

UNCLASSIFIED

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?

The system was developed in Oct 2005

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.)

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_____ 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.

The information collected via physical tests to evaluate fitness has changed over the years to stay current with new research in the fitness industry. For example, core strength was once tested through sit-ups, and then it was abdominal crunches. It is now is tested with the plank hold. The basic biographic information collected remains the same.

_____ 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

UNCLASSIFIED

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM / PROJECT: Commercial Payments Unit Invoice Management System (CPUIMS)

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
	Name: [redacted]	Name: [redacted]
	Program Office: Information Technology Operations Division (ITOD)	Phone: [redacted] Room Number: 7338
	Division: Financial Systems Unit Phone: [redacted] Room Number: 1302	

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FBI DIVISION INTERMEDIATE APPROVALS [complete as necessary]

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: Financial Systems Unit	Signature: [redacted] Date signed: 5/28/2009 Name: [redacted] Title: IT Specialist	Signature: [redacted] Date signed: 6/11/09 Name: [redacted] Title: ITOD Division Privacy Officer
FBIHQ Division:	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

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Additional division(s) approvals may be added as warranted:

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

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

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

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

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

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FBI PTA: CPUIMS

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): DOJ-001, Accounting Systems for the Department of Justice (DOJ).

Notify FBI RMD/RIDS per MIOG 190.2.3? No Yes (see sample EC on PCLU intranet website).

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


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

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

Other:

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

Signature:
Date Signed:


6/18/09

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. (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.):

The Finance Division's Commercial Payments Unit Invoice Management System (CPUIMS) is a general support system in operation since May 17, 2000, supporting the FBI mission by providing an Electronic Document Management System (EDMS) that automates and manages the processing of commercial invoices within the Commercial Payments Unit (CPU). CPUIMS provides Commercial Payments and Confidential Services Unit (CPCSU) supervisors with an effective tool to manage the invoice payment workflow in real-time. The EDMS workflow employs standard routes and business practices that invoices follow throughout the payment process by utilizing document scanning and imaging software for viewing, organizing, filing, and storing commercial invoices.

CPUIMS [redacted] Commercial off the Shelf (COTS) product with customization per CPU's requirements. [redacted] CPUIMS [redacted] CPUIMS

[redacted]

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CPUIMS [redacted]
[redacted]
[redacted] CPUIMS
users will be logging into the FBINET domain [redacted] CPUIMS
workstations are located in authorized FBI controlled facilities. [redacted]

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[redacted]
[redacted] Invoices are scanned on CPCSU client workstations [redacted]
[redacted]
[redacted] to allow users to view the original invoice
at any step in the process.

The CPUIMS [redacted]
[redacted] CPUIMS [redacted]
[redacted] defined by the CPUIMS system.

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[redacted] COTR/CO users to input, validate, and index the invoice information that
they submit to CPCSU for processing in CPUIMS. [redacted]
[redacted]

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CPUIMS [redacted] Financial Management System
(FMS). [redacted] FMS mainframe application [redacted]
Access to CPUIMS requires FBI personnel to have and maintain a user account on the FBINET domain [redacted]
[redacted] Users must authenticate into the FBINET domain in order to log into the CPUIMS
workstation. User access to CPUIMS application [redacted]

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[redacted]

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CPUIMS

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. [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.

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

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

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

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

 X SSNs are important for other reasons. Describe: Certain vendors

 uses their SSN on invoices

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 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?

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CPUIMS

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

_____ NO.

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

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

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

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

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

X YES. If yes, provide date of last C&A certification/re-certification: JANUARY 24, 2008

_____ Don't Know.

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

X NO.

_____ Don't know.

___ YES. If yes, please provide the date and name or title of the OMB submission:

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

X NO.

_____ YES.

_____ Don't know.

10. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? May 17, 2000

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

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CPUIMS

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

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

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

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

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

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

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

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

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

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

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

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

Other. [Provide brief explanation]:

3. Does a PIA for this system/project already exist? NO. YES. If yes:

a. Provide date/title of the PIA:

b. Has the system/project undergone any significant changes since the PIA? NO. YES.

[The PTA is now complete and after division approval(s) should be submitted to FBI 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) Cover Sheet (OGC/PCLU (Rev. 07/06/07))

NAME OF SYSTEM: FBI Automated Messaging System [redacted]

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FBI SYSTEM CONTACT PERSON Name: [redacted] (Program Manger and [redacted] (System Development Manager) Program Office: OIPM Division: Information Technology Branch Phone: [redacted] Room Number: 9664 Date PTA submitted for approval:	FBI OGC/PCLU POC Name: [redacted] Phone: [redacted] Room Number:
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FBI DIVISION APPROVALS. PTA PIA (and/or PTA) should be prepared/approved by the cognizant program management in collaboration with IT, security, and end-user management and OGC/PCLU. (PIAs/PTAs relating to electronic forms/questionnaires implicating the Paperwork Reduction Act should also be coordinated with the RMD Forms Desk.) If the subject of a PTA/PIA is under the program cognizance of an FBIHQ Division, prior to forwarding to OGC the PTA/PIA must also be referred to the FBIHQ Division for program review and approval, if required by the FBIHQ Division.

	Program Division: OIPM	FBIHQ Division: OCTO
Program Manager (or other appropriate executive as Division determines)	Signature: [redacted] Date signed: 5/29/08 Name: [redacted] Title: [redacted]	Signature: [redacted] Date signed: 5/29/08 Name: [redacted] Title: FAMS COTR
Division Privacy Officer	Signature: [redacted] Date signed: 5/29/2008 Name: [redacted] Title: Privacy Officer - OIPM	Signature: [redacted] Date signed: 5/29/08 Name: [redacted] Title: Privacy Officer

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Upon Division approval, forward signed hard copy plus electronic copy to OGC/PCLU (JEH Room 7338).

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature: [redacted] Date Signed: 9/29/08 Name: David C. Larson Title: Deputy General Counsel
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Upon final FBI approval, FBI OGC will distribute as follows:

1 - Signed original to 190-HQ-C1321794

Copies:

- 1 - DOJ Privacy and Civil Liberties Office-Main Justice, Room 4259
- 1 - OGC/PCLU intranet website
- 2 - FBI OCIO / OIPP
- 1 - PCLU Library
- 1 - FBI SecD (electronic copy via e-mail)
- 1 - PCLU Tickler
- 2* - Program Division POC /Privacy Officer
- 2*- FBIHQ Division POC /Privacy Officer

(*please reproduce as needed for Program/Division file(s))

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 10-21-2014 BY NSICG/C32W33B91

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(OGC/PCLU (Rev. 07/06/07))

NAME OF SYSTEM: FBI Automated Messaging System [redacted]

b7E

For efficiency, a system owner or program manager can be aided in making the determination of whether a Privacy Impact Assessment (PIA) is required by conducting and following Privacy Threshold Analysis (PTA).

Whether or not a PIA is required, the system owner/program manager should consult with the FBI Records Management Division (RMD) to identify and resolve any records issues relating to information in the system.

