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

   x   NO

The system contains user names, passwords, and audit logs. [REDACTED] [REDACTED] and such information could be used to support a criminal, CT, or FCI investigation, this system is [REDACTED] [REDACTED] such information and not the place where the information is stored or manipulated.

     YES   [If yes, proceed to question 7.]

b7E

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

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

   x YES **Identify any forms, paper or electronic, used to request such information from the information subject:**
Individuals sign specific computer user agreements to access [REDACTED] These user agreements along with warning banners at login indicate that [REDACTED] activity may be monitored.

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b7E

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

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

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

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

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

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

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

8. Is the system operated by a contractor?

_____ No.

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

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

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

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

Provide date of last C&A certification/re-certification:
Certification Test and Evaluation Date Nov 2008
Last Update to [____]**Nov 2009**   **b7E**
Confidentiality:__Low__Moderate_x_High__Undefined

Integrity: __Low_x_Moderate__High__Undefined

Availability: __Low_x_Moderate__High__Undefined

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

Unclassified

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

___x___ NO

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

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

__x___ NO

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

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

_____ NO ___x___ YES

13. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? Initial Draft 04 May 04

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

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

___x___ 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.

___x___ A new use of an IT system/project, including application of a new technology, that changes how information in identifiable form is managed.

Unclassified

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

b7E

_____ 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?

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

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

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b7E

NAME OF SYSTEM / PROJECT:

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: Program Office: Division: CTD Phone: Room Number:	FBI OGC/PCLU POC Name: Phone: Room Number: 7458	b6 b7C b7E

FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer	
Program Division: CTD/FTTTF	Signature: /s/ Date signed: 1/4/2010 Name Title: Unit Chief	Signature: /s/ Date signed: 1/4/10 Name Title: FTTTF Privacy Attorney	b6 b7C
FBIHQ Division: CTD	Signature: /s/ Date signed: 1/25/10 Name: John A. Boyle Title: Section Chief, FTTTF	Signature: Date signed: Name: Title:	

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

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

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

    Copies (recipients please print/reproduce as needed for Program/Division file(s)):
    1 - DOJ Office of Privacy and Civil Liberties (via e-mail to   1 - OGC\PCLU intranet
    privacy@usdoj.gov)   1 - PCLU UC
            (if classified, via hand delivery to 1331 Penn. Ave. NW, Suite 940,   1 - PCLU Library
    20530)   1 - PCLU Tickler
    2 - FBI OCIO / OIPP (JEH 9376, attn:
    1 - FBI SecD/AU (elec. copy: via e-mail to UC
    1 - RMD/RMAU (attn: b6
    2 - Program Division POC /Privacy Officer   b7C
    2 - FBIHQ Division POC /Privacy Officer

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FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

_____ PIA is required by the E-Government Act.

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

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

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

This system is covered under the FTTTF/NSAC Datamart PIA, dated 8/11/2008

Applicable SORN(s): _____

Notify FBI RMD/RIDS per MIOG 190.2.3? ___No ___Yes--See sample EC on PCLU intranet website here:
http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd

SORN/SORN revision(s) required? ___No ___Yes (indicate revisions needed):

Prepare/revise/add Privacy Act (e)(3) statements for related forms? ___No ___Yes (indicate forms affected):

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

Other:

David C. Larson, Deputy General Counsel FBI Privacy and Civil Liberties Officer	Signature: /s/ Date Signed: 3/2/10

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.

One of the units of the Foreign Terrorist Tracking Task Force (FTTTF)

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The information stored in

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is accessible to [ ] analysts and FTTTF supporting personnel, with administrator approval required for account creation. Users will access the system via FBI Secret Enclave (FBISE) workstations at their desks.

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.]

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___X__ YES [If yes, please continue.]

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

   __X___ 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   ___X__ YES

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

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

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

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

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

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

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

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

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

   _____ YES

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

__X___ 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:**

Security Division granted Authority to Operate (ATO) through October 20, 2011 (reference 319U-HQ-A1487677-SECD, serial # 1761).

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_____ 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)?

