

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



**Privacy Impact Assessment
for the
Master Data Management (MDM)**

Reviewed by: Henry J. Holcombe, Bureau Chief Privacy Officer

- ☒ Concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Officer
☐ Non-concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Officer

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Date

U.S. Department of Commerce Privacy Impact Assessment USPTO Master Data Management (MDM)

Unique Project Identifier: EBPL-DA-02-00

Introduction: System Description

Provide a brief description of the information system.

The Master Data Management (MDM) system is comprised of a Federal Risk and Authorization Management Program (FedRAMP) authorized Software as a Service (SaaS) suite, Collibra Data Intelligence Cloud (CDIC) and Jobserver. CDIC is a platform in which United States Patent and Trademark Office (USPTO) internal users can build their own data governance management system. This platform includes user management, privilege management, data catalog, workflows, and data stewardship. The CDIC platform ingests metadata, and authorized users are responsible for managing and controlling the permission and policies surrounding the data. The tool allows users to store and track metadata, create dashboards, create a business glossary, capture an inventory of reports, and use workflows to manage their data. Jobserver executes processes collecting data source meta-data which is transmitted to the CDIC SaaS system.

Address the following elements:

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

MDM is a FedRAMP authorized SaaS system.

(b) System location

CDIC - This component is a SaaS suite of the tools that resides in the cloud (Amazon Web Services (AWS)).

Jobserver - This executes processes collecting data source meta-data which is transmitted to the CDIC Software as a Solution (SaaS) system and is installed on servers located in the data center at Manassas, VA. This server resides on the USPTO Network (PTONet) and is within the Enterprise Data Warehouse (EDW) security boundary.

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

Systems that interconnect to MDM:

Consolidated Financial System (CFS) - is a master system composed of the following four subsystems: Momentum, Concur Integration, E-Acquisition (ACQ), and VendorPortal. Momentum is a full-featured Commercial Off-The-Shelf (COTS) accounting software package that permits full integration of the processing of financial transactions with other normal business processes. Concur Integration works with Momentum and passes data back and forth between the systems using web services. ACQ provides an automated solution for the procure-to-pay process in the acquisition community at the USPTO. VendorPortal provides a platform for vendor interaction whereby USPTO may publish notices, solicitations and award announcements, etc.

Fee Processing Next Generation (FPNG) - allows internal and external users to manipulate payment accounts, perform profile updates, and make payments for USPTO goods and services. It also provides all functionality related to managing payments, replenishing and transferring of deposit account balances, etc. (primarily handled by the General Ledger/Account COTS Support tier/Momentum). FPNG also supports pricing rules management as well as refund requests and approvals. FPNG has interfaces to various USPTO systems and with the United States Treasury. USPTO system interfaces include MyUSPTO, Role Based Access Control (RBAC) system, Patent Application Location Monitoring (PALM), Momentum, Active Directory, Electronic Library for Financial Management Systems (EL4FMS) and the Enterprise Data Warehouse (EDW). FPNG interfaces to United States (US) Treasury include Pay.gov and Over the Counter (OTCnet) application services.

Information Delivery Product (IDP) - is a master system composed of the following three subsystems: EDW, EL4FMS, and Financial Enterprise Data Management Tools (FEDMT). EDW provides a tool that allows managers and analysts to analyze business processes, resource use and needs, and other facets of the business. EL4FMS provides access to USPTO financial-related documents to support the decision-making activities of managers and analysts. FEDMT is a database/user interface solution utilizing the Oracle Application Express (APEX) product to build small applications to support Financial Reference data.

Planning and Budgeting Products (PBP) - is a master system composed of following three subsystems: Activity Based Information System (ABIS), Analytics and Financial Forecasting (AFF), and Enterprise Budgeting Tool (EBT). ABIS streamlines and automates business processes. AFF supports the analysis of fee collection information and decision-making. EBT supports central planning and budgeting.

Collibra Data Intelligence Cloud (External) - FedRAMP authorized SaaS platform in which USPTO internal users can build their own data governance management system.

ICAM Identity as a Service (ICAM-IDaaS) - provides an enterprise authentication and authorization service to all applications.

