

_____ 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: DCS-HQ is a document scanning tool. The collection of social security numbers that may be contained in the documents scanned has already been deemed necessary to carry out the particular function. DCS *does not* maintain a copy of the document scanned once the scanning process is complete.

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:

System is new, C&A is pending. Anticipated date of completion: July 23, 2012

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

NAME OF SYSTEM / PROJECT: FBI Academy [redacted]

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: SSA [redacted]	Name: [redacted]
Reason:	Program Office: Firearms Training Unit	Phone: [redacted]
Declassify On:	Division: Training	Room Number: JEH 9320
	Phone: [redacted]	
	Room Number: FTU Admin	

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

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Firearms Training Unit	Signature: [redacted] Date signed: 05/03/2010 Name: [redacted] Title: Unit Chief	Signature: [redacted] Date signed: THURSDAY - 5/13/2010 Name: [redacted] Title: SSA
FBIHQ Division: Training Division: New Agent Training Program Section	Signature: <i>Timothy J. Delaney</i> Date signed: 05/03/2010 Name: Timothy J. Delaney Title: Section Chief	Signature: Date signed: Name: Title:

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

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

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

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

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

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

PIA is required by the E-Government Act.

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

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

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

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

Applicable SORN(s): _____

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:

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

Signature: 
Date Signed: 5/24/2016

L. INFORMATION ABOUT THE SYSTEM / PROJECT

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

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

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

YES [If yes, please continue.]

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

NO **YES**

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

_____ NO _____ YES

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

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

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

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

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

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

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

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

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

_____ YES

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

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

_____ NO

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

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

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

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

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

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

_____ Don't Know.

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

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

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

_____ NO _____ YES _____ Don't know

10. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

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

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

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

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

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

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

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

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

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

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

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

..... Other [Provide brief explanation]:

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

..... NO YES

If yes:

a. Provide date/title of the PIA:

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 OGCP/CLU for final FBI approval and determination if PIA and/or other actions are required.]

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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BIKR FBI Unique Asset ID: N/A

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: <input type="text"/> Program Office: Platform Engineering Unit Division: Information Technology Engineering Division Phone: <input type="text"/> Room Number: LS-401	FBI OGC/PCLU POC Name: <input type="text"/> Phone: <input type="text"/> Room Number: hq-7350
--	---	--

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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Information Technology Services Division	Signature: <input type="text"/> Date signed: 11/30/12 Name: <input type="text"/> Title: Platform Support Unit Acting Chief	Signature: <input type="text"/> Date signed: 11/30/12 Name: <input type="text"/> Title: Support Unit Acting Chief
FBIHQ Division: Information Technology Engineering Division	Signature: <input type="text"/> Date signed: 7.16.12 Name: <input type="text"/> Title: Platform Engineering Unit Acting Chief	Signature: <input type="text"/> Date signed: 7/28/12 Name: <input type="text"/> Title: ITB Privacy Officer

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

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

PIA is required by the E-Government Act.

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

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

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

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

Applicable SORN(s): _____

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:

Elizabeth Withnell, Unit Chief Privacy and Civil Liberties Unit	Signature: <i>Elizabeth Withnell</i> Date Signed: <i>7/17/12</i>
James J. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: <i>PCLO Chief & Acting</i> Date Signed: <i>9/17/12</i> <i>Deputy</i>

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

[REDACTED]

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In March 2012, the FBI's Information and Technology Branch (ITB) - IT Engineering Division (ITED) published its new IT Services Strategy wherein the ITB announced its initiative to adopt a services-based strategy for delivering and managing IT investments.

[REDACTED]

Pursuant to the IT Services Strategy, and desiring to assert more effective control of its resources, the FBI has identified the need to consolidate their SQL Server deployments.

[REDACTED]

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[REDACTED] will operate from the DAVE environment (Virtualized) further minimizing the server hardware footprint. Please see the attached system design layout below. This design allows the rapid expansion of services if additional services are needed that surpass the initial work load capacity of the server.

[REDACTED] may host various databases for enterprise applications. [REDACTED] itself does not contain, maintain or disseminate personally identifiable information (PII). As applications request SQL database support, appropriate privacy documentation will be completed that will address the specific needs of the requesting application.

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[REDACTED] provides database services as a service. Databases are accessed via dedicated communication mechanism engaged by the front end application. [REDACTED] responds to data queries presented by the application software. As user interacts with the front end application directly and does not access [REDACTED] Database

administrators are cleared personnel that may have access to the databases that may reside in The access is controlled via the Active Directory team of the Enterprise. Strict database segregation between applications will be enforced via Active Directory group policies and the appropriate database design implementation.

