FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: 

BIKR FBI Unique Asset ID: SYS-0000015

Derived From: SYSTEM/PROJECT POC

Classified By: Name:

Reason: Program Office: Forensic Network

Declassify On: Division: Operational Technology

BIKR FBI Unique Asset ID: Room Number: 2C18-E

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

Program Manager (or other appropriate executive as Division determines)

Program Division: Signature:

Operational Technology Date signed: 2/18/11

Name: Program Manager (Acting)

Title: 

Division Privacy Officer

Signature:

Date signed: 2/18/11

Name:

Title: ISSO

FBIHQ Division: Signature:

[Insert division name] Date signed:

Name:

Title:

After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7350). (The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)
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 PHI.
   ___ System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).
   ___ Information in the system relates to internal government operations.
   ___ System has been previously assessed under an evaluation similar to a PIA.
   ___ No significant privacy issues (or privacy issues are unchanged).
   ___ Other (describe):

□ The privacy risks and mitigation will be handled in a PIA that addresses systems generally.

Applicable SORN(s): ________________ FBI

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/PrivacyCivlib%20Liberties%20Library/form_for_mioig190-2-3_ec.wpd

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

Prepare/revise/add Privacy Act (e)(3) statements for related forms? ___ No ___ X 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: [Signature]
Date Signed: [Date]
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):

placed into service in March 2005 to provide

was during the course of a law enforcement or intelligence investigation.

Since that time, it has provided local, state, and federal law enforcement with efficient, complete, and legally defensible upon request, providing agents, analysts, and law enforcement and intelligence community personnel a

Privacy documentation was last completed for in 2007. This PTA comprises the requisite three-year review.

For example, during the course of a child pornography investigation,

in addition, during the course of terrorism investigations

Accordingly, personally identifying information such as one’s name, social security number, photograph, telephone number, race, gender, birth date, driver’s license number, or other identifying information

may be loaded onto the

for review by FBI Special Agents and Intelligence Analysts. agents and analysts can submit requests to

At the conclusion of an investigation, the

removes all data from the leaving no personally identifying information in the system.

is designed such that only those FBI Special Agents, and Intelligence Analysts assigned to a particular case
[UNCLASSIFIED / FOR OFFICIAL USE ONLY]

are authorized to have access to the system and only to the associated with their specific case. Access is controlled via user access-level privileges and based on case specificity.

Accordingly, the system is designed so that connects to no other systems using no other means.

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.] Personally identifiable information may be maintained in but the purpose of the system is to provide

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.

[UNCLASSIFIED / FOR OFFICIAL USE ONLY]
[UNCLASSIFIED / FOR OFFICIAL USE ONLY]

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

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

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

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

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

____X__ NO     _____ YES

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

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

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

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

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

____X__ YES

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

_____ NO

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

b. Are subjects of information from whom the information is directly collected
provided a written Privacy Act (e)(3) statement (either on the collection form or via a
separate notice)?
___X___ NO [The program will need to work with PCLU to develop/implement the necessary form(s).]

Information is collected through_________________________including those which may contain personally identifiable information, will be informed at the appropriate time pursuant to applicable law and policy.

_____ 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.

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

___X___ SSNs are important for other reasons. Describe:

As there is no control over what data may be contained within__________it is plausible that the__________may include the subject’s or other individuals’ social security numbers (SSNs). _______itself does not specifically collect or associate SSNs with other personally identifiable information. If an SSN is part of__________it will only be attributable to a specific person__________No SSNs are otherwise specifically stored or retrievable.

___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:_________________________and thus it is not feasible to completely negate the presence of SSNs. SSNs may be included and its location is unknown until__________and the case __________________________________agent assigned to a particular case have access__________which potentially may contain SSNs.
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 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 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? [ ] was placed into service in March 2005.

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

___X__ NO [If no, proceed to next question (II.3).] While the system may feature some technological components that have been updated since the conduct of the last privacy threshold assessment, none of these technological updates alter the core functions of the system as described.

____ 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.)
[UNCLASSIFIED / FOR OFFICIAL USE ONLY]

______ 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

Note that a PTA was prepared, but, at that time, it was determined that a PIA would not be necessary. The PTA was signed in October 2007.

