

[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. (This kind of information may be available in the System Security Plan, if available, or from a Concept of Operations document, and can be cut and pasted here.):

- A) The Bank Robbery Statistical Application (BRSA) is a mainframe application that serves as the repository for all statistical data reported on the FD-430 Form.
- B)
- C) Bank Crime Statistical reports
- D) Bank Crime Statistical information derived from the FD-430 form.
- E) Only customers that have access to FBINET may have access to the BRSA
- F) FBI Investigative Mainframe

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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 PLA 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.

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

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

_____ 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.

[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?
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.

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

_____ 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.]

[INSERT CLASSIFICATION/CONTROL MARKINGS,
IF APPROPRIATE]

FD-438 (Rev. 9-18-07)

Approved by: _____

Field Office Case: _____

Subject: _____

- Date: _____
TYPE:
 Robbery
 Burglary
 Larceny
 Extortion
 Hostile Act - Armed Carrier

*Resubmit for a form
when data is
derived for the
database*

Time of offense _____ am pm
 Denial Note Available Yes No
 Surveillance Photos Available Yes No
 Quality of Photo (P) Poor (F) Fair (G) Good
 Is there any Noteworthy Text for this case Yes No
 County _____

- ENTRY (check one):
 New Case
 Change or addition - complete applicable categories only
 Deletion - remove entry, no violation

Initial submission must be uploaded within 15 workdays of the offense.

INSTITUTION TYPE:

- (A) Armed Carrier
 (B) Commercial Bank
 (C) Credit Union
 (M) Mutual Savings Bank
 (S) Savings and Loan

INSTITUTION/COMMUNITY CHARACTERISTICS: (Check one of each group)

- | | | |
|--|--|---|
| Facility Type: | Facility Location: | Community Type: |
| <input type="checkbox"/> (B) Branch Office | <input type="checkbox"/> (C) Commercial District | <input type="checkbox"/> (C) Small City or Town |
| <input type="checkbox"/> (M) Main Office | <input type="checkbox"/> (R) Rural | <input type="checkbox"/> (M) Metropolitan |
| <input type="checkbox"/> (O) Other | <input type="checkbox"/> (R) Residential | <input type="checkbox"/> (R) Rural |
| <input type="checkbox"/> (R) Remote Facility | <input type="checkbox"/> (S) Shopping Center | <input type="checkbox"/> (S) Suburban |
| <input type="checkbox"/> (S) Store | | |

INSTITUTION AREA INVOLVED:

- | | | |
|--|---|--------------------------------------|
| <input type="checkbox"/> (A) Teller Counter | <input type="checkbox"/> (B) Drive-in/Walk-up | <input type="checkbox"/> (I) Courier |
| <input type="checkbox"/> (B) Vault/Safe | <input type="checkbox"/> (F) Night Depository | <input type="checkbox"/> (O) Other |
| <input type="checkbox"/> (C) Safe Deposit Area | <input type="checkbox"/> (G) Automated Vehicle | |
| <input type="checkbox"/> (D) Office Area | <input type="checkbox"/> (H) Automatic Teller Machine | |

SECURITY DEVICES:

- | | | | | | |
|-----------------------------|--|-----------|--|------------------|--|
| Alarm System | <input type="checkbox"/> Yes <input type="checkbox"/> No | Activated | <input type="checkbox"/> Yes <input type="checkbox"/> No | Functioned | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Surveillance Camera | <input type="checkbox"/> Yes <input type="checkbox"/> No | Activated | <input type="checkbox"/> Yes <input type="checkbox"/> No | Functioned | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Bad money maintained | <input type="checkbox"/> Yes <input type="checkbox"/> No | Taken | <input type="checkbox"/> Yes <input type="checkbox"/> No | Bar Criteria met | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Guards(s) | <input type="checkbox"/> Yes <input type="checkbox"/> No | On Duty | <input type="checkbox"/> Yes <input type="checkbox"/> No | Armed | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Curryncy dye/gas pack | <input type="checkbox"/> Yes <input type="checkbox"/> No | Taken | <input type="checkbox"/> Yes <input type="checkbox"/> No | Functioned | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Electronic Tracking Devices | <input type="checkbox"/> Yes <input type="checkbox"/> No | Activated | <input type="checkbox"/> Yes <input type="checkbox"/> No | Functioned | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Bullet resistant enclosure | <input type="checkbox"/> Yes <input type="checkbox"/> No | | | | <input type="checkbox"/> (U) Unknown |

