

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: Financial Disclosure Forms -- [redacted]

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BIKR FBI Unique Asset ID: APP-0000120

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: [redacted]	Name: [redacted]
Reason:	Program Office: AIU	Phone: [redacted]
Declassify On:	Division: Security	Room Number: JEH, 7350
	Phone: [redacted]	
	Room Number: PP II, Room P-602	

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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: IT Services Division	Signature: [redacted] Date signed: 11/6/13 Name: [redacted] Title: IT Specialist	Signature: [redacted] Date signed: 11/13 Name: [redacted] Title: ITB Privacy Officer
FBIHQ Division: Security Division	Signature: [redacted] Date signed: 11/13 Name: Maria Saylor Title: [redacted] Program Manager	Signature: [redacted] Date signed: [redacted] Name: [redacted] Title: Assistant General Counsel

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

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

PIA is required by the E-Government Act.

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

Is PIA to be published on FBI.GOV (after any RMD FOIA redactions)? Yes. No : due to the sensitivities of the information collected from FBI employees and their families, the PIA will not be published.

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

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

Applicable SORN(s): Central Records System, DOJ/FBI-002

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


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

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

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


Other:

Acting Unit Chief
Privacy and Civil Liberties Unit

Signature: 

Date Signed: 01/17/2013

Christine M. Costello, Acting Deputy General Counsel
FBI Privacy and Civil Liberties Officer

Signature: 

Date Signed: 1-17-13

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

A critical aspect of determining an individual's ability to receive or maintain a security clearance is that of financial status. For years, government agencies have required individuals with certain security classification levels to provide detailed information regarding their financial situations. Financial disclosure and analysis has historically been a lengthy, tedious, paper-based process. Current clearance holders must disclose their financial status annually to maintain their clearances.

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

_____ NO

YES [If yes, please continue.]

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

(Check all that apply.)

The information directly identifies specific individuals.

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

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

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

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

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

_____ NO

YES (While the form asks for some information from the employee's spouse/dependents, none of the PII collected pertains to the non-employee.)

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)?

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

X YES Identify any forms, paper or electronic, used to request such information from the information subject: The following is posted immediately following user login:
Privacy Statement

AUTHORITY: Collection of the information requested by this form is authorized under: Public Law 103-359, Title VIII, Counterintelligence and Security Enhancements Act of 1994; Executive Order (E.O.) 12968, Access to Classified Information, Section 1.3; 50 U.S.C. 401-413, National Security Act of 1947, as amended; Public Law 104-134 (April 26, 1996), as amended in Title 31, Section 7701; E.O. 10450, Security Requirements for Government Employees; E.O. 10865, Safeguarding Classified Information Within Industry; E.O. 12958, Classified National

Security Information, as amended; 5 U.S.C. 301, Department Regulations; and E.O. 12333, United States Intelligence Activities.

CONSEQUENCES: Failure to furnish the requested information could result in your being considered unfavorably for new or continued access to particularly sensitive classified information as defined by E.O. 12968

PRINCIPAL PURPOSE: The information will be used to help make personnel security determinations, including whether to grant a security clearance; to allow access to classified information, sensitive areas, and equipment; or to permit assignment to sensitive national security positions. The data may later be used as part of a review process to evaluate continued eligibility for access to classified information or as evidence in legal proceedings. (See Routine Uses.)

ROUTINE USES: Information may be disclosed to individuals, entities, or agencies in order to assist the U.S. Government in connection with investigating or resolving security, counterintelligence, or federal employment suitability matters.

Information may be disclosed to local, state, or federal agencies or entities for security or counterintelligence purposes or when the information alone, or in conjunction with other information, indicates a violation or potential violation of law, whether civil, criminal, or regulatory in nature.

Information may be disclosed to cooperating foreign government officials for security or counterintelligence purposes.

Information may be disclosed when required by federal statute.

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: Only a few System Administrators have access to the data and are also required to file a Financial Disclosure Form annually. An Information System Security Officer (ISSO) reviews audit logs on a weekly basis and reports any suspicious activity.