If yes:

a. Provide date/title of the PIA:

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

_____ NO   _____ YES

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

(OGC/PCLU (Rev. 08/16/2010)

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: ____________________________
BIKR FBI Unique Asset ID: Pending

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<th>SYSTEM / PROJECT POC</th>
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<td>Phone: ____________________________</td>
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<td>Room Number: JEH 7350</td>
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<td>Application Support Unit (HRASU)</td>
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FBI DIVISION INTERMEDIATE APPROVALS

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<th>Program Division:</th>
<th>Program Manager (or other appropriate executive as Division determinates)</th>
<th>Division Privacy Officer</th>
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<td>ITSD</td>
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<tr>
<td>Name:</td>
<td>____________________________</td>
<td>Name: ____________________________</td>
</tr>
<tr>
<td>Title: IT Specialist</td>
<td>____________________________</td>
<td>Title: Division Privacy Contact OCO</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

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

_____ PIA is required by the E-Government Act.

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

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

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

_____ System does not collect, maintain, or disseminate PII.

_____ System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).

X____ Information in the system relates to internal government operations.

_____ System has been previously assessed under an evaluation similar to a PIA.

X____ No significant privacy issues (or privacy issues are unchanged).

_____ Other (describe):


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_mio190-2-3_ec.wpd

SORN/SORN revision(s) required?  x____No  _____Yes (indicate revisions needed):

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

System should have a Privacy Act (e)(3) statement at login.

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 Withnall, Acting Deputy General Counsel
FBI Privacy and Civil Liberties Officer  
Signature: /s/  
Date Signed: 1/31/2011

epic.org  14-06-04-FBI-FOIA-20150417-5th-Production  EPIC-1301
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.

There is no change in the information being collected, maintained or disseminated; rather, is being deployed on which will employ greater network security.

identifies a user by his/her FBINET username within the FBINET domain. No additional PII is collected, maintained or disseminated. The FBINET username of the project creator and project developers are detailed in the project’s properties provides a type of audit trail view where project developers can identify individual changes made (by title), who made the change, and when the change was created.
identifies the user through the user’s
FBINET domain username or through an alternative user name created by the user. The user has
the option of choosing which username to use. [ ] user name identifies individuals
who modify requirements and other stored documents. [ ] captures the history of each
requirement, thus providing an audit log.

tracks user account information, including
the username and password (chosen by the individual user), under direction of the System
Administrator. In addition to access information, user activity of [ ] is also maintained for
audit purposes. [ ] users can query project activities by the activity owner’s username or
first and last name.

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

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

[ ] YES [If yes, please continue.]

contain login information and audit logs of the
select individuals who access the
No other PII is contained in

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

[ ] The information directly identifies specific individuals.

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

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

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

[ ] None of the above. If none of the above, describe why the information does not
identify specific individuals either directly or indirectly. [If you checked this item,
STOP here after providing the requested description.]
4. Does the system/project pertain only to government employees, contractors, or consultants?

_____ NO   _____ YES

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

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

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

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

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

_____ YES

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

_____ NO

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

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

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

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

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

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

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)?

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

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

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

was most recently certified and accredited on 03/10/2005. There have been no other subsequent C&As since for reasons that could only be speculated (i.e. the system fell off SecD radar). However, because the system is now the system is now undergoing recertification.
UNCLASSIFIED

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___ 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?

____________________ was first deployed in 2005. b7E

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

_____ NO [If no, proceed to next question (II.3).]
X YES If yes, indicate which of the following changes were involved (mark all changes that apply, and provide brief explanation for each marked change):

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

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

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

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

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

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

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

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

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

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

X Other [Provide brief explanation]:

Is in process of:  
There is no change in the information being collected, maintained or disseminated; rather,

Is being deployed on  
which will employ greater network security,

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

**NAME OF SYSTEM / PROJECT:** DAVE (Distributed Application Virtual Environment)

**BIKR FBI Unique Asset ID:** N/A. Hosting Environments such as DAVE are not registered in BIKR.

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<tr>
<td>Reason:</td>
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<td>Phone:</td>
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<td>Declassify On:</td>
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<td>Information Technology Services Division (ITSD)</td>
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<td>Name:</td>
<td></td>
<td>Name:</td>
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<tr>
<td>Title: Unit Chief, Data Center Unit</td>
<td></td>
<td>Title: Unit Chief, Vulnerability &amp; Compliance Support Unit</td>
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| FBIHQ Division: | | |
| Signature: | | Signature: |
| Date signed: | | Date signed: |
| Name: | | Name: |
| Title: | | Title: |
FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