SUBJECTS: Number known involved _____ or (U) Unknown

Race/sex-specify number each:

- | | |
|------------------------|-----------------------|
| White Male _____ | White Female _____ |
| Black Male _____ | Black Female _____ |
| Hispanic Male _____ | Hispanic Female _____ |
| Other Male _____ | Other Female _____ |
| Unknown Male _____ | Unknown Female _____ |
| Unknown Race/Sex _____ | |

VIOLENCE: Yes No

- | | |
|------------------------------------|---|
| <input type="checkbox"/> Shooting | <input type="checkbox"/> Physical Assault |
| <input type="checkbox"/> Explosion | <input type="checkbox"/> Hostage Taken |

Injury Yes No Death Yes No Hostage Yes No

LOOT TAKEN: Yes No

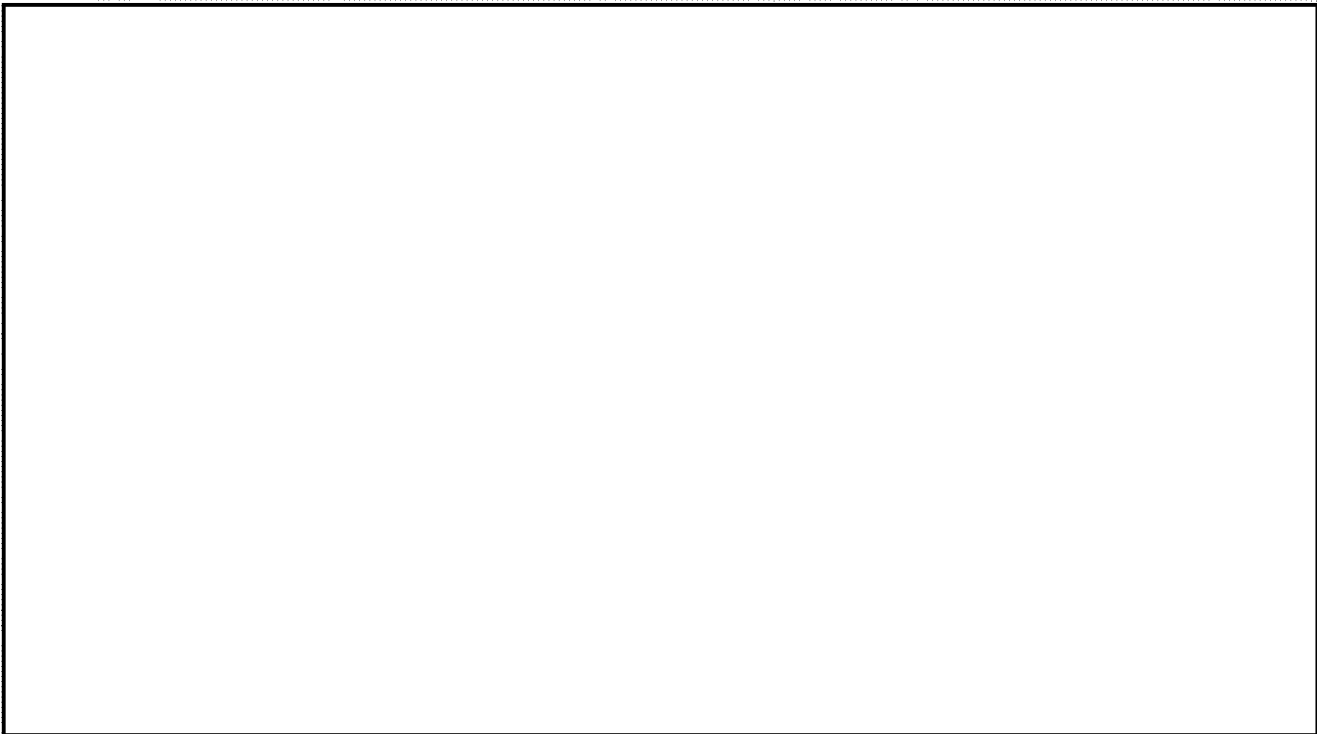
- | | | |
|--|----------|--------------------------------------|
| <input type="checkbox"/> Cash | \$ _____ | <input type="checkbox"/> (U) Unknown |
| <input type="checkbox"/> Security - Face Value | \$ _____ | <input type="checkbox"/> (U) Unknown |
| <input type="checkbox"/> Checks | \$ _____ | <input type="checkbox"/> (U) Unknown |
| <input type="checkbox"/> Traveler's Checks | \$ _____ | <input type="checkbox"/> (U) Unknown |
| <input type="checkbox"/> Food Stamps | \$ _____ | <input type="checkbox"/> (U) Unknown |
| <input type="checkbox"/> Other Property | \$ _____ | <input type="checkbox"/> (U) Unknown |