_____ NO   __X___ 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? [____] was originally developed during late 2005 and early 2006.

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

__X___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 ___X__ YES

If yes:

a. **Provide date/title of the PIA:** 8/11/2008; FTTTF/NSAC Datamart

[_____]that contains limited PII[_____] b3

FTTTF/NSAC Datamart. Thus, this system is covered by that PIA. b7E

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

_X__ NO ___YES

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

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

Total Deleted Page(s) = 1
Page 4 ~ b3 - National Security Act of 1947; b7E;

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XXXXXXXXXXXXXXXXXXXXXXXX
X    Deleted Page(s)    X
X    No Duplication Fee X
X    For this Page      X
XXXXXXXXXXXXXXXXXXXXXXXX
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(OGC/PCLU (Rev. 04/01/2011)

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: [   ]   b3
b7E

BIKR FBI Unique Asset ID: SYS000253

| Derived From:
Classified By:
Reason:
Declassify On: | **SYSTEM/PROJECT POC**
Name: [   ]
Program Office [   ] Unit Chief
Division: TSC
Phone: [   ]
Room Number: TSC 3336 | **FBI OGC/PCLU POC**
Name: [   ]
Phone: [   ]
Room Number: TSC 3344 | b6
b7C
b7E |

FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer	
Program Division: TSC	Signature: Date signed: Name: [ ] Title: [ ] Unit Chief	Signature: Date signed: Name: [ ] Title: TSC Privacy Officer	b6 b7C b7E

After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7350).
(The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)
FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS: [This section will be completed by the FBI PCLU/PCLO following PTA submission. The PTA drafter should skip to the next page and continue.]

PIA is required by the E-Government Act.

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

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

X   PIA is not required for the following reason(s):
___ System does not collect, maintain, or disseminate PII
___ System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks)
X   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):

<table>
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Applicable SORN(s): DOJ/FBI-002 - Central Records System (CRS); DOJ/FBI-019 - Terrorist Screening Records System (TSRS)

Notify FBI RMD/RIDS per MIOG 1902.3.2? X No ___ Yes-See sample FL on PCLU intranet website here:
http://home.fbi/OGC/LITI/PCLU/Privacy Civil%20Liberties%20Library_form_for_mirg1902.3.ee.wpd

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

Prepare revise and Privacy Act (e)(3) statements for related forms? X No ___ Yes (indicate forms affected)

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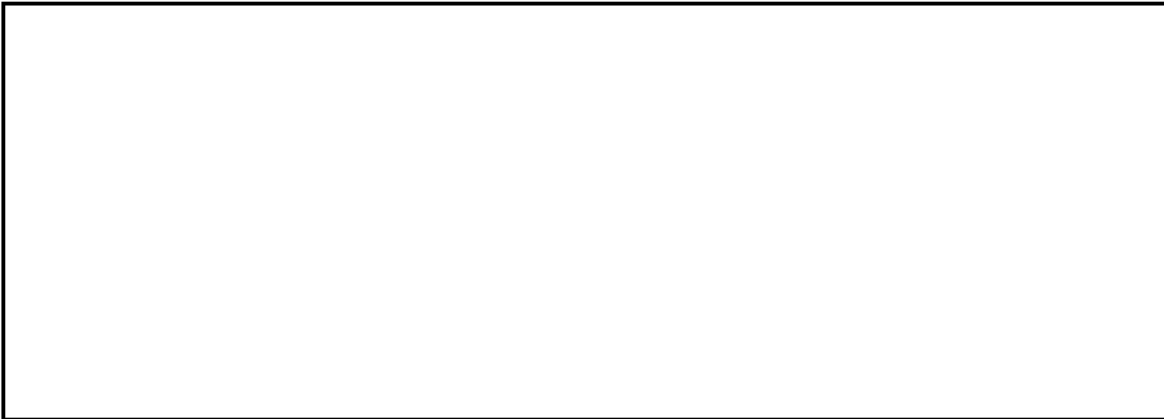Other:

