

FBI PTA:

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

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

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

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

\_\_\_\_\_ Other [Provide brief explanation]:

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

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

If yes:

a. Provide date/title of the PIA:

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

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

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

NAME OF SYSTEM / PROJECT: [redacted] b7E

Derived From:	<b>SYSTEM/PROJECT POC</b> Name: [redacted] Program Office: IATU Division: SecD Phone: [redacted] Room Number: SpyB 5 <sup>th</sup> Floor	<b>FBI OGC/PCLU POC</b> Name: [redacted] Phone: [redacted] Room Number: JEH 7350
Classified By:		
Reason:		
Declassify On:		

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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: Security Division	Signature: /s/ Date signed: 12/03/09 Name: [redacted] Title: Unit Chief, Information Assurance Technology Unit	Signature: /s/ Date signed: 03/05/10 Name: Michael J. Folmar Title: Assistant Director, Security Division
FBIHQ Division: Security Division	Signature: /s/ Date signed: 12/03/09 Name: [redacted] Title: Unit Chief, Information Assurance Technology Unit	Signature: /s/ Date signed: 03/05/10 Name: Michael J. Folmar Title: Assistant Director, Security Division

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

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

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

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

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

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

PIA is required by the E-Government Act.

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

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

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

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

Applicable SORN(s): FBI-002

Notify FBI RMD/RIDS per MIOG 190.2.3?  No  Yes--See sample EC on PCLU intranet website 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):

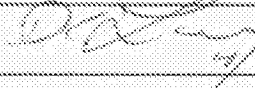
Prepare/revise/add Privacy Act (e)(3) statements for related forms?  No  Yes (indicate forms affected):

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:

This system merely acts as a conduit -- no information is collected, stored, or retained.

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

Signature:   
Date Signed: 7/2/2010

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FBI PIA:  b7E

I. INFORMATION ABOUT THE SYSTEM / PROJECT

1. Provide a general description of the system or project that includes: name of the system/project, including associated acronyms; structure of the system/project, purpose; nature of the information in the system and how it will be used; who will have access to the information in the system and the manner of transmission to all users.

[Redacted]

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will have no direct users -- it will simply facilitate the flow of data  Access to  will be restricted to privileged users (System Administrators, Security Administrators).

[Redacted]

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The information that is transferred as a part of  will merely pass through  -- no data will be stored on  itself. In the event that a document passing through  fails its policy enforcement mechanisms, the document will be deleted and an error message will be sent to the  user. No residual elements of the document will remain on

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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 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.]

\_\_\_X\_\_\_ YES [If yes, please continue.]

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The users of  will be limited to the system administrators and the security administrators. Their usernames and passwords

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This is the only PII that will be stored on the system.

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

\_\_\_\_\_ NO    \_\_\_X\_\_\_ YES

The system administrators and security administrators will always be government employees or contractors, so only their PII would be stored. Information on non-government employees may pass through the system but that information is not collected, maintained or disseminated.

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    \_\_\_X\_\_\_ YES

The system administrators and security administrators will always be U.S. citizens. The only PII stored on the system will be their usernames. All system administrators will be able to see the usernames

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

\_\_\_X\_\_\_ 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:

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\_\_\_\_\_ 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.]

X  YES

Any system administrator will have the ability to control the  and thus the usernames of other administrators. For new administrators, a system administrator will be able to either make up a username for the new administrator or directly request a preferred username.

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

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

\_\_\_\_\_ NO

will be used in support of criminal, CT and FCI investigations and assessments; however, the people whose usernames will be stored on the  are not the subject of investigation.

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

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

A Privacy Act statement is not required since the username/password do not say anything about the individual, especially as an individual could choose anything as their username.

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

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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:

C&A is pending. The anticipated completion date is May 17, 2010.

YES If yes, provide date of last C&A certification/re-certification:

Don't Know.

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

NO  Don't know  YES If yes, please provide the date and name or title of the OMB submission:

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

NO  YES  Don't know

10. Status of System/ Project:

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

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\_\_\_\_\_ 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 \_\_\_\_\_ YES

If yes:

a. Provide date/title of the PIA:



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

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

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

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### FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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

Derived From: Classified By: Reason: Declassify On:	<b>SYSTEM/PROJECT POC</b> Name: <input type="text"/> Program Office: <input type="text"/> Division: IT Services Division Phone: <input type="text"/> Room Number: JEH 1333B	<b>FBI OGC/PCLU POC</b> Name: <input type="text"/> Phone: <input type="text"/> Room Number: JEH 7350
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#### FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: IT Services Division	Signature: <input type="text"/> Date signed: 6/29/2012 Name: <input type="text"/> Title: Unit Chief	Signature: <input type="text"/> Date signed: 6/25/12 Name: <input type="text"/> Title: <del>IT Services</del> Division Privacy Officer
FBIHQ Division: [Insert division name]	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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

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

\_\_\_\_\_ PIA is required by the E-Government Act.

