

**U.S. Department of Commerce  
U.S. Patent and Trademark Office**



**Privacy Impact Assessment  
for the  
USPTO CoSo Cloud Adobe Connect Solution (UCCACS)**

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1/13/2022

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Signature of Senior Agency Official for Privacy/DOC Chief Privacy Officer

Date

## **U.S. Department of Commerce Privacy Impact Assessment USPTO CoSo Cloud Adobe Connect Solution (UCCACS)**

**Unique Project Identifier: PTOC-00-58-00**

### **Introduction: System Description**

*Provide a description of the system that addresses the following elements:*

*The response must be written in plain language and be as comprehensive as necessary to describe the system.*

USPTO CoSo Cloud Adobe Connect Solution (UCCACS), is a web communication solution that enables USPTO to provide online computer-based training to internal audiences. The purpose of this system is to enable USPTO business units to share vital knowledge with USPTO staff. USPTO business units gain efficiency and effectiveness by communicating and sharing vital business knowledge with internal customers. The UCCACS system users are comprised of employees and contractors, including system administrators and regular users that access the system internally through PTONet. Users include USPTO attorneys and patent examiners, and other staff.

UCCACS is an on-demand content delivery Software as a Service (SaaS) that utilizes the CoSo Cloud, LLC - CoSo Cloud FedRAMP Managed Service Platform. The on-demand content includes Microsoft® PowerPoint slides, live and recorded video, interactive slides produced Adobe using Presenter and Captivate. This system serves a variety of user groups and provides internal and external access 24 hours a day, 7 days a week. As an enterprise product, UCCACS includes the ability to interact and integrate with USPTO single sign on capabilities to provide account provisioning and authentication for internal or confidential content. That integration occurs via USPTO's ICAM IDaaS system.

***(a) Whether it is a general support system, major application, or other type of system***

UCCACS is a FedRAMP Software as a Service (SaaS).

***(b) System location***

UCCACS is located in the CoSo Cloud FedRAMP Managed Service Platform. All data and accompanying PII is stored in CoSo Cloud FedRAMP Managed Service Platform SaaS cloud. There is no physical on-premise location for the UCCACS system.

***(c) Whether it is a standalone system or interconnects with other systems (identifying and describing any other systems to which it interconnects)***

**ICAM Identity as a Service (ICAM IDaaS)** system provides an enterprise authentication and authorization service to all applications/AIS's

**Network and Security Infrastructure (NSI)** system facilitates the communications, secure access, protective services, and network infrastructure support for all USPTO applications.

***(d) The way the system operates to achieve the purpose(s) identified in Section 4***

UCCACS provides customers with the ability to serve on demand video to users. Authorized content administrators publish on-demand content for users to retrieve via a Uniform Resource Locator (URL). Users view the on-demand content using a browser or Adobe Connect Mobile Application via a secure Internet connection.

***(e) How information in the system is retrieved by the user***

USPTO username, login ID and email address information is retrieved by authorized USPTO staff and contractors via web browsers on authorized USPTO computer devices and networks connected to CoSo Cloud FedRAMP Managed Service Platform Service (SaaS) cloud. Authorized USPTO staff and contractors via web browsers on authorized USPTO computer devices and networks retrieve USPTO internal video. Users via a web browser or Adobe Connect mobile application retrieve public video content.

***(f) How information is transmitted to and from the system***

Information is transmitted to and from the system via a secure Internet connection to the CoSo Cloud FedRAMP Managed Service Platform SaaS Cloud.

***(g) Any information sharing conducted by the system***

Authorized USPTO staff and contractors have access to the data stored on the UCCACS System. DOC OHR operation's unit request's that PTO post the attendance list for all mandatory USPTO/Trademark training and upload into the Learning Center to make sure that PTO OHR can send all trainee information to the Department of Commerce for compliance purposes. DOC has the ability to get these reports directly through the Learning Center.

***(h) The specific programmatic authorities (statutes or Executive Orders) for collecting, maintaining, using, and disseminating the information***

The citation of the legal authority to collect PII and/or BII is 5 U.S.C 301, 35 U.S.C. 2, and E.O.12862.

