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


___ X ___ NO

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

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

___ X ___ NO ______ YES

13. Status of System/Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

__________________________________________________________________________

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

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

___ X ___ 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?

__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: Loose Media Kiosk (LMK)

BIKR FBI Unique Asset ID: __________________________

<table>
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<tr>
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<th>SYSTEM/PROJECT POC</th>
<th>FBI OGC/PCLU POC</th>
</tr>
</thead>
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<tr>
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<td>Name: _____________</td>
<td>Name: ____________</td>
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<tr>
<td>Reason:</td>
<td>Systems Security Officer</td>
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<tr>
<td></td>
<td>Division: Albany</td>
<td>Room Number: 7350 JEH</td>
</tr>
<tr>
<td></td>
<td>Phone: ____________</td>
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FBI DIVISION INTERMEDIATE APPROVALS

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<th>Program Division:</th>
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<th>Division Privacy Officer</th>
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<tr>
<td>Albany Field Office</td>
<td>Date signed: 3/1/13</td>
<td>Signature: _____________________________</td>
</tr>
<tr>
<td>[insert division name]</td>
<td>Name: Paul M. Holstein</td>
<td>Date signed: 3/1/13</td>
</tr>
<tr>
<td></td>
<td>Title: Chief Division Counsel/Chief Privacy Officer</td>
<td></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.)
**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)?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

- 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).
  - Other:

Applicable SORN(s):

Notify FBI RMD/RIDS per MiOG 190.2.3?

<table>
<thead>
<tr>
<th>No</th>
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</table>

See sample EC on PCLU intranet website here: http://home/DO/OGC/ITB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_mio190-2-3 EC.wpd

SORT/SORT revision(s) required?

<table>
<thead>
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<th>No</th>
<th>Yes</th>
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Prepare/revise/add Privacy Act (e)(3) statements for related forms?

<table>
<thead>
<tr>
<th>No</th>
<th>Yes</th>
</tr>
</thead>
</table>

**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:

<table>
<thead>
<tr>
<th>Acting Unit Chief</th>
<th>Privacy and Civil Liberties Unit</th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
<th>Brian F. Binney, Acting Deputy General Counsel</th>
<th>FBI Privacy and Civil Liberties Officer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature</td>
<td>Date Signed</td>
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</table>
1. INFORMATION ABOUT THE SYSTEM / PROJECT

1. General Description of System

The Albany Field Office (AL FO), Loose Media Kiosk (LMK) is a standalone computer that provides a controlled environment to examine and analyze file structure, size, and types of files stored on secondary storage devices, primarily Universal Serial Bus (USB) connection oriented devices. Security concepts are covered in the LMK System Security Plan. The LMK is internally owned and managed exclusively by the FBI.

The LMK is located in the Albany Field Office Computer Analysis and Response Team (CART) Laboratory.

![Loose Media Kiosk](image)

Figure 1 Loose Media Kiosk

The system has no network connectivity.
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
(Note: It is theoretically possible to open the files that are contained on the inserted media. However, there is no way to save the information in them, print their contents, or transfer the contents to another system.)

____ YES  [If yes, please continue.]

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

____ The information directly identifies specific individuals.

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

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

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

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

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

____ NO  ____ YES

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

____ NO. [If no, skip to question 7.]
____ YES. [If yes, proceed to the next question.]

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

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

____ YES

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

____ NO

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

 b. Are subjects of information from whom the information is directly collected provided a written Privacy Act (s) 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:
UNCLASSIFIED

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:
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.
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: Maximo

BIKR FBI Unique Asset ID: 2010-023-01-P-402-128-9999

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<thead>
<tr>
<th>SYSTEM/PROJECT POC</th>
<th>FBI OGC/PCLU POC</th>
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<tbody>
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<td>Name:</td>
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<tr>
<td>Program Office: FSIO</td>
<td>Phone:</td>
</tr>
<tr>
<td>Division: FD</td>
<td>Room Number: JEH, Rm 7350</td>
</tr>
<tr>
<td>Phone:</td>
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<td>Room Number: MC-700</td>
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FBI DIVISION INTERMEDIATE APPROVALS