_____ 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 (Sec.D)?

_____ 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:

March 8, 2011

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? 2003-2005 manual submissions, 2006 – 2012 electronic submissions.

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. The conversion occurred prior to the 2006 PLA.

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.

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

_____ Other [Provide brief explanation]:

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

_____ NO X YES

If yes:

a. Provide date/title of the PIA: 02/24/2006, PRIVACY IMPACT ASSESSMENT (PIA), SECURITY DIVISION IMPLEMENTATION OF THE FINANCIAL DISCLOSURE FORMS [REDACTED]

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

NO X YES (The only significant change is noted above and is based on a request to match FDF-A information against additional DIVS/IDW datasets -- a PIA will be drafted to reflect the current FDF-A program.)

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1272295-0

Total Deleted Page(s) = 7
Page 2 ~ b5; b6; b7C;
Page 3 ~ b5;
Page 4 ~ b5; b7E;
Page 5 ~ b5; b7E;
Page 6 ~ b5;
Page 7 ~ b5;
Page 8 ~ b5;

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X For this Page X
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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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BIKR FBI Unique Asset ID: pending

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: <input type="text"/>	Name: AGC <input type="text"/>
Reason:	Program Office: Strategic Technology	Phone: <input type="text"/>
Declassify On:	Unit	Room Number: JEH, Rm 7350
	Division: DI	
	Phone: <input type="text"/>	
	Room Number: JEH, Rm 11100	

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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division:	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title: <input type="text"/>
FBIHQ Division: Directorate of Intelligence	Signature: <input type="text"/> Date signed: <input type="text"/> Name: <input type="text"/> Title: Unit Chief	Signature: <input type="text"/> Date signed: 7/18/2013 Name: <input type="text"/> Title: Management & Program Analyst

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

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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). **The system is not intended to capture PII and any PII that is captured is not retrieved by name or personal identifier.**
- ___ Other

Applicable SORN(s): Central Records System, DOJ/FBI-002


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

SORN/SORN revision(s) required? X No ___ Yes :


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

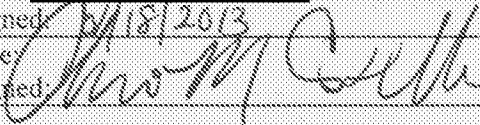
RECORDS. The program should consult with RMD to identify/resolve any Federal records/electronic records issues. The system may contain Federal records whether or not it contains Privacy Act requests and, in any event, a records schedule approved by the National Archives and Records Administration is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

Other:

 Acting Unit Chief
Privacy and Civil Liberties Unit

Christine M. Costello, Acting Deputy General Counsel
FBI Privacy and Civil Liberties Officer

Signature: 
Date Signed: 11/18/2013

Signature: 
Date Signed: 1-10-13

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

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

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

The Washington Field Office (WFO) is participating in a pilot project wherein the FBI Information and Technology Branch (ITB) has [redacted]

[redacted]

Also approved as part of this pilot program is a [redacted]

[redacted]

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[redacted]

[redacted] allows WFO Field Agents

[redacted] to enter information [redacted]

[redacted]

[redacted] It is not contemplated that [redacted] on

this [redacted] However, Agents are trained to follow the DIOG in the event of any [redacted]

The information is then displayed in the [redacted]

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[redacted]

[redacted]

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[Redacted]

Only select WFO field agents [Redacted] and WFO [Redacted] personnel will be able to enter, update, or change [Redacted] information [Redacted]

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[Redacted]

[Redacted] does not expand current FBI WFO capabilities. Prior to the

[Redacted]

However, the current system is time consuming and burdensome because it requires field agents to

[Redacted]

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Accordingly, [Redacted] does nothing that WFO is not already currently doing through the use of [Redacted] and other means. [Redacted] merely streamlines this process by allowing field agents to [Redacted]

[Redacted]

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

[Redacted]

[Redacted]

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(c) The purpose of the system/project:

The purpose of [Redacted] is to streamline [Redacted]

[Redacted] Prior to the [Redacted] the same information via [Redacted] This information had to then be

