FBI PTA: [   ]   b7E

__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.]

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

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

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

__X__ YES

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

_____ NO

__X__ 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)?

__X__ 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:**

While the IC3 public website contains a detailed Privacy Policy, PCLU is working with IC3 to ensure that an appropriate (e)(3) notice is added to the website.

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 **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.

FBI PTA: [REDACTED]   b7E

_____ 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?

   _X_ 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:**

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

   [REDACTED] was reaccredited on January 18, 2011 and has Authority to   b7E
   Operate (ATO) through January 17, 2014.

Confidentiality: ___ Low   _X_ Moderate   ___ High   ___ Undefined

Integrity: _X_ Low   ___ Moderate   ___ High   ___ Undefined

Availability: ___ Low   _X_ 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)?

   _X_ NO

FBI PTA: [   ]   **b7E**

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

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

   __X__ 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?

[   ]   **b7E**

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

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

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

FBI PTA:

b7E

b7E

_____ 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.

__X__ Other [**Provide brief explanation**]: In 2006, the FBI assumed responsibility for [   ] including IC3 websites and system equipment.

b7E

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

_____ NO   __X__ YES

If yes:

a. **Provide date/title of the PIA:**

A PIA for [   ] was completed May 4, 2001, under the predecessor name of the complaint database, the [   ] [   ]

b7E

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

_____ NO   _X_ YES

FBI PRIVACY THRESHOLD ANALYSIS (PTA)   (OGC/PCLU (Rev. 0706/07))
NAME OF SYSTEM: IOB Tracking - 2008

FBI Privacy Threshold Analysis (PTA) Cover Sheet   (OGC/PCLU (Rev. 0706/07))

NAME OF SYSTEM: Intelligence Oversight Board (IOB) Tracking Database - 2008 version

FBI SYSTEM CONTACT PERSON	FBI OGC/PCLU POC
Name: AGC [redacted]	Name: [redacted]
Program Office: NSLB	Phone: [redacted]
Division: OGC	Room Number: 7338
Phone: [redacted]	
Room Number: 7947	
Date PTA submitted for approval: 03/19/2008	

b6
b7C

FBI DIVISION APPROVALS

	Program Division: NSLB	FBIHQ Division: OGC
Program Manager (or other appropriate executive as Division determines) Name: [redacted] Title: AGC	Signature: [signature] Date signed: 6/3/08 Name: Steve Siegel Title: Section Chief	Signature: [signature] Date signed: 6/9/08 Name: Julie F. Thomas Title: Deputy General Counsel
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

b6
b7C

: FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature: Date Signed: Name: David C. Larson Title: Deputy General Counsel

1 - Signed original to 333X-HQ-A1487720
Copies.
1 - DOJ Privacy and Civil Liberties Office-Main Justice, Room 4259   1 - OGC/PCLU intranet website
2 - FBI OCIO / CIPP   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))
1 - 333-HQ-1579028

FBI PRIVACY THRESHOLD ANALYSIS (PTA)   (OGC/PCLU) (Rev. 07/06/07)
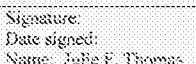NAME OF SYSTEM: IOB Tracking - 2008

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

NAME OF SYSTEM: Intelligence Oversight Board (IOB) Tracking Database - 2008 version

FBI SYSTEM CONTACT PERSON	FBI OGC/PCLU POC	
Name: AGC [redacted]	Name:	**b6**
Program Office: NSLB	Phone:	**b7C**
Division: OGC	Room Number: 7338	
Phone: [redacted]		
Room Number: 7947		
Date PTA submitted for approval: 03/19/2008		

FBI DIVISION APPROVALS

	Program Division: NSLB	FBIHQ Division: OGC	
Program Manager (or other appropriate executive as Division determines) Name: [redacted] Title: AGC	Signature: Date signed: Name: Steve Siegel Title: Section Chief	Signature: Date signed: Name: Julie F. Thomas Title. Deputy General Counsel	**b6** **b7C**
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:	