***(i) The Federal Information Processing Standards (FIPS) 199 security impact category for the system***

Low

**Section 1: Status of the Information System**

1.1 Indicate whether the information system is a new or existing system.

This is a new information system.  
 This is an existing information system with changes that create new privacy risks.  
*(Check all that apply.)*

<b>Changes That Create New Privacy Risks (CTCNPR)</b>					
a. Conversions	<input type="checkbox"/>	d. Significant Merging	<input type="checkbox"/>	g. New Interagency Uses	<input type="checkbox"/>
b. Anonymous to Non-Anonymous	<input type="checkbox"/>	e. New Public Access	<input type="checkbox"/>	h. Internal Flow or Collection	<input type="checkbox"/>
c. Significant System Management Changes	<input type="checkbox"/>	f. Commercial Sources	<input type="checkbox"/>	i. Alteration in Character of Data	<input type="checkbox"/>
j. Other changes that create new privacy risks (specify):					

This is an existing information system in which changes do not create new privacy risks, and there is not a SAOP approved Privacy Impact Assessment.

This is an existing information system in which changes do not create new privacy risks, and there is a SAOP approved Privacy Impact Assessment (version 01-2015 or 01-2017).

This is an existing information system in which changes do not create new privacy risks, and there is a SAOP approved Privacy Impact Assessment (version 01-2019 or later).

## **Section 2: Information in the System**

2.1 Indicate what personally identifiable information (PII)/business identifiable information (BII) is collected, maintained, or disseminated. *(Check all that apply.)*

<b>Identifying Numbers (IN)</b>					
a. Social Security*	<input type="checkbox"/>	f. Driver's License	<input type="checkbox"/>	j. Financial Account	<input type="checkbox"/>
b. Taxpayer ID	<input type="checkbox"/>	g. Passport	<input type="checkbox"/>	k. Financial Transaction	<input type="checkbox"/>
c. Employer ID	<input type="checkbox"/>	h. Alien Registration	<input type="checkbox"/>	l. Vehicle Identifier	<input type="checkbox"/>
d. Employee ID	<input type="checkbox"/>	i. Credit Card	<input type="checkbox"/>	m. Medical Record	<input type="checkbox"/>
e. File/Case ID	<input type="checkbox"/>	n. Other identifying numbers (specify):			
*Explanation for the business need to collect, maintain, or disseminate the Social Security number, including truncated form:					

<b>General Personal Data (GPD)</b>					
a. Name	<input checked="" type="checkbox"/>	h. Date of Birth	<input type="checkbox"/>	o. Financial Information	<input type="checkbox"/>
b. Maiden Name	<input type="checkbox"/>	i. Place of Birth	<input type="checkbox"/>	p. Medical Information	<input type="checkbox"/>

c. Alias	<input type="checkbox"/>	j. Home Address	<input type="checkbox"/>	q. Military Service	<input type="checkbox"/>
d. Gender	<input type="checkbox"/>	k. Telephone Number	<input type="checkbox"/>	r. Criminal Record	<input type="checkbox"/>
e. Age	<input type="checkbox"/>	l. Email Address	<input type="checkbox"/>	s. Physical Characteristics	<input type="checkbox"/>
f. Race/Ethnicity	<input type="checkbox"/>	m. Education	<input type="checkbox"/>	t. Mother's Maiden Name	<input type="checkbox"/>
g. Citizenship	<input type="checkbox"/>	n. Religion	<input type="checkbox"/>		
u. Other general personal data (specify):					

<b>Work-Related Data (WRD)</b>					
a. Occupation	<input type="checkbox"/>	e. Work Email Address	<input checked="" type="checkbox"/>	i. Business Associates	<input type="checkbox"/>
b. Job Title	<input type="checkbox"/>	f. Salary	<input type="checkbox"/>	j. Proprietary or Business Information	<input type="checkbox"/>
c. Work Address	<input type="checkbox"/>	g. Work History	<input type="checkbox"/>	k. Procurement/contracting records	<input type="checkbox"/>
d. Work Telephone Number	<input type="checkbox"/>	h. Employment Performance Ratings or other Performance Information	<input type="checkbox"/>		
l. Other work-related data (specify):					

<b>Distinguishing Features/Biometrics (DFB)</b>					
a. Fingerprints	<input type="checkbox"/>	f. Scars, Marks, Tattoos	<input type="checkbox"/>	k. Signatures	<input type="checkbox"/>
b. Palm Prints	<input type="checkbox"/>	g. Hair Color	<input checked="" type="checkbox"/>	l. Vascular Scans	<input type="checkbox"/>
c. Voice/Audio Recording	<input checked="" type="checkbox"/>	h. Eye Color	<input checked="" type="checkbox"/>	m. DNA Sample or Profile	<input type="checkbox"/>
d. Video Recording	<input checked="" type="checkbox"/>	i. Height	<input type="checkbox"/>	n. Retina/Iris Scans	<input type="checkbox"/>
e. Photographs	<input checked="" type="checkbox"/>	j. Weight	<input type="checkbox"/>	o. Dental Profile	<input type="checkbox"/>
p. Other distinguishing features/biometrics (specify):					

