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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): This application [redacted] The purpose of [redacted] thus, there is no privacy risk [redacted]

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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](http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd)

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

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

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

[redacted] Unit Chief Privacy and Civil Liberties Unit	Signature: [redacted] Date Signed: 3/26/12
James J. Landon, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: [redacted] Date Signed: 3/26/12

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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.

[redacted] supports the management of [redacted]

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[redacted] Directorate of Intelligence. The application allows a user to [redacted]

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[redacted]

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Information is manually entered into the [redacted] Application via predefined data entry screens. Users may view the information using predefined queries and reports.

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Users of the application are FBI Headquarters and Field personnel with a need to [redacted] Access to [redacted] [redacted] is limited to selected personnel [redacted] All access to the [redacted] Application is approved by [redacted]

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The [redacted] Application is part of the Investigative Mainframe Applications that run on the FBINET closed network. FBINET can only be accessed by authorized persons.

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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 [redacted]

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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.

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

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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.

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).]

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\_\_\_\_\_ 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

### FBI PRIVACY THRESHOLD ANALYSIS (PTA)

**NAME OF SYSTEM / PROJECT:** Child Exploitation Tracking System (CETS)

**BIKR FBI Unique Asset ID:** 2011-006-01

	<b>SYSTEM/PROJECT POC</b> Name: SA [redacted] Program Office: Innocent Images Division: Cyber (moving to CID as of October 1) Phone: [redacted] Room Number: FBI HQ, Linthicum 2	<b>FBI OGC/PCLU POC</b> Name: AGC [redacted] Phone: [redacted] Room Number: JEH, Rm 7350
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#### FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: CID	Signature: [redacted] Date signed: 10/5/12 Name: [redacted] Title: Unit Chief	Signature: [redacted] Date signed: 10/5/12 Name: [redacted] Title: [redacted]
FBIHQ Division: CID	Signature: [redacted] Date signed: 10/05/2012 Name: [redacted] Title: Acting, Assistant Section Chief	Signature: [redacted] Date signed: 10/10/12 Name: [redacted] Title: Supervisory Special Agent

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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 : Due to the very sensitive nature of this project, it will not be published.

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

- System does not collect, maintain, or disseminate PHI.
- 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): JUSTICE/FBI-002 (Central Records System) and DOJ-002 (DOJ 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](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="checkbox"/> Unit Chief (Acting) Privacy and Civil Liberties Unit	Signature: <input type="checkbox"/> Date Signed: <input type="checkbox"/> 9/28/12
Elizabeth Ross Withnell, Deputy General Counsel (Acting) FBI Privacy and Civil Liberties Officer	Signature: <i>Elizabeth Withnell</i> Date Signed: <i>9/28/12</i>

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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.

The Child Exploitation Tracking System (CETS) is a web-based application available from the FBI's Innocent Images Office [redacted]

[redacted] CETS will be used as a deconfliction tool by FBI personnel internally and between federal, state, local, and international law enforcement agencies<sup>1</sup> who are investigating child exploitation cases. CETS will provide approved authorized FBI users the ability to share investigative intelligence and images in child pornography cases. [redacted]

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[redacted]

CETS will contain [redacted] images [redacted] originally obtained from various law enforcement entities [redacted]. These images have been seen in or identified through child exploitation cases. Not all images [redacted] are considered child pornography, however, most of them are considered child exploitation material. [redacted]

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[redacted]

**Victims:** There will be no victim names or addresses maintained in the system, but there will be images [redacted]

[redacted]

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[redacted] Nothing in CETS (including any image [redacted] refers to the victim's true name [redacted]

**Subjects:** [redacted] CETS. This would include the subject Name [redacted]

[redacted]

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<sup>1</sup> CETS will only be available to those state, local, or international law enforcement individuals [redacted] CETS [redacted]

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[redacted]

[Redacted] CETS [Redacted]

[Redacted]

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[Redacted]

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Users will access CETS via a valid [Redacted] account [Redacted]

[Redacted]

CETS and a CETS login screen is presented. Even though users will access CETS

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[Redacted] CETS will not actually [Redacted]

[Redacted] CETS.