LOOT RECOVERED: Yes No

- | | |
|--|----------|
| <input type="checkbox"/> Cash | \$ _____ |
| <input type="checkbox"/> Security - Face Value | \$ _____ |
| <input type="checkbox"/> Checks | \$ _____ |
| <input type="checkbox"/> Traveler's Checks | \$ _____ |
| <input type="checkbox"/> Food Stamps | \$ _____ |
| <input type="checkbox"/> Other Property | \$ _____ |

Specific number of each:

	Injury	Death	Hostage
Customer			
Employee			
Employee Family			
Subject			
Law Officer			
Guard			
Other			



Demand Note Text (Is Demand Note Text Exact or Paraphrased? Exact Paraphrased)

.....
.....
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.....
.....

Significant Information

.....
.....
.....
.....

CAUTION: Complete only upon identification of all subjects. Complete justification for solution credit must be set forth in accompanying narrative pages.

Solution communication date: _____ (mm/dd/yyyy)

Solution by: (F) FBI (S) Joint Police/FBI (P) Police

Predominant solution factor: (D) Defensive action by employee, guard, etc. (E) Extended investigation (L) Law enforcement response

Elapsed time-violation to solution: (A) Response (B) Same Day (C) 1-3 Days (D) 4-30 days (E) 1-3 months (F) 4-6 months (G) 7-12 months (H) 1 year or longer

Total number of subjects: _____

Interrate aspect: Yes No Unknown Multiple BR, BB, BL or BE activity: Yes No

Subject(s) previously convicted (Federal or State) for BR, BB, BL, or BE: Yes No Number _____

Subject(s) on parole/probation (Federal or State) at the time of offense: Yes No Number _____

Subject(s) in escape status: Yes No Number _____

Subject(s) member of Gang: Yes No Unknown Number _____

Subject(s) affiliated with Terrorist Organization: Yes No Unknown Number _____

Drug user(s) involved: Yes No Unknown Number _____

NABRA cancellation: Yes No (Attach administrative comments) NABRA Number: _____

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:


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BIKR FBI Unique Asset ID: APP-0000288

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: BUREAU AIRCRAFT OPERATIONS Program Officer: FFOU Division: IR Phone: <input type="text"/> Room Number: Manassas, Hangar	FBI OGC/PCLU POC Name: <input type="text"/> Phone: <input type="text"/> Room Number:
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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: CCRSW/CIRG	Signature: Date signed: Name: <input type="text"/> Title: Unit Chief, FFOU	Signature:  Date signed: 5-18-11 Name: <input type="text"/> Title: UNIT CHIEF
FBIHQ Division: ITB/ITSD	Signature: Date signed: Name: <input type="text"/> Title: Unit Chief, FASU	Signature: Date signed: Name: Title:

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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 (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): Information that pertains to personnel is covered by the CRS, Justice/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 (indicate revisions needed):

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

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

Other:

[Redacted] Unit Chief Privacy and Civil Liberties Unit	Signature: [Redacted] Date Signed: 5/22/12
James J. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: [Handwritten Signature] Date Signed: 6/4/12

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b7C

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

The mission of the Bureau Aviation Program is to provide aviation support for all facets of FBI investigative activities, including aerial surveillance, aerial photography, transportation of response personnel and equipment to a crisis site

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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

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

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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.
 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.] The Bureau Aviation Program supports these investigations.