<b>System Administration/Audit Data (SAAD)</b>					
a. User ID	<input checked="" type="checkbox"/>	c. Date/Time of Access	<input checked="" type="checkbox"/>	e. ID Files Accessed	<input type="checkbox"/>
b. IP Address	<input type="checkbox"/>	f. Queries Run	<input type="checkbox"/>	f. Contents of Files	<input type="checkbox"/>
g. Other system administration/audit data (specify):					

<b>Other Information (specify)</b>					

2.2 Indicate sources of the PII/BII in the system. (*Check all that apply.*)

<b>Directly from Individual about Whom the Information Pertains</b>					
In Person	<input type="checkbox"/>	Hard Copy: Mail/Fax	<input type="checkbox"/>	Online	<input type="checkbox"/>
Telephone	<input type="checkbox"/>	Email	<input type="checkbox"/>		

Other (specify):
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<b>Government Sources</b>					
Within the Bureau	<input checked="" type="checkbox"/>	Other DOC Bureaus	<input type="checkbox"/>	Other Federal Agencies	<input type="checkbox"/>
State, Local, Tribal	<input type="checkbox"/>	Foreign	<input type="checkbox"/>		
Other (specify):					

<b>Non-government Sources</b>					
Public Organizations	<input type="checkbox"/>	Private Sector	<input type="checkbox"/>	Commercial Data Brokers	<input type="checkbox"/>
Third Party Website or Application			<input type="checkbox"/>		
Other (specify):					

2.3 Describe how the accuracy of the information in the system is ensured.

The PII in UCCACS is secured using appropriate administrative, physical and technical safeguards in accordance with the FedRAMP Li-SaaS Authorization. All access has role-based restrictions via USPTO Role Based Access System via SAML 2.0, and individuals with access privileges have undergone vetting and suitability screening. The USPTO maintains an audit trail and performs random periodic reviews to identify unauthorized access and changes a part of verifying the integrity of data.
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2.4 Is the information covered by the Paperwork Reduction Act?

<input type="checkbox"/>	Yes, the information is covered by the Paperwork Reduction Act. Provide the OMB control number and the agency number for the collection.
<input checked="" type="checkbox"/>	No, the information is not covered by the Paperwork Reduction Act.

2.5 Indicate the technologies used that contain PII/BII in ways that have not been previously deployed. *(Check all that apply.)*

<b>Technologies Used Containing PII/BII Not Previously Deployed (TUCPBNPD)</b>			
Smart Cards	<input type="checkbox"/>	Biometrics	<input type="checkbox"/>
Caller-ID	<input type="checkbox"/>	Personal Identity Verification (PIV) Cards	<input type="checkbox"/>
Other (specify):			

<input checked="" type="checkbox"/>	There are not any technologies used that contain PII/BII in ways that have not been previously deployed.
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**Section 3: System Supported Activities**

3.1 Indicate IT system supported activities which raise privacy risks/concerns. *(Check all that apply.)*

<b>Activities</b>			
Audio recordings	<input checked="" type="checkbox"/>	Building entry readers	<input type="checkbox"/>
Video surveillance	<input type="checkbox"/>	Electronic purchase transactions	<input type="checkbox"/>
Other (specify):			

<input type="checkbox"/>	There are not any IT system supported activities which raise privacy risks/concerns.
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#### **Section 4: Purpose of the System**

4.1 Indicate why the PII/BII in the IT system is being collected, maintained, or disseminated. *(Check all that apply.)*

<b>Purpose</b>			
For a Computer Matching Program	<input type="checkbox"/>	For administering human resources programs	<input type="checkbox"/>
For administrative matters	<input type="checkbox"/>	To promote information sharing initiatives	<input checked="" type="checkbox"/>
For litigation	<input type="checkbox"/>	For criminal law enforcement activities	<input type="checkbox"/>
For civil enforcement activities	<input type="checkbox"/>	For intelligence activities	<input type="checkbox"/>
To improve Federal services online	<input type="checkbox"/>	For employee or customer satisfaction	<input checked="" type="checkbox"/>
For web measurement and customization technologies (single-session)	<input type="checkbox"/>	For web measurement and customization technologies (multi-session)	<input type="checkbox"/>
Other (specify):			

#### **Section 5: Use of the Information**

5.1 In the context of functional areas (business processes, missions, operations, etc.) supported by the IT system, describe how the PII/BII that is collected, maintained, or disseminated will be used. Indicate if the PII/BII identified in Section 2.1 of this document is in reference to a federal employee/contractor, member of the public, foreign national, visitor or other (specify).