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

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

\_\_\_\_\_ NO. [If no, skip to question 7.]

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

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

X  NO [If no, proceed to question 7.] However, CETS will

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\_\_\_\_\_ YES

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

\_\_\_\_\_ NO

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

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

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

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

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

X  NO \_\_\_\_\_ YES If yes, check all that apply:

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

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

\_\_\_\_\_ SSNs are important for other reasons. **Describe:**

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

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

8. Is the system operated by a contractor?

  X   No.

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

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

  X   NO **If no, indicate reason; if C&A is pending, provide anticipated completion date:** Pending with an anticipated completion date of 2/13/2013; however, Security Division (SecD) has determined the below categories for CETS. On August 13, 2012, SecD granted CETS an Authority to Test for 180 days, beginning on August 13, 2012.

Once this PTA is completed, the Innocent Images Office may begin testing in accordance with the ATT requirements, which include purging all of the data from the test environment at the end of the testing.

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

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

**Confidentiality:**    Low   X   Moderate    High    Undefined

**Integrity:**    Low   X   Moderate    High    Undefined

**Availability:**   X   Low    Moderate    High    Undefined

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

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

X  NO

\_\_\_\_\_ YES If yes, please describe the data mining function:

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

X  NO \_\_\_\_\_ YES

12. Status of System/ Project:

X  This is a new system/ project in development.

**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.

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\_\_\_\_\_ 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)**  
(equivalent to the DOJ Initial Privacy Assessment (IPA))

NAME OF SYSTEM / PROJECT: [Redacted]

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<b>Derived From:</b> <b>Classified By:</b> <b>Reason:</b> <b>Declassify On:</b>	<b>SYSTEM/PROJECT POC</b> Name: [Redacted] Program Office: CIRG/CITU Division: CIRG Phone: [Redacted] Room Number: Aquia, Stafford	<b>FBI OGC/PCLU POC</b> Name: [Redacted] Phone: [Redacted] Room Number:
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**FBI DIVISION INTERMEDIATE APPROVALS**

	Program Division: CIRG	FBIHQ Division: CIRG
Program Manager (or other appropriate executive as Division determines)	Signature: [Redacted] Date signed: 4/16/2009 Name: [Redacted] Title: Information Technology Specialist (ITS)	Signature: [Signature] Date signed: 4/16/09 Name: Lewis M. Chapman Title: Section Chief
Division Privacy Officer	Signature: [Redacted] Date signed: 4/16/2009 Name: [Redacted] Title: CIRG SSA/CDC/Division Privacy Officer	Signature: Date signed: Name: Title:

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After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7338).

**FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:**

PIA required:  No  Yes:      SORN/SORN revision required:  No  Yes:

Applicable SORN(s):

Notify FBI RMD/RIDS per MIOG 190.2.3:  No  Yes

Consult with RMD to identify/resolve any Federal records/electronic records issues:  No  Yes:

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

Other: This PTA involved infrastructure and therefore does not require a PIA.

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David C. Larson, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: [Signature] Date Signed: 5/1/2009
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**FBI PRIVACY THRESHOLD ANALYSIS (PTA)**

**NAME OF SYSTEM / PROJECT:**

[Redacted]

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

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

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

1 - DOJ Office of Privacy and Civil Liberties (via e-mail to [privacy@usdoj.gov](mailto:privacy@usdoj.gov))  
(if classified, via hand delivery to 1331 Penn. Ave. NW, Suite 940, 20530)

2 - FBI OCIO / OIPP (JEH 9376, attn: [Redacted])

1 - FBI SecD/AU (electronic copy: via e-mail to UC [Redacted])

1 - RMD/RMAU (attn: [Redacted])