A PTA contains basic questions about the nature of the system in addition to a basic system description. The questions are as follows:

A. General System Description: Please briefly describe:

The FBI Automated Messaging System (FAMS) is the replacement for the legacy SAMNET System. FAMS receives and disseminates organizational message traffic from Other Government Agencies [redacted]

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1. Type of information in the system:

The system receives Intelligence Information Reports (IIR) [redacted]

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a. If the system is solely related to internal government operations please provide a brief explanation of the quantity and type of employee/contractor information:

The system is used for automated internal routing of messages received by the FBI. The system only serves as a conduit for these messages, and routing is accomplished automatically by computer based on addressing parameters in each message. No users access the content of the transiting messages while within the boundaries of the system. If the messages are retained or used by the FBI, it is done after the messages have left the FAMS system. The system does keep a backup of messages as a contingency to ensure continuity of operations in case of casualty or other system disruption. However, the backup data would only be used to continue message routing upon system restoration, no users access the content of the backup data, and the backup data resides on the system for no longer than 30 days.

2. Purpose for collecting the information and how it will be used:

FAMS is a transport mechanism for organizational messages. The data is not collected but transmitted to other government agencies and internal entities within the FBI for the purpose of responding to requests or action items from other agencies.

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

FAMS consists of two enclaves: Secret [redacted] and Top Secret/SCI [redacted]

[redacted] Both FAMS systems [redacted]

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4. Means of accessing the system and transmitting information to and from the system:

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(OGC/PCLU (Rev. 07/06/07))

NAME OF SYSTEM: FBI Automated Messaging System [redacted]

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Message content for customers is not accessed within the system. [redacted]

Access to

administrative functions of the system are limited to privileged operators [redacted] Administrative functions consists of creating accounts for customers, unlocking accounts and setting up profiles for message delivery. These privilege users are [redacted] System Administrators.

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[redacted]

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

Only the System Administrator and Information System Security Officers have access to the controls for ensuring that only authorized persons can access the information. FAMS [redacted]

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[redacted] No one can access the system who is not authorized to do so.

6. Who outside the FBI will have access to the information in the system and controls for ensuring that only authorized persons can access the information:

No personnel can access the system from outside the FBI. Information from the system is sent to other Organizations by FBI personnel. The FAMS system can send organizational message traffic to other agencies

7. Has this system been certified and accredited by the FBI Security Divisions? Yes No

8. Is this system encompassed within an OMB-300? Yes No Don't Know
(A copy of the OMB 300 is available on the FBI Sharepoint Server. A hardcopy cannot be printed without losing data.)

I. Was the system developed prior to April 17, 2003?

YES (If "yes," proceed to Question 1.)

NO (If "no," proceed to Section II.)

1. Has the system undergone any significant changes since April 17, 2003?

YES If "yes," please explain the nature of those changes: N/A

(Continue to Question 2.)

NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(OGC/PCLU (Rev. 07/06/07))

NAME OF SYSTEM: FBI Automated Messaging System

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2. Do the changes involve the collection, maintenance, or dissemination of information in identifiable form about individuals?

YES (If "yes," please proceed to Question 3.)

NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

3. Is the system solely related to internal government operations? Yes

YES If "yes," is this a Major Information System (as listed on OGC's FBINET website)?:

Yes. (If "yes," a full PIA is required. PTA is complete.)

No. (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required. (FBI and DOJ reviewing officials reserve the right to require a PIA.))

NO (If "no," go to section III to determine if a full or short-form PIA is required.)

II. For systems developed after April 17, 2003.

1. What is the purpose of the system? (Answer in detail unless details already provided in A. 2 above):

See Part A above.

(Continue to Question 2.)

2. Does the system collect, maintain or disseminate information in identifiable form about individuals?

YES (If "yes," please proceed to Question 3.)

NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

As discussed above, this system is merely a conduit for transiting messages.

Note: Although this would normally complete the PTA based on absence of PII, we are continuing further to document that even if the system were viewed as containing PII, the system would also exempt from completing a PIA based on being solely related to internal government operations.

3. Is the system solely related to internal government operations?

YES If "yes," is this a Major Information System (as listed on OGC's FBINET website)?:

Yes. (If "yes," a full PIA is required. PTA is complete.)

SENSITIVE BUT UNCLASSIFIED

FBI Privacy Threshold Analysis (PTA) Cover Sheet

(OGC/PCLU (Rev. 05/02/07))

NAME OF SYSTEM: DEPUTATION DATABASE

Derived From: Classified By: Reason: Declassify On:	SYSTEM POC Name: [Redacted] Program Office: ITB Division: IT Operations Phone: [Redacted] Room Number: 8979	FBI OGC/PCLU POC Name: [Redacted] Phone: [Redacted] Room Number: 7338
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FBI DIVISION APPROVALS. A PIA (and/or PTA) should be prepared/approved by the cognizant program management in collaboration with IT, security, and end-user management and OGC/PCLU. (PIAs/PTAs relating to electronic forms/questionnaires implicating the Paperwork Reduction Act should also be coordinated with the RMD Forms Desk.) If the subject of a PTA/PIA is under the program cognizance of an FBIHQ Division, prior to forwarding to OGC the PTA/PIA must also be referred to the FBIHQ Division for program review and approval, if required by the FBIHQ Division.

	Program Division:	FBIHQ Division: Criminal Investigation
Program Manager (or other appropriate executive as Division determines)	Signature: Date signed: Name: Title:	Signature: /s/ Date signed: 5/21/08 Name: [Redacted] Title: Program Manager
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: /s/ Date signed: 5/21/08 Name: [Redacted] Title: CID Division Policy Officer

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Upon Division approval, forward signed hard copy plus electronic copy to OGC/PCLU (JEH Room 7338).

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature: /s/ Date Signed: 6/21/08 Name: David C. Larson Title: Deputy General Counsel
---	--

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

1 - Signed original to 190-HQ-C1321794

Copies:

- | | |
|--|-------------------------------|
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| 2 - FBI OCIO / OIPP | 1 - PCLU UC |
| 1 - FBI SecD (electronic copy via e-mail) | 1 - PCLU Library |
| 2* - Program Division POC /Privacy Officer | 1 - PCLU Tickler |
| 2*- FBIHQ Division POC /Privacy Officer | |

(*please reproduce as needed for Program/Division file(s))

SENSITIVE BUT UNCLASSIFIED

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: DEPUTATION DATABASE

For efficiency, a system owner or program manager can be aided in making the determination of whether a Privacy Impact Assessment (PIA) is required by conducting and following Privacy Threshold Analysis (PTA).

Whether or not a PIA is required, the system owner/program manager should consult with the FBI Records Management Division (RMD) to identify and resolve any records issues relating to information in the system.

A PTA contains basic questions about the nature of the system in addition to a basic system description. The questions are as follows:

A. General System Description: Please briefly describe:

1. Type of information in the system:

The database contains the task force names for each of the FBI's field offices, the program that has oversight of the task force, the type of deputation requested (Title 18 or Title 21), case file number, task force officers names, social security numbers, and dates of deputation.

a. If the system is solely related to internal government operations please provide a brief explanation of the quantity and type of employee/contractor information:

The database is holding historic information concerning the FBI's task force officers. This information is used to provide the Director with the number of deputized officers and the types of deputations they are holding. The information is also used to remind field offices to deputize officers whose deputation are getting ready to expire.

2. Purpose for collecting the information and how it will be used:

The information is collected as a way to track all deputized task force officers and to provide information concerning the officers to the Director and the FBI's field offices.

