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

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

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

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

Other [Provide brief explanation]:

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

   NO    YES

If yes:

a. Provide date/title of the PIA:

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

   NO    YES
FBI PRIVACY THRESHOLD ANALYSIS (PTA)
(Equivalent to the DOJ Initial Privacy Assessment (IPA))

NAME OF SYSTEM / PROJECT: b7E

<table>
<thead>
<tr>
<th>SYSTEM/PROJECT POC</th>
<th>FBI OGC/PCLU POC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
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</tr>
<tr>
<td>Program Office: IATU</td>
<td>Phone</td>
</tr>
<tr>
<td>Division: SecD</td>
<td>Room Number: JEH 7350</td>
</tr>
<tr>
<td>Room Number: SpyB 5th Floor</td>
<td></td>
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FBI DIVISION INTERMEDIATE APPROvals [complete as necessary consonant with Division policy]

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<tr>
<th>Program Division: Security Division</th>
<th>Division Privacy Officer</th>
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<tbody>
<tr>
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<td>Signature: /s/</td>
</tr>
<tr>
<td>Date signed: 12/03/09</td>
<td>Date signed: 03/05/10</td>
</tr>
<tr>
<td>Name</td>
<td>Name: Michael J. Folmar</td>
</tr>
<tr>
<td>Title: Unit Chief, Information Assurance Technology Unit</td>
<td>Title: Assistant Director, Security Division</td>
</tr>
</tbody>
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</table>

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)
1 - OGC/PCLU intranet
1 - PCLU UC
1 - PCLU Library
1 - PCLU Tickler
2 - FBI OCIO / OIPP (JEH 9376, attn:)
1 - FBI SecD/AU (elee. copy: via e-mail to UC
1 - RMD/RMAU (attn:)
2 - Program Division POC/Privacy Officer
2 - FBIHQ Division POC/Privacy Officer
UNCLASSIFIED//FOUO

FBI PTA: [ ]

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

___ PIA is required by the E-Government Act.

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

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

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

Applicable SORN(s): FBI-002

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_mioq190-2-3_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:

This system merely acts as a conduit—no information is collected, stored, or retained.

David C. Larson, Deputy General Counsel
FBI Privacy and Civil Liberties Officer
Signature: [Signature]
Date Signed: [Date]

UNCLASSIFIED//FOUO
1. 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.

The information that is transferred as a part of [redacted] will merely pass through [redacted] — no data will be stored on [redacted] itself. In the event that a document passing through [redacted] fails its policy enforcement mechanisms, the document will be deleted and an error message will be sent to the [redacted] user. No residual elements of the document will remain on [redacted].

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.]
FBI PTA: b7E

The users of the system will be limited to the system administrators and the security administrators. Their usernames and passwords are the only PII that will be stored on the system.

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

   _____ NO   ___X__ YES

The system administrators and security administrators will always be government employees or contractors, so only their PII would be stored. Information on non-government employees may pass through the system but that information is not collected, maintained or disseminated.

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

The system administrators and security administrators will always be U.S. citizens. The only PII stored on the system will be their usernames. All system administrators will be able to see the usernames.

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:
FBI PTA: b7E

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.]

   __X__ YES

Any system administrator will have the ability to control the usernames and thus the usernames of other administrators. For new administrators, a system administrator will be able to either make up a username for the new administrator or directly request a preferred username.

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

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

   _____ NO

   __X__ will be used in support of criminal, CT and FCI investigations and assessments; however, the people whose usernames will be stored on the __X__ are not the subject of investigation.

   **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  [The program will need to work with PCLU to develop/implement the necessary form(s).]

   A Privacy Act statement is not required since the username/password do not say anything about the individual, especially as an individual could choose anything as their username.

   _____ 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)?

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

   C&A is pending. The anticipated completion date is May 17, 2010.
   _____ 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?

   _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   _____ YES   _X_ Don’t know

10. Status of System/Project:

    _X_ 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/PCLI 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).]
UNCLASSIFIED//FOUO

FBI PTA: □ b7E

_____ 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)**

**NAME OF SYSTEM / PROJECT:** ____________________________

**BIKR FBI Unique Asset ID:** ____________________________

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**FBI DIVISION INTERMEDIATE APPROVALS**

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<th>Program Manager (or other appropriate executive as Division determines)</th>
<th>Division Privacy Officer</th>
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<tr>
<td>IT Services Division</td>
<td>Name:</td>
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</tr>
<tr>
<td></td>
<td>Title: Unit Chief</td>
<td>Title: IT Services Division Privacy Officer</td>
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</table>

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/PCLLO 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 reductions)? ___ 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.
___ Other (describe): 

Applicable SORN(s): U/A

Notify FBI RMD/RIDS per MIOG 190.2.3? ___ No ___ Yes--See sample EC on PCLU intranet website here: http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_mioig190-2-3_ec.wpd