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

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

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

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

Applicable SORN(s): \_\_\_\_\_ *N/A* \_\_\_\_\_

Notify FBI RMD/RIDS per MIOG 190.2.3? \_\_\_\_\_ No \_\_\_\_\_ Yes--See sample EC on PCLU intranet website here: [http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form\\_for\\_miog190-2-3\\_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):  
*N/A*

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

Other:

[Redacted]	Unit Chief	Signature:	[Redacted]
Privacy and Civil Liberties Unit		Date Signed:	<i>7/6/12</i>
James J. Landon, Deputy General Counsel	FBI Privacy and Civil Liberties Officer	Signature:	<i>[Signature]</i>
		Date Signed:	<i>7/5/12</i>

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

(a) Name of the system/project, including associated acronyms?

[Redacted]

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(b) Structure of the system/project, including interconnections with other projects or systems?

[Redacted] does not integrate

with any other FBI project or system. [Redacted]

[Redacted]

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[Redacted]

[Redacted] commercial-off-the-shelf (COIS) analytical software products that is already approved to use on the FBI network. The approved [Redacted] enables Special Agent (SA) and Intelligence Analyst (IA) users to collate and visualize information, then organize and analyze it. Users can [Redacted]

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[Redacted]

(c) Purpose of the system/project?

The purpose of the [Redacted]

[Redacted]

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

[Redacted]

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(e) Who will have access to the information in the system/project?

- No information is stored on the [redacted] Only ITSD personnel assigned to support the [redacted] are granted the authorized rights and permissions to access and maintain [redacted]

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(f) The manner of transmission to all users?

- Users' workstations will be configured to [redacted] [redacted] to their machines.

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

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

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-5)?

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

### FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: [REDACTED]

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BIKR FBI Unique Asset ID: 2011-024-01

Derived From: N/A Classified By: Reason: Declassify On:	<b>SYSTEM/PROJECT POC</b> Name: SSA [REDACTED] Program Office: Strategic Technology Division: Directorate of Intelligence Phone: [REDACTED] Room Number:	<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: [REDACTED]	Signature: Date signed: Name: Title: [REDACTED]
FBIHQ Division: Directorate of Intelligence	Signature: [REDACTED] Date signed: 7/29/2013 Name: [REDACTED] Title: Unit Chief, Strategic Technology Unit.	Signature: [REDACTED] Date signed: 7/29/2013 Name: [REDACTED] Title: Management and Program Analyst

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After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7350).

(The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)

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FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

PIA is required by the E-Government Act.

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

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

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

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

Applicable SORN(s): FBI Central Records System, Justice/FBI-002, 63 Fed. Reg. 8671 (Feb. 20, 1998); Bureau Mailing Lists, Justice/FBI-003, (Feb. 14, 2005); DOJ Computer Systems Activity and Access Records, Justice/DOJ-002 (Dec. 30, 1999).

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: [redacted] does not maintain PII other than: audit information about system users, limited personal information contained in [redacted].

[redacted] This limited PII for [redacted] does not warrant a PIA, since both categories of information relate to internal government operations: information about individuals contained in the [redacted] is also contained in the CRS. However, if any additional PII is added to [redacted] the DI assess the new privacy risks by submitting a new PTA to PCLU for review.

[redacted] Unit Chief Privacy and Civil Liberties Unit	Signature: [redacted] Date Signed: [redacted] 7/30/13
Christine M. Costello, Acting Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: [redacted] Date Signed: [redacted] 8/5/13

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1. 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.

A Privacy Threshold Analysis (PTA) for the [redacted] [redacted] was previously approved on October 12, 2012. In light of the addition to [redacted] [redacted] as discussed below, a new PTA has been prepared.

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a) Name of the system/project, including associated acronyms

[redacted]

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b) Structure of the system/project, including interconnections with other projects or systems

[redacted] which resides on the FBI's SECRET Enclave, includes [redacted]

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[redacted]

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c) Purpose of the system/project

[redacted] is typically related to a specific FBI investigative or [redacted]

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[Redacted]

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[Redacted]

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[Redacted]

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d) Nature of the information in the system/project and how it will be used

[Redacted]

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e) Who will have access to the information in the system/project

FBI personnel, including [Redacted]  
[Redacted]  
[Redacted] will have access to the information, as well as FBI  
personnel with access to FBI IT systems utilizing the [Redacted]  
[Redacted]

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f) The manner of transmission to all users

Information from the [Redacted] is provided to FBI systems and read-  
only users via a [Redacted]  
[Redacted]

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

\_\_\_\_\_ NO

X  YES  *[If yes, please continue.] As noted above, the primary information maintained in [redacted] which generally does not refer to specific individuals. [redacted] does contain limited personally identifiable information (PII) in the following forms:*

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- User access and activity information, pulled from the Active Directory, collected for audit purposes.