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

The Deputation Database [redacted]
[redacted]

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4. Means of accessing the system and transmitting information to and from the system:

The application will have a link off the FBI Homepage (listed under applications). Verification for access to the application is done using the customer's FBINET username through Active Directory. If successful, the username is searched in the application's User Table to verify access to the application. The application uses the Internet Explorer to present the application screens to the customers.

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: DEPUTATION DATABASE

Access will be limited to the Criminal Investigation Division Operational Support Section Administrative Unit at Headquarters and to employees responsible for the processing the deputation candidates in the Field Offices. The application has a role based security matrix for access and manipulation of the data. The application will have a System Administrator (ITOD) and an Owner (Criminal Investigation Division) who will have access to the User Table. It will be the Owner's responsibility for granting access to the database for the following roles: Reports Only, Read Only, Modify, and Owner. The Owner is the only one who grant access to the field offices. It will be the System Administrator's responsibility to grant access for the Admin and Owner roles.

6. Who outside the FBI will have access to the information in the system and controls for ensuring that only authorized persons can access the information:

No one outside the FBI will have access to the application.

7. Has this system been certified and accredited by the FBI Security Divisions? Yes No

8. Is this system encompassed within an OMB-300? Yes No Don't Know
(if yes, please attach copy of latest one.)

I. Was the system developed prior to April 17, 2003?

YES (If "yes," proceed to Question 1.)

NO (If "no," proceed to Section II.)

1. Has the system undergone any significant changes since April 17, 2003?

YES If "yes," please explain the nature of those changes:

(Continue to Question 2.)

NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

2. Do the changes involve the collection, maintenance, or dissemination of information in identifiable form about individuals?

YES (If "yes," please proceed to Question 3.)

NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

3. Is the system solely related to internal government operations?

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: DEPUTATION DATABASE

YES If "yes," is this a Major Information System (as listed on OGC's FBINET website)?:

Yes. (If "yes," a full PIA is required.. PTA is complete.)

No. (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required. (FBI and DOJ reviewing officials reserve the right to require a PIA.))

NO (If "no," go to section III to determine if a full or short-form PIA is required.)

II. For systems developed after April 17, 2003.

1. What is the purpose of the system? (Answer in detail unless details already provided in A. 2 above):

(Continue to Question 2.)

2. Does the system collect, maintain or disseminate information in identifiable form about individuals?

YES (If "yes," please proceed to Question 3.)

NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

3. Is the system solely related to internal government operations?

YES If "yes," is this a Major Information System (as listed on OGC's FBINET website)?:

Yes. (If "yes," a full PIA is required.. PTA is complete.)

No. (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required. (FBI and DOJ reviewing officials reserve the right to require a PIA.))

NO (If "no," go to section III to determine if a full or short-form PIA is required.)

III. Full or Short-Form PIA

1. Is the system a major information system (as listed on OGC's FBINET website)?

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: DEPUTATION DATABASE

YES (If "yes," a full PIA is required. PTA is complete.)

NO (If "no," please continue to question 2.)

2. Does the system involve routine information AND have limited use/access?

YES A short-form PIA is required. (I.e., you need only answer Questions 1.1, 1.2, 2.1, 3.1, 4.1, 5.1 (if appropriate), 6.2, 6.3, and 8.9 of the PIA template.) Please note that FBI and DOJ reviewing officials reserve the right to require completion of a full PIA. (PTA is complete---forward with PIA.)

NO (If "no," a full PIA is required. PTA is complete.)

FBI Privacy Threshold Analysis (PTA) Cover Sheet

(OGC/PCLU (Rev. 07/06/07))

NAME OF SYSTEM:

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<p>FBI SYSTEM CONTACT PERSON</p> <p>Name: <input type="text"/></p> <p>Program Office: <input type="text"/></p> <p><input type="text"/></p> <p>Division: Directorate of Intelligence</p> <p>Phone: <input type="text"/></p> <p>Room Number: 11715</p> <p>Date PTA submitted for approval: 12/31/2007</p>	<p>FBI OGC/PCLU POC</p> <p>Name: AGC <input type="text"/></p> <p><input type="text"/></p> <p>Phone: <input type="text"/></p> <p>Room Number: 7338</p>
--	--

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FBI DIVISION APPROVALS.

	Program Division: Directorate of Intelligence <input type="text"/>	FBIHQ Division: Directorate of Intelligence <input type="text"/>
	<input type="text"/>	<input type="text"/>
Program Manager (or other appropriate executive as Division determines)	<p>Signature:</p> <p>Date signed: 2/4/2008</p> <p>Name: <input type="text"/></p> <p>Title: Unit Chief</p>	
Division Privacy Officer	<p>Signature:</p> <p>Date signed: 1/16/2008</p> <p>Name: <input type="text"/></p> <p>Title: Division Privacy Officer</p>	<p>Signature:</p> <p>Date signed: 1/16/2008</p> <p>Name: <input type="text"/></p> <p>Title: Division Privacy Officer</p>

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Upon Division approval, forward signed hard copy plus electronic copy to OGC/PCLU (JEH Room 7338).

FINAL FBI APPROVAL:

<p>FBI Privacy and Civil Liberties Officer</p>	<p>Signature:</p> <p>Date Signed: 2/14/2008</p> <p>Name: David C. Larson</p> <p>Title: Acting Deputy General Counsel</p>

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

1 - Signed original to 190-HQ-C1321794

Copies:

1 - DOJ Privacy and Civil Liberties Office-Main Justice, Room 4259

2 - FBI OCIO / OIPP

1 - FBI SecD (electronic copy via e-mail)

2* - Program Division POC /Privacy Officer

2*- FBIHQ Division POC /Privacy Officer

(*please reproduce as needed for Program/Division file(s))

1 - OGC\PCLU intranet website

1 - PCLU Library

1 - PCLU Tickler

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(OGC/PCLU (Rev. 07/06/07))

NAME OF SYSTEM: [redacted]

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For efficiency, a system owner or program manager can be aided in making the determination of whether a Privacy Impact Assessment (PIA) is required by conducting and following Privacy Threshold Analysis (PTA).

Whether or not a PIA is required, the system owner/program manager should consult with the FBI Records Management Division (RMD) to identify and resolve any records issues relating to information in the system.

A PTA contains basic questions about the nature of the system in addition to a basic system description. The questions are as follows:

A. General System Description:

1. Type of information in the system:

[redacted] will store information about [redacted] planned or conducted by FBI field offices. It will include [redacted]

[Large redacted block]

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The information which will populate the [redacted] database is administrative and transactional. It will be provided to an FBIHQ employee with [redacted] privileges by FBIHQ program managers or field office personnel. [redacted] will populate a narrative field in the database. That information will exist independently in the FBI's system of records. Its inclusion in the database is necessary in order for the FBI to accurately and efficiently address its Departmental reporting and retention requirements and address anticipated reporting needs.

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[redacted] data will include:

[Large redacted block]

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[Redacted line]

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NAME OF SYSTEM: [redacted]

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[Large redacted area]

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All of the data which populates or otherwise appears in the [redacted] database will exist separately and independently in the FBI's system of records. [redacted] The system will allow the FBI to fulfill its obligation to the Department of Justice to report about [redacted] and the approval of (and justification for) [redacted]

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a. If the system is solely related to internal government operations please provide a brief explanation of the quantity and type of employee/contractor information: N/A

2. Purpose for collecting the information and how it will be used:

[redacted] a relatively new, but critical, FBI responsibility. The system will allow the FBI to fulfill its obligation to the Department of Justice to report about [redacted] and the approval of (and justification for) [redacted] [redacted] also permits the FBI to comply with a requirement in the Attorney General's Supplemental Guidelines for [redacted] requiring the FBI to maintain a database or records system that permits the prompt retrieval of certain sorts of information.