UCCACS is a web communication solution that enables USPTO to provide online computer-based training to internal audiences. UCCACS will be used internally by government employees and contractors and other government agencies to promote information sharing initiatives and to improve employee or customer satisfaction. Federal employees: Name, login ID and email address etc. are collected and maintained in audit logs and that information is only used to capture system access. The total number of users helps to improve federal services online and as employees enjoy the convenience of the service.

5.2 Describe any potential threats to privacy, such as insider threat, as a result of the bureau's/operating unit's use of the information, and controls that the bureau/operating unit has put into place to ensure that the information is handled, retained, and disposed appropriately. (For example: mandatory training for system users regarding appropriate handling of information, automatic purging of information in accordance with the retention schedule, etc.)

Inadvertent private information exposure to foreign entities or adversarial entities as well as insider threats are risks. UCCACS implements security management controls to prevent the inappropriate disclosure of sensitive information. Automated mechanisms are in place to ensure the security of all data collected. Security controls are employed to ensure information is resistant to tampering (Physical and Access Controls), the confidentiality of data in transit (Encryption), and that the data is available for authorized users only (Access Control). Management controls are utilized to prevent the inappropriate disclosure of sensitive information. In addition, the Perimeter Network (NSI) and Security and Compliance Services (SCS) systems provide additional automated transmission and monitoring mechanisms to ensure that PII is protected and not breached by any outside entities or insider threat. USPTO has policies, procedures, and training to ensure that employees are aware of their responsibility of protecting information and the negative impact to the agency if there is a loss, misuse, or unauthorized access to or modification of private information. USPTO requires annual security role-based training and annual mandatory security awareness procedure training for all employees. In the event of disposal, UCCACS uses degaussing to permanently remove data according to government mandate and security policy.

## **Section 6: Information Sharing and Access**

6.1 Indicate with whom the bureau intends to share the PII/BII in the IT system and how the PII/BII will be shared. *(Check all that apply.)*

Recipient	How Information will be Shared		
	Case-by-Case	Bulk Transfer	Direct Access
Within the bureau	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DOC bureaus	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Federal agencies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
State, local, tribal gov't agencies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Private sector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Foreign governments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Foreign entities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (specify):	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<input type="checkbox"/>	The PII/BII in the system will not be shared.
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6.2 Does the DOC bureau/operating unit place a limitation on re-dissemination of PII/BII shared with external agencies/entities?

<input type="checkbox"/>	Yes, the external agency/entity is required to verify with the DOC bureau/operating unit before re-dissemination of PII/BII.
<input type="checkbox"/>	No, the external agency/entity is not required to verify with the DOC bureau/operating unit before re-dissemination of PII/BII.
<input checked="" type="checkbox"/>	No, the bureau/operating unit does not share PII/BII with external agencies/entities.

6.3 Indicate whether the IT system connects with or receives information from any other IT systems authorized to process PII and/or BII.

<input checked="" type="checkbox"/>	<p>Yes, this IT system connects with or receives information from another IT system(s) authorized to process PII and/or BII.</p> <p>Provide the name of the IT system and describe the technical controls which prevent PII/BII leakage:</p> <p>UCCACS connects with USPTO RBAC via SAML 2.0 via the Enterprise Software Services (ESS) system. The information transmitted between the systems is protected within USPTO's secure perimeter through the NSI system. All data transmissions are encrypted and require credential verification.</p> <p>The security safeguards for the UCCACS shall meet the NIST SP 80-53 (Rev. 4) requirements set forth System Security Plan (SSP) and in the USPTO Cybersecurity Baseline Policy. The Security Plan specifically addresses the management, operational, and technical controls that are in place and planned during the operation of the enhanced system. All systems are subject to monitoring that is consistent with applicable regulations, agency policies, procedures, and guidelines. The system is implemented with encryption (SSL). Authorized users have role-based permissions. UCCACS is continually monitored to provide "near real-time" risk reporting and mitigation activities.</p>
<input type="checkbox"/>	No, this IT system does not connect with or receive information from another IT system(s) authorized to process PII and/or BII.