FINAL FBI APPROVAL

FBI Privacy and Civil Liberties Officer	Signature: Date Signed: Name: David C. Larson Title: Deputy General Counsel

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2* - Program Division POC /Privacy Officer
2*- FBIHQ Division POC /Privacy Officer
    (*please reproduce as needed for Program/Division file(s))
1 - 333-HQ-1579028

FBI PRIVACY THRESHOLD ANALYSIS (PTA)   (OGC/PCLU (Rev. 07/06/07))
NAME OF SYSTEM: IOB Tracking - 2008

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:

        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:

This database is designed to track the reporting, review, and adjudication of potential Intelligence Oversight Board (PIOB) matters that are required to be processed by the FBI as a member of the Intelligence Community.

**b3
b7E**

The primary reason for the development of this database is to satisfy the President's Intelligence Oversight Board (IOB) and Director of National Intelligence (DNI) reporting requirements

**b3
b7E**

**b3
b7E**

FBI PRIVACY THRESHOLD ANALYSIS (PTA)   (OGC/PCLU (Rev. 07/06/07)
NAME OF SYSTEM: IOB Tracking - 2008
2. Purpose for collecting the information and how it will be used:

Executive Order (EO) 13462, dated 02/29/2008, mandates that any intelligence activities that "may be unlawful or contrary to Executive Order or presidential directive" be reported to the DNI and the IOB. The FBI is also responsible for providing "such information and assistance" that the IOB and DNI may need to perform their respective functions under Executive Order 13462.

The primary purpose of this database is to assist in satisfying FBI reporting requirements to the IOB and to the DNI.   b3

Additionally, this database will be able to generate reports in response to queries from Congressional and   b7E
Executive Branch offices, the DNI, and the IOB.

| | b3 b7E |

| | b3 b7E |

| | b3 b7E |

The database captures relevant information for reporting purposes   b3
                                                                                                          b7E

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

The IOB Tracking Database is an access database that is accessible on FBINet   b3
                                                                                                          b7E

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

The system is accessed via FBINet _____   **b3**
_____   **b7E**

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

_____ for the IOB Tracking   **b3**
Database. _____ Data from the system is provided to   **b7E**
the FBI Executive management, the Inspection Division, and the Director's Office as needed.

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:

This database will be able to generate reports to facilitate queries from Congressional and Executive Branch offices, such as DOJ, the DNI, and the IOB.

7. Has this system been certified and accredited by the FBI Security Divisions?

____ Yes

_X_ No   The database resides on the FBI's accredited infrastructure, but does not require a separate C&A.

8. Is this system encompassed within an OMB-300?

__ Yes

_X_ 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.)

_X_ 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):

Please see the response in Section A.2.

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

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)   (OGC/PCLU Rev. 07/06/07)
NAME OF SYSTEM: IGB Tracking - 2008

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

3 Is the system solely related to internal government operations?

   X 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.)

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

UNCLASSIFIED//~~FOR OFFICIAL USE ONLY~~

CHECKLIST FOR PRIVACY COMPLIANCE FOR
FBI ROUTINE DATABASES
(Including comparable applications)

This checklist is based on the FBI Privacy Impact Assessment (PIA) for FBI Routine Databases of 4/7/08 as approved 8/29/08 (190-HQ-C1321794 Serial 432, 9/8/08). Per the PIA, this checklist may be used in lieu of any additional PIA (or PTA), so long as every one of the twelve blocks below can be checked. This checklist should be completed by the database manager (or other appropriate official/ as determined by the division) and approved by the Division Privacy Officer.

