox"/> Yes (indicate revisions needed):</p>	
<p>Prepare/revise/add Privacy Act (e)(3) statements for related forms? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes (indicate forms affected):</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>Brian F. Binney, Acting Deputy General Counsel FBI Privacy and Civil Liberties Officer</p>	<p>Signature:  Date Signed: <u>8/20/2012</u></p>

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

GRB Assist – Web Version (GRB) is software used on the internal FBINET by FBI's Human Resource Division (HRD) personnel. This software provides the ability to compute estimated annuity calculations, retirement service credit payments, and other computations for the FBI's administration of the federal retirement systems. It provides a variety of computation tools to assist the FBI's HRD personnel in applying the various laws and regulations that affect an employee's service history and retirement benefits. The tool assists in determining service computation dates, intermittent service credit conversion, part-time proration factors, social security supplemental payment under Federal Employment Retirement System (FERS), post-56 military service deposits, redeposits and deposits for civilian service, and other calculations/determinations based on employee information obtained from other sources (Bureau of Personnel Management System (BPMS), National Finance Center (NFC), and the Official Personnel Folder (OPF) and entered into the system by HR personnel. GRB allows HR personnel to build an employee profile-centric service history and to perform functions to assist each employee. The GRB is linked to the HRD's shared drive so the Retirement Unit (RU) can pull the computations made by other specialists within the RU, as needed.

The employee profile and history to be built may include as little as an employee's name, date of birth (DOB), social security number (SSN), retirement coverage, earnings during the last three years of service and retirement Service Computation Date (SCD), or as extensive as an employee's complete service history and retirement coverage, information on multiple retirement coverages, historical earnings from beginning through end of federal career, social security earnings, military service dates and earnings, part-time and full-time hours worked for entire career, intermittent service dates, survivor elections, retirement coverage determinations, Federal Erroneous Retirement Coverage Correction Act (FERCCA) determinations and benefit comparisons, Annual Leave lump-sum payment estimates, leave balances, and Thrift Saving Plan (TSP) computations.

The information entered in the GRB by FBI HRD personnel is used to create reports of retirement estimates, service computation dates, average salaries, redeposits/deposits, FERCCA comparisons, for example, for use by employees and survivors in making retirement decisions and other reports for use by FBI's HRD personnel in making service and retirement coverage determinations. The reports are printed to hard copy or saved as a PDF file and emailed to employees. A copy of the report (an internal "tickler file") is kept until the employee retires or a new report is generated. Only 25 licenses are

authorized for use by personnel in the Employee Services Section of HRD. GRB is a tool designed to assist an HR Specialist in completing assignments. The tickler file is kept by the Retirement Unit for Retirement Unit employees to reference any past work done in determining various estimates, SCDs, retirement errors, FERCCA corrections, or military deposits, for example.

In addition to information Technology (IT) support personnel, employees in the following units of the FBI's HRD will have access to the system: Retirement, Benefits, Payroll/Personnel Actions Processing, Time and Attendance/Special Pay.

The FBI hosted system requires Windows Service 2000/2003/2008 running IIS 5.0, 6.0, 7.0 or greater, and a backend database of Oracle 9i or greater or SqlServer 2005 or greater.

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 The System only pertains to government employee information; however, information from the system will be shared with survivors in the case of an employee death; or family member, if a family member is assisting in a disability retirement case. But, these family members will not have direct access to GRB.

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: SSNs are not printed on any final documents produced by the system.

\_\_\_\_\_ 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: Per Security Division's [redacted] Information System Security Manager (ISSM), this is an application not a system (GRB Assist) that is residing on the Secret Enclave; therefore, a separate C&A is not required.

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\_\_\_\_\_ 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. 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/FCLU 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?

GRB Assist, as standalone software, has been used by the Retirement Unit for over 10 years and purchased off-the-shelf. In 2010 GRB stopped supporting the standalone version and only offers a web-based off-the-shelf product, with Agency Hosting (agency downloading software and updates from GRB, then uploading and supporting on internal network/database) as an Option.

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]: Off-the-shelf software changed from a standalone version, to a web-based product with agency hosting option.