6.4 Identify the class of users who will have access to the IT system and the PII/BII. *(Check all that apply.)*

<b>Class of Users</b>			
General Public	<input type="checkbox"/>	Government Employees	<input checked="" type="checkbox"/>
Contractors	<input checked="" type="checkbox"/>		
Other (specify):			

## **Section 7: Notice and Consent**

7.1 Indicate whether individuals will be notified if their PII/BII is collected, maintained, or disseminated by the system. *(Check all that apply.)*

<input checked="" type="checkbox"/>	Yes, notice is provided pursuant to a system of records notice published in the Federal Register and discussed in Section 9.	
<input checked="" type="checkbox"/>	Yes, notice is provided by a Privacy Act statement and/or privacy policy. The Privacy Act statement and/or privacy policy can be found at: <a href="http://www.uspto.gov/privacy-policy">http://www.uspto.gov/privacy-policy</a>	
<input checked="" type="checkbox"/>	Yes, notice is provided by other means.	Specify how: See Appendix A: USPTO Warning Banner
<input type="checkbox"/>	No, notice is not provided.	Specify why not:

7.2 Indicate whether and how individuals have an opportunity to decline to provide PII/BII.

<input type="checkbox"/>	Yes, individuals have an opportunity to decline to provide PII/BII.	Specify how:
<input checked="" type="checkbox"/>	No, individuals do not have an opportunity to decline to provide PII/BII.	Specify why not: Individuals do not have the opportunity to decline to provide PII. The authorization process automatically passes the user's name, login id, and USPTO email address via the USPTO computer used to access content used by USPTO employees.

7.3 Indicate whether and how individuals have an opportunity to consent to particular uses of their PII/BII.

<input checked="" type="checkbox"/>	Yes, individuals have an opportunity to consent to particular uses of their PII/BII.	Specify how: USPTO employees and contractors consent to providing information for the primary purpose of acquiring access to applications and the network during onboarding when they accept their USPTO PTONet credentials.
<input type="checkbox"/>	No, individuals do not have an opportunity to consent to particular uses of their PII/BII.	Specify why not:

7.4 Indicate whether and how individuals have an opportunity to review/update PII/BII pertaining to them.

<input checked="" type="checkbox"/>	Yes, individuals have an opportunity to review/update PII/BII pertaining to them.	Specify how: USPTO employees and contractors may log in to MyUSPTO and update and review the PII held in their account profile.
<input type="checkbox"/>	No, individuals do not have an opportunity to review/update PII/BII pertaining to them.	Specify why not:

## **Section 8: Administrative and Technological Controls**

8.1 Indicate the administrative and technological controls for the system. (Check all that apply.)

<input checked="" type="checkbox"/>	All users signed a confidentiality agreement or non-disclosure agreement.
<input checked="" type="checkbox"/>	All users are subject to a Code of Conduct that includes the requirement for confidentiality.
<input checked="" type="checkbox"/>	Staff (employees and contractors) received training on privacy and confidentiality policies and practices.
<input checked="" type="checkbox"/>	Access to the PII/BII is restricted to authorized personnel only.
<input checked="" type="checkbox"/>	Access to the PII/BII is being monitored, tracked, or recorded. Explanation: The PII recorded and stored in a CoSo Cloud, LLC SaaS database. That PII is monitored and tracked by USPTO on an as-needed basis through audit logs.
<input checked="" type="checkbox"/>	The information is secured in accordance with the Federal Information Security Modernization Act (FISMA) requirements. Provide date of most recent Assessment and Authorization (A&A): _____ <input checked="" type="checkbox"/> This is a new system. The A&A date will be provided when the A&A package is approved.
<input type="checkbox"/>	The Federal Information Processing Standard (FIPS) 199 security impact category for this system is a moderate or higher.
<input checked="" type="checkbox"/>	NIST Special Publication (SP) 800-122 and NIST SP 800-53 Revision 4 Appendix J recommended security controls for protecting PII/BII are in place and functioning as intended; or have an approved Plan of Action and Milestones (POA&M).
<input checked="" type="checkbox"/>	A security assessment report has been reviewed for the information system and it has been determined that there are no additional privacy risks.
<input checked="" type="checkbox"/>	Contractors that have access to the system are subject to information security provisions in their contracts required by DOC policy.
<input type="checkbox"/>	Contracts with customers establish DOC ownership rights over data including PII/BII.
<input type="checkbox"/>	Acceptance of liability for exposure of PII/BII is clearly defined in agreements with customers.
<input type="checkbox"/>	Other (specify): _____

8.2 Provide a general description of the technologies used to protect PII/BII on the IT system.  
(*Include data encryption in transit and/or at rest, if applicable*).

The information system provides protection of resources in accordance with NIST 800-18 Rev. 1 and NIST 800-53 Rev. 4; the UCCACS System Security & Privacy Plan (SSPP) addresses the extent to which the security controls are implemented correctly, operating as intended, and producing the desired outcome with respect to meeting the security requirements for the information system in its operational environment. The SSPP is reviewed on an annual basis. In addition, annual assessments and Continuous Monitoring reviews are conducted on RBAC. The USPTO Cybersecurity Division conducts these assessments and reviews based on NIST SP 800-53 Revision 4, Security and Privacy Controls for Federal Information Systems and Organizations and NIST SP 800-53A Revision 4 Assessing Security and Privacy Controls in Federal Information Systems and Organizations. The results of these assessments and reviews are documented in the UCCACS Security Assessment Package as part of the system's Security Authorization process.