___ PIA is required by the E-Government Act.

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

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

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

___ System does not collect, maintain, or disseminate PII.

___ System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).

___ Information in the system relates to internal government operations.

___ System has been previously assessed under an evaluation similar to a PIA.

___ No significant privacy issues (or privacy issues are unchanged).

___ Other (describe): DAVE is a hosting environment for applications operating on the only PII collected and maintained within DAVE is that of a limited number of IT administrators and security personnel with access rights to the DAVE infrastructure.


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/review/add Privacy Act (e)(3) statements for related forms?  ___ No  ___ Yes (indicate forms affected):
PCLU will work with the Program Manager to ensure that a Privacy Act (e)(3) statement appears on the initial login screen.

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:

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

Signature: [Redacted]
Date Signed: [Redacted]
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.

The Distributed Application Virtual Environment (DAVE) provides IT infrastructure serving as network and server architecture hosting virtual servers within the DAVE. The DAVE utilizes some common infrastructure services, such as virtualization. The DAVE management servers provide interfaces/databases supporting the allocation of server and network resources and also support the collection of performance statistics for the infrastructure and hosted servers. The DAVE also supports FBI data center consolidation and reduces spending on physical server hardware and maintenance.

All access to information contained in an application hosted on DAVE is controlled by the application, rather than DAVE. For that reason, this Privacy Threshold Analysis (PTA) addresses only the DAVE hosting environment, and not the various software applications that are hosted on DAVE. Those applications will be the subject of separate PTAs.

A select group of IT administrators have access privileges to the DAVE infrastructure and management servers and their login information is stored in DAVE for security purposes. Other than administrator access and activity, the DAVE does not collect, maintain, or disseminate personally identifiable information.

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.]

- The only PII maintained in DAVE consists of access and activity information for the limited number of IT administrators with access privileges to the DAVE infrastructure.

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

(Check all that apply.)
X The information directly identifies specific individuals.

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

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

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

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

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

NO X 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.]

- The only PII maintained in DAVE consists of access and activity information for the limited number of IT administrators with access privileges to the DAVE infrastructure.

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

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

YES

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

NO

YES [If yes, proceed to question 7.]

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

____ 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:

The DAVE was last certified and accredited on August 31, 2010. Its authority to operate (ATO) has been extended through August 30, 2014 at the following risk levels:

UNCLASSIFIED
Confidentiality: ___ Low ___ Moderate X High ___ Undefined
Integrity: ___ Low ___ Moderate X High ___ Undefined
Availability: ___ Low ___ Moderate X High ___ Undefined

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

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

X NO

YES 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.

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? August 30, 2010

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

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

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

_____ A conversion from paper-based records to an electronic system.
A change from information in a format that is anonymous or non-identifiable to a format that is identifiable to particular individuals.

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

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

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

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

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

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

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

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

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

**NAME OF SYSTEM/PROJECT:** DAVE (Distributed Application Virtual Environment)

**BIKR FBI Unique Asset ID:** N/A. Hosting Environments such as DAVE are not registered in BIKR.

<table>
<thead>
<tr>
<th>Derived From:</th>
<th>SYSTEM/PROJECT POC</th>
<th>FBI OGC/PCLU POC</th>
</tr>
</thead>
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<tr>
<td>Classified By:</td>
<td>Name: Lead ITS</td>
<td>Name: AGC</td>
</tr>
<tr>
<td>Reason:</td>
<td>Program Office: Data Center Unit</td>
<td>Phone:</td>
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<td>Declassify On:</td>
<td>Division: ITSD</td>
<td>Room Number: 7350 JEII</td>
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**FBI DIVISION INTERMEDIATE APPROVALS**

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<tr>
<th>Program Division: Information Technology Services Division (ITSD)</th>
<th>Program Manager (or other appropriate executive as Division determines)</th>
<th>Division Privacy Officer</th>
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<tr>
<td>Signature:</td>
<td>Date signed: 9/23/13</td>
<td>Signature:</td>
</tr>
<tr>
<td>Name:</td>
<td>Title: Unit Chief, Data Center Unit</td>
<td>Date signed: 9/23/13</td>
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<td>Name:</td>
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**FBIHQ Division:**

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<td>Date signed:</td>
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<td>Title:</td>
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### FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

___ PIA is required by the E-Government Act.

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

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

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

___ System does not collect, maintain, or disseminate PII.

X Information in the system relates to internal government operations.