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[Redacted]

[Redacted]

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

[Redacted]

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[Redacted] No personal identifying information (PII) will be entered into the [Redacted] without an authorized law enforcement purpose.³

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

Agents in the field [Redacted] will have access to the information entered [Redacted] FBI personnel [Redacted]

[Redacted]

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[Redacted] Only WFO Agents and [Redacted] personnel who have access [Redacted] will be able to enter, change, or update [Redacted] information. Personnel with an [Redacted] who are not [Redacted] will not be able to view, enter or change the information in the [Redacted]

(f) Manner of transmission:

The information will be transmitted [Redacted]

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

___ NO

X YES While the system is not intended to collect, maintain, or disseminate any information about individuals, it is possible that it will [Redacted]

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

³ While the purpose of the system is to [Redacted] information and not PII, some PII might be entered into the system such as [Redacted]

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- The information directly identifies specific individuals.
- The information is intended to be used, in conjunction with other data elements, to indirectly identify specific individuals.
- The information can be used to distinguish or trace an individual's identity (i.e., it is linked or linkable to specific individuals). **While the information collected is not intended to be used for this, it is possible that [redacted] may allow for distinguishing or tracing an individual's identity.**

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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:

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Since this is part of a pilot project, it has not undergone C&A at this point. However, it will go through C&A at the appropriate stage.

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.

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_____ 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

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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BIKR FBI Unique Asset ID: SYS-0000035

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: Electronics Technician Program Office: ET Operations and Development Unit (EODU) Division: Operational Technologies Div. (OTD) Phone: Room Number: ERF, Quantico	FBI OGC/PCLU POC Name: AGC Phone: Room Number: 7350 JEH
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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:	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:
FBIHQ Division: Operational Technologies Division (OTD)	Signature: Date signed: 4/25/14 Name: Title: Program Manager, OTD/EODU	Signature: Date signed: 5/15/2014 Name: SSA Title: Assistant Section Chief, OTD / <i>DFB</i>

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

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FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS: [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). Privacy issues have remained unchanged since the previous PTA for FOISS was approved on December 10, 2009.

Other (describe):

Applicable SORN(s): Security Access Control System (SACS), Justice/FBI-013, 70 Fed. Reg. 7516 (Feb. 14, 2005)

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

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

Other:


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

Signature 
Date Signed 6/2/14

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

[redacted]
[redacted] at the FBI's field locations, such as Field Offices, Resident Agencies (RAs) and off-site facilities. The system controls and manages both [redacted]
[redacted]

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[redacted] data collected and stored within [redacted] consists of the names of individuals, [redacted] (no other identifiers are maintained within the system) and the date and time [redacted]
[redacted]

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[redacted] also contains [redacted]
[redacted]

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Each FBI facility [redacted] (e.g., FO HQ, RAs and offsites)
[redacted]

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Access to data in [redacted] is restricted to authorized users within each Field Office. The number of authorized users within a Field Office varies somewhat, [redacted] for which a Field Office is responsible. Information contained in one field office's [redacted] cannot be accessed by personnel assigned to another field office or to FBIHQ.

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¹ All Bureau employees, contractors, task force officers and consultants with security clearances issued by the FBI's Security Division are [redacted]
[redacted]

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[redacted]

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Records from [redacted] including access and audit logs, are maintained off-line by each Field Office for two years.

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

_____ NO

X YES [If yes, please continue.]

The system contains the names of FBI personnel (employees, contractors, consultants, and task force officers) [redacted] The names of these individuals are the only personal identifiers contained in [redacted]

b7E

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 individuals identified in [redacted] are all FBI personnel; see response to Q.2, supra.

b7E

_____ 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

See responses to Q.2 and Q.3, supra.

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.]