UCCACS implements security and management controls to prevent the inappropriate disclosure of information. Automated mechanisms are in place to ensure the security of all data collected. Security controls are employed to ensure information is resistant to tampering (Physical and Access Controls), the confidentiality of data in transit (Encryption), and that data is available for authorized users only (Access Control). Management controls are utilized to prevent the inappropriate disclosure of information.

UCCACS is secured using appropriate administrative, physical and technical safeguards in accordance with the FedRAMP Li-SaaS Authorization. All access has role based restrictions, and individuals with access privileges have undergone vetting and suitability screening. The USPTO maintains an audit trail and performs random periodic reviews to identify unauthorized access and changes as part of verifying the integrity of data.

USPTO uses the Life Cycle review process to ensure that management controls are in place for UCCACS. During the enhancement of any component, the security controls are reviewed, re-evaluated, and updated in the SSPP. The SSPP specifically addresses the management, operational, and technical controls that are in place, and planned, during the operation of the enhanced system. Additional management controls include performing national agency checks on all personnel, including contractor staff. Additionally, USPTO develops privacy and PII-related policies and procedures to ensure safe handling, storing, and processing of data.

UCCACS is secured by various USPTO infrastructure components, including the NSI and SCS systems and other OCIO established technical controls to include SAML 2.0 authentication to UCCACS. Web communications leverages modern encryption technology such as TLS 1.2 over HTTPS.

## **Section 9: Privacy Act**

9.1 Is the PII/BII searchable by a personal identifier (e.g, name or Social Security number)?

- Yes, the PII/BII is searchable by a personal identifier.
- No, the PII/BII is not searchable by a personal identifier.

9.2 Indicate whether a system of records is being created under the Privacy Act, 5 U.S.C. § 552a. (*A new system of records notice (SORN) is required if the system is not covered by an existing SORN.*)

As per the Privacy Act of 1974, “the term ‘system of records’ means a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.”

<input checked="" type="checkbox"/>	Yes, this system is covered by an existing system of records notice (SORN). Provide the SORN name, number, and link. ( <i>list all that apply</i> ):  <u>COMMERCE/DEPT-23</u> Information Collected Electronically in Connection with Department of Commerce Activities, Events, and Programs.
<input type="checkbox"/>	Yes, a SORN has been submitted to the Department for approval on <u>(date)</u> .
<input type="checkbox"/>	No, this system is not a system of records and a SORN is not applicable.

## **Section 10: Retention of Information**

10.1 Indicate whether these records are covered by an approved records control schedule and monitored for compliance. (*Check all that apply*.)

<input checked="" type="checkbox"/>	There is an approved record control schedule. Provide the name of the record control schedule:  GRS 5.1, item 020, Non-recordkeeping copies of electronic records
<input type="checkbox"/>	No, there is not an approved record control schedule. Provide the stage in which the project is in developing and submitting a records control schedule:

<input checked="" type="checkbox"/>	Yes, retention is monitored for compliance to the schedule.
<input type="checkbox"/>	No, retention is not monitored for compliance to the schedule. Provide explanation:

10.2 Indicate the disposal method of the PII/BII. (*Check all that apply.*)

<b>Disposal</b>			
Shredding	<input type="checkbox"/>	Overwriting	<input type="checkbox"/>
Degaussing	<input type="checkbox"/>	Deleting	<input checked="" type="checkbox"/>
Other(specify):			

## **Section 11: NIST Special Publication 800-122 PII Confidentiality Impact Level**

11.1 Indicate the potential impact that could result to the subject individuals and/or the organization if PII were inappropriately accessed, used, or disclosed. (*The PII Confidentiality Impact Level is not the same, and does not have to be the same, as the Federal Information Processing Standards (FIPS) 199 security impact category.*)

<input checked="" type="checkbox"/>	Low – the loss of confidentiality, integrity, or availability could be expected to have a limited adverse effect on organizational operations, organizational assets, or individuals.
<input type="checkbox"/>	Moderate – the loss of confidentiality, integrity, or availability could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals.
<input type="checkbox"/>	High – the loss of confidentiality, integrity, or availability could be expected to have a severe or catastrophic adverse effect on organizational operations, organizational assets, or individuals.