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.]*

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

**NAME OF SYSTEM:** GTMS (GETA Training Management System)

<b>FBI SYSTEM CONTACT PERSON</b> Name: <input type="text"/> Program Office: TD GETA office Division: 2 - Training Phone: <input type="text"/> Room Number: Biograph Bldg. Date PTA submitted for approval:	<b>FBI OGC/PCLU POC</b> Name: <input type="text"/> Phone: <input type="text"/> Room Number: 7338
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**FBI DIVISION APPROVALS.** A PIA (and/or PTA) should be prepared/approved by the cognizant program management in collaboration with IT, security, and end-user management and OGC/PCLU. (PIAs/PTAs relating to electronic forms/questionnaires implicating the Paperwork Reduction Act should also be coordinated with the RMD Forms Desk.) If the subject of a PTA/PIA is under the program cognizance of an FBIHQ Division, prior to forwarding to OGC the PTA/PIA must also be referred to the FBIHQ Division for program review and approval, if required by the FBIHQ Division.

	Program Division: Training	FBIHQ Division: Training Division
Program Manager (or other appropriate executive as Division determines)	Signature: /S/ Date signed: 02/27/2008 Name: <input type="text"/> Title: Management & Program Analyst	Signature: /S/ Date signed: 02/27/2008 Name: <input type="text"/> Title: Management & Program Analyst
Division Privacy Officer	Signature: /S/ Date signed: 02/27/2008 Name: Michael J. Stephens Title: TD CSO	Signature: /S/ Date signed: 02/27/2008 Name: Michael J. Stephens Title: TD CSO

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b7C

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

**FINAL FBI APPROVAL:**

FBI Privacy and Civil Liberties Officer	Signature: /S/ Date Signed: 03/10/2008 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:

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

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

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

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:

**The GETA Training Management System (GTMS) is an enterprise-wide workflow tool providing FBI employees with a web-based interface on which to request and track requests for GETA training (job-related training for federal employees paid for by the employing agency, pursuant to the Government Employees Training Act). The individual requesting training completes an electronic form available on the Training Division's GETA web-site. That form is then routed electronically through appropriate reviewing and approving officials.**

**The electronic form includes information about the individual requesting training (including name, social security number, job series, job title, and grade), information about the training course requested (such as the title of course requested, justification, course objective, vendor information), cost/funding/ billing information, and the name, e-mail address and electronic signatures of reviewing and approving officials. While the individual requesting training provides his social security number on the electronic form, the Training Division is taking steps to "mask" the social security number so that it is no longer visible to others reviewing the training request.**

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:

**GTMS will contain supporting information about all requests for GETA training by FBI employees. As noted above, GTMS will contain information about the individual requesting training, the training course requested, the vendor providing the training and reviewing and approving officials.**

**The system is solely related to internal government operations and is available to all FBI employees through the FBI's internal computer system (FBI Intranet).**

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

**The information is collected to track, approve/deny GETA requests submitted by FBI employees.**

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

**GTMS operates using Sharepoint/InfoPath linked via FBI Intranet. SharePoint is a Microsoft product that supports network file sharing and collaboration. Infopath is a Microsoft forms application located on individual desktop computers.**

4. Means of accessing the system and transmitting information to and from the system:  
epic.org 14-06-04-FBI-FOIA-20150318-4th-Production

EPIC-691

NAME OF SYSTEM: GTMS (GETA Training Management System)

GTMS can be accessed by FBI employees using the FBI intranet. Information is transmitted to and from GTMS by use of Sharepoint and Infopath. An individual requesting training will access GTMS using Infopath and then complete a training request form. The form is then transmitted back to GTMS, where SharePoint permits supervisors and other authorized individuals in the workflow process to access the form and take appropriate action, such as reviewing and approving the request.

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:

A list of "Groups and People" has been established for each FBI division and field office. Only those individuals belonging to these groups have access to the GETA requests for their respective office/division. Additionally, anyone identified within the workflow will have access to track a specific GETA training request, including the individual originally completing and submitting the GETA form. Individuals assigned to the Training Division's GETA office, presently consisting of [redacted] personnel including supervisors, have been granted access to all FBI GETA requests, since this office was responsible for the GTMS rollout and provided training on the use of GTMS to all FBI entities. Individuals accessing GTMS must do so using individual-specific user names and passwords. Any individual accessing a workflow document (such as supervisors reviewing or approving GETA requests) leaves an electronic signature detailing their access, with the date and time of their action on the request.

