UNCLASSIFIED // ~~FOUO~~

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

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

___X__ 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?

__X__ NO

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

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

_X____ 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?

(S)

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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 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.

_XX___ 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?

__X___ 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: Loose Media Kiosk (LMK)

BIKR FBI Unique Asset ID: _____

| Derived From: Classified By: Reason: Declassify On: | SYSTEM/PROJECT POC Name: [redacted] Systems Security Officer Program Office: Security (Squad 13) Division: Albany Phone: [redacted] Room Number: 326 | FBI OGC/PCLU POC Name: [redacted] Phone: [redacted] Room Number: 7350 JEH | b6 b7C |

FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer	
Program Division: Albany Field Office [insert division name]	Signature: [redacted] Date signed: [redacted] Name: [redacted] Title: Chief Security Officer	Signature: [signature] Date signed: 3/11/13 Name: Paul M. Holstein Title: Chief Division Counsel/Chief Privacy Officer	b6 b7C
FBIHQ Division: [insert division name]	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.)

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:

_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 :

Applicable SORN(s): _____

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

SORN/SORN revision(s) required? _____ No _____ Yes :

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 records 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:

[ ] Acting Unit Chief	Signature: [ ]	b6
Privacy and Civil Liberties Unit	Date Signed:	b7C
Brian F. Binney, Acting Deputy General Counsel	Signature:	
FBI Privacy and Civil Liberties Officer	Date Signed:	

1. INFORMATION ABOUT THE SYSTEM / PROJECT

1. General Description of System

The Albany Field Office (AL FO), Loose Media Kiosk (LMK) is a standalone computer that provides a controlled environment to examine and analyze file structure, size, and types of files stored on secondary storage devices, primarily Universal Serial Bus (USB) connection oriented devices. Security concepts are covered in the LMK System Security Plan. The LMK is internally owned and managed exclusively by the FBI.

The LMK is located in the Albany Field Office Computer Analysis and Response Team (CART) Laboratory.

Figure 1 Loose Media Kiosk

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The system has no network connectivity.

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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)?

__X__ NO
(Note: It is theoretically possible to open the files that are contained on the inserted media. However, there is no way to save the information in them, print their contents, or transfer the contents to another system.)

_____ YES   [If yes, please continue.]

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

_____ The information directly identifies specific individuals.

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

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

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

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

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

_____ NO   _____ YES

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

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

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

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

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

_____ YES

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

_____ NO

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

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

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

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

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

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

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

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

_____ SSNs are important for other reasons. Describe:

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

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

8. Is the system operated by a contractor?

_____ No.

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

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

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

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

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

                Confidentiality: _Low _Moderate _High _Undefined

                Integrity: _Low _Moderate _High _Undefined

                Availability: _Low _Moderate _High _Undefined

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

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

_____ NO

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

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

_____ NO   _____ YES

12. Status of System/ Project:

_____ This is a new system/ project in development.

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: Maximo

BIKR FBI Unique Asset ID: _2010-023-01-P-402-128-9999_

	SYSTEM/PROJECT POC	FBI OGC/PCLU POC	
	Name:	Name:	**b6**
	Program Office: FSIO	Phone:	**b7C**
	Division: FD	Room Number: JEH, Rm 7350	
	Phone:		
	Room Number: MC-700		

FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer	
Program Division: Financial Systems Implementation Office (FSIO)	Signature: Date signed: Name: Title: FSIO Director	Signature: Date signed: Name: Title: Unit Chief	**b6** **b7C**
FBIHQ Division: Finance Division (FD)	Signature: Date signed: Name: Title: FD Accounting Deputy Section Chief	Signature: Date signed: Name: Title: Unit Chief	

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.

__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:

Applicable SORN(s): Central Records System, DOJ/FBI-002; Bureau Personnel Management System, DOJ/FBI-008; Computer systems Activity and Access Records, DOJ-002

Notify FBI RMD/RIDS per MIOG 190.2.3? ___No __X__ 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? ___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 Withnell, Acting Deputy General Counsel Acting FBI Privacy and Civil Liberties Officer	Signature: Date Signed: _Elizabeth Withnell_ 3/4/11

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epic.org   14-06-04-FBI-FOIA-20150318-4th-Production   EPIC-872

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

The systems used by the FBI to manage and track its supply chain processes for purchasing goods and services, including assets on hand, are outdated and insufficient. To better manage the FBI's growing number of assets, new supply chain management functionality is required, including: (1) an integrated asset management system to value and track assets throughout their useful lives (2) an improved ability to manage vendor interactions, and (3) new data collection devices to facilitate inventory processes.