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

Prepare/review/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:

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<th>Unit Chief</th>
<th>Signatures</th>
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<tbody>
<tr>
<td>Privacy and Civil Liberties Unit</td>
<td></td>
<td></td>
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<tr>
<td>James J. Landon, Deputy General Counsel</td>
<td></td>
<td></td>
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<tr>
<td>FBI Privacy and Civil Liberties Officer</td>
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</table>

b6 b7c

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epic.org 14-06-04-FBI-FOIA-20150318-4th-Production EPIC-701
I. INFORMATION ABOUT THE SYSTEM/PROJECT

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

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

(b) Structure of the system/project, including interconnections with other projects or systems:
- does not integrate with any other FBI project or system.

(c) Purpose of the system/project?
- The purpose of the

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

commercial-off-the-shelf (COTS) analytical software products that is already approved to use on the FBI network. The approved enables Special Agent (SA) and Intelligence Analyst (IA) users to collate and visualize information, then organize and analyze it. Users can
(e) Who will have access to the information in the system/project?  
- No information is stored on the [ ] Only ITSD personnel assigned to support the [ ] are granted the authorized rights and permissions to access and maintain [ ]

(f) The manner of transmission to all users?  
- Users’ workstations will be configured to [ ] to their machines.

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

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.


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/PCLI 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.]
### FBI PRIVACY THRESHOLD ANALYSIS (PTA)

**NAME OF SYSTEM / PROJECT:**

**BIKR FBI Unique Asset ID:** 2011-024-01

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<td></td>
<td>Program Office: Strategic Technology</td>
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<td></td>
<td>Division: Directorate of Intelligence</td>
<td>Room Number: 7350 JEH</td>
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**FBI DIVISION INTERMEDIATE APPROVALS**

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<td>FBIHQ Division:</td>
<td><strong>Name:</strong></td>
<td><strong>Signature:</strong></td>
</tr>
<tr>
<td>Directorate of Intelligence</td>
<td><strong>Title:</strong> Unit Chief, Strategic Technology Unit.</td>
<td><strong>Title:</strong> Management and Program Analyst</td>
</tr>
</tbody>
</table>

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.)
UNCLASSIFIED//FOUO

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

___ PIA is required by the E-Government Act.

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

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

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


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%20&%20Liberties%20Library/form_for_mio_190-2-3_ec.wpd

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

Prepare/revise/add Privacy Act (e.g.) 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: ___ X ___ does not maintain PII other than: Audit information about system users, limited personal information contained in

This limited PII for does not warrant a

PIA, since both categories of information relate to internal government operations: information about individuals contained in the is also contained in the CRS. However, if any additional PII is added to the DI assess the new privacy risks by submitting a new PTA to PCLU for review.

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

Signature: [Signature]
Date Signed: 7/30/13

Signature: [Signature]
Date Signed: 8/5/13
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) the manner of transmission to all users.

A Privacy Threshold Analysis (PTA) for the [Redacted] was previously approved on October 12, 2012. In light of the addition to [Redacted] as discussed below, a new PTA has been prepared.

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

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

which resides on the FBI's SECRET Enclave, includes

c) Purpose of the system/project

is typically related to a specific FBI investigative or
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

- FBI personnel, including
- 
- will have access to the information, as well as FBI personnel with access to FBI IT systems utilizing the

f) The manner of transmission to all users

- Information from the 
- is provided to FBI systems and read-only users via a

2. Does the system/project collect, maintain, or disseminate any information about individuals (i.e., a human being or natural person, regardless of nationality)?
[If yes, please continue.] As noted above, the primary information maintained in the database generally does not refer to specific individuals. It does contain limited personally identifiable information (PII) in the following forms:

- User access and activity information, pulled from the Active Directory, collected for audit purposes.

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.

      See response to Q.2, supra.

   ____ 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 linkable 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?

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

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

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

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

   ____ YES

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

      ____ NO

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

   b. Are subjects of information from whom the information is directly collected provided a written Privacy Act (6)(3) statement (either on the collection form or via a separate notice)?

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

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

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

   **X** NO   ____ YES  If yes, check all that apply.

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

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

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

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

8. Is the system operated by a contractor?

   - **X** No.
   - **__** Yes. Information systems operated by contractors for the FBI may be considered Privacy Act systems of records. The Federal Acquisition Regulation contains standard contract clauses that must be included in the event the system collects, maintains, or disseminates PII and additional requirements may be imposed as a matter of Department of Justice policy. Consultations with the Office of the General Counsel may be required if a contractor is operating the system for the FBI.