2 - Program Division POC /Privacy Officer

2 - FBIHQ Division POC /Privacy Officer

1 - OGC/PCLU intranet

1 - PCLU UC

1 - PCLU Library

1 - PCLU Tackler

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

[Redacted]

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I. INFORMATION ABOUT THE SYSTEM / PROJECT

1. Name of the system/project. Provide current name, any previous or anticipated name changes, and any associated acronyms:

[Redacted]

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2. Briefly describe the system's/project's structure (including identification of any components/subsystems or parent system, if applicable):

[Redacted]

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[Redacted] is currently undergoing a change in requirements and is going through the reaccreditation process with the Security Division. The current authority-to-operate expires February 12, 2012.

3. What is the purpose for the system/project?

[Redacted] main purpose is to provide the infrastructure for the [Redacted] [Redacted] is in the process of migrating from the [Redacted] to the [Redacted] C&A covers all the [Redacted] The mission of the [Redacted] is to provide support [Redacted]

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4. Please provide a general summary of the nature of information in the system/project and how it will be used:

Generally, the information that is collected [Redacted]

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[Redacted] does not store any information. [Redacted] is simply the infrastructure used to [Redacted]

FBI PRIVACY THRESHOLD ANALYSIS (PTA)  
NAME OF SYSTEM / PROJECT:

[Redacted]

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[Redacted]

[Redacted] in accordance with approved standard operating procedures (SOP).

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

NO. 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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Any PII is maintained on the system that [Redacted] for which we have a PIA awaiting approval.

..... YES. If yes, please continue.

6. Access

a. Describe the means of accessing the system/project and transmitting information to and from the system/project.

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

[Redacted box]

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

c. Describe who outside the FBI will have access to the information in the system/project and the controls for ensuring that only authorized persons can access the information:

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

\_\_\_\_\_NO.

\_\_\_\_\_YES. If yes, provide a brief explanation of the quantity and type of information:

8. 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

9. Are Social Security Numbers collected, maintained or disseminated from the system/project?

\_\_\_\_\_ NO

\_\_\_\_\_YES. This system supports law enforcement and/or intelligence activities. Every deployment is unique and may collect different types of information to support the current mission requirements.

If yes, for systems/projects **other than** those supporting law enforcement or intelligence activities:

- What is the purpose for the collection, maintenance or dissemination of SSNs?

- Is it feasible to eliminate SSNs from the system/project (please indicate why or why not)?

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

[Redacted box]

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- In light of Federal policy to reduce the use of SSNs, is it feasible to minimize system/project-user access to SSNs in the system/project (why or why not)?

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

\_\_\_\_\_ NO

\_\_\_\_\_ YES.

If yes, for systems/projects **other than** those relating to criminal investigations, CT, or CI:

- Indicate how such information is collected:

- Identify by name and form number any forms used to request such information from the information subject (this includes paper or electronic forms):

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

\_\_\_\_\_ Yes \_\_\_\_\_ No

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

\_\_\_\_\_ NO. If no, please indicate reason; if C&A is pending, provide anticipated completion date:

\_\_\_\_\_ YES. If yes, please:

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

\_\_\_\_\_ Don't Know

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

\_\_\_\_\_ NO \_\_\_\_\_ Don't know

\_\_\_\_\_ YES. If yes, if the name of the OMB 300 is not the same as the name of the system/project, please provide OMB name:

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

[Redacted box]

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\_\_\_\_\_ NO                      \_\_\_\_\_ YES                      \_\_\_\_\_ Don't know

14. Status of System/ Project:

\_\_\_\_\_ This is a new system/ project in development. [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.]

\_\_\_\_\_ This is an existing system/project. [Continue to Section II.]

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.