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

In addition to user access and activity data, the personal information that may be retrieved from [redacted] consists of the names of individuals who have been [redacted]
[redacted]

b7E

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:

A Privacy Act system of records notice (SORN) for the [redacted]
[redacted] provides general notice of the routine uses that may be made of information in the system, such as the date and time [redacted]
[redacted]

b7E

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: June 15, 2009; currently has Authority to Operate (ATO) through February 26, 2015 at the following risk levels:

b7E

Confidentiality: Low Moderate High

Integrity: Low Moderate High

Availability: Low Moderate High

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

10. Does the system conduct data mining as defined in Section 804 of the Implementing Recommendations of the 9/11 Commission Act of 2007, P.L. 110-53 (codified at 42 USC 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? was developed prior to April 17, 2003.

b7E

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.

System enhancements now enable [redacted] at a FO HQ to communicate directly with [redacted] at the FO's subordinate RAs and offsites. This capability enables, for example, system updates to be pushed from the FO HQ without requiring that a technician visit each subordinate facility to update hardware/software.

b7E

_____ Other:

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

NO _____ YES

A PIA for [redacted] was previously approved on December 10, 2009.

b7E

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

NAME OF SYSTEM / PROJECT: [REDACTED]
BIKR FBI Unique Asset ID: N/A

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	SYSTEM/PROJECT POC Name: [REDACTED] Program Office: [REDACTED] [REDACTED] Division: Directorate of Intelligence Phone: [REDACTED] Room Number: 11709C	FBI OGC/PCLU POC Name: AGC [REDACTED] Phone: [REDACTED] Room Number: 7350, JEH
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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Directorate of Intelligence	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title: [REDACTED]
FBIHQ Division: Directorate of Intelligence	Signature: <i>[Signature]</i> Date signed: 5/8/2010 Name: William G. Davidson Title: Section Chief	Signature: [REDACTED] Date signed: 8/8/2011 Name: [REDACTED] Title: Supv 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.)



FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

_____ PIA is required by the E-Government Act.

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

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

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

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

Applicable SORN(s): Bureau Mailing Lists, DOJ/FBI-003; Central Records System (CRS), DOJ/FBI-002

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

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

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

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

Other:

Unit Chief Privacy and Civil Liberties Unit	Signature: Date Signed: 8/10/11
James J. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: Date Signed: 8/10/11

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

[redacted]
[redacted] in order to
collect feedback from state and local law enforcement partners regarding [redacted]
[redacted] will collect general
information from the user, such as, customer role, position type, organization, and region
of interest. The customer will be asked [redacted]
[redacted]
[redacted] Lastly, the user has the option to provide his/her email address or other
contact information if he/she would like to be contacted in response to his/her [redacted]
[redacted] If an individual volunteers his/her information, the contact information will
be used only for that purpose. [redacted] results, including agency information of the
respondent, will be analyzed [redacted]
personnel to better help the FBI understand its customer base and their needs. With this
information, the FBI will be able to create better, more relevant and usable [redacted]
[redacted]

b7E

[redacted] is in PDF format [redacted]
[redacted]
[redacted] The user has the option to [redacted]
[redacted] if he or she
chooses [redacted]
[redacted]
[redacted] without the respondent's name/email address, will be
maintained in a shared folder [redacted] that is only accessible to
personnel within [redacted]

b7E

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

_____ 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.

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

If you marked any of the above, proceed to Question 3.

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

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

X NO _____ YES

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

X 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:

Per the Security Division, no C&A is required for this

b7E

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

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

Confidentiality: Low Moderate High Undefined

Integrity: Low Moderate High Undefined

Availability: Low Moderate High Undefined

Not applicable – this system is only paper-based.

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

NO

YES 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?

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.

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: FIPS (FedEx Invoice Processing System)

BIKR FBI Unique Asset ID: 2010-015-01-P-407-126-3411

Derived From:	SYSTEM/PROJECT POC Name: [REDACTED] Program Office: Division: FLSD Phone: [REDACTED] Room Number: 1B909	FBI OGC/PCLU POC Name: Phone: Room Number:
Classified By:		
Reason:		
Declassify On:		

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

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Facilities & Logistics Services Division (FLSD)	Signature: [REDACTED] Date signed: 4/28/11 Name: [REDACTED] Title: Unit Chief	Signature: [REDACTED] Date signed: 4/28/11 Name: Elton W. Thomas Title: Chief Security officer
FBIHQ Division: Facilities & Logistics Services Division (FLSD)	Signature: [REDACTED] Date signed: 4/27/11 Name: [REDACTED] Title: Management & Program Analyst	Signature: [REDACTED] Date signed: [REDACTED] Name: [REDACTED] Title: Assistant chief Security 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.)