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

X  The information directly identifies specific individuals.

See response to Q.2, supra.

\_\_\_\_\_ 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?

X  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:

is encompassed within the C&A boundaries for the Distributed Application Virtual Environment (DAVE) and is not separately accredited. DAVE was most recently accredited on August 30, 2010, and has authority to operate through August 30, 2013, at the following risk levels:

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Confidentiality: \_\_\_Low \_\_\_Moderate  High

Integrity: \_\_\_Low \_\_\_Moderate  High

Availability: \_\_\_Low \_\_\_Moderate  High

\_\_\_\_\_ 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 2000e-3)?

NO



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

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

\_\_\_\_\_ NO \_\_\_\_\_X\_\_\_\_\_ YES

12. Status of System/ Project:

\_\_\_\_\_ This is a new system/ project in development.

**II. EXISTING SYSTEMS / PROJECTS**

1. When was the system/project developed? [ ] was originally deployed in [ ]  
[ ]

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

\_\_\_\_\_ NO [If no, proceed to next question (11.3).]

X 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.

- As discussed in Part I,

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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.]

### FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: [REDACTED]

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BIKR FBI Unique Asset ID: APP-0000256

	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
	Name: [REDACTED] Program Office: Strategic Technology Unit II Division: Directorate of Intelligence Phone: [REDACTED] Room Number: 11100	Name: AGC [REDACTED] Phone: [REDACTED] Room Number: JEH, Rm 7350

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#### FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager	Division Pr
Program Division: Directorate of Intelligence	Signature: [REDACTED] Date signed: 2/13/2014 Name: [REDACTED] Title: SSA/JOINT Technical Team Lead	Signature: [REDACTED] Date signed: 2/13/2014 Name: [REDACTED] Title: Division Privacy Officer
FBIHQ Division: Directorate of Intelligence	Signature: [REDACTED] Date signed: 6/12/2014 Name: [REDACTED] Title: Unit Chief	Signature: Date signed: Name: Title:

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

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

PIA is required by the E-Government Act.

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

Is PIA to be published on FBI.GOV (after any RMD FOIA redactions)?  Yes.  No -- Since this is a national security system, it will not be published on fbi.gov.

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

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

Applicable SORN(s): Data Warehouse System, Justice/FBI-022, 77 Fed. Reg. 40630 (July 10, 2012)

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:

Unit Chief  
Privacy and Civil Liberties Unit  
FBI Privacy and Civil Liberties Officer

Signature:   
Date Signed: 6/17/14

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b7C

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

[redacted] In order to support the mission needs of the FBI's intelligence and investigative programs. [redacted]

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[redacted] is not physically stored on FBI systems and does not contain PII.

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

\_\_\_\_\_ NO

YES [If yes, please continue.]

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

The information directly identifies specific individuals.

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

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

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

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

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

NO  YES

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

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

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

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

NO [If no, proceed to question 7.]

YES

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

NO

YES [If yes, proceed to question 7.]

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

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

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

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

NO  YES If yes, check all that apply:

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

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

SSNs are important for other reasons. Describe:

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

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8. Is the system operated by a contractor?

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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:

is covered by the DIVS C&A.

Provide date of last C&A certification/re-certification:  
September 30, 2010

Confidentiality:  Low  Moderate  High  Undefined

Integrity:  Low  Moderate  High  Undefined

Availability:  Low  Moderate  High  Undefined

Not applicable – this system is only paper-based.

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

NO

YES If yes, please describe the data mining function:

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

NO  YES

12. Status of System/ Project:

This is a new system/ project in development.

**II. EXISTING SYSTEMS / PROJECTS**

1. When was the system/project developed?

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

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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.

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

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

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

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

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

Other [Provide brief explanation]:

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

NO  YES

If yes:

a. Provide date/title of the PIA:

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

NO  YES

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

### FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: [REDACTED] b7E

BIKR FBI Unique Asset ID: APP-0000256 (BIKR number for unclassified system pending)

	<b>SYSTEM/PROJECT POC</b> Name: SSA [REDACTED] Program Office: Geospatial Division: DI Phone: [REDACTED] Room Number: 11100	<b>FBI OGC/PCLU POC</b> Name: AGC [REDACTED] Phone: [REDACTED] Room Number: JEH, Rm 7350
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#### FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Records Management Division	Signature: [REDACTED] Date signed: [REDACTED] Name: [REDACTED] Title: Management and Program Analyst	
Security Division	Signature: [REDACTED] Date signed: 2/10/2013 Name: Robert Cox Title: Security Chief (IAS)	
Directorate of Intelligence	Signature: [REDACTED] Date signed: 7/11/2013 Name: [REDACTED] Title: Unit Chief (STU)	Signature: [REDACTED] Date signed: 2/11/2013 Name: [REDACTED] Title: Management & Program Analyst

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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.)