11.2 Indicate which factors were used to determine the above PII confidentiality impact level. (*Check all that apply.*)

<input checked="" type="checkbox"/>	Identifiability	Provide explanation: UCCACS collects, maintains, or disseminates PII about DOC employees and contractors. The types of information collected, maintained, used or disseminated by the system may include Name, user id, and work email etc. which are personal identifiers. When combined, this data set can be used to identify a particular individual.
<input checked="" type="checkbox"/>	Quantity of PII	Provide explanation: The number of PII user reports could be in the thousands.
<input checked="" type="checkbox"/>	Data Field Sensitivity	Provide explanation: Data fields include name, login id, and email address etc. for USPTO employees and contractors, which alone or in combination have little relevance outside the context.
<input checked="" type="checkbox"/>	Context of Use	Provide explanation: Name, Login ID and email address etc. are collected and maintained in audit logs and that information is used to capture system usage. The total number of users helps to improve federal services online and as a way to measure employee satisfaction with the service for the legal work done within the Patent and Trademark offices.

<input checked="" type="checkbox"/>	Obligation to Protect Confidentiality	Provide explanation: USPTO Privacy Policy requires the PII information collected within the system to be protected in accordance to NIST SP 800-122, Guide to Protecting the Confidentiality of Personally Identifiable Information. In accordance with the Privacy Act of 1974, PII must be protected.
<input checked="" type="checkbox"/>	Access to and Location of PII	Provide explanation: Authorized USPTO staff and contractors have access to the data stored on the UCCACS System. UCCACS does not disseminate PII information to any other systems. PII in UCCACS is secured using appropriate administrative, physical and technical safeguards in accordance with the FedRAMP Li-SaaS Authorization.
<input type="checkbox"/>	Other:	Provide explanation:

## **Section 12: Analysis**

12.1 Identify and evaluate any potential threats to privacy that exist in light of the information collected or the sources from which the information is collected. Also, describe the choices that the bureau/operating unit made with regard to the type or quantity of information collected and the sources providing the information in order to prevent or mitigate threats to privacy. (For example: If a decision was made to collect less data, include a discussion of this decision; if it is necessary to obtain information from sources other than the individual, explain why.)

In addition to foreign and adversarial entities, insider threats, and computer failure, activity which may raise privacy concerns include the collection, maintenance, and dissemination of PII such as name, email, and voice recordings, as well as ID and date/time access. USPTO mitigates such threats through mandatory training for system users regarding appropriate handling of information and automatic purging of information in accordance with the retention schedule.

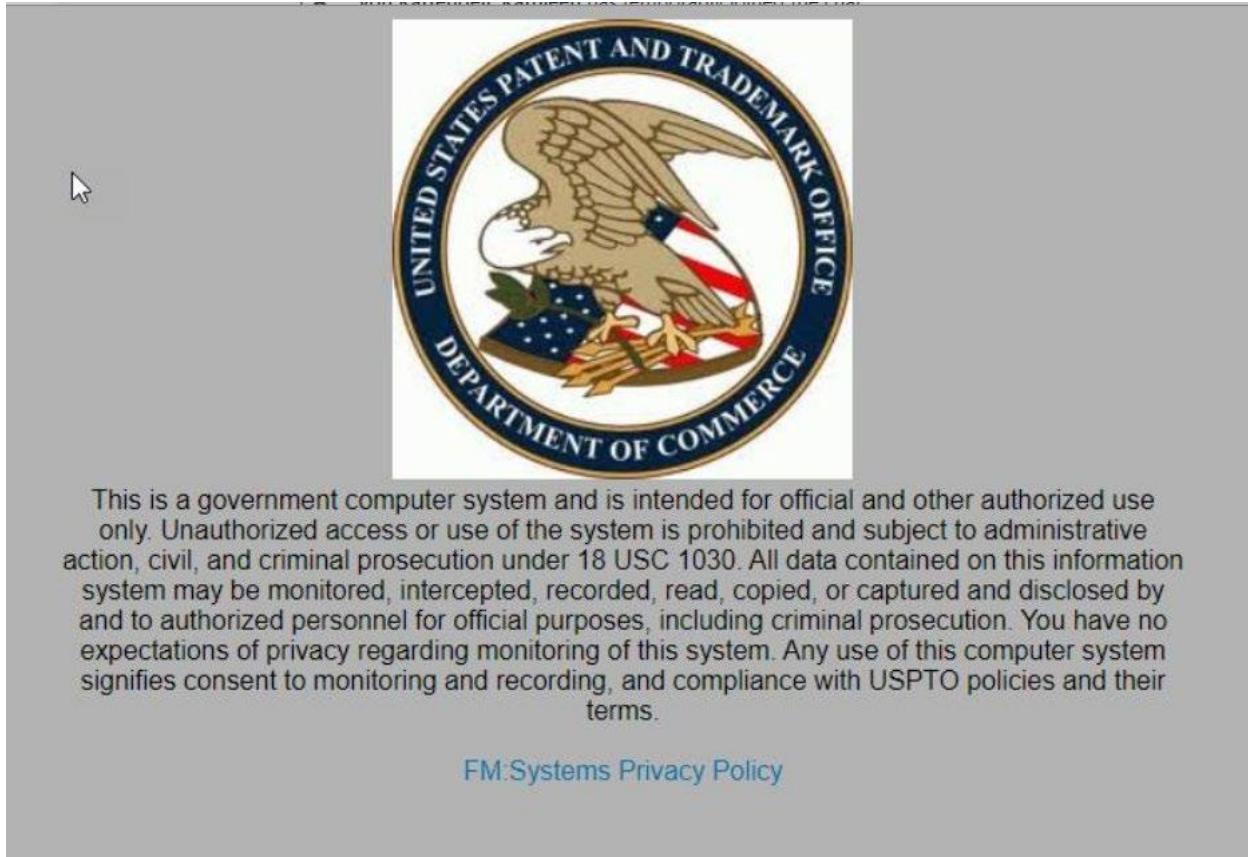
12.2 Indicate whether the conduct of this PIA results in any required business process changes.