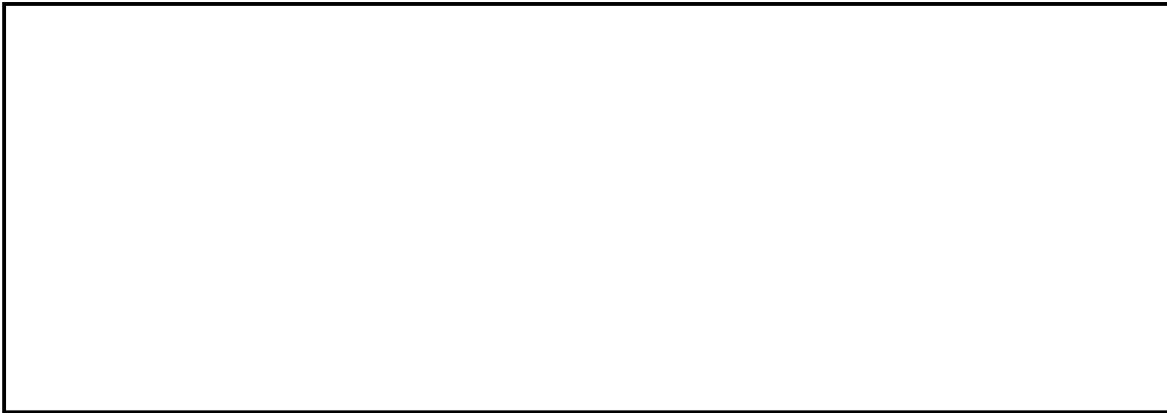| Monica Ryan, FBI Privacy and Civil Liberties Officer, Unit Chief, Privacy and Civil Liberties Unit | Signature: [signature] Date Signed 2/5/2014 |

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

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

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

___X__ YES **[If yes, please continue.]**

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

__X___   The information directly identifies specific individuals.

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

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

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

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

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

__X___ NO _____ YES

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

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

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

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

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

_____ YES

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

_____ NO

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

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

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

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

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

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

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

<div style="border:1px solid #000; height:180px"></div>

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

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

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

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

8.   Is the system operated by a contractor?

__X__No.

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

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

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

completion date:

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

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

March 15, 2012

Confidentiality:__Low__Moderate _X_High __Undefined

Integrity: __Low _X_Moderate __High __Undefined

Availability: __Low _X_Moderate __High __Undefined

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

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

__X__ NO

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

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

_____ NO   __X__ YES

12. **Status of System/ Project:**

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

II. EXISTING SYSTEMS / PROJECTS

1. **When was the system/project developed?** March 2011

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

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

___X__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.)

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

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

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

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

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

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

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

__X___Other **[Provide brief explanation]:**

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

__X__ NO   _____ YES

Although a PIA does not currently exist for the _____
PIAs have been completed for the _____

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_____

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.]

UNCLASSIFIED

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

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

BIKR FBI Unique Asset ID: SYS-0000115

| Derived From:
Classified By:
Reason:
Declassify On: | SYSTEM/PROJECT Point of Contact (POC)
Name: Supervisory Special Agent (SSA)
[ ]
Program Office: TRU 28 Oct 16
Division: Operational Technology Division (OTD)
Phone: [ ]
Room Number: ERF-B | FBI OGC/PCLU POC
Name: [ ]
Phone: [ ]
Room Number: 7350 JEH | **b6**
b7C |

FBI DIVISION INTERMEDIATE APPROVALS

	TRU Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer	
Program Division: TRU	Signature: Date signed: Name: SSA [ ] Title: Unit Chief	Signature: [ ] 11/9/16 Date signed: Name: SC J. Clay Price Title: Division Privacy Officer	**b6** **b7C**
FBIHQ Division: OTD	Signature: 28 Oct 16 Date signed: Name: Title:	Signature: Date signed: Name: Title:	

After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7350).
(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)

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;   1 - OGC\PCLU intranet
     if classified, via hand delivery to 1331 Penn. Ave. NW, Suite 940, 20530)
  2- FBI OCIO / OIPP [ ]
  1- FBI SecD/AU (UC [ ]   **b6**
  1- RMD/RMAU [ ]   **b7C**

UNCLASSIFIED

1- Program Division POC
1- Division Privacy Officer

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):

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

Applicable SORN(s): FBI-002, "FBI Central Records System," 63 Fed. Reg. 8671 (Feb. 20, 1998), as amended 66 Fed. Reg. 8425 (Jan. 31, 2001); 66 Fed. Reg. 17,200 (Mar. 29, 2001); 66 Fed. Reg. 33,558 (June 22, 2001); and 70 Fed. Reg. 7513, 17 (Feb. 14, 2005).

