I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

   A) The Bank Robbery Statistical Application (BRSA) is a mainframe application that serves as the repository for all statistical data reported on the FD-430 Form.

   B) 

   C) Bank Crime Statistical reports

   D) Bank Crime Statistical information derived from the FD-430 form.

   E) Only customers that have access to FBINET may have access to the BRSA

   F) FBI Investigative Mainframe

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

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

   YES [If yes, please continue.]

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

   The information directly identifies specific individuals.

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

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

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

   [INSERT CLASSIFICATION/CONTROL MARKINGS, IF APPROPRIATE]
SSNs are necessary to establish/confirm the identity of subjects, victims, witnesses or sources in this law enforcement or intelligence activity.

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

SSNs are important for other reasons. Describe:

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

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

8. Is the system operated by a contractor?

No.

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

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

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

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

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

Confidentiality: [ ] Low [ ] Moderate [ ] High [ ] Undefined

Integrity: [ ] Low [ ] Moderate [ ] High [ ] Undefined

Availability: [ ] Low [ ] Moderate [ ] High [ ] Undefined

Not applicable – this system is only paper-based.

______ NO

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

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

______ NO  ______ YES

12. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

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

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

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

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

______ A change that results in information in identifiable form being merged, centralized, or matched with other databases.
A new method of authenticating the use of and access to information in identifiable form by members of the public.

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

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

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

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

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

Other [Provide brief explanation]:

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

NO YES

If yes:

a. Provide date/title of the PIA:

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

NO YES

[The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCLU for final FBI approval and determination if PIA and/or other actions are required.]
**INSTITUTION TYPE:**
- [ ] (A) Armored Carrier
- [ ] (B) Commercial Bank
- [ ] (C) Credit Union
- [ ] (K) Mutual Savings Bank
- [ ] (S) Savings and Loan

**INSTITUTION AREA INVOLVED:**
- [ ] (A) Teller Counter
- [ ] (B) Drive-in/Walk-up
- [ ] (C) Safe Deposit Area
- [ ] (D) Office Area
- [ ] (E) Automatic Teller Machine

**SECURITY DEVICES:**
- [ ] Yes
- [ ] No
- [ ] Activated
- [ ] Functioned
- [ ] Armed
- [ ] Arrested
- [ ] Yes
- [ ] No

**SUBJECTS:**
- Number known involved ( )
- Unknown ( )

**LOOT TAKEN:**
- [ ] Yes
- [ ] No
- [ ] Unknown

<table>
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<tr>
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**LOOT RECOVERED:**
- [ ] Yes
- [ ] No
- [ ] Unknown

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**INSTITUTION/COMMUNITY CHARACTERISTICS:**
- Facility Type
- Facility Location
- Community Type
- Branch Office
- Commercial District
- Small City or Town
- Main Office
- Rural
- Metropolitan
- Other
- Residential
- Rural
- Remote Facility
- Shopping Center
- Suburban

**VIOLANCE:**
- [ ] Yes
- [ ] No
- [ ] Physical Assault
- [ ] Hostage Taken

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<th>Death</th>
<th>Hostage</th>
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**ENTRY (check one):**
- [ ] New Case
- [ ] Change or addition - complete applicable categories only
- [ ] Deletion - remove entry, no violation.

---

**Date:**

**TYPE:**
- [ ] Robbery
- [ ] Burglary
- [ ] Larceny
- [ ] Extortion
- [ ] Other - Arson Carrier

**ENTRY (check one):**
- [ ] New Case
- [ ] Change or addition - complete applicable categories only
- [ ] Deletion - remove entry, no violation.

**Certified to the best of my knowledge and belief:**

**Date:**

**Time of offense:**
- [ ] am
- [ ] pm

**Record:-Note Available:**
- [ ] Yes
- [ ] No

---

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**SECURITY DEVICES:**

- [ ] Yes
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- [ ] Activated
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- [ ] Yes
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**SUBJECTS:**

- Number known involved ( )
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FBI PRIVACY THRESHOLD ANALYSIS (PTA)

NAME OF SYSTEM / PROJECT: 

BIKR FBI Unique Asset ID: _APP-0000288_

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FBI DIVISION INTERMEDIATE APPROVALS