<input type="checkbox"/>	Yes, the conduct of this PIA results in required business process changes. Explanation:
<input checked="" type="checkbox"/>	No, the conduct of this PIA does not result in any required business process changes.

12.3 Indicate whether the conduct of this PIA results in any required technology changes.

<input type="checkbox"/>	Yes, the conduct of this PIA results in required technology changes. Explanation:
<input checked="" type="checkbox"/>	No, the conduct of this PIA does not result in any required technology changes.

## Appendix A: USPTO Warning Banner



## USPTO Points of Contact and Signatures

<p><b>System Owner</b></p> <p>Name: Randy Hill            Office: Office of Information Management Services (OIMS) Collaborative Services Division (CSD)            Phone: (571) 272-8983            Email: Randy.Hill@uspto.gov</p> <p>I certify that this PIA is an accurate representation of the security controls in place to protect PII/BII processed on this IT system.</p> <p>Signature:  <small>Digitally signed by Users, Hill, Randy Date: 2021.11.19 10:45:04 -05'00'</small></p> <p>Date signed: _____</p>	<p><b>Chief Information Security Officer</b></p> <p>Name: Don Watson            Office: Office of the Chief Information Officer (OCIO)            Phone: (571) 272-8130            Email: Don.Watson@uspto.gov</p> <p>I certify that this PIA is an accurate representation of the security controls in place to protect PII/BII processed on this IT system.</p> <p>Signature:  <small>Digitally signed by DON R Watson Date: 2021.12.02 10:43:02 -05'00'</small></p> <p>Date signed: _____</p>
<p><b>Privacy Act Officer</b></p> <p>Name: Ezequiel Berdichevsky            Office: Office of General Law (G/GLO)            Phone: (571) 270-1557            Email: ezequiel.berdichevsky@uspto.gov</p> <p>I certify that the appropriate authorities and SORNs (if applicable) are cited in this PIA.</p> <p>Signature:  <small>Digitally signed by Users, Berdichevsky, Ezequiel Date: 2021.11.10 11:15:26 -05'00'</small></p> <p>Date signed: _____</p>	<p><b>Bureau Chief Privacy Officer and Authorizing Official</b></p> <p>Name: Henry J. Holcombe            Office: Office of the Chief Information Officer (OCIO)            Phone: (571) 272-9400            Email: Jamie.Holcombe@uspto.gov</p> <p>I certify that the PII/BII processed in this IT system is necessary, this PIA ensures compliance with DOC policy to protect privacy, and the Bureau/OU Privacy Act Officer concurs with the SORNs and authorities cited.</p> <p>Signature:  <small>Digitally signed by Users, Holcombe, Henry Date: 2021.12.07 10:39:00 -05'00'</small></p> <p>Date signed: _____</p>
<p><b>Co-Authorizing Official</b></p> <p>Name: N/A            Office: N/A            Phone: N/A            Email: N/A</p> <p>I certify that this PIA accurately reflects the representations made to me herein by the System Owner, the Chief Information Security Officer, and the Chief Privacy Officer regarding security controls in place to protect PII/BII in this PIA.</p> <p>Signature: _____</p> <p>Date signed: _____</p>	

**This page is for internal routing purposes and documentation of approvals. Upon final approval, this page must be removed prior to publication of the PIA.**