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

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:

C&A is pending at this time and should be completed by 01/01/2013.

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.

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

b7E

BIKR FBI Unique Asset ID: _____

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: <input type="text"/>	Name: <input type="text"/>
Reason:	Program Office: IAS/IATU	Phone:
Declassify On:	Division: SecD	Room Number:
	Phone: <input type="text"/>	
	Room Number: SpvB, 5 th Floor	

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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: IATU Program	Signature: <input type="text"/> Date signed: 2-6-12 Name: <input type="text"/> Title: Unit Chief	Signature: Date signed: Name: Title:
FBIHQ Division: Security Division	Signature: <i>Jennifer Smith Love</i> Date signed: 2/6/12 Name: Jennifer Smith Love Title: Assistant Director	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 7359).
(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 for the BICS II System; this PTA is sufficient for the Beecrypt Trusted Client.

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

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

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

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

Applicable SORN(s): CRS, JUSTICE/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 (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:

	Unit Chief Privacy and Civil Liberties Unit	Signature:  Date Signed: 2/7/12
James J. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer		Signature:  Date Signed: 2/7/12

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b7C

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This Privacy Threshold Analysis describes a [redacted] [redacted] that will improve the protection of personally identifiable data about FBI personnel and applicants for employment and security clearances with the Bureau and throughout the government.

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The FBI is responsible for conducting Background Investigations (BIs) on applicants and candidates for employment with the FBI and other Federal agencies. The FBI also conducts Background Investigations on individuals requiring security clearances and on current Federal employees who require investigations or reinvestigations for security clearances. The FBI uses contract special investigators (SIs) for this purpose, coordinated through the Background Investigation Contract Services Unit (BICSU) of the FBI's Security Division. BICS SIs are utilized to conduct interviews and to conduct record checks in accordance with these BIs.

[redacted]

b7E

The BICS II project will better protect this PII by providing a secure user environment utilizing [redacted] to create a fully self-contained, bootable, encrypted operating environment on [redacted]

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[redacted]

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

NO [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 PLA 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? Except perhaps indirectly if information is uncovered that has a bearing on these assessments and investigations.

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: All data on the devices are encrypted and transmitted through a Virtual Private Network.

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.

Contract employees are used to conduct the background investigations.

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: This tool will be used in conjunction with BICS Online, part of PBMS, which has a C&A date of 7/11/2008

_____ 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.]

The Bcrypt Trusted Client will be rolled out on a pilot basis.

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.]

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

Total Deleted Page(s) = 1
Page 4 ~ b7E;

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X For this Page X  
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(OGC/PCLU (Rev. 04/01/2011))

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

b7E

BIKR FBI Unique Asset ID: 2010-006-01-P-404-140-3231

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: <input type="text"/> Program Office: Cross Domain Management Office, IATU Division: Security Division Phone: <input type="text"/> Room Number: <input type="text"/> 601	FBI OGC/PCLU POC Name: <input type="text"/> Phone: <input type="text"/> Room Number: 7350 JEH
--	---	---

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b7C

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

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Security Division	Signature: <input type="text"/> Date signed: <i>5-23-2011</i> Name: <input type="text"/> Title: Information Assurance Technology Unit Chief	Signature: <input type="text"/> Date signed: Name: Title:
FBIHQ Division: Security Division	Signature: Date signed: Name: Title:	Signature: <i>[Signature]</i> Date signed: <i>05/23/11</i> Name: Michael J. Folmar Title: Assistant Director Security Division

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b7C

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

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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). **System constitutes infrastructure.**
- Other (describe):

Applicable SORN(s): N/A

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

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

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

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

Other:

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

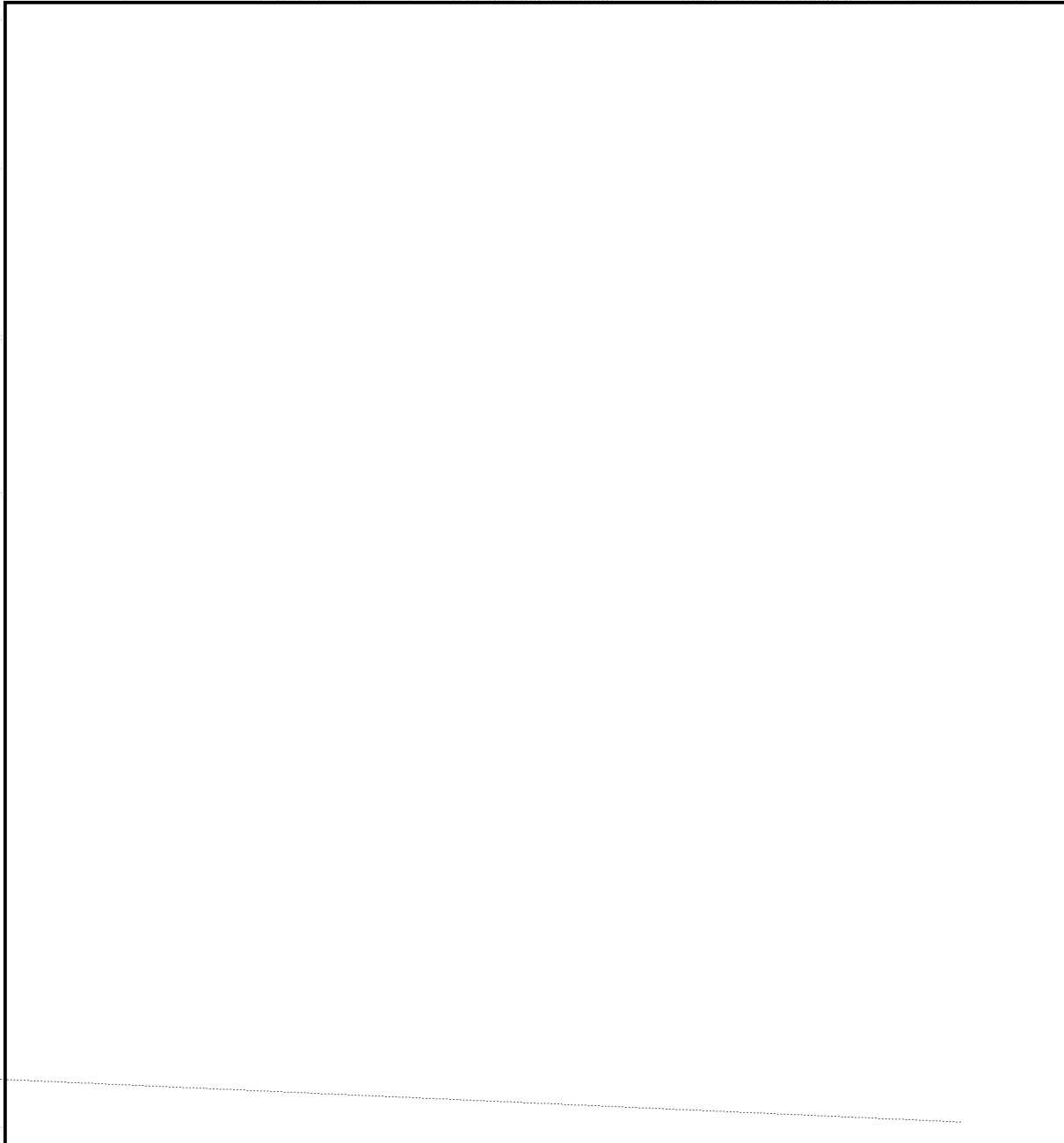
Signature:

Date Signed: 5/25/11

~~UNCLASSIFIED//FOR OFFICIAL USE ONLY~~

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

b7E

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?