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

[Redacted box]

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..... 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. [Please provide brief explanation]:

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

.....NO

..... YES. If yes, please provide date/title of the PIA:

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

### FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(equivalent to the DOJ Initial Privacy Assessment (IPA)) DRAFT 12/1/09

NAME OF SYSTEM / PROJECT: [REDACTED]

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Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
Classified By:	Name: [REDACTED]	Name: [REDACTED]
Reason:	Program Office: ITMS/CTU	Phone: [REDACTED]
Declassify On:	Division: CJIS	Room Number: JEH 7458
	Phone: [REDACTED]	
	Room Number: Mod B-1	

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### FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Criminal Justice Information Services	Signature: [Handwritten Signature] Date signed: [Handwritten Date] Name: William G McKinstry Title: Section Chief	Signature: [REDACTED] Date signed: 2/16/10 Name: [REDACTED] Title: CJIS Division Privacy Officer
FBIHQ Division: [Criminal Justice Information Services	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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

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

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

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FBI PTA:

[Redacted]

DRAFT 12/1/09

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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

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): \_\_\_\_\_

Notify FBI RMD/RIDS per MIOG 190.2.3?  No  Yes--See sample EC on PCLU intranet website here:  
[http://homs/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form\\_for\\_miog190-2-3\\_ec.wpd](http://homs/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:

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

Signature:

Date Signed:

  
5/29/2014

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

[redacted]

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The Security Division's Accreditation Unit has conducted a review of certification documents and each [redacted] is required to sign a User Agreement incorporating the CJIS Security Policy. [redacted] is subject to CJIS Division audits and any infraction is reported to and considered by the CJIS Advisory Policy Board.

[redacted] has been assessed as a Tier Level 3 in accordance with the FBI Certification and Accreditation Handbook. The Levels of Concern (LoC) are High for Confidentiality, Integrity and Availability. [redacted] is a Sensitive But Unclassified system operating in the System High Security Operating Mode. [redacted]

[redacted]

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In relation to personally identifiable information (PII), administrative accounts are created [redacted] that contain usernames and passwords for a limited number of FBI employees/contractors engaged in system administration and maintenance. This methodology of administration has been implemented since the system was established in 1996. These accounts are used to administer the system for continued operations and are wholly internal in nature. The [redacted] does not store or keep any user data for [redacted] data only exists on the [redacted] Privacy issues for [redacted]

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[redacted]

FBI PTA:

[Redacted]

DRAFT 12/1/09

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[Redacted]

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- First, [Redacted] provides [Redacted]

[Redacted] Scalable and reusable commercial off-the-shelf (COTS) components are used along with existing [Redacted] resources as appropriate.

[Redacted]

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[Redacted]

[Redacted] is established through the use of existing and new COTS components. [Redacted] addresses CJIS' vision of [Redacted] provides a number of enhancements for CJIS' [Redacted]

[Redacted]

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

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

X  YES. [Redacted] PII [Redacted] is not considered to be collected, maintained, or disseminated by the [Redacted] and any such PII would be addressed by PTAs/PIAs of the [Redacted] However, the [Redacted] does contain some user account data containing user names and passwords for FBI employees

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[Redacted]

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FBI PTA:

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formerly

[Redacted]

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and contractors involved in system administration and maintenance. This account information might arguably be considered PII, and the answers that follow pertain to this user account information. [If yes, please continue.]

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

\_\_\_\_\_ NO. \_\_\_\_\_X\_\_\_\_\_ YES.

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

\_\_\_\_\_ NO. \_\_\_\_\_X\_\_\_\_\_ YES. Account information is retrieved by user names..

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

\_\_\_\_X\_\_\_\_ NO. \_\_\_\_\_ YES. If yes, check all that apply:

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

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

\_\_\_\_\_ SSNs are important for other reasons. Describe:

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

\_\_\_\_\_ It is not feasible for the system/project to provide special protection to SSNs.

Explain:

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

\_\_\_\_X\_\_\_\_ NO. [If no, proceed to question 7.]

\_\_\_\_\_ YES.