Network and Security Infrastructure System (NSI) - is an infrastructure information system that facilitates the communications, secure access, protective services, and network infrastructure support for all USPTO IT applications.

Security and Compliance Services (SCS) - is a general support system comprised of subsystems which work together to provide enterprise level monitoring to the USPTO.

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

MDM system utilizes a job server that resides on premise to connect to source databases that are cataloged within the CDIC. It runs jobs to collect metadata from the data sources and transmits the metadata to CDIC. This provides USPTO users with an enterprise-oriented data governance platform for data governance and stewardship. USPTO users are able to better analyze their data, improve business decisions, and business and IT can collaborate.

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

MDM allows users to retrieve information in electronic format. MDM allows user access to the CDIC platform, where they can perform contextual search and access reports and dashboards.

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

MDM transmits metadata to CDIC cloud using a secured Hypertext Transfer Protocol Secure (HTTPS) connection.

(g) Any information sharing

MDM collects information about USPTO employees and contractors such as First Name, Last Name, and Email Address. This information is based on roles associated with various data domains (e.g., Name of the Data Owner role of the Patent Quality Data) and will be shared within the bureau on a case-by-case basis.

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

The following federal laws provide the specific programmatic authority for collecting, maintaining, using, and disseminating the information: E-Government Act of 2002; and Foundations for Evidence-Based Policymaking.

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

The FIPS 199 security impact category for MDM is Moderate.

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.)*

Changes That Create New Privacy Risks (CTCNPR)					
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.

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.)*

Identifying Numbers (IN)					
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:

General Personal Data (GPD)					
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. Marital Status	<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):					

Work-Related Data (WRD)					
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):					

Distinguishing Features/Biometrics (DFB)					
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 type="checkbox"/>	l. Vascular Scans	<input type="checkbox"/>
c. Voice/Audio Recording	<input type="checkbox"/>	h. Eye Color	<input type="checkbox"/>	m. DNA Sample or Profile	<input type="checkbox"/>
d. Video Recording	<input type="checkbox"/>	i. Height	<input type="checkbox"/>	n. Retina/Iris Scans	<input type="checkbox"/>
e. Photographs	<input type="checkbox"/>	j. Weight	<input type="checkbox"/>	o. Dental Profile	<input type="checkbox"/>
p. Other distinguishing features/biometrics (specify):					

System Administration/Audit Data (SAAD)					
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 checked="" type="checkbox"/>	f. Queries Run	<input type="checkbox"/>	f. Contents of Files	<input type="checkbox"/>
g. Other system administration/audit data (specify):					

Other Information (specify)

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

Directly from Individual about Whom the Information Pertains					
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):					

Government Sources					
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):					

Non-government Sources					
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.

MDM is secured using appropriate administrative, physical and technical safeguards in accordance with the NIST security controls (encryption, access control, auditing). Mandatory IT Awareness and role-based training is required for staff who have access to the system and addresses how to handle, retain, and dispose of data. 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.
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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.)*

Technologies Used Containing PII/BII Not Previously Deployed (TUCBNPD)
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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.)*

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

<input checked="" 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.)*

Purpose			
For a Computer Matching Program	<input type="checkbox"/>	For administering human resources programs	<input type="checkbox"/>
For administrative matters	<input checked="" 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 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).

The information in this system is about USPTO employees and contractors and is used for administrative matters and to promote information sharing initiatives. By providing an enterprise-oriented data governance platform for data governance and stewardship, USPTO users are able to better analyze their data, improve business decisions, and allow for better collaboration between business units and the IT departments.

The information collected is primarily used for administrative purposes. For example, Work Email Address is used for notification emails to notify users of any changes made to assets; Internet Protocol (IP) Address and Date/Time of Access are used for logging and auditing purposes.

MDM to serve as a foundational tool in the effort to mature the data management practices under the Enterprise Data as an Asset initiative.

- 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.)