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<tr>
<th>Program Division: Financial Systems Implementation Office (FSIO)</th>
<th>Division Privacy Officer</th>
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<td>Program Manager (or other appropriate executive as Division determines)</td>
<td>Division Privacy Officer</td>
</tr>
<tr>
<td>Signature:</td>
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<tr>
<td>Date signed: 2015-01-01</td>
<td>Date signed: 2015-01-01</td>
</tr>
<tr>
<td>Name: FSIO Director</td>
<td>Name: Unit Chief</td>
</tr>
<tr>
<td>Title: FSIO Director</td>
<td>Title: Unit Chief</td>
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</tbody>
</table>

| FBIHQ Division: Finance Division (FD) | |
|--------------------------------------||
| Signature: 2015-01-01 | Signature: 2015-01-01 |
| Date signed: 2015-01-01 | Date signed: 2015-01-01 |
| Name: FD Accounting Deputy Section Chief | Name: Unit Chief |
| Title: FD Accounting Deputy Section Chief | Title: Unit Chief |

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:

_____ 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:

Applicable SORN(s):  Central Records System, DOJ/FBI-002; Bureau Personnel Management System, DOJ/FBI-008;
Computer systems Activity and Access Records, DOJ-002

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_miofg190-2-3_ec.wpd

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

Prepare/revise/add Privacy Act (c)(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:

Elizabeth Withnell, Acting Deputy General Counsel
Acting FBI Privacy and Civil Liberties Officer  Signature:  [Signature]
Date Signed:  3/2/11

UNCLASSIFIED//FOR OFFICIAL USE ONLY
I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

The systems used by the FBI to manage and track its supply chain processes for purchasing goods and services, including assets on hand, are outdated and insufficient. To better manage the FBI's growing number of assets, new supply chain management functionality is required, including: (1) an integrated asset management system to value and track assets throughout their useful lives (2) an improved ability to manage vendor interactions, and (3) new data collection devices to facilitate inventory processes.

The current asset management systems used by the FBI include the Property Management Application (PMA), the Vehicle Management Application (VMA), the Fixed Assets Module (FA) and Issued Personal Property (IPP) system. Specific information and purpose of each system is summarized below:
Each is a separate system, over 20 years old, with a different architecture. As a result, these first generation systems contain numerous add-on enhancements and are not as efficient or flexible as more modern systems with updated capabilities, and fail to provide the functionality needed to maintain a robust process and improve accountability.

Additionally, the current system structure spreads various asset types across several systems, requiring multiple interfaces, duplicative asset entry, significant manual reconciliations between systems and delayed processing. The current system landscape is summarized below. Please note this is a working document subject to revision.

The Finance Division (FD) seeks to mitigate these issues through the deployment of a new Supply Chain Management (SCM) Program via three core projects (only Project 1 is intended to be covered by this PTA, Projects 2 and 3 will have additional privacy paperwork as necessary during their development and implementation):
1. Project 1 – Project Aikman
   - **Objectives:** Replace the Property Management Application (PMA), Vehicle Management Application (VMA), Fixed Asset (FA) Module and Identifiable Personal Property (IPP) application with one Commercial Off the Shelf (COTS) Asset and Fleet Management Solution, IBM’s Maximo software.
   - **Estimated deployment:** Limited pilot (tentatively 3-5 FOs and an undetermined number of HQ division participation) in FY 11 Q4. A full FBI-wide deployment is scheduled to begin November 2011.
   - **Software:** Maximo (IBM). Note this is the base software platform for which Project 2 and Project 3 software will be added.
To ensure each project is optimally positioned to achieve its objectives, FD will be initiating a staggered approach to project implementation. In other words, Project Aikman (which will be referred to as Project Aikman throughout this document) will be the first rollout of FD's new SCM model, followed by

Please note the following:

- Project Aikman is replacing PMA, VMA, FA module and IPP systems with one central asset management system (IBM's Maximo). After historical information from legacy systems is transferred to Maximo (scheduled for FY 12 Q3), the legacy systems will be shut down and slated for the system retirement process.

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

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

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

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

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

   ___ NO   ___ YES

   The only information contained within this program that does not pertain to government employees, contractors, or consultants is in the case of a vehicle accident involving an FBI vehicle and a non-FBI individual or vehicle. In the case of such an incident, the name and contact information for the non-FBI individual would be maintained within the Vehicle Management files.

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)?

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

Some of the forms have a Privacy Act (e)(3) statement, but others do not so the program is working with PCLU to ensure that all the forms have such a statement.