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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.]

YES [If yes, please continue.]

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

The information directly identifies specific individuals.

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

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

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

_____ None of the above. If none of the above, describe why the information does not identify specific individuals either directly or indirectly. **[If you checked this item, STOP here after providing the requested description.]**

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

_____ NO _____ YES

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

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

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

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

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

_____ YES

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

_____ NO

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

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

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

the necessary form(s).]

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

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

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

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

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

_____ SSNs are important for other reasons. Describe:

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

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

8. Is the system operated by a contractor?

_____ No.

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

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

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

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

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

Confidentiality: __Low__Moderate__High__Undefined

Integrity: __Low__Moderate__High__Undefined

Availability: __Low__Moderate__High__Undefined

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

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

_____ NO

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

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

_____ NO

_____ YES

12. Status of System/ Project:

_____ This is a new system/ project in development. **[If you checked this block, STOP. The 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) INSTRUCTIONS

What is a Privacy Threshold Analysis (PTA)? A PTA is designed to assess and document whether a Privacy Impact Assessment (PIA), a Privacy Act system of records notice (SORN), and/or other privacy-related documents are required.

When should a PTA be completed? A PTA should be completed at the beginning of any information system's/project's development, including system testing or pilot projects. Additionally, a PTA should be completed whenever there is a significant system/project change to determine whether there are any privacy issues as a result of such a change.

A current PTA (and PIA if indicated by the PTA) is required for:

- A security certification and accreditation (C&A) of an IT system;
- An OMB-300 budget submission involving an IT system;
- IT life cycle milestones beyond system concept and prior to any solicitations or expenditures involving project funds (i.e., before);
- Acquisition Review Board (ARB) consideration, or applications for external funding/grants;
- Significant changes in FBI SORNs;
- Reportable data mining systems or projects; and
- Submissions to OMB for Paperwork Reduction Act approval of non-investigative IT forms, questionnaires, or surveys involving personally identifiable information (PII) posed to 10 or more persons or entities (other than current FBI employees, detailees, assignees, contractors).

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When is a PTA current? A PTA may be considered current when the PTA is less than 3 years old with no subsequent changes involving significant new privacy risks.

Who should prepare/approve the PTA?

Preparation/coordination/intermediate approval: A PTA should be prepared/approved by the program management and Division Privacy Officer, in collaboration with IT, security, and end-user management. If the subject of a PTA is under the program cognizance of an FBIHQ Division, prior to forwarding to OGC the PTA/PIA must also be referred to the FBIHQ Division for program review and approval, if required by the FBIHQ Division. PTAs relating to forms/questionnaires/surveys implicating the Paperwork Reduction Act should also be coordinated with the RMD Forms Desk. Until such time as electronic formats and signatures may be authorized for record copies, all PTAs should be submitted in both hard copy and electronic formats. Preparers/reviewers are encouraged to coordinate with FBI OGC/PCLU for guidance and assistance during this process.

Final FBI approval: Following divisional approval(s), forward the PTA to FBI OGC's PCLU for staffing for final determination/approval by the FBI Privacy and Civil Liberties Officer (PCLO). Electronic copies of any system security plan (SSP) or other

materials explaining the system should be forwarded with the PTA. PCLU staffing will include a thorough review and any appropriate follow-up, and may include returning a submission to the division for revision. PTA processing is complete upon final approval by the FBI PCLO. OGC/PCLU will file the signed final PTA in OGC's PIA control file and provide copies to FBI stakeholders for filing and retention in pertinent files.

How should the terms "PII" and "identifiable form" be interpreted?

In this PTA, "PII" means: information which can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc. alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc.

In this PTA, "identifiable form" means: any representation of information that permits the identity of an individual to whom the information applies to be reasonably inferred by either direct or indirect means.

Section 208 of the E-Government Act of 2002. See also M-03-22, OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002.

Please complete the FBI PTA form per the specific guidance provided in the questions on the form.

(And please detach these instructions before submitting completed PTA.)