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

[redacted] will store administrative information necessary to permit the FBI to discharge its reporting obligations and manage the approval [redacted]

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[redacted] as presently configured, is a Microsoft Access-based relational database which provides users with a simple, menu-driven mechanism to enter, store, query and report information [redacted] The system relies heavily upon forced entry choices (drop-down menus), thereby significantly increasing the accuracy and reliability of captured information. Automated, structured reports reduce the possibility of reporting errors while providing recipients with standardized reporting. A

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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(OGC/PCLU (Rev. 07/06/07))

NAME OF SYSTEM:

[redacted]

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password restricted-access user interface enhances security and reduces the likelihood of operator error. Existing password protection will, in the future, permit systems administrators the ability to track and identify user activity.

4. Means of accessing the system and transmitting information to and from the system:

The [redacted] database will be used by program managers in the Directorate of Intelligence to comply with Departmental record retention and reporting requirements. As it will initially be implemented, only a limited number of Directorate of Intelligence personnel will have [redacted] privileges. They will perform all data entry, searching, and report production operations based upon information provided by field offices and other components. Once it is populated with real data, the system will be classified at the "Secret" level. Access to the system will require physical access to a classified, FBINET-capable computer as well as authorized access to a shared folder located on a server to which some Directorate of Intelligence personnel are mapped. Although there will be few authorized users of this system [redacted] is also password protected. Usage of the system will be auditable (beyond presently possible network activity auditing) in the future, pending the completion of system enhancements.

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The information appearing in the [redacted] system will be, for the most part, administrative. The risk to the FBI and the harm to the national security which would result from the unauthorized disclosure of information such as [redacted] [redacted] could, cumulatively, be serious, but the Directorate of Intelligence believes that the protections in place adequately ensure that that data will remain secure.

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All of the data which populates or otherwise appears in the [redacted] database will exist separately and independently in the FBI's system of records. Decisions to index any of that data in the FBI's system of records will be made by field offices or other FBI components on the basis of established indexing policy. Indexing of records or other information in the [redacted] system will be prohibited and no such indexing will occur.

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As the [redacted] develops momentum, it is likely that the Directorate of Intelligence will consider the distribution of limited access to the database (e.g. certain data entry forms) to field offices via the FBI's secure Intranet. An amended Privacy Threshold Analysis or Privacy Impact Assessment will precede any such change.

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

A very small number of users (program managers assigned to the Directorate of Intelligence [redacted] [redacted] have administrative (including data entry and modification) privileges. A larger group within the Directorate of Intelligence will have "read only" and querying capability.

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The Supplemental Guidelines require reporting from the FBI to the Department of Justice's National Security Division and/or the Deputy Attorney General. Certain reports are, thereafter, forwarded by the National Security Division to the Attorney General or the Deputy Attorney General. Some of the information in the database will be shared by the FBI's Directorate of Intelligence, its owner, with the Office of the General Counsel and other FBI components.

6. Who outside the FBI will have access to the information in the system and controls for ensuring that only authorized persons can access the information:

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(OGC/PCLU (Rev. 07/06/07))

NAME OF SYSTEM:

[Redacted]

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No dissemination of the data in the database to any entity outside of the Department of Justice is planned at this time.

[Redacted]

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[Redacted]

may, in the future, request information about the database or the reports derived from it.

7. Has this system been certified and accredited by the FBI Security Divisions? Yes No

Certification and accreditation have not been sought for this small, classified, program-specific access database for reasons related to its limited purpose, small size, and restricted access. Disseminable reports generated by the database were previously reviewed by the Security Division.

8. Is this system encompassed within an OMB-300? Yes No Don't Know

(if yes, please attach copy of latest one.)

I. Was the system developed prior to April 17, 2003?

YES (If "yes," proceed to Question 1.)

NO (If "no," proceed to Section II.)

1. Has the system undergone any significant changes since April 17, 2003?

YES If "yes," please explain the nature of those changes:

(Continue to Question 2.)

NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

2. Do the changes involve the collection, maintenance, or dissemination of information in identifiable form about individuals?

YES (If "yes," please proceed to Question 3.)

NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

3. Is the system solely related to internal government operations?

YES If "yes," is this a Major Information System (as listed on OGC's FBINET website)?:

Yes. (If "yes," a full PIA is required.. PTA is complete.)

No. (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required. (FBI and DOJ reviewing officials reserve the right to require a PIA.))

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(OGC/PCLU (Rev. 07/06/07))

NAME OF SYSTEM:

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NO (If "no," go to section III to determine if a full or short-form PIA is required.)

II. For systems developed after April 17, 2003.

1. What is the purpose of the system? (Answer in detail unless details already provided in A. 2 above):

See Section A.2.

(Continue to Question 2.)

2. Does the system collect, maintain or disseminate information in identifiable form about individuals?

YES (If "yes," please proceed to Question 3.)

NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

3. Is the system solely related to internal government operations?

YES If "yes," is this a Major Information System (as listed on OGC's FBINET website):

Yes. (If "yes," a full PIA is required.. PTA is complete.)

No. (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required. (FBI and DOJ reviewing officials reserve the right to require a PIA.))

NO (If "no," go to section III to determine if a full or short-form PIA is required.)

III. Full or Short-Form PIA

1. Is the system a major information system (as listed on OGC's FBINET website)?

YES (If "yes," a full PIA is required. PTA is complete.)

NO (If "no," please continue to question 2.)

2. Does the system involve routine information AND have limited use/access?

YES A short-form PIA is required. (I.e., you need only answer Questions 1.1, 1.2, 2.1, 3.1, 4.1, 5.1 (if appropriate), 6.2, 6.3, and 8.9 of the PIA template.) Please note that FBI and DOJ reviewing officials reserve the right to require completion of a full PIA. (PTA is

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(OGC/PCLU (Rev. 07/06/07))

NAME OF SYSTEM:

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complete---forward with PIA.)

__NO (If "no," a full PIA is required. PTA is complete.)

FBI Privacy Threshold Analysis (PTA) Cover Sheet

NAME OF SYSTEM: FTTF System

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<p>FBI SYSTEM CONTACT PERSON Name: Program Manager: Division: Counterterrorism Division Unit: Foreign Terrorist Tracking Task Force Phone: Date PTA submitted for approval: 8/16/2007</p>	<p>FBI OGC/PCLU POC Name: Phone: Room Number: LX-1 3S-126</p>
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FBI DIVISION APPROVALS. A PIA (and/or PTA) should be prepared/approved by the cognizant program management in collaboration with IT, security, and end-user management and OGC/PCLU. (PIAs/PTAs relating to electronic forms/questionnaires implicating the Paperwork Reduction Act should also be coordinated with the RMD Forms Desk.) If the subject of a PTA/PIA is under the program cognizance of an FBIHQ Division, prior to forwarding to OGC the PTA/PIA must also be referred to the FBIHQ Division for program review and approval, if required by the FBIHQ Division.