A. Add date checklist prepared: 4/21/2011

B. Provide name and brief description of database (or comparable application): **Database of potential class members in *Langley v. United States* (Fed. Cl.). The data will consist of information derived from BPMS as well as information provided by the Training Division regarding New Agent Trainees (NATs) from 8/2007- 4/2011, including individuals who did not complete training and individuals who were recycled through NA training. The database will be used by the FBI to provide notice of the class action to potential class members, as ordered by the court, as well as to support the litigation.**

C. Identify program division and unit/squad: **OGC, Employment Law Unit II.**

D. Provide name, address, and phone number of point of contact: **AGC** [   ]   b6
OGC-ELU II, PA-400, [   ]   b7C

E. **Checklist (all must be checked as being accurate for this database/application):**

__X__   1. Information in the system identifies individuals, either directly or indirectly. An individual can be identified indirectly through a combination of descriptors such as gender, race, birth data, geographic indicator, license number, or license plate number.[1]

__X__   2. The system derives information from FBI records covered by existing Privacy Act system of records notices (http://foia.fbi.gov/rec_sys.htm) regardless of format in which those records are maintained and/or from information that is publicly available at no cost. (If information comes from FBI records that are not covered by existing systems of records notices, contact the PCLU.)

__X__   3. Neither commercial data nor paid subscription service data is included in the database unless that information is derived from existing FBI records.

---

[1] Systems that do not contain any personally identifiable information need not complete this checklist.

1

__X__ 4. The system can be accessed only by members of a particular office, unit, squad or other similar FBI entity and sharing of information is based strictly on an operational need to know.

__X__ 5. The system is not used for purposes of pattern-based data mining.

__X__ 6. Initial and continued access to the system is subject to permission controls enforced by FBI supervisory personnel, including the use of access passwords.

__X__ 7. Access to the system can be audited.

__X__ 8. The system is part of an established platform on which a Security Certification and Accreditation has been performed.

__X__ 9. The system was developed after April 17, 2003. [2]

__X__ 10. If the system maintains information about U.S. citizens or legal permanent residents, it is covered by a published Privacy Act System of Records Notice.

__X__ 11. Records retention issues have been discussed with the Records Management Division.

__X__ 12. Any personally identifiable information placed on a mobile device or on media that is transported outside FBI facilities must comply with the FBI policy on encryption and must be password protected.

F. If a database contains information that may be considered sensitive/controversial or is maintained as part of a larger FBI program, the database administrator or program manager (or division privacy officer) must consult with the FBI's Office of the General Counsel, Privacy and Civil Liberties Unit about the potential need to assess the privacy risks in a separate PIA.

G. File Notes (summarize any additional information that may be warranted for record purposes, e.g., coordination with OGC, etc.):

The FBI has been sued by a former NAT for overtime allegedly due NATs under the Fair Labor Standards Act (FLSA). The FLSA has a three year "look back" provision for willful violations, and a two year look back provision for a negligent violation. This class action requires that the FBI identify potential claimants; notify them of the pending litigation, track claimants who "opt in" to the litigation; quantify the amount of individual claims since the amounts vary among NATs; and track disbursements of funds to class members. There are approximately 2800 putative class members.

---

[2] Systems developed before April 17, 2003, and not modified since then are not required to conduct a PIA until a modification occurs that would change the privacy risks to information in the system.

APPROVING OFFICIALS

Program Manager (or other appropriate official as division determines)	Division Privacy Officer
Signature: ▮▮▮▮▮▮▮ Date signed: 6/12/2~~~~ [▮ 21] Name: ▮▮▮▮▮▮▮ Title: Unit Chief, OGC, Employment Litigation Unit II	Signature: _[signature]_ Date signed: 4/25/11 Name: James J. Landon Title: Deputy General Counsel and FBI Privacy and Civil Liberties Officer

b6
b7C

(OGC/PCLU (Rev. 07/06/2010)

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

NAME OF SYSTEM / PROJECT: [ ]   **b7E**

BIKR FBI Unique Asset ID: __SYS-0000054__

| Derived From:
Classified By:
Reason:
Declassify On: | **SYSTEM/PROJECT POC**
Name: [ ]
Program Office:
Division: STAS/OTD
Phone: [ ]
Room Number: CH-102, 14800 CCD | **FBI OGC/PCLU POC**
Name: [ ]
Phone: [ ]
Room Number: 7350 JEH | **b6**
b7C |

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

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer	
Program Division: Special Technologies and Applications Section (STAS)	Signature: [ ] Date signed: 7-19-2011 Name: [ ] Title: Unit Chief, Computer Engineering Unit	Signature: [ ] Date signed: 7/13/11 Name: [ ] Title: STAS Privacy Officer	**b6** **b7C**
FBIHQ Division: N/A	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:	