See to JCS 5/11/10

(OGC/PCLU (Rev. 05/15/09))

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

NAME OF SYSTEM / PROJECT:

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Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: Program Office: ITMS/SDU Division: Criminal Justice Info. Services Phone: Room Number: Module B2	FBI OGC/PCLU POC Name: Phone: Room Number: C3-655
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FBI DIVISION INTERMEDIATE APPROVALS [complete as necessary consonant with Division policy]

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Criminal Justice Information Services	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:
FBIHQ Division: Criminal Justice Information Services	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 7338).
(The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)

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

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

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

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

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[Redacted]

b7E

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

PIA is required by the E-Government Act.

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

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

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

System does not collect, maintain, or disseminate PII.

System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).

Information in the system relates to internal government operations.

System has been previously assessed under an evaluation similar to a PIA.

No significant privacy issues (or privacy issues are unchanged).

Other (describe):

[Redacted]

[Redacted]

b7E

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_nuog190-2-3_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

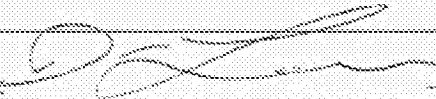
RECORDS. The program should consult with RMD to identify/resolve any Federal records/electronic records issues. The system may contain Federal records whether or not it contains Privacy Act requests and, in any event, a records schedule approved by the National Archives and Records Administration is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

Other:

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

Signature:

Date Signed:


5/13/10

[Redacted]

b7E

L. INFORMATION ABOUT THE SYSTEM / PROJECT

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

Provide a general description of the system or project that includes: name of the system/project, including associated acronyms:

[Redacted]

b7E

What is the structure of the system/project?

[Redacted] consists of the following [Redacted] segments:

[Redacted]

b7E

[Redacted]

b7E

What is the purpose of the system/project?

[Redacted]

b7E

What is the nature of the information in the system and how it will be used?

[Redacted]

b7E

Who will have access to the information in the system and what will be the manner of transmission to all users?

The information will be accessed by the individual users [Redacted] and the [Redacted] administrators. [Redacted]

b7E

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

_____ NO

YES [If yes, please continue.]

Only to the extent that [Redacted] administrators can retrieve FBI employee, contractor, or authorized user account information and associated audit log records of user activity.

b7E

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

[Redacted]

b7E

NO YES

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

NO YES

Only to the extent that [Redacted] administrators can retrieve FBI employee, contractor, or authorized user account information and associated audit log records of user activity.

b7E

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

NO YES If yes, check all that apply:

The system does not collect SSNs for its own purposes. [Redacted]

[Redacted]

b7E

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

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

SSNs are important for other reasons. Describe:

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

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

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

NO [If no, proceed to question 7.]

YES

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

_____ NO

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

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

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

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

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

YES If yes, provide date of last C&A certification/re-certification: [Redacted] ATO dated 9/30/2009. C&A completed August 2009, but new ATO has not yet been issued. [Redacted] will be under accreditation boundary of [Redacted]

b7E

_____ Don't Know.

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

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

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

NO _____ YES _____ Don't know

10. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

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

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

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

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

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

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

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

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

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

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

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

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

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

..... Other [Provide brief explanation]:



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

_____ NO _____ YES

If yes:

a. Provide date/title of the PIA:

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

_____ NO _____ YES

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: Electronic Surveillance Records System (ELSUR)

BIKR FBI Unique Asset ID: APP-0000176

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: [Redacted] Program Office: Division: IT Services Division Phone: [Redacted] Room Number: 8977	FBI OGC/PCLU POC Name: [Redacted] Phone: [Redacted] Room Number: 7350
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FBI DIVISION INTERMEDIATE APPROVALS [complete as necessary consonant with Division policy]

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Operational Technology Division	Signature: [Redacted] Date signed: 3/13/12 Name: [Redacted] Title: Team Lead	Signature: [Redacted] Date signed: [Redacted] Name: [Redacted] Title: [Redacted]
FBIHQ Division: IT Services Division	Signature: [Redacted] Date signed: 29-Feb-2012 Name: [Redacted] Title: IT Specialist	Signature: [Redacted] Date signed: 3-1-12 Name: [Redacted] Title: ITB Policy and Compliance Manager

b6
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.)

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

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

PIA is required by the E-Government Act.

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

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

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

System does not collect, maintain, or disseminate PII.

System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).

Information in the system relates to internal government operations.

System has been previously assessed under an evaluation similar to a PIA.

No significant privacy issues (or privacy issues are unchanged).

Other (describe): ELSUR Records System was developed prior to 2003 and the data residing in ERS is also located in other systems for which PIAs have been conducted.