<table>
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<tr>
<th>Program Division:</th>
<th>Program Manager (or other appropriate executive as Division determines)</th>
<th>Division Privacy Officer</th>
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</thead>
</table>
| CCRSIB/CIRG       | Signature: 
Name: 
Title: Unit Chief, FFOU | Signature: 
Date signed: 5/18/11 
Name: 
Title: Unit Chief |
| FBIHQ Division:   | Signature: 
Date signed: 
Name: 
Title: Unit Chief, FASU |
| ITI/ITSD          | Signature: 
Date signed: 
Name: 
Title: |

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

XX ___ PIA is not required for the following reason(s):
   ___ System does not collect, maintain, or disseminate PII.
   ___ System is grandfathered (in existence before 4/1/2003; 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.
   XX _No significant privacy issues (or privacy issues are unchanged).
   ___ Other (describe):

Applicable SORN(s): Information that pertains to personnel is covered by the CRS, Justice/FBI-002

Notify FBI RMD/RIDS per MIOG 190.2.39? X No ___Yes--See sample EC on PCLU intranet website here:
http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liberties%20Library/form_for_mioj90-2-3_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 ___Yes (indicate forms affected):

In progress

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</th>
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<td>James J. Landon, Deputy General Counsel</td>
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<tr>
<td>FBI Privacy and Civil Liberties Officer</td>
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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 mission of the Bureau Aviation Program is to provide aviation support for all facets of FBI investigative activities, including aerial surveillance, aerial photography, transportation of response personnel and equipment to a crisis site.

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

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?

__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.

__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 7.1] The Bureau Aviation Program supports these investigations

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).]

_____ 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:
C&A is pending at this time and should be completed by 01/01/2013.

_____ 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.
   ___X___ NO
   ____ YES  If yes, please describe the data mining function:

11. Is this a national security system (as determined by the SecD)?
   ___X___ NO    ____ YES

12. Status of System/ Project:
   ___X___ This is a new system/project in development.
**FBI PRIVACY THRESHOLD ANALYSIS (PTA)**

**NAME OF SYSTEM / PROJECT:**

**BIKR FBI Unique Asset ID:**

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**FBI DIVISION INTERMEDIATE APPROVALS**

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<td></td>
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<tr>
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<tr>
<td>Name: Jennifer Smith Love</td>
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<tr>
<td>Title: Assistant Director</td>
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Signature: [Signature]

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:

__X__ PIA is required by the E-Government Act for the BICS II System; this PIA is sufficient for the Becrypt Trusted Client.

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

Is PIA to be published on FBLGOV (after any RMD FOIA redactions)? __X__ Yes, ___ No (indicate reason):

___ PIA is not required for the following reason(s):
___ System does not collect, maintain, or disseminate PIL.
___ 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): CRS, JUSTICE/FBI-062

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_mioig190-2-3_ec.wpd

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

Prepare/revise/add Privacy Act (e)1(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:

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<th>James J. Lanston, Deputy General Counsel</th>
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<tr>
<td>FBI Privacy and Civil Liberties Officer</td>
<td></td>
<td>2/7/12</td>
</tr>
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</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.

This Privacy Threshold Analysis describes a [redacted] that will improve the protection of personally identifiable data about FBI personnel and applicants for employment and security clearances with the Bureau and throughout the government.

The FBI is responsible for conducting Background Investigations (BIs) on applicants and candidates for employment with the FBI and other Federal agencies. The FBI also conducts Background Investigations on individuals requiring security clearances and on current Federal employees who require investigations or reinvestigations for security clearances. The FBI uses contract special investigators (SIs) for this purpose, coordinated through the Background Investigation Contract Services Unit (BICSU) of the FBI's Security Division. BICS SIs are utilized to conduct interviews and to conduct record checks in accordance with these BIs.

The BICS II project will better protect this PII by providing a secure user environment utilizing [redacted] to create a fully self-contained, bootable, encrypted operating environment on [redacted].
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.]

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? Except perhaps indirectly if information is uncovered that has a bearing on these assessments and investigations.

_____ NO

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

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

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

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

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

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

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

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

_____ SSNs are important for other reasons. Describe:

_____ The system/project provides special protection to SSNs (e.g., SSNs are encrypted, hidden from all users via a look-up table, or only available to certain users). Describe: All data on the devices are encrypted and transmitted through a Virtual Private Network.