___ System has been previously assessed under an evaluation similar to a PIA.

___ No significant privacy issues (or privacy issues are unchanged).

X Other (describe): DAVE is a hosting environment for applications operating on the the only PII collected and maintained within DAVE is that of a limited number of IT administrators and security personnel with access rights to the DAVE infrastructure.


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):

PCLU will work with the Program Manager to ensure that a Privacy Act (e)(3) statement appears on the initial login screen.

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>Unit Chief, Privacy and Civil Liberties Unit</th>
<th>Signature</th>
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<tbody>
<tr>
<td>FBI Privacy and Civil Liberties Officer</td>
<td>[Signature]</td>
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</table>

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.

The Distributed Application Virtual Environment (DAVE) provides IT infrastructure serving as network and server architecture hosting virtual servers within the The DAVE utilizes some common infrastructure services, such as provide interfaces/databases supporting the allocation of server and network resources and also support the collection of performance statistics for the infrastructure and hosted servers. The DAVE also supports FBI data center consolidation and reduces spending on physical server hardware and maintenance.

All access to information contained in an application hosted on DAVE is controlled by the application, rather than DAVE. For that reason, this Privacy Threshold Analysis (PTA) addresses only the DAVE hosting environment, and not the various software applications that are hosted on DAVE. Those applications will be the subject of separate PTAs.

A select group of IT administrators have access privileges to the DAVE infrastructure and management servers and their login information is stored in DAVE for security purposes. Other than administrator access and activity, the DAVE does not collect, maintain, or disseminate personally identifiable information.

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

___ NO

___ YES [If yes, please continue.]

- The only PII maintained in DAVE consists of access and activity information for the limited number of IT administrators with access privileges to the DAVE infrastructure.

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.]

- The only PII maintained in DAVE consists of access and activity information for the limited number of IT administrators with access privileges to the DAVE infrastructure.

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)?
UNCLASSIFIED

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

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

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

___ X___ NO _______ YES If yes, check all that apply:

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

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

_____ SSNs are important for other reasons. Describe:

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

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

Explain:

8. Is the system operated by a contractor?

___ X___ No.

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

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

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

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

It is anticipated that C&A for DAVE  will be completed in the Spring of 2014 at the following risk levels:

UNCLASSIFIED
UNCLASSIFIED

Confidentiality:   _Low   _Moderate     X High
Integrity:       _Low   _Moderate     X High
Availability:    _Low   _Moderate     X High

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

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

   X YES

   ____ NO

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


   X YES

   ____ 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:

   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/PCLU for final FBI approval and determination if PIA and/or other actions are required.]

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

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

   _____ A conversion from paper-based records to an electronic system.
A change from information in a format that is anonymous or non-identifiable to a format that is identifiable to particular individuals.

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

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

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

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

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

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

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

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

Other [Provide brief explanation]:

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

NO YES

If yes:

a. Provide date/title of the PIA:

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

NO YES
**FBI PRIVACY THRESHOLD ANALYSIS (PTA)**

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

**NAME OF SYSTEM / PROJECT:** Distributed Application Virtual Environment (DAVE)

**BIKR FBI Unique Asset ID:** N/A. Hosting platforms such as DAVE are not required to be registered in BIKR.

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<td>Name: AGC</td>
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<td>Name:</td>
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<tr>
<td>Title: Unit Chief, DCSU</td>
<td>Title: Unit Chief, Vulnerability Compliance Support Unit</td>
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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 required for the following reason(s):
  ___ System does not collect, maintain, or disseminate PII.
  ___ System is grandfathered (in existence before 4/17/2003; no later changes posing significant privacy risks).
  X System information in the system relates to internal government operations.
  ___ System has been previously assessed under an evaluation similar to a PIA.
  ___ No significant privacy issues (or privacy issues are unchanged).
  X Other: DAVE is a hosting environment for applications operating on the _ the only PII collected
and maintained within DAVE is that of a limited number of _ with access rights
  to the DAVE infrastructure.