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

\_\_\_\_\_ YES. [If yes, proceed to question 7.]

\_\_\_\_\_ NO.

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

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

X  YES. If yes, provide date of last C&A certification/re-certification: The [redacted] was certified on 2009-12-02.

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\_\_\_\_\_ Don't Know.

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

\_\_\_\_\_ NO. \_\_\_\_\_ Don't know.  X  YES (entire system). If yes, please provide the date and name or title of the OMB submission:

Date of Submission: 2010-01-22  
UPI: 011-10-02-00-01-2903-00

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

X  NO. \_\_\_\_\_ YES. \_\_\_\_\_ Don't know.

10. Status of System/ Project:

\_\_\_\_\_ This is a new system/ project in development.

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? 1996

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

X  NO. The [redacted] is merely a name change accompanying a [redacted] [redacted] The user accounts for system administration and maintenance in the [redacted] do not involve a change in the type of records maintained by the [redacted] the category of individuals on whom these records are maintained, or the use or dissemination of this information from the system.

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[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.

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 PTA: Child Pornography Victim Assistance Tracking System (CPVA)

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

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

NAME OF SYSTEM / PROJECT: Child Pornography Victim Assistance Tracking System  
(CPVA)

BIKR FBI Unique Asset ID: SYS-000199

Derived From:	<b>SYSTEM/PROJECT POC</b>	<b>FBI OGC/PCLU POC</b>
Classified By:	Name: [redacted] Management	Name: AGC [redacted]
Reason:	& Program Analyst	Phone: [redacted]
Declassify On:	Program Office: OVA	Room Number: 7350 JEH
	Division: Criminal Investigative Division (CID)	
	Phone: [redacted]	
	Room Number: 8977 JEH	

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FBI DIVISION INTERMEDIATE APPROVALS:

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Director's Office, Office of Victim Assistance (OVA)	Signature: [redacted] Date signed: 3/19/11 Name: [redacted] Title: Supervisory Victim Assistance Clinical PM	Signature: [redacted] Date signed: 3/21/11 Name: James J. Landon Title: Deputy General Counsel/ Privacy and Civil Liberties Officer
FBIHQ Division: Information Technology Services Division (ITSD)	Signature: [redacted] Date signed: 3/27/11 Name: [redacted] Title: IT Spec., Intel. Applications Support Unit	Signature: [redacted] Date signed: 3-24-11 Name: [redacted] Title: IT Specialist, IT Branch

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FBI PTA: Child Pornography Victim Assistance Tracking System (CPVA)

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:

This PTA is prepared in conjunction with a change in the way the FBI's Office of Victim Assistance (OVA) electronically stores data pertaining to victims of child pornography. The data previously stored in the Tracking System's Access database is now being stored in an Oracle database. This change does not create any additional privacy issues. The data remains accessible only by FBI personnel with a specific need-to-know, presently consisting of  OVA employees, along with any necessary IT personnel supporting the Tracking System. In CP cases investigated by the FBI, local FBI Victim Specialists add the same victim information to the Department of Justice's Victim Notification System (VNS).

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Applicable SORN(s): FBI Central Records System, DOI/FBI-002, 66 Fed. Reg. 29994; 66 Fed. Reg. 17200; 63 Fed. Reg. 8671

The Central Records System contains information on individuals "who relate in any manner to official FBI investigations including . . . victims." 63 Fed. Reg. 8671.


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](http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd)

SORN/SORN revision(s) required?  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:

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

Signature:   
Date Signed: 2/25/11

## 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 PTA is prepared in conjunction with the internal transfer of personally identifiable information (PII) about child pornography victims from a Microsoft Access database to an Oracle-based database.

Pursuant to the Crime Victims' Rights Act of 2004 (18 U.S.C. § 3771) and the Child Victims' Rights Act (18 U.S.C. § 3509), a victim of child pornography or exploitation (CP) is entitled to notice each and every time the victim's image is the basis for a federal CP investigation or prosecution. In addition, crime victims have the right to submit a Victim Impact Statement (VIS) in related legal or parole proceedings.