In the event of computer failure, insider threats, or an attack against the system by a adversarial or foreign entities, any potential PII data from USPTO employees or contractors stored within the system could be exposed, the USPTO has policies, procedures and training to ensure that employees are aware of their responsibility of protecting sensitive information and the negative impact on the agency if there is a loss, misuse, or unauthorized access to or modification of sensitive private information. Physical access to servers is restricted to only a few authorized individuals. USPTO requires an annual security role based training and an annual mandatory security awareness procedure training for all employees. All offices of the USPTO adhere to the USPTO Records Management Office's Comprehensive Records Schedule that describes the types of USPTO records and their corresponding disposition authority or citation.

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 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. Provide the name of the IT system and describe the technical controls which prevent PII/BII leakage:</p> <p>MDM receives information, system and application logs) from the following other USPTO systems that have been authorized to process PII and/or BII:</p> <ul style="list-style-type: none"> • CFS • IDP • FPNG • PBP • ICAM-IDaaS • SCS <p>The technical controls in place to prevent PII/BII leakage include encryption, antivirus and anti-malware, firewalls, Security Information and Event Management (SIEM), Intrusion Detection Systems (IDS) and Intrusion Prevention System (IPS). Access to PTO data is via a Virtual Private Network (VPN) and Privilege access controls are maintained via Active directory. Services are logically partitioned via a Demilitarized Zone (DMZ) and an internal USPTO firewall is used as the boundary protection device that secures the communication between internet users and the systems they access. The Data within MDM is also secured via FedRAMP-authorized Collibra - Collibra Data Intelligence Cloud (CDIC), and established controls to include password authentication at the server levels. HTTPS is used for all data transmissions to and from the Internet and PTOnet.</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.)*

Class of Users			
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: https://www.uspto.gov/privacy-policy	
<input checked="" type="checkbox"/>	Yes, notice is provided by other means.	Specify how: See Appendix A
<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: Users of USPTO systems receive a warning banner notification regarding consent to be monitored by using the system and therefore do not have the opportunity to decline to provide PII/BII.

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

<input type="checkbox"/>	Yes, individuals have an opportunity to consent to particular uses of their PII/BII.	Specify how:
<input checked="" type="checkbox"/>	No, individuals do not have an opportunity to consent to particular uses of their PII/BII.	Specify why not: MDM data is used to provide users access to the system. Data is also collected via system monitoring in the form of audit logs. Because the data is used to allow users to access the system and the nature of how the audit data is collected, users do not have the opportunity to consent to particular uses of their PII/BII.

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

<input type="checkbox"/>	Yes, individuals have an opportunity to review/update PII/BII pertaining to them.	Specify how:
<input checked="" type="checkbox"/>	No, individuals do not have an opportunity to review/update PII/BII pertaining to them.	Specify why not: USPTO employees and contractors are unable to review and update PII/BII pertaining to them in MDM but have the opportunity to review/update their PII with office of Human Resources.

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: 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): 9/11/2023 <input type="checkbox"/> This is a new system. The A&A date will be provided when the A&A package is approved.
<input checked="" 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 5 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).*

MDM is secured by the USPTO's infrastructure systems, FedRAMP-authorized CDIC, and established controls to include password authentication at the server levels. HTTPS is used for all data transmissions to and from the Internet and PTOnet.

Management Controls:

The USPTO uses the Life Cycle review process to ensure that management controls are in place for the MDM. During the enhancement of any component, the security controls are reviewed, re-evaluated, and updated in the

Security Plan. The Security Plans specifically address 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 check on all personnel, including contractor staff.

Operational Controls:

Operational controls include securing all hardware associated with this system in the USPTO Data Center. The Data Center is controlled by access card entry, and manned by a uniformed guard service to restrict access to the servers, their operation systems and databases. Backups are stored on tape and are secured off-site. Additional operation controls include: (1) Logical edit checks to ensure proper sequence of actions” (2) Physical terminal identification; (3) Database User Identification (ID); (4) restricted data display, as required; and (5) restricted access.

Technical Controls:

Technical controls include password authentication (User ID and passwords). At the client Personal Computers’ (PC), a access is managed through a password authentication (User ID and passwords) based on certification in Access Request Management System (ARMS). Requests are approved first by the user’s supervisor based on a justification of need.