Applicable SORN(s): DOJ-002, Department of Justice Computer Systems Activity and Access Records, 64 Fed. Reg. 73,585 (Dec. 30, 1999), as amended.

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

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

Prepare/revise/add Privacy Act (e)(3) statements for related forms? ___ No ___ Yes
  PCLU will work with the Program Manager to ensure that a Privacy Act (e)(3) statement appears on the DAVE
initial login screen.

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

Other:

Monica E. Ryan, Unit Chief
Privacy and Civil Liberties Unit
FBI Privacy and Civil Liberties Officer

Signature: [Signature]
Date Signed: 03/14
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 Distributed Application Virtual Environment (DAVE) provides a virtual hosting environment for various applications operating within the FBI's domain. The DAVE infrastructure provides a network and server architecture on which to host virtual servers. The DAVE utilizes some common infrastructure services, such as [Redacted]. The DAVE-specific management servers provide interfaces/databases to support the allocation of server and network resources and to support the collection of performance statistics for the infrastructure and hosted servers. The DAVE also supports Data Center consolidation and reduces spending on physical server hardware and maintenance.

All access to information contained in an application hosted on DAVE is controlled by the owner of the particular application, rather than by DAVE. For that reason, this Privacy Threshold Analysis (PTA) is limited to the DAVE hosting environment itself, and does not encompass the various software applications hosted on DAVE. To the extent that particular software applications require privacy documentation, those applications will be the subject of separate documentation.

Access to the DAVE infrastructure and management servers is limited to approximately [Redacted] assigned to the ITSD’s Data Center Support Unit (DCSU) along with [Redacted] assigned to the Security Division (SecD). User access and activity information for these individuals is collected and maintained within DAVE, as required, for IT support and security purposes. No personally identifiable information (PII) about other individuals is collected, maintained, used, or disseminated by DAVE.

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

[ ] NO
[ ] YES [If yes, please continue.]

[Redacted]

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

_X_ The information directly identifies specific individuals.

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

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

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

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

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

 ______ NO ______ X 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.]

- The only PII maintained in DAVE consists of user access and activity information for the limited number of ITSD and SecD personnel with access rights to the DAVE infrastructure.

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

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

 ______ YES

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

____ NO

____ YES

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

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

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

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

____ X__ NO ______ YES If yes, check all that apply:

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

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

____ SSNs are important for other reasons. Describe:

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

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

Explain:

8. Is the system operated by a contractor?

____ X__ No.

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

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

UNCLASSIFIED
UNCLASSIFIED

(X) NO DAVE[_____] is undergoing certification and accreditation; a completion date is not yet available. It is anticipated that DAVE[_____] will receive authority to operate (ATO) 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.

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.

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed? DAVI[_____] was first deployed in October, 2013.

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

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

There have been no significant changes to DAVI[_____] affecting the collection, retention, use or dissemination of PII since it was first deployed.
_____ 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
FEDERAL BUREAU OF INVESTIGATION
FOI/PA
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FOI/PA# 1272295-0

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FBI PTA: Digital Collection System (DCS 6000)

FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: Digital Collection System (DCS) 6000

BIKR FBI Unique Asset ID: SYS-0000023

<table>
<thead>
<tr>
<th>Derived From</th>
<th>SYSTEM/PROJECT POC</th>
<th>FBI OGC/PCLU POC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Classified By:</td>
<td>Name: Electronics Eng’</td>
<td>Name: AGC</td>
</tr>
<tr>
<td>Reason:</td>
<td>Program Office: Telecommunications</td>
<td></td>
</tr>
<tr>
<td>Declassify On:</td>
<td>Intercept Collections Technology Unit (TICTU)</td>
<td>Phone:</td>
</tr>
<tr>
<td>N/A</td>
<td>Division: Operational Technology Division</td>
<td>Room Number: 7350 JEH</td>
</tr>
<tr>
<td></td>
<td>Phone:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Room Number: ERF-E, 4A68</td>
<td></td>
</tr>
</tbody>
</table>