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

1

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

_____ PIA is required by the E-Government Act.

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

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

__X__ PIA is not required for the following reason(s):
    __X__ 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? __X__ No ___ Yes--See sample EC on PCLU intranet website here:
http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd

SORN/SORN revision(s) required? __X__ No ___ Yes

Prepare/revise/add Privacy Act (e)(3) statements for related forms? __X__ 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:

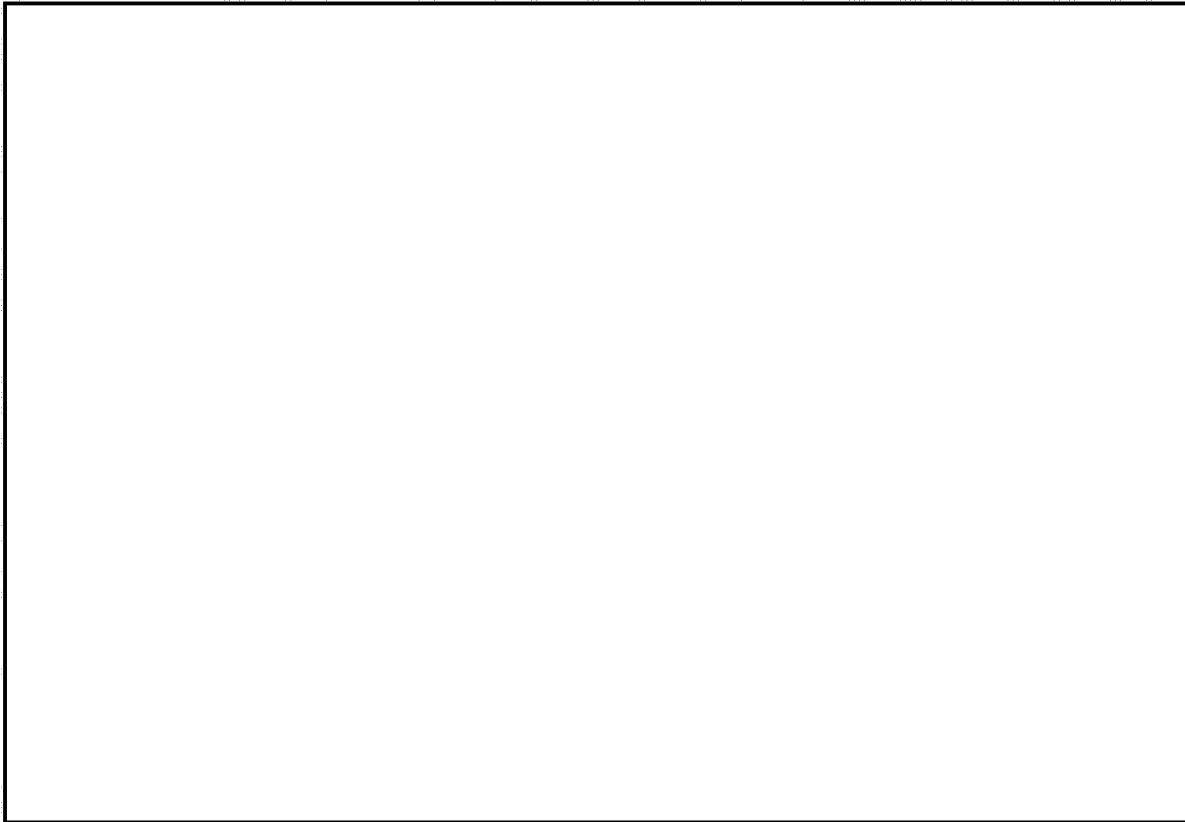|	
Elizabeth Ross Withnell, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: Date Signed: *Elizabeth W. Withnell 2/4/2011*

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.**

b7E

```






```

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

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

_____ YES   [If yes, please continue.]

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

(Check all that apply.)