Applicable SORN(s): JUSTICE/FBI-006 (Electronic Surveillance Indices)

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.

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

Other: The legacy ELSUR application that this PTA covers has been replaced by a product from OTD called the ELSUR Data Application (EDA). EDA went live in Jan. 2012; the legacy ELSUR application remains in restricted access (less than 10 users) with read-only mode. The legacy ELSUR application will be retired in the future. The EDA is a [REDACTED] within OTD called [REDACTED]. The functions of the ERS are no longer needed [REDACTED]. A PTA was completed on [REDACTED].

b7E

Elizabeth Withnell, Unit Chief
Privacy and Civil Liberties Unit

Signature:
Date Signed:

James T. Landon, Deputy General Counsel
FBI Privacy and Civil Liberties Officer

Signature:
Date Signed:

Elizabeth Withnell 1/16/12

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

(a) Name of the system:

Electronic Surveillance (ELSUR) Records System (ERS).

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

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(c) Purpose for collecting the information and how it will be used:

Primary Purpose: For reporting by the Declarant to the Judge (Title III cases)¹ whether any subject(s) for which the FBI is requesting authorization to conduct electronic surveillance has ever been surveilled before and, if so, when.

Secondary Purpose(s): Reporting metrics regarding electronic surveillances.

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

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

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

Additionally, ELSUR contains select biographical information (Social Security Numbers - SSNs, Dates of Birth – DOBs, and FBI Numbers) of some individuals who are in the system. Note that

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¹ ELSUR records checks are no longer reported upon in FISA declarations.

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

The legacy ELSUR application that this PTA covers has been replaced by a product from OTD called the ELSUR Data Application (EDA). EDA went live in Jan. 2012, the legacy ELSUR application remains in restricted access (less than 10 users) with read-only mode. The legacy ELSUR application will be retired in the future.

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

ELSUR Operations Technicians (EOTs), EOT Supervisors, Management & Program Analysts assigned to the former ELSUR Operations Unit (RMD), and programmers in assigned to the ELSUR application (around in total) have direct access to ELSUR.

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Special Agents have indirect access (through their EOTs).

Analysts, judges, court clerks, task force members, and others may have indirect access to some information as provided by a member of one of the two above paragraphs.

(f) Manner of transmission to all users:

Electronically via FBI Net. Reports may be printed or downloaded by EOTs and provided to other users.

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

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

YES [If yes, please continue.]

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

(Check all that apply.)

The information directly identifies specific individuals.

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

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

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

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

_____ 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.

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

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: To the extent social security numbers are collected, they are necessary to identify the individuals or may be collected as part of the surveillance.

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: Feb.
2009

According to the IMA SSP v2-1 2012-01-09:

Confidentiality: Low Moderate High Undefined

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

{INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE}

Integrity: __Low__ Moderate X High __Undefined

Availability: __Low__ Moderate X High __Undefined

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

{INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE}

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

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

NO

YES If yes, please describe the data mining function:

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

NO YES

12. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

Prior to January, 1999.

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.)

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

_____ 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.

SSNs, Dates of Birth [redacted] and FBI Numbers were linked to individual names [redacted] at the request of the sponsor (RMD).

b7E

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

_____ Other [Provide brief explanation]:

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

_____ NO _____ YES

If yes:

a. Provide date/title of the PIA:

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

_____ NO _____ YES

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

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: Employee Skills Profile

BIKR FBI Unique Asset ID: _____

Derived From: N/A Classified By: N/A Reason: N/A Declassify On: N/A	SYSTEM/PROJECT POC Name: [REDACTED] Program Office: Workforce Planning Unit Division: Human Resources Phone: [REDACTED] Room Number: JEH 10373	FBI OGC/PCLU POC Name: Phone: Room Number:
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FBI DIVISION INTERMEDIATE APPROVALS [complete as necessary consonant with Division policy]

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Human Resources	Signature: [REDACTED] Date signed: 9/21/2012 Name: [REDACTED] Title: Supervisory Mgmt. & Program Analyst	Signature: [REDACTED] Date signed: 9/21/2012 Name: [REDACTED] Title: Supervisory Mgmt. & Program Analyst
FBIHQ Division: Human Resources	Signature: [REDACTED] Date signed: 9/21/2012 Name: [REDACTED] Title: Supervisory Mgmt. & Program Analyst	Signature: [REDACTED] Date signed: 9/21/2012 Name: [REDACTED] Title: Supervisory Mgmt. & Program Analyst

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

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

PIA is required by the E-Government Act.