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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):

System is a workflow to manage packages. If there is PII it is likely in package addresses and the privacy concerns are de minimis at best.

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:

____, Deputy General Counsel
FBI Privacy and Civil Liberties Officer

Signature: _____

Date Signed: 6/29/11

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L. 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.

For payment and invoice processing between FedEx and the FBI, there is an established process which allows the FBI to collect billing invoices on delivered items and make payments to FedEx for the approved deliveries. FIPS (FedEx Invoice Processing System) is an updated version of the legacy system (DirectLink) previously used to complete this process. The FIPS application facilitates invoice approval, report generation, data archiving and exception handling. The system's purpose is to assist FLSD with routine tasks involving validation and payment of Federal Express shipping invoices.

The FLSD system POC will have access to information in the system, and field personnel will receive reports (on their specific shipping information only) delivered via email. Field personnel do not access the application; information is transmitted to them via automated email delivery.

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.] Any PII in the system consists of addressee information in the event a package is sent to an individual. The system is intended to be a workflow and is therefore predominantly internal. Any privacy concerns are minimal.

..... 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.

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_____ 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).]**

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_____ **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:

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UNCLASSIFIED/FOR OFFICIAL USE ONLY

Confidentiality: Low Moderate High Undefined

Integrity: Low Moderate High Undefined

Availability: Low Moderate High Undefined

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

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UNCLASSIFIED/FOR OFFICIAL USE ONLY

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.

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(For example, a change that would create a more open environment and/or avenue for exposure of data that previously did not exist.)

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

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

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

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

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

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

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

_____ Other [Provide brief explanation]:

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

_____ NO _____ YES

If yes:

a. Provide date/title of the PIA:

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

_____ NO _____ YES

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

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FEDERAL BUREAU OF INVESTIGATION
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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

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BIKR FBI Unique Asset ID: _____

Derived From: Unclassified Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: <input type="text"/> Program Office: Intelligence Division Division: New York Phone: <input type="text"/> Room Number: 1012	FBI OGC/PCLU POC Name: <input type="text"/> Phone: <input type="text"/> Room Number: JEH-7350
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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: New York Intelligence Division	Signature: <i>Gerald Rose</i> Date signed: 1/31/2014 Name: Gerald Rose Title: SAC	Signature: <input type="text"/> Date signed: 1/27/2014 Name: <input type="text"/> Title: CDC
FBIHQ Division: [insert division name]	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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

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

PIA is required by the E-Government Act.

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

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

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

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

Applicable SORN(s): FBI-002 Central Records System SORN

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

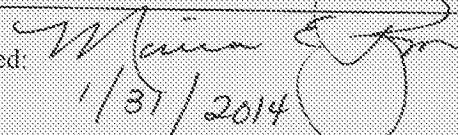
SORN/SORN revision(s) required? No Yes (indicate revisions needed):

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:

Monica Ryan
 FBI Privacy and Civil Liberties Officer

Signature: 
 Date Signed: 1/31/2014

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.

Definitions for document:

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

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

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c) **Purpose of the system/project:**

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

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(f) Transmission to all users:

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

X YES

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

(Check all that apply.)

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).

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

NO

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

YES.

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

NO

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

YES

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

NO

8. Is the system operated by a contractor?

No.

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

YES

ASU Internal Assessment Completed 01/31/14

- **Company:**
- **Location:** Florida, U.S. owned company
- **Counterintelligence Concerns:** None
- **Foreign Ownership/Influence:** None
- **Criminal Concerns:** None
- **Sentinel:** No derogatory information found
- **DIVS:** No derogatory information found
- **Company Website:** No derogatory information found

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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

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

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).]