	Program Division: [insert division name]	FBIHQ Division: Counterterrorism Division
Program Manager (or other appropriate executive as Division determines)	Signature: Date signed: Name: Title:	Signature: /s/ Date signed: 8/22/2007 Name: Michael V. Caputo Title: Acting Section Chief, JTTF
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:

Upon Division approval, forward signed hard copy plus electronic copy to OGC/Privacy and Civil Liberties Law Unit (JEH Room 7338).

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature: /s/ Date Signed: 8/23/2007: Name: David C. Larson Title: Acting Deputy General Counsel
---	--

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

1 - Signed original to 190-HQ-C1321794

Copies to:

- | | |
|---|---|
| 1 - DOJ Privacy and Civil Liberties Office-Main Justice, Room 4259
1 - FBI OCIO
1 - FBI SecD (electronic copy via e-mail)
2*- Program Division POC /Privacy Officer
2*- FBIHQ Division POC /Privacy Officer
(*please reproduce as needed for Program/Division file(s)) | 1 - OGC/PCLU intranet website
1 - PCLU Library
1 - PCLU Tickler |
|---|---|

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: FTTTF [redacted]

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For efficiency, a system owner or program manager can be aided in making the determination of whether a Privacy Impact Assessment (PIA) is required by conducting and following Privacy Threshold Analysis (PTA).

Whether or not a PIA is required, the system owner/program manager should consult with the FBI Records Management Division (RMD) to identify and resolve any records issues relating to information in the system.

A PTA contains basic questions about the nature of the system in addition to a basic system description. The questions are as follows:

A. General System Description: Please briefly describe:

(U/FOUO) [redacted] FTTTF System. [redacted] The FTTTF System is the subject of a PIA.¹ The FTTTF System PIA includes [redacted] This PTA addresses specifically [redacted]

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(U/FOUO) 1. Type of information in the system: [redacted] but do not contain information.

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a. If the system is solely related to internal government operations please provide a brief explanation of the quantity and type of employee/contractor information: n/a

(U/FOUO) 2. Purpose for collecting the information and how it will be used: n/a

(U/FOUO) 3. The system's structure (including components/subsystems): [redacted]

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(U/FOUO) 4. Means of accessing the system and transmitting information to and from the system: As stated in the FTTTF System PIA, "Access to the system is controlled under established security access controls to only cleared personnel, as certified and accredited (C&A) by the FBI."

(U/FOUO) 5. Who within FBI will have access to the information in the system and controls for ensuring that only authorized persons can access the information? See FTTTF System PIA. The system is managed and updated by assigned and cleared information technology specialists.

(U/FOUO) 6. Who outside the FBI will have access to the information in the system and controls for ensuring that only authorized persons can access the information? See FTTTF System PIA and update.

¹ On October 17, 2005, the FBI's Privacy and Civil Liberties Officer (formerly the FBI Senior Privacy Official) approved a Privacy Impact Assessment (PIA) for the FTTTF System, also known as the FTTTF Datamart, subject to conditions. The 10/17/2005 PIA was subsequently updated, on 9/14/2006, to encompass additional data sets approved by the FBI Privacy and Civil Liberties Officer. 66F-HQ-C1321794 serial 213 and 66F-HQ-C1321794 serial 307. As noted in the FTTTF PIA dated 10/17/2005, the FTTTF system is a national security system and is therefore exempt from the PIA requirements of section 208 of the E-Government Act of 2002, P.L. 107-347.

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: FTTTF

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Only authorized personnel, including contractors and other government agency task force members, have access to the information in the FTTTF system. These individuals are cleared, receive indoctrination and training and sign appropriate non-disclosure agreements and other access documentation prior to gaining access to the data. Access is regulated, maintained and documented by system administrators. The FTTTF has the ability to restrict user access and does restrict access in certain cases.

(U/FOUO) 7. Has this system been certified and accredited by the FBI Security Division? Yes
 No

(U/FOUO) 8. Is this system encompassed within an OMB-300? Yes No Don't Know
(Please attach copy of the current one.)

I. Was the system developed prior to April 17, 2003?

YES (If "yes," proceed to Question 1.)

NO (If "no," proceed to Section II.)

1. Has the system undergone any significant changes since April 17, 2003?

YES If "yes," please explain the nature of those changes: See FTTTF System PIA.

(Continue to Question 2.)

NO (If "no," the PTA is complete and should be sent to FBI OGC's Administrative Law Unit for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

2. Do the changes involve the collection, maintenance, or dissemination of information in identifiable form about individuals?

YES (If "yes," please proceed to Question 3.)

NO (If "no," the PTA is complete and should be sent to FBI OGC's Administrative Law Unit for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

3. Is the system solely related to internal government operations?

YES If "yes," please provide a brief explanation of a) the purpose of the system, and b) quantity and type of employee/contractor information:

NO (If the answer to Question 3 is "no" go to subsection III to determine if a full or short-form PIA is required.)

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: FTTTF [redacted]

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II. For systems developed after April 17, 2003.

- 1. What is the purpose of the system? (Answer in detail and proceed to Question 2.)
- 2. Does the system collect, maintain or disseminate information in identifiable form about individuals?
 - YES (If "yes," please proceed to Question 3.)
 - NO (If "no," the PTA is complete and should be sent to FBI OGC's Administrative Law Unit for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)
- 3. Is the system solely related to internal government operations?
 - YES If "yes," please provide a brief explanation of a) the purpose of the system, and b) quantity and type of employee/contractor information:
 - NO (If "no," go to section III to determine if a full or short-form PIA is required.)

III. Full or Short-Form PIA

- 1. Is the system a major information system (as listed on OGC's FBINET website)?
 - YES (If "yes," a full PIA is required. PTA is complete.)
 - NO (If "no," please continue to question 2.)
- 2. Does the system involve routine information AND have limited use/access?
 - YES If "yes, please explain what type of information is collected and the access provided:
A short-form PIA is required. (I.e., you need only answer Questions 1.1, 1.2, 2.1, 3.1, 4.1, 5.1 (if appropriate), 6.2, 6.3, and 8.9 of the PIA template.) Please note that FBI and DOJ reviewing officials reserve the right to require completion of a full PIA. (PTA is complete – forward with PIA.)

NO (If "no," a full PIA is required. PTA is complete.) [redacted]

[redacted] FTTTF System. [redacted]

[redacted] The FTTTF System is already the subject of a current PIA.

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This is a privileged FBI communication; do not circulate outside the FBI without the permission of the Office of the General Counsel.