The current asset management systems used by the FBI include the Property Management Application (PMA), the Vehicle Management Application (VMA), the Fixed Assets Module (FA) and Issued Personal Property (IPP) system. Specific information and purpose of each system is summarized below:
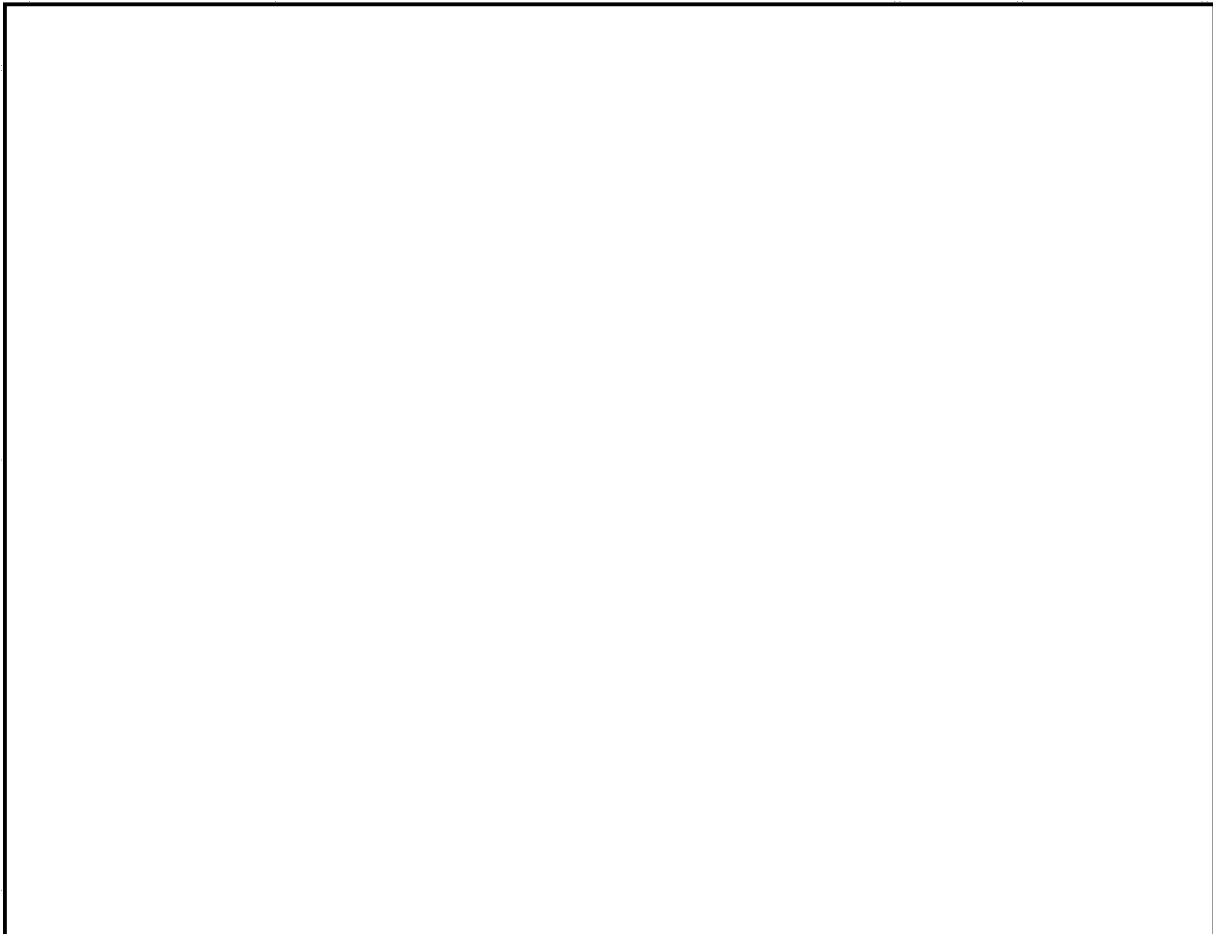
b7E

Each is a separate system, over 20 years old, with a different architecture. As a result, these first generation systems contain numerous add-on enhancements and are not as efficient or flexible as more modern systems with updated capabilities, and fail to provide the functionality needed to maintain a robust process and improve accountability.

Additionally, the current system structure spreads various asset types across several systems, requiring multiple interfaces, duplicative asset entry, significant manual reconciliations between systems and delayed processing. The current system landscape is summarized below. Please note this is a working document subject to revision.