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

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

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

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

As a matter of policy, it would be a good idea to complete a PIA for this system, but in lieu of that, HRD should post this on its website so employees are aware of the system and its uses.

Applicable SORN(s): Justice/FBI-002 to the extent information will be maintained in a personnel file; Justice/FBI -008, BPMS

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:

Acting
Deputy General Counsel
FBI Privacy and Civil Liberties Officer

Signature: *Elizabeth W. ...*
Date Signed: *9/24/12*

[INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

- (a) Employee Skills Profile (ESP)
- (b) ESP is a database that will be housed on the Compass/Resource Allocation Planning (RAP) Tool platform on the FBI intranet.
- (c) ESP will capture the skills, education, and certifications of the FBI workforce. This skills database will allow the Workforce Planning Unit (WPU) to analyze the gaps between the current and desired skills for workforce as well as develop recommendations to close any identified gaps.
- (d) ESP will ask employees to select their skills from a list and then provide their proficiency level, the year the skill was last used, and where they obtained the skill (e.g. Federal Government, state/local government, private industry). The data will be used as described in part (c) above.
- (e) WPU will have access to the data for purposes describe above. WPU would likely show specific skill information to managers with critical skill needs or cumulative data to executive management to show gaps in critical skill areas. Additionally, so this information may be shared with them to minimize administrative burden on FBI employees. Furthermore, the data could potentially be used, in an aggregated form, to answer Congressional queries, GAO audits, etc.
- (f) ESP will be housed on the FBI intranet and will be delivered to all employees through the intranet. WPU will act as administrators for ESP, and will generate and provide reports as describe in part (e) above.

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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.)

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

- 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)?

[INSERT CLASSIFICATION/CONTROL MARKINGS,

IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

_____ 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: A privacy statement will appear on-screen when a user accesses ESP. This statement is being developed by the Privacy and Civil Liberties Unit in OGC.

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)?

[INSERT CLASSIFICATION/CONTROL MARKINGS,

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

NO If no, indicate reason; if C&A is pending, provide anticipated completion date: The Compass/RAP platform has already received C&A and this add-on does not meet the threshold for additional C&A review.

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

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

Confidentiality: Low Moderate High Undefined

Integrity: Low Moderate High Undefined

Availability: Low Moderate High Undefined

Not applicable – this system is only paper-based.

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

NO

YES If yes, please describe the data mining function:

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

NO YES

12. Status of System/ Project:

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

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

_____ 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?

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

___ NO ___ YES

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

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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BIKR FBI Unique Asset ID: _____

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: <input type="text"/> Program Office: Division: Information Technology Services Division Phone: <input type="text"/> Room Number: 1B467	FBI OGC/PCLU POC Name: <input type="text"/> Phone: <input type="text"/> Room Number: 7350
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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: [insert division name]	Signature: <input type="text"/> Date signed: 8/17/12 Name: <input type="text"/> Title: IT Specialist/System Owner	Signature: <input type="text"/> Date signed: <input type="text"/> Name: <input type="text"/> Title: Privacy Officer
FBIHQ Division: [insert division name]	Signature: <input type="text"/> Date signed: 8/17/12 Name: <input type="text"/> Title: A/UC	Signature: <input type="text"/> Date signed: <input type="text"/> Name: <input type="text"/> Title: <input type="text"/>

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

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

PIA is required by the E-Government Act.

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

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

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

- System does not collect, maintain, or disseminate PII.
- System is grandfathered (in existence before 4/17/2001, 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 SOIN(s): only log in information is at hand.
DOJ-DOJ Computer Systems Security



Notify FBI RMD/BIDS per MIOG 190.2.3? No Yes--See sample EC on PCLU intranet website here:
http://home/DO/OGC/LTR/PCLU/PrivacyCivilLib%20Liberties%20Library/Form_for_miog190-2-3_se.wpd

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

Prepare/revise/add Privacy Act (eFOI) 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:

<input type="checkbox"/> Unit Chief Privacy and Civil Liberties Unit	Signature:  Date Signed: <u>8/10/12</u>
<input checked="" type="checkbox"/> Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature:  Date Signed: <u>8/14/12</u>

Ben F. Dwyer, Acting

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1. INFORMATION ABOUT THE SYSTEM/ PROJECT

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

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The information in the system concerns each user's account information, which is the same information as is located in

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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.] The only PII consists primarily of user name and logon information.

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.