UNCLASSIFIED

(OGC/PCLU (Rev. 12/05/08))

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

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

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
	Name: [redacted] Program Office: Administrative Projects Unit (APU) Division: Office of IT Program Management (OIPM) Phone: [redacted] Room Number: 1829	Name: Phone: Room Number:

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FBI DIVISION INTERMEDIATE APPROVALS [complete as necessary]

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: [Criminal Investigative Division]	Signature: Date signed: Name: [redacted] Title: CID Project Manager	Signature: Date signed: Name: Title:
FBIHQ Division: [Office of IT Program Management (OIPM)]	Signature: Date signed: Name: [redacted] Title: OIPM Program Manager	Signature: Date signed: Name: Title:

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Additional division(s) approvals may be added as warranted:

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

(The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)

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

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

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

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

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 Tickler

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UNCLASSIFIED

FBI PTA:

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FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

PIA required: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes: _____		SORN/SORN revision required: <input type="checkbox"/> No <input type="checkbox"/> Yes: _____	
Applicable SORN(s): _____			
Notify FBI RMD/RIDS per MIOG 190.2.3: <input type="checkbox"/> No <input type="checkbox"/> Yes			
Prepare/revise/add Privacy Act (e)(3) statements for related forms? <input type="checkbox"/> No <input type="checkbox"/> Yes-forms affected: _____			
The program should consult with RMD to identify/resolve any Federal records/electronic records issues.			
Other: _____			
David C. Larson, Deputy General Counsel FBI Privacy and Civil Liberties Officer		Signature: David C. Larson Date Signed: 1/22/09	

FBI PTA: [redacted] b7E

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 al 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.):

In the conduct of investigations into financial institutions and related organizations, it is common that a large number of documents are acquired (through subpoenas and voluntary productions) in all criminal sub-programs from a number of different sources and in various formats. The documents are reviewed, annotated, categorized, and tracked. Throughout the duration of an FBI case, the FBI may exchange this data with partner agencies and law firms. This is a significant activity in large document-intensive cases such as corporate frauds. The FBI and the U.S. Securities and Exchange Commission (SEC) often conduct parallel investigations in major corporate fraud cases and partner with the U.S. Department of Justice (DOJ) to prosecute these cases. Therefore, the FBI needs to utilize Commercial-off-the-Shelf products that allow for the sharing of large amounts of data, the ability to easily search, and the ability to facilitate the use of the information during the discovery and trial phases of a case.

[redacted]

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[redacted]

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[redacted] is responsible for any PTA and/or PIA that their system requires. [redacted] will be Sensitive But Unclassified (SBU). The FBI may acquire additional typical case file information from various sources during the conduct of the investigation. That information will be logged and copies provided for input using the same process as described above with the appropriate level of security required.

The results of the [redacted] Pilot will be factored into determining an appropriate IT solution to provide a long-term FBI Enterprise System for any major investigation. This Enterprise System Project will likely require a Privacy Threshold Analysis, and a Privacy Impact Assessment is expected to be completed. This project will go through the full LifeCycle.

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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))?

FBI PTA:

[Redacted]

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NO. [If no, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval. Unless you are otherwise advised, no PIA is required.] The project is designed to permit the FBI to use the [Redacted] in order to evaluate it for a long-term IT solution for enterprise case management purposes.

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YES. [If yes, please continue.]

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

NO. YES.

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

NO. YES.

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

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

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

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

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

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

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

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

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

YES.

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

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

NO.

FBI PTA:

[Redacted]

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

___ 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: This is a commercial-off-the-shelf (COTS) solution [Redacted]

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

___ Don't Know.

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

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

The Pilot system is not the subject of an OMB submission; however, the long-term solution will be the subject of an OMB submission as soon as the requirements have been identified and potential solutions investigated.

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

___ NO. ___ YES. ___ Don't know.

11. 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).]

FBI PTA:

[Redacted]

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

- ___ A conversion from paper-based records to an electronic system.
- ___ A change from information in a format that is anonymous or non-identifiable to a format that is identifiable to particular individuals.
- ___ A new use of an IT system/project, including application of a new technology, that changes how information in identifiable form is managed. (For example, a change that would create a more open environment and/or avenue for exposure of data that previously did not exist.)
- ___ A change that results in information in identifiable form being merged, centralized, or matched with other databases.
- ___ A new method of authenticating the use of and access to information in identifiable form by members of the public.
- ___ A systematic incorporation of databases of information in identifiable form purchased or obtained from commercial or public sources.
- ___ A new interagency use or shared agency function that results in new uses or exchanges of information in identifiable form.
- ___ A change that results in a new use or disclosure of information in identifiable form.
- ___ A change that results in new items of information in identifiable form being added into the system/project.
- ___ Changes do not involve a change in the type of records maintained, the individuals on whom records are maintained, or the use or dissemination of information from the system/project.
- ___ Other. [Provide brief explanation]:

3. Does a PIA for this system/project already exist? ___ NO. ___ YES. If yes:

a. Provide date/title of the PIA:

b. Has the system/project undergone any significant changes since the PIA? ___ NO. ___ YES.

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

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

NAME OF SYSTEM / PROJECT: Bureau Investigative Document Management System (BIDMAS) Phase II

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC
	Name: [Redacted]	Name: AGC [Redacted]
	Program Office: BIDMAS	Phone: [Redacted]
	Division: Office of IT Program Management (OIPM)	Room Number: 7338 JEH
	Phone: [Redacted]	
	Room Number: 8376	

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

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer
Program Division: [[Criminal Investigative Division]]	Signature: Date signed: approved 9/16/2009 Name: [Redacted] Title: CID Project Manager	Signature: Date signed: Name: Title:
FBIHQ Division: [Office of IT Program Management (OIPM)]	Signature: Date signed: approved 10/5/09 Name: [Redacted] Title: OIPM Program Manager	Signature: Date signed: Name: Title:

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

(The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)

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

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

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

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

- 1 - OGC/PCLU intranet
- 1 - PCLU UC
- 1 - PCLU Library
- 1 - PCLU Tickler

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FBI PTA: Bureau Investigative Document Management System (BIDMAS)

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). Privacy documentation provided by EOUSA re should be sufficient to cover this activity, particularly as the records ultimately are passed to the U.S. Attorney's Offices where the cases are prosecuted.

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Other (describe):

Applicable SORN(s): Information that is maintained is uploaded to FBI case files and is therefore covered by the Central Records System

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):
N/A

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

Other:

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

Signature: David C. Larson
Date Signed: 10/6/09

FBI PTA: Bureau Investigative Document Management System (BIDMAS)

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 al users.

In the conduct of investigations into financial institutions and related organizations, it is common that a large number of documents are acquired for evidentiary and other purposes (through subpoenas and voluntary productions) in all criminal sub-programs from a number of different sources and in various formats. The documents are reviewed, annotated, categorized, and tracked. Throughout the duration of an FBI case, the FBI may exchange this data with partner agencies and law firms. This is a significant activity in large document-intensive cases such as corporate frauds. The FBI and the U.S. Securities and Exchange Commission (SEC) often conduct parallel investigations in major corporate fraud cases and partner with the U.S. Department of Justice (DOJ) to prosecute these cases. Therefore, the FBI needs to utilize a Commercial-off-the-Shelf (COTS) litigation information management tool that allows for the sharing of large amounts of data, the ability to easily search, and the ability to facilitate the use of the evidentiary information during the discovery and trial phases of a case.

In order to more consistently and concisely assure that the evidentiary data required to be shared is available in an easily shared, consistent format, a pilot project was used to investigate the use of a COTS tool. [Redacted]

[Redacted]

b7E

[Redacted] Because of the success of the pilot project, Phase II is being implemented; the FBI is purchasing this COTS product for its own use as described below data.