_____ 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.

Contract employees are used to conduct the background investigations.

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: This tool will be used in conjunction with BICS Online, part of PBMS, which has a C&A date of 7/11/2008

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.

_____ X NO

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

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

_____ X NO

_____ YES

12. 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.] The Bcrypt Trusted Client will be rolled out on a pilot basis.

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

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

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

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

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

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

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

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

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

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

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

Other [Provide brief explanation]:

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

_____ NO    _____ YES

If yes:

a. Provide date/title of the PIA:

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

_____ NO    _____ YES

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

NAME OF SYSTEM / PROJECT:

BIKR FBI Unique Asset ID: 2010-066-01-P-404-140-3231

Derived From: SYSTEM/PROJECT POC
Classified By: Name: [redacted]
Reason: Program Office: Cross Domain
Declasify On: Management Office, IATU


Division: Security Division
Phone: [redacted]
Room Number: 7350 JEH

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

Program Manager (or other appropriate executive as Division determines)

Program Division: Security Division
Signature: [redacted]
Date signed: 5-25-2011
Name: Title: Information Assurance Technology Unit Chief

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

Signature:
Date signed:
Name: Michael J. Folmar
Title: Assistant Director Security Division

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

____ PIA is required by the E-Government Act.

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

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

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

___ X ____ 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). System constitutes infrastructure.

___ Other (describe):

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_mio190-2-3_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: 11/11/11
Date Signed: 11/11/11
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.)
2. Does the system/project collect, maintain, or disseminate any information about individuals (i.e., a human being or natural person, regardless of nationality)?

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

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

_____ The information directly identifies specific individuals.

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

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

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

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

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

_____ NO      _____ YES

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

_____ 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 the necessary form(s).]

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

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

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

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

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

____ SSNs are important for other reasons. Describe:

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

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

8. Is the system operated by a contractor?

____ No.

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

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

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

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

   Confidentiality:  _Low_ Moderate _High _ Undefined

   Integrity:  _Low_ Moderate _High _ Undefined

   Availability:  _Low_ Moderate _High _ Undefined

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


    _____ NO

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

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

    _____ NO  _____ YES

12. Status of System/ Project:

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

II. EXISTING SYSTEMS / PROJECTS

1. When was the system/project developed?

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

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

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

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

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

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

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

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

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

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

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

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

_____ Other [Provide brief explanation]:

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

_____ NO  _____ YES

If yes:

a. Provide date/title of the PIA:

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

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

**NAME OF SYSTEM / PROJECT:**

**BIKR FBI Unique Asset ID:** Pending

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

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<th>Division Privacy Officer</th>
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<td>FBI HQ Division:</td>
<td>Signature: Date signed: Name: Title: Supervisory IT Specialist</td>
<td>Signature: Date signed: Name: Title: Division Privacy Officers for ITD</td>
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*After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7350). (The FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)*
UNCLASSIFIED

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

___ PIA is required by the E-Government Act.

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

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

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

_X__ 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 (describe):

Applicable SORN(s): _N/A________________________________________________

Notify FBI RMD/RIDS per MIORG 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_miorig190-2-3_ec.wpd

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

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

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

Other:

---

Unit Chief:

Privacy and Civil Liberties Unit

Signature: ____________________________ Date Signed: ____________________________

James J. Landon, Deputy General Counsel

FBI Privacy and Civil Liberties Officer

Signature: ____________________________ Date Signed: ____________________________

---
I. INFORMATION ABOUT THE SYSTEM / PROJECT

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

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.]
UNCLASSIFIED

YES  [If yes, please continue.]

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

_____ The information directly identifies specific individuals.

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

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

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

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

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

_____ NO  _____ YES

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

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

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

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

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

_____ YES

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

______ NO

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

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

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

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

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

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

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

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

______ SSNs are important for other reasons. Describe:

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

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

8. Is the system operated by a contractor?

______ No.

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

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

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

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

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

Confidentiality:  ___Low ___Moderate ___High ___Undefined

Integrity:      ___Low ___Moderate ___High ___Undefined

Availability:  ___Low ___Moderate ___High ___Undefined

______ Not applicable – this system is only paper-based.
10. 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.
(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: Characterization and Storage System (BACSS)