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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:

GTMS was created by an FBI contractor, [redacted]. Contractor personnel (currently [redacted] individuals) also have access to all GETA requests in the GTMS to facilitate troubleshooting any difficulties occurring with this new system. When the development process for GTMS (including troubleshooting) has concluded, GTMS will be turned over to FBI/TD for operation and maintenance, at which point contractor access to GTMS will terminate.

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The contractor personnel assigned to the GTMS project have been granted access to necessary FBI systems through the Security Access Request (SAR) process and have been assigned individual FBI usernames and passwords. Their access and usage of FBI systems is subject to audit by the Security Division to ensure system integrity.

7. Has this system been certified and accredited by the FBI Security Divisions?  Yes  No  
Per [redacted] Executive Assistant to the Director, Training Division.

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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.)

**FBI PRIVACY THRESHOLD ANALYSIS (PTA)**

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

**NAME OF SYSTEM:** GTMS (GETA Training Management System)

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

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

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

(Continue to Question 2.)

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

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

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

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

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

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

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

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

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

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

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

**The GETA Training Management System (GTMS) is an enterprise-wide workflow tool providing FBI employees with a web-based interface on which to request and track requests for GETA training (job-related training for federal employees paid for by the employing agency, pursuant to the Government Employees Training Act). The individual requesting training completes an electronic form available on the GTMS web-site. That form is then routed electronically through appropriate**

**NAME OF SYSTEM:** GTMS (GETA Training Management System)

**reviewing and approving officials.** All approvals are gathered via Microsoft Outlook emails.

The electronic form includes information about the individual requesting training (such as name, social security number, job series, job title, and grade), information about the training course requested (such as title of course requested, justification, course objective, vendor information), cost/funding/ billing information, and the name, e-mail address and electronic signatures of reviewing and approving officials.

(Continue to Question 2.)

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

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

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

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

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

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

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

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

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

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

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

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

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

**YES** A short-form PIA is required. (I.e., you need only answer Questions 1.1, 1.2, 2.1, 3.1, 4.1, 5.1 (if appropriate), 6.2, 6.3, and 8.9 of the



**FBI PRIVACY THRESHOLD ANALYSIS (PTA)**

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

**NAME OF SYSTEM:** GTMS (GETA Training Management System)

PIA  
template.)  
Please note  
that FBI and  
DOJ  
reviewing  
officials  
reserve the  
right to  
require  
completion  
of a full PIA.  
(PTA is  
complete--f  
orward with  
PIA.)

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

FBI Privacy Threshold Analysis (PTA) Cover Sheet

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

FOR OFFICIAL USE ONLY

NAME OF SYSTEM:

b7E

<p><b>FBI SYSTEM CONTACT PERSON</b></p> <p>Name: <input type="text"/></p> <p>Program Office: RSDU</p> <p>Division: OTD</p> <p>Phone: <input type="text"/></p> <p>Room Number: B340</p> <p>Date PTA submitted for approval: 4/21/2008</p>	<p><b>FBI OGC/PCLU POC</b></p> <p>Name: <input type="text"/></p> <p><input type="text"/></p> <p>Phone: <input type="text"/></p> <p>Room Number: 7338</p>
--	--

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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: [RSDU/OTD]	FBIHQ Division:[insert division name]
Program Manager (or other appropriate executive as Division determines)	Signature: /s/ Date signed: 4/23/08 Name: <input type="text"/> Title: Electronics Technician	Signature: Date signed: Name: Title:
Division Privacy Officer	Signature: /s/ Date signed: 4/23/08 Name: Charles Barry Smith Title: Section Chief	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: 5/8/08 Name: David C. Larson Title: Acting Deputy General Counsel
---	--

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

1 - Signed original to 190-HQ-C1321794

Copies:

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

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM: [redacted] b7E

FOR OFFICIAL USE ONLY

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:

[redacted] b7E

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

[redacted] b7E

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

[redacted] b7E

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

[redacted] b7E

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

[redacted] b7E

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

No one

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

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

(if yes, please attach copy of latest one.)