The Child Pornography Victim Assistance (CPVA) program is a joint initiative between the FBI, DOJ (the Child Exploitation and Obscenity Section as well as U.S. Attorney offices), the United States Postal Inspection Service (USPIS), Immigration and Customs Enforcement (ICE) and the National Center for Missing and Exploited Children (NCMEC).<sup>1</sup> CPVA's goal is to streamline the notification process in order to minimize the trauma of numerous, never-ending contacts which may occur as CP images subsequently appear in an infinite number of potential investigations.

DOJ component responsibilities for victim assistance programs in general and CP victims in particular are outlined in the *Attorney General Guidelines for Witness and Victim Assistance* (May 2005) (*Guidelines*). In addition to statutory responsibilities, the *Guidelines* require the FBI, when it is the lead investigating agency, to notify crime victims of their rights and offer victim assistance services. *Guidelines*, section III.I. Victims are free to decline to receive further services or assistance. In such cases, however, the *Guidelines* recommend properly documenting the victim's informed declination of mandatory rights and services.<sup>2</sup> *Id.*

Within the FBI, the Office of Victim Assistance (OVA) coordinates the CPVA program. In order to facilitate victim assistance while avoiding trauma to victims resulting from repeated and unwanted notice by law enforcement (LE) agencies and U.S. Attorney's Offices of additional incidents involving their images, OVA maintains a



<sup>1</sup> NCMEC is a private non-profit organization established by the Congress to provide services nationwide for families and professionals in the prevention of abducted, endangered and sexually exploited children. See 42 U.S.C. § 5771, et seq.

<sup>2</sup> Due to the nature of modern technology, a CP victim's image may repeatedly appear in multiple investigations over a number of years. Because of the traumatic effects of repeated notifications, many CP victims choose to waive their rights to notice in each and every investigation.

## FBI PTA: Child Pornography Victim Assistance Tracking System (CPVA)

tracking system (the CPVA containing the names, contact information and notification preferences of previously identified CP victims in matters investigated by federal, state or local LE agencies.<sup>3</sup> CPVA contains limited victim biographical data including name, address, race and date of birth (DOB), contact information for a parent or legal guardian of a minor victim, POC information for any LE agency that has previously conducted an investigation based on images of the same victim and whether the victim has previously waived (opted out of) the right to receive notice of additional investigations or to submit a VIS. If a particular victim has not previously waived that right, he/she will continue to be notified by LE agencies whenever the victim's image appears in any subsequent investigation. CP victims who have previously opted out of notice and VIS rights and wish to change their mind may do so by contacting OVA, the local FBI Victim Specialist or the local U.S. Attorney's Office.

The process by which victim information is ultimately placed in the CPVA DB begins when a LE agency recovers pornographic images depicting CP victims and submits the images to NCMEC for identification of victims depicted. NCMEC

  NCMEC assigns a series name, such as "Blossom," to the images and notifies the contributing agency that no match was found. If the images match one or more victims already contained in CRIS, NCMEC notifies the investigating agency of the series name(s) assigned to any group of images in which the victim was depicted and also provides contact information for the POC of the identified series.<sup>4</sup>

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When matching images are submitted to NCMEC by a federal LE agency, NCMEC also notifies OVA that a match has occurred.<sup>5</sup> OVA prepares and forwards a Victim Information Report (VIR), containing victim information from CPVA, to the investigating federal agency.<sup>6</sup> The VIR includes victim identification (name, DOB, address, telephone number, and the relationship of the legal guardian, if any, to the victim) and whether the victim has previously opted out of notification and VIS submission rights. Unless the victim has opted out, the VIR also identifies the method (letter, e-mail

<sup>3</sup> The identification, contact and notice preference information is provided to OVA by the investigating LE agency, pursuant to provisions of the Child Victim's Rights Act. The Department of Justice maintains a Victim Notification System (VNS) containing contact information to ensure that crime victims receive post-arrest notifications of judicial and custodial (i.e., parole) proceedings. Where the FBI is the investigating LE agency, the local FBI Victim Specialist adds the victim information to the VNS.