Binary Analysis

BIKR FBI Unique Asset ID: NEN-000098

SYS-000022 (BACSS)

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FBI DIVISION INTERMEDIATE APPROVALS

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<tr>
<th>Program Division</th>
<th>Program Manager (or other appropriate executive as Division determines)</th>
<th>Division Privacy Officer</th>
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<tr>
<td></td>
<td>Name: BACSS PM</td>
<td>Name: IT Security Program Manager</td>
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<tr>
<td>FBHQ Division</td>
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<td>Name:</td>
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<td></td>
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After all division approvals, forward signed hard copy plus electronic copy to FBI OGC/PCLU (JEH 7350).

(Incident FBI Privacy and Civil Liberties Officer's determinations, conditions, and/or final approval will be recorded on the following page.)
FINAL FBI APPROVAL / DETERMINATIONS / CONDITIONS:  [This section will be completed by the FBI PCLU/PCLO following PTA submission. The PTA drafter should skip to the next page and continue.]

_____ PIA is required by the E-Government Act.

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

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

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

Only log on information is maintained, with the exception of information in the metadata (IP address) that is arguably PII, but this is not significant enough to give rise to further documentation, particularly because, if a case is opened, any PII will be maintained in the case file and covered by the CRS and related privacy documentation.

Applicable SORN(s): DOJ-002, Computer Systems Activity and Access Records

Notify FBI RMD/RIDS per MIOG 199.2.3?  ___No  ___Yes--See sample EC on PCLU intranet website here:
http://home/DO/OGC/LTB/PCLU/PrivacyCivil%20Liabilities%20Library/form_for_mioig.199-2-3_ec.wpd

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

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

<table>
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<tr>
<th>Unit Chief</th>
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<tbody>
<tr>
<td>Privacy and Civil Liberties Unit</td>
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<tr>
<td>James J. Landon, Deputy General Counsel</td>
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<tr>
<td>FBI Privacy and Civil Liberties Officer</td>
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epic.org  EPIC-14-06-04-FBI-FOIA-20150519-6th-Production  EPIC-1713
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.):

To support the high number of intrusion investigations where software applications have been used to facilitate a criminal act or terrorist plot, the FBI has created [REDACTED] Binary Analysis Characterization and Storage System (BACSS) for use by the FBI's Operational Technology Division (OTD) / Digital Evidence Section (DES) / Investigative Analysis Unit (IAU).

Through [REDACTED] and BACSS, IAU personnel can assess the functionality of potential malicious software ("malware"), establish and maintain a malware repository to facilitate future identification, and deduce the capability of exploits in support of criminal, counterintelligence, and counterterrorism investigations.

Files suspected of containing malware are acquired via a variety of external sources, such as through the seizure of hardware pursuant to a search warrant, reporting by corporate entities or private citizens, and via FISA-acquired electronic communications or business records. Standard minimization procedures are applied to all FISA-derived material.

Suspected malware files are extracted from the programs or applications in which they are located and uploaded onto [REDACTED] via email, FTP, or physical media. Separation of the portable executable malware file helps to ensure that no personally identifiable information (PII) contained in the host program/application is introduced into [REDACTED]
agents and analysts can access the web-based BACSS application to review the technical reports and identify associations between cases in which similar technical methods have been used.

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

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

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

_____ The information directly identifies specific individuals.

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

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

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

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

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

_____ NO  _____ YES

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

_____ 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)(5) statement (either on the collection form or via a separate notice)?

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

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

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

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

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

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

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

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

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

8. Is the system operated by a contractor?

_____ No.

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

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

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

   - Provide date of last C&A certification/re-certification:
   - Confidentiality: __Low__ Moderate __High__ Undefined
   - Integrity:     __Low__ Moderate __High__ Undefined
   - Availability: __Low__ Moderate __High__ Undefined

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


    ____ NO

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

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

    ____ NO    ____ YES

12. Status of System/ Project:

    ____ This is a new system/ project in development. [If you checked this block, STOP. The PTA is now complete and after division approval(s) should be submitted to FBI OGC/PCL.U 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):

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- 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 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:** Biometric Identification Tools Program (B-ID)

**BIKR FBI Unique Asset ID:** SYS0000171

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## FBI DIVISION INTERMEDIATE APPROVALS

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