_____ The information directly identifies specific individuals.

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

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

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

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

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

_____ NO   _____ YES

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

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

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

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

_____ NO **[If no, proceed to question 7.]**

_____ YES

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

_____ NO

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

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

_____ NO **[The program will need to work with PCLU to develop/implement**

the necessary form(s).]

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

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

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

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

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

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

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

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

8.   Is the system operated by a contractor?

_____ No.

_____ 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. 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.

(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 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.]

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: LICENSE PLATE READER

BIKR FBI Unique Asset ID: _____

b6
b7C

Derived From: Classified By: Reason: Declassify On:	**SYSTEM/PROJECT POC** Name: License Plate Reader Program Office: Video Surveillance Unit Division: Operational Technology Phone: 703-985-6601 Room Number: ERF Annex, Rm G07.3	**FBI OGC/PCLU POC** Name Phone Room Number: ~~437~~ 7350

FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer	
Program Division: Video Surveillance Unit	Signature: Date signed: 04/05/12 Name: Title: Program Manager	Signature: Date signed: 09/15/2012 Name: Title: OTD Privacy Officer	b6 b7C
FBIHQ Division: Operational Technology Division	Signature: Date signed: 9/6/12 Name: Title: Unit Chief	Signature: Date signed: Name: Title:	

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

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS

__X__ 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): _CRS/Sentinel/FBI-002 but if information will uploaded to a case file, a separate SORN may be required_

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

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

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

_N/A_

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

Other:

Elizabeth Withnell, Unit Chief Privacy and Civil Liberties Unit	Signature: Date Signed:
James J. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: Date Signed: _Elizabeth Withnell_ 9/23/12

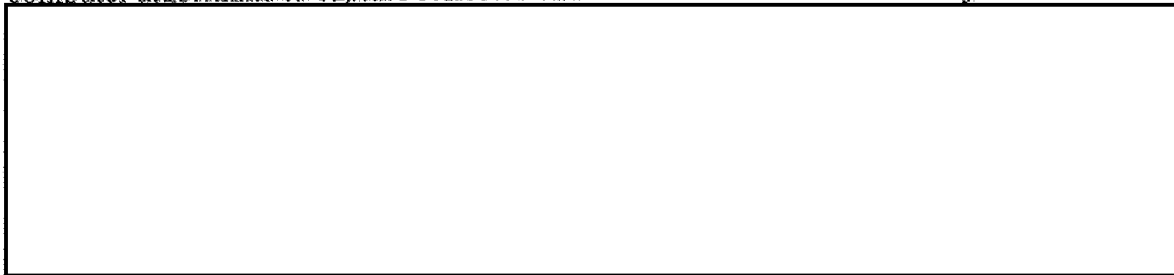14-06-04-FBI-FOIA-20150318-4th-Production

EPIC-644

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.

(a) License Plate Reader (LPR)

(b) The LPR system is a centralized system, created by the Operational Technology Division, that uses digital pictures, near infrared (IR) illumination, and computer algorithms to capture reflected characters and store them. The system consists

b7E

[redacted]

Structurally all 4 same

The LPR system is not connected to any other data collection system, but the license plate information can be checked against the National Crime Information Center by a particular agent or analyst in an appropriate investigation. RIGHT?

(c) Information collected by the LPR may be used in connection with an active predicated investigation, positive foreign intelligence collection, or assistance to other agencies when use is not otherwise prohibited by law or policy. The license plate information is not intended to be used to identify the occupants of a vehicle except in connection with an actual or potential investigation.

(d) As noted above, the data collected is used to support FBI criminal and national security investigations. The data that is collected consists of: (1) license plate number; (2) partial image of the vehicle rear or front; (3) location of the LPR system; and (d) date and time of the collection. Users can retrieve data for appropriate law enforcement purposes. Users are warned to be particularly careful about collections of data from areas where activities may be protected by the First Amendment.

(e) Users are FBI agents and analysts who are trained on the system and have an operational need for access. Levels of access are controlled by roles, consisting of system administrators, field office administrators, and analysts. All users must have a password for access and their log-in attempts are monitored and audited. In addition,

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[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   [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.]