Phase II will provide Bureau-wide implementation of standardized processes and a tool set to support the immediate need of agents conducting major fraud investigations to organize evidentiary materials in anticipation of prosecution by an appropriate U.S. Attorney's office. [Redacted]

[Redacted]

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[Redacted] This product will be used to annotate, categorize, and track data. This information will then be analyzed and used as appropriate during the prosecution of a case. The information that is collected will be maintained throughout the investigatory portion of a case. Materials that will be used for prosecution will be forwarded to the U.S. Attorney's office for maintenance and contemporaneously uploaded into the appropriate FBI case file. Materials that are not used in connection with a prosecution will be purged.

[Redacted]

[Redacted] This will allow the information to be limited only to designated users of the case. Within the case users, the case agent will determine the access of the other agents/analysts working the case. Their access can be restricted to a certain folder of data, or limited ability to annotate.

b7E

FBI PTA: Bureau Investigative Document Management System (BIDMAS)

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

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

YES. [If yes, please continue.]

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

NO. YES.

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

NO. YES.

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

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

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

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

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

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

It is not feasible for the system/project to provide special protection to SSNs. **Explain:** data obtained from banks or corporations may contain social security numbers

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

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

YES.

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

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

FBI PTA: Bureau Investigative Document Management System (BIDMAS)

NO.

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

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

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

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

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

YES. If yes, provide date of last C&A certification/re-certification: Expecting ATT - for initial case in production, on 9/30/09. We will continue to work towards ATO.

Don't Know.

8. Is this system/project the subject of an OMB-300 budget submission? Right now it is an OMB SB

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

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

NO. YES. Don't know.

10. Status of System/ Project:

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

FBI PTA: Bureau Investigative Document Management System (BIDMAS)

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

3. Does a PIA for this system/project already exist? NO. YES. If yes:

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

b. Has the system/project undergone any significant changes since the PIA? NO. YES.

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

FBI Privacy Threshold Analysis (PTA) Cover Sheet (OGC/PCLU (Rev. 05/08/07))

NAME OF SYSTEM: [Redacted]

b7E

FBI SYSTEM CONTACT PERSON

Name: [Redacted]

Program Office: OIPM

Division: OCIO

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Phone: [Redacted]

Room Number: 9330

Date PTA submitted for approval: 6/08/07

FBI DIVISION APPROVALS. A PIA (and/or PTA) should be prepared/approved by the cognizant program management in collaboration with IT, security, and end-user management and OGC/PCLU. (PIAs/PTAs relating to electronic forms/questionnaires implicating the Paperwork Reduction Act should also be coordinated with the RMD Forms Desk.) If the subject of a PTA/PIA is under the program cognizance of an FBIHQ Division, prior to forwarding to OGC the PTA/PIA must also be referred to the FBIHQ Division for program review and approval, if required by the FBIHQ Division.

	Program Division: Security Division	FBIHQ Division:[insert division name]
Program Manager (or other appropriate executive as Division determines)	Signature: /s/ Date signed: 6/11/07 Name: [Redacted] Title: IATU Unit Chief	Signature: Date signed: Name: Title:
Division Privacy Officer	Signature: /s/ Date signed: 6/11/07 Name: Jeffery J. Berkin Title: SecD AD (acting) /Privacy Officer	Signature: Date signed: Name: Title:

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Upon Division approval, forward signed hard copy plus electronic copy to OGC/PCLU (JEH Room 7338).

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature: /s/ Date Signed: 7/13/07 Name: David C. Larson Title: Acting Deputy General Counsel
---	---

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

1 - Signed original to 190-HQ-C1321794

Copies:

1 - DOJ Privacy and Civil Liberties Office-Main Justice, Room 4259

1 - OGC/PCLU intranet website

1 - FBI OCIO

1 - PCLU Library

1 - FBI SecD (electronic copy via e-mail)

1 - PCLU Tickler

2* - Program Division POC /Privacy Officer

2* - FBIHQ Division POC /Privacy Officer

(*please reproduce as needed for Program/Division file(s))

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: [REDACTED]

b7E

For efficiency, a system owner or program manager can be aided in making the determination of whether a Privacy Impact Assessment (PIA) is required by conducting and following Privacy Threshold Analysis (PTA).

A PTA contains basic questions about the nature of the system in addition to a basic system description. The questions are as follows:

A. General System Description: Please briefly describe:

1. Type of information in the system:

[REDACTED] The only individual information recorded and stored is the user id (i.e. network logon id) [REDACTED]
[REDACTED]

b7E

a. If the system is solely related to internal government operations please provide a brief explanation of the quantity and type of employee/contractor information:

The user id is extracted from the users workstation [REDACTED] The user enters their own user id. b7E

2. Purpose for collecting the information and how it will be used:

[REDACTED]

b7E

[REDACTED] If they didn't follow proper security procedures, then ensure they are trained properly. The information collected is for internal use only and will not be made available to the general public.

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

[REDACTED]

b7E

4. Means of accessing the system and transmitting information to and from the system:

General users do not have access to the system. [REDACTED]
[REDACTED]

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[REDACTED] This data contained in the system is not made available to the general public and is contained within the system itself.

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

b7E

The system will be Certified and Accredited as a Tier 3 to ensure the proper security controls are in place. Privileged users (System admins) and the Enterprise Security Operations Center personnel will have access

b7E

6. Who outside the FBI will have access to the information in the system and controls for ensuring that only authorized persons can access the information:

No one outside has access to the system. All system data is contained within the Secret Enclave.

7. Has this system been certified and accredited by the FBI Security Divisions? Yes No
C&A activities are in process.

8. Is this system encompassed within an OMB-300? Yes No Don't Know
(if yes, please attach copy of latest one.)

I. Was the system developed prior to April 17, 2003?

YES (If "yes," proceed to Question 1.)

NO (If "no," proceed to Section II.)

1. Has the system undergone any significant changes since April 17, 2003?

YES If "yes," please explain the nature of those changes:

(Continue to Question 2.)

NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

2. Do the changes involve the collection, maintenance, or dissemination of information in identifiable form about individuals?

YES (If "yes," please proceed to Question 3.)

NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

3. Is the system solely related to internal government operations?

YES If "yes," is this a Major Information System (as listed on OGC's FBINET website)?:

Yes. (If "yes," a full PIA is required.. PTA is complete.)

No. (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised,

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

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no PIA is required. (FBI and DOJ reviewing officials reserve the right to require a PIA.)

NO (If "no," go to section III to determine if a full or short-form PIA is required.)

II. For systems developed after April 17, 2003.

1. What is the purpose of the system? (Answer in detail unless details already provided in A. 2 above):

(Continue to Question 2.)

2. Does the system collect, maintain or disseminate information in identifiable form about individuals?

YES (If "yes," please proceed to Question 3.)

NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

3. Is the system solely related to internal government operations?

YES If "yes," is this a Major Information System (as listed on OGC's FBINET website)?:

Yes. (If "yes," a full PIA is required.. PTA is complete.)

No. (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required. (FBI and DOJ reviewing officials reserve the right to require a PIA.)

NO (If "no," go to section III to determine if a full or short-form PIA is required.)

III. Full or Short-Form PIA

1. Is the system a major information system (as listed on OGC's FBINET website)?

YES (If "yes," a full PIA is required. PTA is complete.)

NO (If "no," please continue to question 2.)

2. Does the system involve routine information AND have limited use/access?

YES A short-form PIA is required. (I.e., you need only answer Questions 1.1, 1.2, 2.1, 3.1, 4.1, 5.1 (if appropriate), 6.2, 6.3, and 8.9 of the PIA template.) Please note that FBI

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM:

b7E

and DOJ reviewing officials reserve the right to require completion of a full PIA. (PTA is complete--forward with PIA.)