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> Commerce/Dept 18 : Employees Personnel Files Not Covered by Notices of Other Agencies. Commerce/PAT-TM-17 : USPTO Security Access Control and Certificate Systems.
<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 3.1, item 010, Information technology development project records; Infrastructure project records. GRS 3.1, item 011, Information technology development project records; System development records. GRS 3.1, item 012, Information technology development project records; Special purpose computer programs and applications. GRS 3.1, Item 040, Information technology oversight and compliance records. GRS 5.2, item 020, Intermediary records. GRS 6.3, item 010, Information Technology program and capital investment planning records. GRS 6.3, item 020, Enterprise architecture 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 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.)*

Disposal			
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: The information such as name, work email address, and User ID captured by the MDM system could identify an individual.
<input checked="" type="checkbox"/>	Quantity of PII	Provide explanation:

		MDM will collect data from a small segment of internal users for purposes of account set up. Also, there is the potential for PII data to be included over time within the logs collected by the system.
<input checked="" type="checkbox"/>	Data Field Sensitivity	Provide explanation: The combination of name, User ID and email address have a low impact on the data field sensitivity.
<input checked="" type="checkbox"/>	Context of Use	Provide explanation: MDM data is account data that will be used by a select segment of internal users who will access the system.
<input checked="" type="checkbox"/>	Obligation to Protect Confidentiality	Provide explanation: Based on the data collected, USPTO must protect the PII of each individual in accordance with the Privacy Act of 1974 which prohibits the disclosure of information from a system of records absent of the written consent of the subject individual.
<input checked="" type="checkbox"/>	Access to and Location of PII	Provide explanation: Access Control Lists limits access to MDM to only a few approved authorized accounts. Authorized privileged users access the applications for administrative functions only, and authorized non-privileged users access some applications as required for their roles within their group. The servers storing the potential PII are located in a highly sensitive zone within the USPTO internal network and logical access is segregated with network firewalls and switches.
<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.)

Access to MDM is very limited and controlled by the MDM Project Management (PM) team. Data is protected in transit through Transport Layer Security (TLS) 1.2. Administrative access to the back-end on premise servers is limited to trusted individuals on the development team. Given the limited access under this category, the threat of PII leakage is very low but can be a potential threat to privacy. Access to the user interface is not exposed to the public internet and only accessed within the USPTO network. USPTO has identified and evaluated potential threats to PII such as loss of confidentiality and integrity of information. Based upon USPTO's threat assessment policies, procedures, and training has been implemented to ensure that employees are aware of their responsibility to protect PII and to be aware of insider threats. Our employees are aware of the negative impact to the agency if there is a loss, misuse, or unauthorized access to or modification of PII.

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

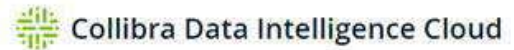
<input type="checkbox"/>	Yes, the conduct of this PIA results in required business process changes.
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	Explanation:
<input checked="" type="checkbox"/>	No, the conduct of this PIA does not result in any required business process changes.

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



*****WARNING*****WARNING*****WARNING*****You have accessed a United States Government computer system. Unauthorized access or actions exceeding authorized access is a violation of Public Law 99-474; 18 U.S.C. 1030 and may result in criminal, civil or administrative penalties. Authorized use of this system is limited to work needed to perform official US Patent and Trademark Office (USPTO) business. While using this system, users must comply with USPTO policy as documented in the USPTO AAO 212-4, Information Technology Security. Unauthorized use, or modification or disclosure of the data contained herein or in transit to/from this system constitutes a violation of Public Law 99-474; 18 U.S.C. 1030 and state criminal and civil laws. Users of this system may be monitored in order to ensure its continued operational effectiveness and integrity. Users of this system are reminded that such monitoring does occur and that use of this system constitutes consent to such monitoring. Unauthorized use or actions exceeding authorized use of USPTO systems will be investigated and, when appropriate, official sanctions will be imposed. If criminal activity is discovered, systems information will be provided to the appropriate law enforcement officials for investigation and prosecution. Report access violations or policy infractions to the Service Desk at (571) 272-9000.

*****WARNING*****WARNING*****WARNING*****

I do not agree, sign out

I agree, continue