_____ 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:

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

_X_ 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:

A unique user-name and password are required for access to the Maximo program. Without approval, an FBI employee will be unable to access Maximo. All users are assigned specific roles commensurate with their job responsibilities and not all users will have access to the PII maintained in Maximo. Where one’s job responsibilities warrant access to view another employee’s PII, the system will allow this.

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

Explain:

8. Is the system operated by a contractor?

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

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

   X NO  If no, indicate reason; if C&A is pending, provide anticipated completion date: This is a new system and is currently undergoing the C&A process. The anticipated completion date is mid-June 2011.

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

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

   Confidentiality:  Low Moderate High Undefined

   Integrity:  Low Moderate High Undefined

   Availability:  Low Moderate High Undefined

   Not applicable – this system is only paper-based.

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

   X YES  If yes, please provide the date and name or title of the OMB submission: An OMB-300 budget submission is planned for the spring budget submission (05/18/2011)


   X NO

   YES  If yes, please describe the data mining function:

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

   X NO  YES

13. Status of System/ Project:
This is a new system/project in development.

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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 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.
3. Does a PIA for this system/project already exist?
   
   ____ NO   ____ YES

   If yes:

   a. Provide date/title of the PIA:

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

   ____ NO   ____ YES
# FBI PRIVACY THRESHOLD ANALYSIS (PTA)

**NAME OF SYSTEM / PROJECT:**

**BIKR FBI Unique Asset ID:**

<table>
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<th>Derived From:</th>
<th>SYSTEM/PROJECT POC</th>
<th>FBI OGC/PCLU POC</th>
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<td>Classified By:</td>
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## FBI DIVISION INTERMEDIATE APPROVALS

**Program Manager** (or other appropriate executive as Division determines)

**Division Privacy Officer**

<table>
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<tr>
<td></td>
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<td></td>
<td></td>
<td>Chief, System Management Support Unit</td>
</tr>
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</table>

<table>
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<th>FBIHQ Division: ITSD</th>
<th>Signature:</th>
<th>Date signed:</th>
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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

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

_____ PIA is required by the E-Government Act.

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

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

_____ PIA is not required for the following reason(s):
   XX 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):
   cPO is too small.

Applicable SORN(s):  ______ N/A

Notify FBI RMD/RIDS per MIOG 190.2.3?  ____ No  ____ Yes--See sample EC on PCLU intranet website here:
http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_mio_g190-2-3_ec.wpd

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

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

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

Other:

James J. Landon, Deputy General Counsel
FBI Privacy and Civil Liberties Officer
Signature: _____________________________
Date Signed: 7/9/11

UNCLASSIFIED
UNCLASSIFIED

I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

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.
UNCLASSIFIED

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 (c)(3) statement (either on the collection form or via a separate notice)?

_____ NO [The program will need to work with PCLU to develop/implement...]

UNCLASSIFIED
UNCLASSIFIED

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 PHI 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:
UNCLASSIFIED

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.
UNCLASSIFIED

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

       ----- NO

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


       ----- NO

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

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

       ----- NO       ----- YES

13. Status of System/Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

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

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

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

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

(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: MP 2

BIKR FBI Unique Asset ID: Not currently available

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<td>Name:</td>
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<tr>
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FBI DIVISION INTERMEDIATE APPROVALS [complete as necessary consonant with Division policy]

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<tr>
<th>Program Manager (or other appropriate executive as Division determines)</th>
<th>Division Privacy Officer</th>
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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.)
FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS: [This section will be completed by the FBI PCLU/PCLO following PTA submission. The PTA drafter should skip to the next page and continue.]

___ PIA is required by the E-Government Act.

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

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

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

Applicable SORN(s): ___________________________ DOJ/FBI-002/classification for administrative matters

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/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:

, Deputy General Counsel  

FBI Privacy and Civil Liberties Officer  

Signature: Elizabeth Withnell  

Date Signed: 3/11/2011
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.

MP2 is a COTS database that collects information regarding building maintenance.

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.

(Write Yes or No as appropriate.)

X The information directly identifies specific individuals. Employee names – those making a maintenance request or those performing the work – is the only PII maintained in this system.

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

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

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

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

_____ SSNs are important for other reasons. Describe:

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

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

8. Is the system operated by a contractor?

X No.

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

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

_____x_ NO If no, indicate reason; if C&A is pending, provide anticipated MP2 will be accredited under its parent operating system.

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

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