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM:  b7E

FOR OFFICIAL USE ONLY

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

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

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

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

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

(Continue to Question 2.)

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

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

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

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

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

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

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

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

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

II. For systems developed after April 17, 2003.

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

b7E

(Continue to Question 2.)

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM:

b7E

FOR OFFICIAL USE ONLY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

~~SECRET//NOFORN~~

THIS PAGE IS UNCLASSIFIED WHEN DETACHED FROM THE ACCOMPANYING PTA

(OGC/PCLU (Rev. 06/08/2010))

### FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM / PROJECT: [REDACTED]

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BIKR FBI Unique Asset ID: N/A

Derived From: Multiple sources Classified By: program manager Reason: FBI NSISCG-20080301 Declassify On: 20350901	SYSTEM/PROJECT POC Name: SSA [REDACTED] Program Office: [REDACTED] Division: WMDD Phone: [REDACTED] Room Number: 6387 JEH	FBI OGC/PCLU POC 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: WMDD	Signature: [REDACTED] Date signed: 7/1/2010 Name: SSA [REDACTED] Title: UC, [REDACTED]	Signature: [REDACTED] Date signed: 7/1/2010 Name: [REDACTED] Title: Management & Program Analyst, Executive Strategy Unit

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

~~SECRET//NOFORN~~

FBI PTA: [redacted]

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FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

PIA is required by the E-Government Act.

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

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

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

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

Other: [redacted] is a proof of concept project. This is a National Security System [redacted]  
[redacted] Limited PII is involved at this stage.

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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](http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd)

SORN/SORN revision(s) required?  No  Yes

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

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:

If the Proof of Concept is successful [redacted] a new PTA should be prepared and submitted to PCLU so that a determination can be made of whether a PIA or other documentation is required.

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Elizabeth Ross Withnell  
Acting Deputy General Counsel &  
Privacy and Civil Liberties Officer

Signature: [Handwritten Signature]  
Date Signed: [Handwritten Date]



FBI PTA: [redacted]

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

1. Provide a general description of the system or project that includes: (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.

~~(S//NF)~~ [redacted] presently undergoing proof-of-concept, [redacted]

[redacted]

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b7E (S)

[redacted]

b1  
b3  
b7E

~~(S//NF)~~ In [redacted]

[redacted]

b1  
b3  
b7E

~~(S//NF)~~ [redacted]  
[redacted]

b1  
b3  
b7E

FBI PTA: [redacted]

b3  
b7E

~~(S)~~ [redacted]

[redacted]

(S)

b1  
b3  
b7E

~~(S)~~ [redacted]

no personally identifiable information (PII) [redacted]

[redacted]

(S) b1  
b3  
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~~(S)~~ During [redacted]

[redacted]

(S) b1  
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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)?

..... NO

...X 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.)

(S)

[redacted]

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FBI PTA:

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- 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).

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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.]

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

NO  
 YES

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

NO

FBI PTA: [redacted]

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..... YES

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)? N/A

..... NO

..... YES

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.

X  NO ..... YES

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

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

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

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

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

8. Is the system operated by a contractor?

..... No.

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

~~X~~  (NF) FBI OGC (Procurement Law Unit) has reviewed [redacted] [redacted] pertaining to PII. [redacted]

(S)

(S)

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b7E

FBI PTA:

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b7E

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

NO

~~X~~/NF) The FBI's Security Division, Information Systems Security Unit, has determined that C & A is unnecessary, since

(S)

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b3  
b7E

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

NO

YES

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?

NO

YES If yes, please describe the data mining function:

~~X~~/NF) As  proceeds,

(S)

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FBI PTA: [redacted]

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b7E

~~(S)~~ [redacted]

b1  
b3  
b7E

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

\_\_\_\_\_ NO                        X   YES

13. Status of System/ Project:

  X   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 boxes that apply):

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

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

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

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

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

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