<sup>4</sup> A series may contain images of more than one victim.

<sup>5</sup> NCMEC provides OVA with the names of the series in which a victim appears along with a NCMEC tracking number. NCMEC does not possess information identifying any victim other than the name of the series in which a particular victim was depicted.

<sup>6</sup> VIRs are provided only to federal LE agencies; they are not provided to state or local LE agencies.

FBI PTA: Child Pornography Victim Assistance Tracking System (CPVA)

or both) by which the victim prefers to be contacted by LE agencies.<sup>7</sup> If the named series depicts more than one identified victim, the VIR provides information for each victim.

Whenever OVA is notified of a new series by NCMEC, OVA requests the investigating LE agency obtain notification preference information from the victim(s). When the FBI itself is the investigating agency, victims are contacted by the Case Agent or the local FBI Victim Specialist to obtain the information needed to complete the OVA Notification Preference form. The form seeks basic identification information (name, DOB, address, phone numbers, e-mail address, race and gender) and contains check boxes by which the victim may waive notification and VIS submission rights. After the form is signed by the victim (and parent or guardian if appropriate), it is forwarded to OVA, where the victim's information and preferences are entered into CPVA. The local Victim Specialist also enters the victim's information and preferences into DOJ's Victim Notification System (VNS). See note 3, supra.

Similarly, in cases being investigated by another LE agency in which one or more victims are identified in a new named series, OVA requests the investigating agency obtain and forward victim preference information. The OVA's Notification Preference form is available for use by other LE agencies, but the investigating agency is free to collect and forward victim information and preferences to OVA in any manner they choose.<sup>8</sup>

On a quarterly basis, NCMEC also provides OVA with a cumulative listing of all named series submitted by both federal and non-federal LE agencies, along with an agency POC. OVA reviews this information to determine whether the victim's preferences are already contained in CPVA; if not, OVA requests the pertinent LE agency to obtain that information.

Because the Tracking System contains sensitive data, access is restricted to [redacted] FBI employees with a specific need to know: the CPVA Program Manager [redacted] [redacted] While the Program Manager has the ability to grant access privileges to additional personnel, there are no plans at present for such access.

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The information in CPVA resides on the FBI's secure internal network, Secret Enclave. Secret Enclave is accredited to store information classified at or below the SECRET level. [redacted] Victim Notification Preference forms [redacted] [redacted] These forms are not

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<sup>7</sup> Once a CP victim becomes an adult, the victim's parent or legal guardian information is no longer provided in the VIR; the information remains in the CPVA DB, although RMD will work with OVA to determine the applicable retention period.

<sup>8</sup> While investigating LE agencies are required by the CPVA to provide OVA with victim notification and VIS preferences, OVA has no authority to compel non-FBI entities to provide such information.

<sup>9</sup> A limited number of FBI IT personnel, serving as system administrators, also have access to the DB for maintenance and security purposes.

## FBI PTA: Child Pornography Victim Assistance Tracking System (CPVA)

filed, nor may they be retrieved, by the name of a CP victim; the forms are instead filed by the Series Name assigned by NCMEC.

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

\_\_\_\_\_ 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).

\_\_\_\_\_ 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.

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

YES

## FBI PTA: Child Pornography Victim Assistance Tracking System (CPVA)

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

NO

As previously explained, CPVA contains information obtained by investigating LE agencies regarding the notice and VIS submission preferences of a CP victim (or a parent or guardian, where appropriate). While the information results from one or more CP investigations, CPVA itself does not directly support an investigation or assessment.