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The Finance Division (FD) seeks to mitigate these issues through the deployment of a new Supply Chain Management (SCM) Program via three core projects (only Project 1 is intended to be covered by this PTA, Projects 2 and 3 will have additional privacy paperwork as necessary during their development and implementation):

1. **Project 1 – Project Aikman**
   - <u>Objectives</u>: Replace the Property Management Application (PMA), Vehicle Management Application (VMA), Fixed Asset (FA) Module and Identifiable Personal Property (IPP) application with one Commercial Off the Shelf (COTS) Asset and Fleet Management Solution, IBM's Maximo software.
   - <u>Estimated deployment</u>: Limited pilot (tentatively 3-5 FOs and an undetermined number of HQ division participation) in FY 11 Q4. A full FBI-wide deployment is scheduled to begin November 2011.
   - <u>Software</u>: Maximo (IBM). Note this is the base software platform for which Project 2 and Project 3 software will be added.
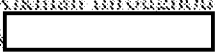
b7E

b7E

[REDACTED]
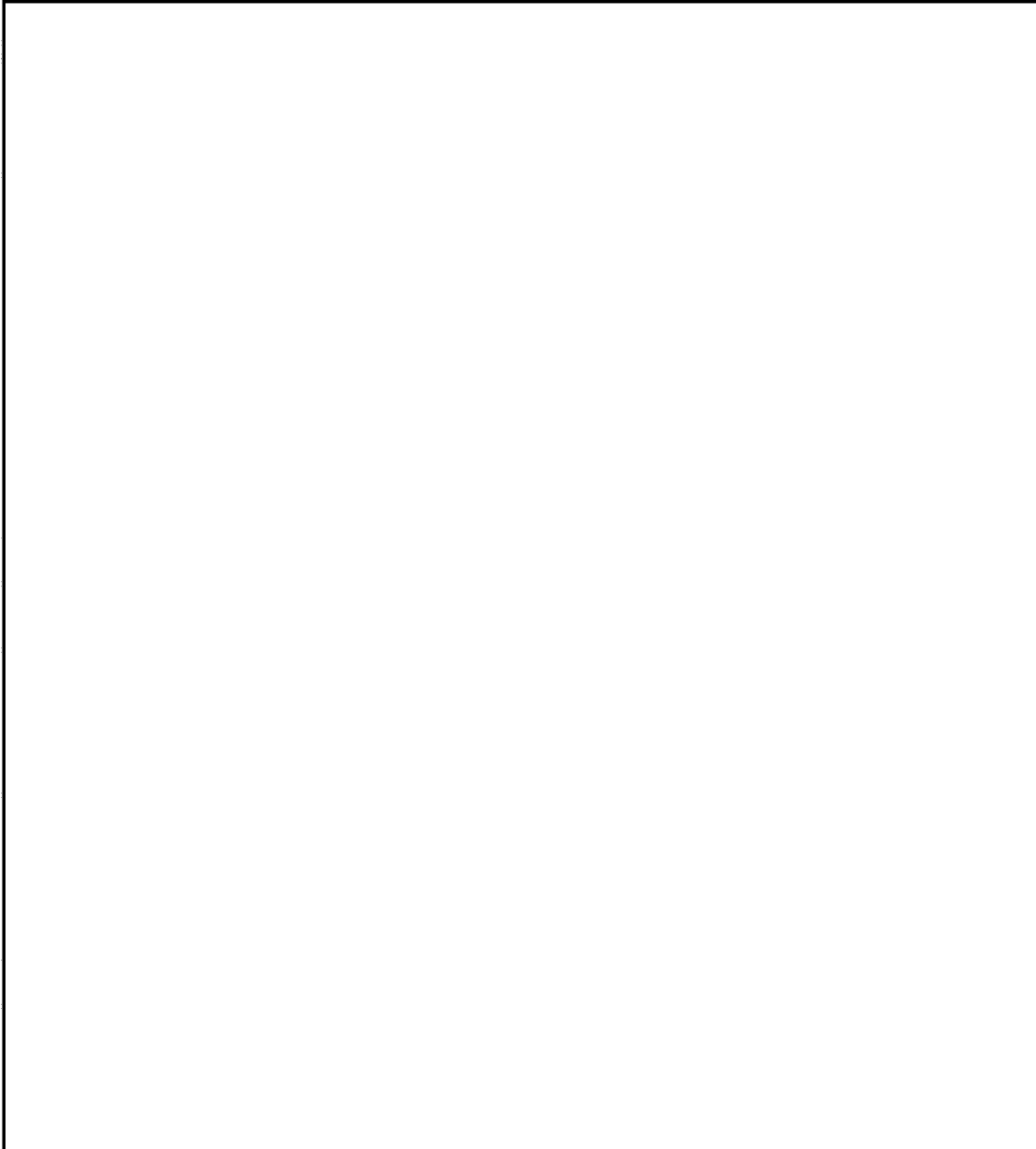
To ensure each project is optimally positioned to achieve its objectives, FD will be initiating a staggered approach to project implementation. In other words, Project 1 (which will be referred to as Project Aikman throughout this document) will be the first rollout of FD's new SCM model, followed by [REDACTED]