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

   - **__** NO If no, indicate reason; if C&A is pending, provide anticipated completion date:
   - **X** YES If yes, please indicate the following, if known:

     [ ] is encompassed within the C&A boundaries for the Distributed Application Virtual Environment (DAVE) and is not separately accredited. DAVE was most recently accredited on August 30, 2010, and has authority to operate through August 30, 2013, at the following risk levels:

     - **Confidentiality:**  _Low_  _Moderate_  **X** High
     - **Integrity:**  _Low_  _Moderate_  **X** High
     - **Availability:**  _Low_  _Moderate_  **X** High

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


    - **X** NO
UNCLASSIFIED//FOUO

14. YES If yes, please describe the data mining function:

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

_____ NO  _____ YES

12. Status of System/Project:

_____ This is a new system/project in development.

II. EXISTING SYSTEMS/PROJECTS

1. When was the system/project developed? [ ] was originally deployed to

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 nonidentifiable 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 the way in which information is 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.

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

* As discussed in Part I.

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

Other [Provide brief explanation]:

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

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.]


**FBI PRIVACY THRESHOLD ANALYSIS (PTA)**

**NAME OF SYSTEM / PROJECT:**

**BIKR FBI Unique Asset ID:** APP-0000256

<table>
<thead>
<tr>
<th>SYSTEM/PROJECT POC</th>
<th>FBI OGC/PCLU POC</th>
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<tbody>
<tr>
<td><strong>Name:</strong></td>
<td><strong>Name:</strong></td>
</tr>
<tr>
<td>Program Office: Strategic Technology Unit II</td>
<td>Phone:</td>
</tr>
<tr>
<td>Division: Directorate of Intelligence</td>
<td>Room Number: JEH, Rm 7350</td>
</tr>
<tr>
<td>Phone:</td>
<td></td>
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<tr>
<td>Room Number: 11100</td>
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**FBI DIVISION INTERMEDIATE APPROVALS**

<table>
<thead>
<tr>
<th>Program Division</th>
<th>Signature</th>
<th>Date signed:</th>
<th>Name:</th>
<th>Title:</th>
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<tbody>
<tr>
<td>Directorate of Intelligence</td>
<td></td>
<td>06/17/2014</td>
<td></td>
<td>SSA/GROINT Technical Team Lead</td>
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<td>FBIHQ Division:</td>
<td>Signature</td>
<td>Date signed:</td>
<td>Name:</td>
<td>Title:</td>
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<tr>
<td>Directorate of Intelligence</td>
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<td>06/17/2014</td>
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<td>Unit Chief</td>
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<tr>
<th>Program Manager</th>
<th>Division Pr</th>
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<tbody>
<tr>
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<td>Date signed:</td>
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<td></td>
<td>06/17/2014</td>
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After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7350).

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

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 – Since this is a national security system, it will not be published on fbi.gov.

___ 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


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_milog190-2-3_ec.wpd

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

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

[Signature]
Date Signed: 6/7/14

[Signature]

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

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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.

In order to support the mission needs of the FBI’s intelligence and investigative programs.

Is not physically stored on FBI systems and does not contain PII.

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
UNCLASSIFIED//FOUO

__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 individual[s]).

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?

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

_____ YES

a. Does the system/project support criminal, CI, 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:

      ___ is covered by the DIVS C&A.

Provide date of last C&A certification/re-certification:
September 30, 2010

Confidentiality: ___ Low ___ Moderate  ___ High ___ Undefined

Integrity:      ___ Low ___ Moderate  ___ High ___ Undefined

Availability:  ___ Low ___ Moderate  ___ High ___ Undefined

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


     ___ NO

     ___ YES  If yes, please describe the data mining function:

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

     ___ NO  ___ YES

12. Status of System/ Project:

     ___ This is a new system/ project in development.

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

2. Has the system/project undergone any significant changes since April 17, 2003?
____ NO  [If no, proceed to next question (II.3).]

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

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

____ 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 a new use or disclosure of information in identifiable form.

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

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

____ Other  [Provide brief explanation]:

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

____ NO  ______ YES

If yes:
a. Provide date/title of the PIA:

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

___ NO ___ YES
FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: [Redacted]

BIKR FBI Unique Asset ID: APP-0000256 (BIKR number for unclassified system pending)

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<tr>
<td>Name: SSA</td>
<td>Name: AGC</td>
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<tr>
<td>Program Office: Geospatial</td>
<td>Phone:</td>
</tr>
<tr>
<td>Division: DI</td>
<td>Room Number: JEH, Rm 7350</td>
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<thead>
<tr>
<th>Records Management Division</th>
<th>Security Division</th>
<th>Directorate of Intelligence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program Manager (or other appropriate executive as Division determines)</td>
<td>Signature: [Redacted] Date signed: 2/18/2013 Name: [Redacted] Title: Management &amp; Program Analyst</td>
<td>Signature: [Redacted] Date signed: 11/5/2015 Name: [Redacted] Title: Unit Chief (STU)</td>
</tr>
</tbody>
</table>

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.)