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

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

The Notification Preference form used by the FBI to collect information from CP Victims includes a written Privacy Act (e)(3) statement.

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?

FBI PTA: Child Pornography Victim Assistance Tracking System (CPVA)

 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:

CPVA is not separately accredited because it is an Oracle-based application residing on Secret Enclave, the FBI's secure internal network, and is not itself an IT system. Secret Enclave has Authority to Operate (ATO) through March 14, 2011 and is presently undergoing re-certification. Secret Enclave's C & A information appears below.

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? December 2006.

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.



FBI PTA: Child Pornography Victim Assistance Tracking System (CPVA)

\_\_\_\_\_ 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:**

BIKR FBI Unique Asset ID: 2010-019-01-P-404-142-9999

Derived From: Classified By: Reason: Declassify On:	<b>SYSTEM/PROJECT POC</b> Name: [Redacted] Program Office: Division: CD Phone: [Redacted] Room Number: 4640 JEH	<b>FBI OGC/PCLU POC</b> Name: [Redacted] 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 Monica McLean
Program Division: National Security Branch	Signature: [Redacted] Date signed: 6/2/2011 Name: Title: JT PROJECT MANAGER	Signature: [Redacted] Date signed: 6-22-11 Name: Title: SA, PRIVACY OFFICER, DS
FBIHQ Division: Counterintelligence Division	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.)

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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): An EC has been submitted in lieu of a PIA.

Applicable SORN(s): \_\_\_\_\_

Notify FBI RMD/RIDS per MIOG 190.2.3?  No  Yes--See sample EC on PCLU intranet website here: [http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form\\_for\\_miog190-2-3\\_ec.wpd](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 (eX3) statements for related forms?  No  Yes (indicate forms affected):

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

Other:

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

Signature:   
Date Signed: 7/2/11

UNCLASSIFIED

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

[redacted] has been created to enable [redacted] will enable authorized users to [redacted] This will enhance the FBI's ability to [redacted]

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[redacted] will be a "stand alone" system that will not be connected to the network or other systems. Information in the system will be [redacted] [redacted] This information is currently prohibited from inclusion on the existing TS/SCI network, due to concern with its sensitive content. The information in the system will be used along with other [redacted] [redacted] personnel, including contractors,<sup>1</sup> will be the only individuals with access to the system. The system itself will consist of a stand alone network, with terminals provided to each user.

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

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

YES [If yes, please continue.]

<sup>1</sup> The contractors who will be involved with this system have not been chosen yet. The choice of contractor will affect the choice of [redacted] referenced previously.

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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).

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: Anticipated date of Jun 2011

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

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

Confidentiality:  Low  Moderate  High  Undefined

Integrity:  Low  Moderate  High  Undefined

Availability:  Low  Moderate  High  Undefined

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

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

NO

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 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.]

**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 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.]

Unclassified

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

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

NAME OF SYSTEM / PROJECT: Financial Disclosure Forms Analyzer (FDF-A)

Derived From:	<b>SYSTEM/PROJECT POC</b>	<b>FBI OGC/PCLU POC</b>
Classified By:	Name: [Redacted]	Name: [Redacted]
Reason:	Program Office: AIU	Phone: [Redacted]
Declassify On:	Division: Security	Room Number: JEH 7350
	Phone: [Redacted]	
	Room Number: WB-420	

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#### FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Office of IT Program Management	Signature: [Redacted] Date signed: 3/15/10 Name: [Redacted] Title: SMIS Program Manager	Signature: [Redacted] Date signed: 3/15/10 Name: [Redacted] Title: ITB Privacy Officer
FBIHQ Division: Security Division	Signature: [Redacted] Date signed: 3/15/2010 Name: [Redacted] Title: FDF-A Program Manager	Signature: [Handwritten Signature] Date signed: 03/15/2010 Name: Michael J. Folmar Title: Assistant Director

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

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

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

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

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

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Unclassified