FBI DIVISION INTERMEDIATE APPROVALS

<table>
<thead>
<tr>
<th>Program Division:</th>
<th>Program Manager (or other appropriate executive as Division determines)</th>
<th>Division</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operational Technology Division (OTD)</td>
<td>Signature:</td>
<td>Signature:</td>
</tr>
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<td></td>
<td>Date signed:</td>
<td>Date signed:</td>
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<tr>
<td></td>
<td>Name: SSA</td>
<td>Name: SSA</td>
</tr>
<tr>
<td></td>
<td>Title: Unit Chief, TICTU</td>
<td>Title: Assistant Section Chief</td>
</tr>
</tbody>
</table>

FBIHQ Division: Signature: Date signed: Name: Title:

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

(The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)
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FBI PTA: Digital Collection System (DCS 6000)

FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:

- PIA is required by the E-Government Act.
- PIA is to be completed as a matter of FBI/DOJ discretion.

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

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


Notify FBI RMD/RIDS per MIOG 190.2.3? Yes ______ No (indicate reason):

http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_miod190-2-3_ec.wpd

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

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

N/A

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

Other: PCLU will coordinate with OTD to ensure that a Privacy Impact Assessment (PIA) is prepared for the components of the Digital Collection System operated by TICTU (DCSNet, DCS 3000, DCS 5000 and DCS 6000). This requirement may be satisfied by a consolidated PIA discussing one or more components and separate PIA's for components that are not included in the consolidated PIA.

<table>
<thead>
<tr>
<th>Acting Unit Chief</th>
<th>Signature:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jacqueline F. Brown, Acting Deputy General Counsel and FBI Privacy and Civil Liberties Officer</td>
<td>Signature:</td>
</tr>
</tbody>
</table>
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.

Title III of the Omnibus Crime Control Act of 1968 (Title III), as amended, permits the FBI to intercept wire, oral or electronic communications as authorized by warrant. The DCS 6000 (sometimes referred to as) an earlier version was known as is 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)?

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

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

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

   (Check all that apply.)

   **X** The information directly identifies specific individuals.

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

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

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

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

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

   **X** NO  ____ YES
5. Is information about United States citizens or lawfully admitted permanent resident aliens retrieved from the system/project by name or other personal identifier?

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

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

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

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

   X YES

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

      ___ NO

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

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

      ___ 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:

   While the DCS 6000 is not designed to collect SSNs, they may be inadvertently collected on the system/project. Any SSNs obtained during conversations deemed non-pertinent will be purged, in accordance with 18 U.S.C. § 2518(5).

   ___ SSNs are necessary to establish/confirm the identity of subjects, victims, witnesses or sources in this law enforcement or intelligence activity.
FBI PTA: Digital Collection System (DCS 6000)

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 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:

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

DCS 6000 was most recently reaccredited on September 12, 2010 and has Authority to Operate (ATO) through September 11, 2013.

Confidentiality:  Low X Moderate _ High _ Undefined

Integrity:  Low X Moderate _ High _ Undefined

Availability:  Low X Moderate _ High _ Undefined

Not applicable – this system is only paper-based.

10. Is this system/project the subject of an OMB-300 budget submission?
FBI PTA: Digital Collection System (DCS 6000)

___ NO

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

DCS 6000 is encompassed by the OMB 300 for FBI Digital Collection, forwarded by the FBI to DOJ on February 13, 2012.


___ 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/PCLIU 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? DCS 6000 was first deployed in November, 1999.

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

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

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

___ A conversion from paper-based records to an electronic system.
A change from information in a format that is anonymous or non-identifiable to a format that is identifiable to particular individuals.

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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]: Since its initial deployment in 1999, updates to DCS 6000 have involved server enhancements or replacements as well as software (operating system) updates.

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

X NO    YES

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FBI PTA: Digital Collection System (DCS 6000)

If yes:

a. Provide date/title of the PIA:

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

___ NO ___ YES

A Privacy Threshold Analysis (PTA) for DCS 6000 was completed in April, 2007.

[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.]