Notify FBI RMD/RIDS per MIOG 190.2.3? __X_No _____Yes--See sample EC on PCLU intranet website here:
http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ee.wpd

SORN/SORN revision(s) required? _X_No _____Yes

Prepare/revise/add Privacy Act (e)(3) statements for related forms? _X_No ___Yes

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

Other:

Elizabeth Withnell, Acting Deputy General Counsel Acting FBI Privacy and Civil Liberties Officer	Signature: _Elizabeth_ _for_ _and_ Date Signed:

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

When a user logs onto the user's computer [   ] the user first enters a user name and password in [   ] then the user enters a separate user name and password [   ] stores the username and password used to log onto [   ] In addition, [   ] creates audit logs used to monitor [   ] activity for security purposes.

b7E

[   ] and such information could be used to support a criminal, CT, or FCI investigation, this system is [   ] such information and not the place where criminal, CT, or FCI information is stored or manipulated.

b7E

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

_____ NO

__X__ YES

**The system maintains user names and passwords. In addition, the system creates and maintains audit logs. [   ]

b7E

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

EPIC-1779

__X__ The information directly identifies specific individuals.

**The information that directly identifies specific individuals is logon and audit log information.

b7E

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

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

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

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

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

__X__ NO _____ YES

**The user names, passwords, and audit logs pertain to government employees, contractors, or consultants.

b7E

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

_____ NO.

__X__ YES.
**The information that can be retrieved by personal identifier is logon and audit log information.

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

_____ NO

_X_ YES

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

_____ NO

_X_ YES

** The system collects user names and passwords directly from the individual. Audit logs indirectly monitor system activity.

    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)?

_X_ NO

Although a specific (e)(3) notice is not provided, as FBI-002 exempts the FBI from providing such notices in certain circumstances, individuals sign specific computer user agreements and must acknowledge a warning banner at login, to access [ ]   **b7E
These user agreements along with warning banners at login indicate that [ ] activity may be monitored.

_____ YES

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

_____ NO   _X_ YES

    User names and audit logs do not contain social security numbers. [ ]
[ ] which may consist of social security   **b7E**
numbers, about individuals other than government employees, contractors, or consultants,
[ ]

__X__ 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:**

__X__ 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:** [   ]   **b7E**

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

8.   Is the system operated by a contractor?

____No.

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

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

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

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

           Provide date of last C&A certification/re-certification:
           Certification Test and Evaluation Date Feb 2007
           Last Update to [   ] Feb 2009   **b7E**
           Confidentiality:__Low__Moderate _x_High __Undefined

           Integrity: __Low _x_Moderate __High ___Undefined

           Availability: __Low _x_Moderate __High __Undefined

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

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

    __X__ NO

    _____ YES

11. Does the system conduct data mining as defined in Section 804 of the Implementing Recommendations of the 9/11 Commission Act of 2007, P.L. 110-53 (codified at 42 USC 2000ee-3)?
    __X__ NO

    _____ YES

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

    __X__ NO   _____ YES

13. Status of System/ Project: N/A

    _____ This is a new system/ project in development.

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? Initial Draft 04 May 04

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

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

    __X__ YES If yes, indicate which of the following changes were involved (**mark all changes that apply, and provide brief explanation for each marked change**):

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

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

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

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

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

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

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

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

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

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

Changes since the last PTA involve changes to

b7E

_____ Other [Provide brief explanation]:

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

__X__ NO _____ YES
**A PTA was last completed April 26, 2007. Changes since the last PTA involve changes to

b7E

If yes:

a. Provide date/title of the PIA:

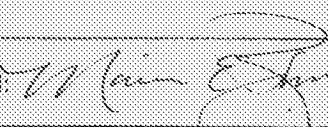b. Has the system/project undergone any significant changes since the PIA?