Please note the following:

* Project Aikman is replacing PMA, VMA, FA module and IPP systems with one central asset management system (IBM's Maximo). After historical information from legacy systems is transferred to Maximo (scheduled for FY 12 Q3), the legacy systems will be shut down and slated for the system retirement process.

* [REDACTED]

b7E

* [REDACTED]

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.]

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 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.

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

　　　__X__ NO　　___ YES

　　　The only information contained within this program that does not pertain to government employees, contractors, or consultants is in the case of a vehicle accident involving an FBI vehicle and a non-FBI individual or vehicle. In the case of such an incident, the name and contact information for the non-FBI individual would be maintained within the Vehicle Management files.

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?

　　　__X__ 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)?

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

Some of the forms have a Privacy Act (e)(3) statement, but others do not so the program is working with PCLU to ensure that all the forms have such a statement.

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

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

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

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

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

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

__X__ 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:**

A unique user-name and password are required for access to the Maximo program. Without approval, an FBI employee will be unable to access Maximo. All users are assigned specific roles commensurate with their job responsibilities and not all users will have access to the PII maintained in Maximo. Where one's job responsibilities warrant access to view another employee's PII, the system will allow this.

_____ 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)?

   _X_ NO   **If no, indicate reason; if C&A is pending, provide anticipated completion date**: This is a new system and is currently undergoing the the C&A process. The anticipated completion date is mid-June 2011.

   _____ 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

   _X_ YES   **If yes, please provide the date and name or title of the OMB submission**: An OMB-300 budget submission is planned for the spring budget submission (05/18/2011)

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)?

   _X_ NO

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

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

   _X_ NO   _____ YES

13.   Status of System/ Project:

__X__   This is a new system/ project in development.

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

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

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

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

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

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

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

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

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

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

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

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

_____ Other [**Provide brief explanation**]:

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

_____ NO _____ YES

If yes:

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

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

_____ NO _____ YES

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

BIKR FBI Unique Asset ID: _____

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: [ ] Program Office: System Management Support Unit Division: ITSD Phone: [ ] Room Number: 1396	FBI OGC/PCLU POC Name: [ ] Phone: [ ] Room Number:

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: ITSD	Signature: [ ] Date signed: *5 Jan 2011* Name: [ ] Title: *Chief System Mgt Support Unit*	Signature: Date signed: Name: Title:
FBIHQ Division: ITSD	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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b7C

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

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):
    xx 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):
ePO is a tool.

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

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:

James J. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: Date Signed: 7/9/11

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.

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.]

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. 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.**]

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: MP 2

BIKR FBI Unique Asset ID: ___ Not currently available

| Derived From:
Classified By:
Reason:
Declassify On: | **SYSTEM/PROJECT POC**
Name:
Program Office:
Division: FLSD
Phone:
Room Number: 1B301 | **FBI OGC/PCLU POC**
Name:
Phone:
Room Number: | 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: ITSD	Signature: Date signed: 11/30/2010 Name: Title: ITS	Signature: Date signed: 11/30/2010 Name: Title:	b6 b7C
FBIHQ Division: [insert division name]	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.)

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).
    _X_ 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/FBI-002/classification for administrative matters_____

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? _X_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:

, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: Elizabeth Withnell Date Signed: 3/11/2011

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.

MP2 is a COTS database that collects information regarding building maintenance.

b6
b7C
b7E

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

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

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.)

X   The information directly identifies specific individuals. Employee names – those making a maintenance request or those performing the work – is the only PII maintained in this system.

_____ 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   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?

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

_____ YES

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

_____ NO

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

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

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

_____ YES   **Identify any forms, paper or electronic, used to request such**

information from the information subject:

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

    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?

    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)?

    ___x_ NO **If no, indicate reason; if C&A is pending, provide anticipated**

    MP2 will be accredited under its parent operating system.

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

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