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___ 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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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

b7E

BIKR FBI Unique Asset ID: Pending

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: <input type="text"/>	Name: <input type="text"/>
Reason:	Program Officer: SysMSU	Phone: <input type="text"/>
Declassify On:	Division: ITSD	Room Number: JEH 7350
	Phone: <input type="text"/>	
	Room Number: JEH 9719	

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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: [insert division name]	Signature: <input type="text"/> Date signed: <input type="text"/> Name: <input type="text"/> Title: <input type="text"/>	Signature: <input type="text"/> Date signed: <input type="text"/> Name: <input type="text"/> Title: <input type="text"/>
FBIHQ Division: IT Services Division	Signature: <input type="text"/> Date signed: <input type="text"/> Name: <input type="text"/> Title: Supervisory IT Specialist	Signature: <input type="text"/> Date signed: <input type="text"/> Name: <input type="text"/> Title: Division Privacy Officers for ITD

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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):

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:


<input type="text"/> Unit Chief Privacy and Civil Liberties Unit	Signature: <input type="text"/> Date Signed: 4/13/11
James J. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: Date Signed: 4/13/11

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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.



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

X NO {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.}

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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?

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..... 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

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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.

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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.]

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: Binary Analysis
Characterization and Storage System (BACSS)

b7E

BIKR FBI Unique Asset ID: NEN-000003 / SYS-0000222 (BACSS)

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: BACSS /	Name: AGC
Reason:	 PM	Phone:
Declassify On:	Program Office: IAU Division: OTD/DES Phone: Room Number: Bldg 14800, Suite 200	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: IAU	Signature: Date signed: Name: Title: BACSS PM	Signature: Date signed: Name: Title: IT Security Program Manager
FBIHQ Division: OTD/DES	Signature: Date signed: <i>6 February 2012</i> Name: Title: <i>Program Manager</i>	Signature: Date signed: <i>2/7/2012</i> Name: Title: <i>IT Sec Program Manager</i>

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b7E

After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEM 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):

Only log on information is maintained, with the exception of information in the metadata (IP address) that is arguably PII, but this is not significant enough to give rise to further documentation, particularly because, if a case is opened, any PII will be maintained in the case file and covered by the CRS and related privacy documentation.

Applicable SORN(s): DOJ-002, Computer Systems Activity and Access Records


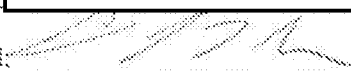
Notify FBI RMD/RIDS per MIOG 190.2.3? No Yes--See sample EC on PCLU intranet website here: http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd

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:

	Unit Chief Privacy and Civil Liberties Unit	Signature:		2/23/12
James J. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer		Signature:		2/23/12

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

To support the high number of intrusion investigations where software applications have been used to facilitate a criminal act or terrorist plot, the FBI has created [REDACTED] Binary Analysis Characterization and Storage System (BACSS) for use by the FBI's Operational Technology Division (OTD) / Digital Evidence Section (DES) / Investigative Analysis Unit (IAU).

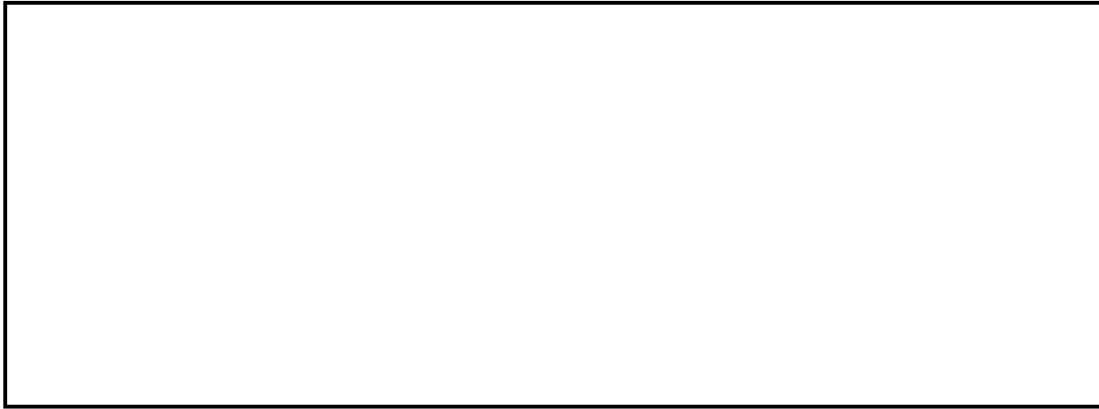
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Through [REDACTED] and BACSS, IAU personnel can assess the functionality of potential malicious software ("malware"), establish and maintain a malware repository to facilitate future identification, and deduce the capability of exploits in support of criminal, counterintelligence, and counterterrorism investigations. [REDACTED]