_X__NO ___YES

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: b7E

BIKR FBI Unique Asset ID: ___NEN-2013408_____

Derived From: Classified By: Reason: Declassify On:	SYSTEM/PROJECT POC Name: Program Office: Terrorist Screening Center Division: National Security Branch Phone: Room Number: Liberty Park 3360	FBI OGC/PCLU POC Name: Phone: Room Number: JEH 7350	b6 b7C

FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer	
Program Division: N/A	Signature: Date signed: Name: Title:	Signature: Date signed: Name: Title:	
FBIHQ Division: NSB/TSC IT	Signature: Date signed: Name: Title: Terrorist Screening Center/IT Unit Chief	Signature: Date signed: Name: Title: TSC Privacy Officer	b6 b7C

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

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS: [This section will be completed by the FBI PCLU/PCLO following PIA submission. The PIA 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):

__X__ PIA is not required for the following reason(s):
_____ System does not collect, maintain, or disseminate PII.
_____ System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).
_____ Information in the system relates to internal government operations.
_____ System has been previously assessed under an evaluation similar to a PIA.
_____ No significant privacy issues (or privacy issues are unchanged).
__X__ Other (describe): [redacted]   **b7E**
[redacted] will be described in other privacy documentation on an as-needed basis.

Applicable SORN(s): _____

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

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

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

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

Other:

Monica E. Ryan Unit Chief, Privacy and Civil Liberties Unit FBI Privacy and Civil Liberties Officer	Signature: Date Signed: _Monica E. Ryan_ 2/5/2014

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

b7E

and access is restricted to cleared FBI/TSC personnel.

b7E

All TSC users are prohibited from releasing any information from the physical or logical boundary of [   ] without explicit consent from the Information system Security Officer (ISSO) or the Information System Security Manager (ISSM). Specific access control provisions and use of data in [   ] is further described in the [   ] Privacy Impact Assessment.

b7E

Attached are two technical illustrations depicting the [   ] [   ]

b7E

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

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

[   ] collects audit log and general logon information. Other types of PII collected, maintained, or disseminated by [   ] are described in the Privacy Impact Assessment for [   ]

b7E

_____ YES [If yes, please continue.]

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

(Check all that apply.)

_____ The information directly identifies specific individuals.

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

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

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

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

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

_____ NO   _____ YES

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

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

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

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

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

_____ YES

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

_____ NO

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

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

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

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

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

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

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

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

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

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

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

8. Is the system operated by a contractor?

_____ No.

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

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

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

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

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

Confidentiality:__Low__Moderate__High__Undefined

Integrity: **__Low__Moderate__High__Undefined**

Availability: **__Low__Moderate__High__Undefined**

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

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

_____ NO

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

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

_____ NO   _____ YES

12. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

_____ YES If yes, indicate which of the following changes were involved **(mark all changes that apply, and provide brief explanation for each marked change):**

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

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

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

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

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

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

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

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

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

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

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

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

_____ NO   _____ YES

If yes:

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

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

_____ 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.]

UNCLASSIFIED

FBI Privacy Threshold Analysis (PTA) Cover Sheet

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

NAME OF SYSTEM: [   ] **b7E**

| Derived From:
Classified By:
Reason:
Declassify On: | **SYSTEM POC**
Name: [   ]
Program Office: TOCU
Division: Operational Technology Division
Phone: [   ]
Room Number: C-300 | **FBI   OGC/PCLU POC**
Name: [   ]
[   ] Phone: [   ]
Room: 7338 | **b6**
b7C |

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:OTD	
Program Manager (or other appropriate executive as Division determines)	Signature: Date signed: Name: Title:	Signature: /s/ Date signed: 11/13/08 Name: [ ] Title: Supervisory Intelligence Analyst	**b6** **b7C**
Division Privacy Officer	Signature: Date signed: Name: Title:	Signature: /s/ Date signed: 11/24/08 Name: [ ] Title: Division Privacy Officer	