__X___ 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.

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

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

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

_____ None of the above. If none of the above, describe why the information does not identify specific individuals either directly or indirectly. [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.]   I'm not sure how I want to answer this question.

_____ 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? Maybe

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

_____ YES

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

_____ NO

__X__ 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?

_X___ 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)?   *In the process*

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

__X?__ YES **If yes, please indicate the following, if known:**

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

Confidentiality: __Low __Moderate __High __Undefined

Integrity: __Low __Moderate __High __Undefined

Availability: __Low __Moderate __High __Undefined

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

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

   __X?__ NO

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

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

   __X__ NO   _____ YES

12. 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 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 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.]

~~SECRET~~

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

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

NAME OF SYSTEM / PROJECT: [   ]   b7E

BIKR FBI Unique Asset ID: __SYS-0000181_____

| Derived From:
Classified By:
Reason:
Declassify On: | **SYSTEM/PROJECT POC**
Name: [   ]
Program Office: LASR / LSS
Division: DI
Phone: [   ]
Room Number: WB-601 | **FBI OGC/PCLU POC**
Name:
Phone:
Room Number: | b6
b7C |

FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer	
Program Division: DI	Signature: Date signed: Name: [ ] Title: Program Manager	Signature: Date signed: Name [ ] Title: Supv Mgmt & Program Analyst	b6 b7C
FBIHQ Division: DI	Signature: Date signed: Name: Margaret Gulotta Title: Section Chief	Signature: Date signed: Name: [ ] Title: Supv Mgmt & Program Analyst	

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   1 - OGC\PCLU intranet
privacy@usdoj.gov)   1 - PCLU UC
    (if classified, via hand delivery to 1331 Penn. Ave. NW, Suite 940,   1 - PCLU Library
20530)   1 - PCLU Tickler
2 - FBI OCIO / OIPP (JEH 9376, attn: [   ])   b6
1 - FBI SecD/AU (elec. copy: via e-mail to UC [   ])   b7C
1 - RMD/RMAU (attn: [   ])
2 - Program Division POC /Privacy Officer
2 - FBIHQ Division POC /Privacy Officer

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):

_X__ 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.
  _X_ No significant privacy issues (or privacy issues are unchanged).
  ___ Other (describe):

Applicable SORN(s): DOJ Computer Systems Activity & Access Records, 64 Fed. Reg. 73,585 (Dec. 30, 1999), as amended by 66 Fed. Reg. 8525 (Jan. 31, 2001) and 72 Fed. Reg. 3410 (Jan. 25, 2007).

Notify FBI RMD/RIDS per MIOG 190.2.3? _x__No ___Yes--See sample EC on PCLU intranet website here: http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd

SORN/SORN revision(s) required? _x__No ___Yes (indicate revisions needed):

Prepare/revise/add Privacy Act (e)(3) statements for related forms? _x__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:

| David C. Larson, Deputy General Counsel
FBI Privacy and Civil Liberties Officer | Signature: /s/ [   ] Acting FBI Privacy Officer
Date Signed: 1/10/2011 | b6
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.

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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   ~~[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.]~~

__X__ YES   **[If yes, please continue.]** The information about individuals is about the users of the system whose log-in is collected and subject to audit.

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

__X__ The information directly identifies specific individuals. The information about individuals is log-in and audit data.

_____ 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 3.

____   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   __X__ 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.]**

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

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

_____ NO   **[If no, proceed to question 7.]**

__X__ YES

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

_____ NO

__X__ 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.

  __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:**

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

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

8. Is the system operated by a contractor?
  _____No.

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

9. Has the system undergone Certification & Accreditation (C&A) by the FBI Security Division (SecD)?
  _____ NO **If no, indicate reason; if C&A is pending, provide anticipated completion date**:

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

    Provide date of last C&A certification/re-certification: 10May10

    Confidentiality:__Low__Moderate _X_High __Undefined

    Integrity: __Low _X_Moderate __High __Undefined

    Availability: __Low _X_Moderate __High __Undefined