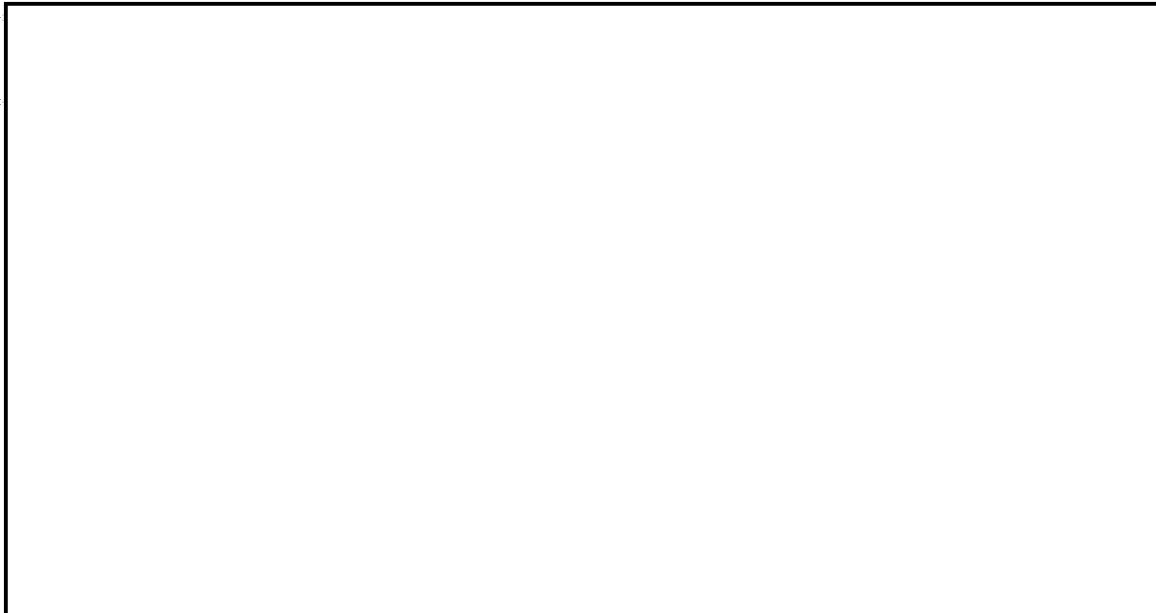
Files suspected of containing malware are acquired via a variety of external sources, such as through the seizure of hardware pursuant to a search warrant, reporting by corporate entities or private citizens, and via FISA-acquired electronic communications or business records. Standard minimization procedures are applied to all FISA-derived material.

Suspected malware files are extracted from the programs or applications in which they are located and uploaded onto [REDACTED] via email, FTP, or physical media. Separation of the portable executable malware file helps to ensure that no personally identifiable information (PII) contained in the host program/application is introduced into [REDACTED]

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[redacted] agents and analysts can access the web-based BACSS application to review the technical reports and identify associations between cases in which similar technical methods have been used. [redacted]



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

NO [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 PLA and/or other actions are required.]

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: Biometric Identification Tools Program (B-ID)

BIKR FBI Unique Asset ID: SYS0000171

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: [REDACTED]	Name: [REDACTED]
Reason:	Program Office: B-ID	Phone: [REDACTED]
Declassify On:	Division: CJIS	Room Number: C3-655
	Phone: [REDACTED]	
	Room Number: C3-704	

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FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer John Robert Richter
Program Division: CJIS Division	Signature: [REDACTED] Date signed: 3/16/12 Name: [REDACTED] Title: Supervisory MAPA	Signature: [REDACTED] Date signed: 3/9/2012 Name: [REDACTED] Title: Supervisory Security Specialist
FBIHQ Division: Security Division	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

b6
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