___NO (If "no," a full PIA is required. PTA is complete.)

FBI Privacy Threshold Analysis (PTA) Cover Sheet (OGC/PCLU (Rev. 07/06/07))

NAME OF SYSTEM: National Stolen Art File

FBI SYSTEM CONTACT PERSON Name: [Redacted] Program Office: Art Theft Program/Major Theft Unit/Gang-Criminal Enterprise Section Division Criminal Investigative Division: Phone: [Redacted] Room Number: 3247 Date PTA submitted for approval: July 26, 2007	FBI OGC/PCLU POC Name: [Redacted] Phone: [Redacted] Room Number:
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FBI DIVISION APPROVALS. A PIA (and/or PTA) should be prepared/approved by the cognizant program management in collaboration with IT, security, and end-user management and OGC/PCLU. (PIAs/PTAs relating to electronic forms/questionnaires implicating the Paperwork Reduction Act should also be coordinated with the RMD Forms Desk.) If the subject of a PTA/PIA is under the program cognizance of an FBIHQ Division, prior to forwarding to OGC the PTA/PIA must also be referred to the FBIHQ Division for program review and approval, if required by the FBIHQ Division.

	Program Division: Art Theft Program	FBIHQ Division: Criminal Investigative
Program Manager (or other appropriate executive as Division determines)	Signature: /s/ Date signed: Aug 2, 2007 Name: [Redacted] Title: Program Manager	Signature: /s/ Date signed: 7/26/07 Name: Alex J. Turner Title: Section Chief, Gang/Criminal Enterprise Section
Division Privacy Officer	Signature: Date signed: Name: [Redacted] Title: Asst. Section Chief, OSS	Signature: /s/ Date signed: 7/26/07 Name: [Redacted] Title: Asst. Section Chief, OSS

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Upon Division approval, forward signed hard copy plus electronic copy to OGC/PCLU (JEH Room: 7338).

FINAL FBI APPROVAL:

FBI Privacy and Civil Liberties Officer	Signature: /s/ Date Signed: 8/3/07 Name: David C. Larson Title: Acting Deputy General Counsel
---	--

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

1 - Signed original to 190-HQ-C1321794

Copies:

1 - DOJ Privacy and Civil Liberties Office-Main Justice, Room 4259

2 - FBI OCIO / OIPP

1 - FBI SecD (electronic copy via e-mail)

2* - Program Division POC /Privacy Officer

2* - FBIHQ Division POC /Privacy Officer

1 - OGC\PCLU intranet website

1 - PCLU Library

1 - PCLU Tickler

(*please reproduce as needed for Program/Division file(s))

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(OGC/PCLU (Rev. 07/06/07))

NAME OF SYSTEM: National Stolen Art File

For efficiency, a system owner or program manager can be aided in making the determination of whether a Privacy Impact Assessment (PIA) is required by conducting and following Privacy Threshold Analysis (PTA).

Whether or not a PIA is required, the system owner/program manager should consult with the FBI Records Management Division (RMD) to identify and resolve any records issues relating to information in the system.

A PTA contains basic questions about the nature of the system in addition to a basic system description. The questions are as follows:

A. General System Description: Please briefly describe:

1. Type of information in the system:

The National Stolen Art File (NSAF) is a computerized index of stolen art and cultural property as reported to the FBI by law enforcement agencies throughout the United States and internationally.

Information includes [redacted]

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[redacted] The NSAF was established in 1979 and computerized in the 1990s.

a. If the system is solely related to internal government operations please provide a brief explanation of the quantity and type of employee/contractor information:

2. Purpose for collecting the information and how it will be used:

The NSAF was developed to record stolen art and cultural artifacts which cannot be added to NCIC because they lack serial numbers.

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

[redacted]

b7E

4. Means of accessing the system and transmitting information to and from the system:

The NSAF is only accessible on a single, stand-alone laptop kept in the Art Theft Program/Major Theft Unit office. Information is entered manually on the laptop and reports printed to a local (not networked) printer.

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

Only the Art Theft Program Manager enters and searches data in the NSAF. Results of searches can be requested by other FBI employees.

6. Who outside the FBI will have access to the information in the system and controls for ensuring that only authorized persons can access the information:

The Art Theft Program Manager will search the NSAF when art suspected to be stolen is located by the FBI or other law enforcement agencies. When stolen art is identified within the database as the result of a search, information [redacted] is supplied

b7E

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

(OGC/PCLU (Rev. 07/06/07))

NAME OF SYSTEM: National Stolen Art File

only to the law enforcement agency requesting the search.

7. Has this system been certified and accredited by the FBI Security Divisions? Yes Not yet

CID is currently working on certifying and accrediting all of its laptops, including this one. The NSAF laptop has [redacted] of all CID laptops.

b7E

8. Is this system encompassed within an OMB-300? Yes No Don't Know
(if yes, please attach copy of latest one.)

I. Was the system developed prior to April 17, 2003?

YES (If "yes," proceed to Question 1.)

NO (If "no," proceed to Section II.)

1. Has the system undergone any significant changes since April 17, 2003?

YES If "yes," please explain the nature of those changes:

(Continue to Question 2.)

NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

2. Do the changes involve the collection, maintenance, or dissemination of information in identifiable form about individuals?

YES (If "yes," please proceed to Question 3.)

NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

3. Is the system solely related to internal government operations?

YES If "yes," is this a Major Information System (as listed on OGC's FBINET website)?:

Yes. (If "yes," a full PIA is required.. PTA is complete.)

No. (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required. (FBI and DOJ reviewing officials reserve the right to require a PIA.))

NO (If "no," go to section III to determine if a full or short-form PIA is required.)

NAME OF SYSTEM: National Stolen Art File

II. For systems developed after April 17, 2003.

1. What is the purpose of the system? (Answer in detail unless details already provided in A. 2 above):

(Continue to Question 2.)

2. Does the system collect, maintain or disseminate information in identifiable form about individuals?

YES (If "yes," please proceed to Question 3.)

NO (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required.)

3. Is the system solely related to internal government operations?

YES If "yes," is this a Major Information System (as listed on OGC's FBINET website)?:

Yes. (If "yes," a full PIA is required.. PTA is complete.)

No. (If "no," the PTA is complete and should be sent to FBI OGC's Privacy and Civil Liberties Unit (PCLU) for review, approval, and forwarding to DOJ's Privacy and Civil Liberties Office. Unless you are otherwise advised, no PIA is required. (FBI and DOJ reviewing officials reserve the right to require a PIA.))

NO (If "no," go to section III to determine if a full or short-form PIA is required.)

III. Full or Short-Form PIA

1. Is the system a major information system (as listed on OGC's FBINET website)?

YES (If "yes," a full PIA is required. PTA is complete.)

NO (If "no," please continue to question 2.)

2. Does the system involve routine information AND have limited use/access?

YES A short-form PIA is required. (I.e., you need only answer Questions 1.1, 1.2, 2.1, 3.1, 4.1, 5.1 (if appropriate), 6.2, 6.3, and 8.9 of the PIA template.) Please note that FBI and DOJ reviewing officials reserve the right to require completion of a full PIA. (PTA is complete---forward with PIA.)