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: 12/22/08 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:

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 UC

1 - PCLU Library

1 - PCLU Tickler

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: [   ]   **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:

[   ] s part of the Technical Evaluation Office (TEO) in the Technical Operations Coordination Unit (TOCU).   This system is used by intelligence analysts [   ]   **b7E**
[   ] This system does not collect or maintain personally identifiable information.   The information is analyzed and disseminated [   ]

   1.   Type of information in the system:

   Information regarding [   ]   **b7E**

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

   The information is used to create reports [   ]   **b7E**

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

   The system is [   ]   **b7E**
   [   ] within the SCIF. [   ] and does not leave the SCIF.

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

   Isolated terminals in a SCIF.

   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:

   All TEO personnel have access to the system and all are properly cleared and have a need to know.   The system is locked down using passwords that require change every 90 days.

   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:

UNCLASSIFIED

FBI PRIVACY THRESHOLD ANALYSIS (PTA)
NAME OF SYSTEM:

b7E

has access to the system as the system ISSO and holds the proper clearance and need to
know for the information.

b6
b7C

7. Has this system been certified and accredited by the FBI Security Divisions?   X   Yes   __No

8. Is this system encompassed within an OMB-300?   __ Yes   X   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.)

X_____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.))

UNCLASSIFIED

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: [   ]   **b7E**

___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.)

X_____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?

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM: [   ]   **b7E**

___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.)

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

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT:

BIKR FBI Unique Asset ID: _____ **b3**
b7E

Derived From:	SYSTEM/PROJECT POC	FBI OGC/PCLU POC	
Classified By:	Name:	Name:	**b6**
Reason:	Program Office: ITB	Phone:	**b7C**
Declassify On:	Division: ITSD	Room Number: 7350	
	Phone:		
	Room Number: 8979		

FBI DIVISION INTERMEDIATE APPROVALS

	Program Manager (or other appropriate executive as Division determines)	Division Privacy Officer	
Program Division: CD	Signature: 12/18/2012 Date signed: Name: Title: MAPA	Signature: 1/14/13 Date signed: 1/15/13 Name: Title: SSA	**b6** **b7C**
FBIHQ Division: ITSD	Signature: Date signed: 10/15/12 Name: Title: IT Specialist	Signature: Date signed: 10/15/12 Name: Title: Chief, Vulnerability & Compliance Support Unit	

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

_____ PIA is required by the E-Government Act.

__x__ 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. __x__ No (indicate reason):
This is a national security system.

_____ 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): _____ JUSTICE/FBI-002 (Central Records System)

Notify FBI RMD/RIDS per MIOG 190-2.3? _____ No __x__ Yes--See sample EC on PCLU intranet website here:
http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miog190-2-3_ec.wpd

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

Prepare/revise/add Privacy Act (e)(3) statements for related forms? __x__ 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:
A PTA was completed on [ ] on 4/24/2008. Because the system was developed before 2003, no PIA was required to   b3
be completed. As a matter of DOJ policy, a PIA must now be completed for this system.   b7E

	Signature: [ ]	b6
[ ] Acting Unit Chief		b7C
Privacy and Civil Liberties Unit	Date Signed: 01/14/2013	
Christine M. Costello, Acting Deputy General	Signature:	
Counsel	Date Signed:	
FBI Privacy and Civil Liberties Officer		

1/17/13

1. INFORMATION ABOUT THE SYSTEM / PROJECT

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

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_____ is part of the Investigative Mainframe Applications that run on the FBINET closed network. FBINET can only be accessed by authorized persons.

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Users of _____ are FBI Headquarters and Field personnel with a need to see information _____ All access to the _____ is approved by the Personnel, Logistics and IT Unit in the Counterintelligence Division.

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

_____ NO

__X__ YES   **[If yes, please continue.]**

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

__X__ The information directly identifies specific individuals.

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

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

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

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

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

__X__ NO   _____ YES

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

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

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

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

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

__X__ YES

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

_____ NO

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

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

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

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

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

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

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

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

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

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

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