

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



**Privacy Impact Assessment  
for the  
USPTO Subscription Center (USC)**

Reviewed by: Deborah Stephens, 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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Signature of Senior Agency Official for Privacy/DOC Chief Privacy Officer

Date

## U.S. Department of Commerce Privacy Impact Assessment USPTO Subscription Center (USC)

**Unique Project Identifier: PTOC-033-00**

### **Introduction: System Description**

*Provide a brief description of the information system.*

United States Patent and Trademark Office (USPTO) Subscription Center (USC): is the USPTO's instance of the Federal Risk and Authorization Management Program (FedRAMP)-authorized GovDelivery Communications Cloud service. The Communications Cloud (CC) provides USPTO with a number of features to support the efficient communication of timely information to the general public. It provides a comprehensive digital communications management solution tailored to public sector requirements. It is designed to facilitate and increase citizen engagement with public government messaging. It also enables citizens (hereinafter referred to as "End Users") to more effectively communicate with the Government by providing secure case tracking and collaboration mechanisms.

Address the following elements:

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

USPTO Subscription Center is a major application.

*(b) System location*

USC uses the FedRAMP Granicus GovDelivery Communications Cloud Software as a Service (SaaS) located in Denver, Colorado.

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

**Identity Management Authenticator (ID-AUTH)** - is an end-to-end system tasked with managing the personal identity credentials of USPTO employees and contractors. ID-AUTH supports the personalization and issuance of smart card identification credentials under HSPD-12.

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

The application is accessed through a web browser where administrators and content creator's login, create and manage topics for subscribers. Topics published are made available for end users to subscribe.

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

Administrators access the application through a web browser to manage and create content. Subscribers receive the published topics via email.

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

The web application is accessed via an internet connection and topics created. Published topics are transmitted to subscribers via email. However, members of the public do not receive any Personally Identifiable Information (PII) in those emails.

*(g) Any information sharing*

The information stays within the bureau; authorized USPTO staff and contractors have access to the data stored on the USC System. USC does not disseminate PII information to any other systems.

*(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.)*

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-	<input type="checkbox"/>	e. New Public Access	<input type="checkbox"/>	h. Internal Flow or	<input type="checkbox"/>

Anonymous				Collection	
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.)*

<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 checked="" type="checkbox"/>	r. Criminal Record	<input type="checkbox"/>
e. Age	<input type="checkbox"/>	l. Email Address	<input checked="" 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):					

<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 checked="" 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 checked="" 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 checked="" 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.

<p>Email addresses of USPTO users' (which contain their full name) are maintained in Active Directory, users can update their phone numbers via their user profiles. Members of the public can unsubscribe at any time thereby dissociating their email address from the system. The non-sensitive PII in USC is secured using appropriate administrative, physical and technical safeguards in accordance with the FedRAMP 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.</p>
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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 (TUCPBNDP)			
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>
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Audio recordings	<input type="checkbox"/>	Building entry readers	<input type="checkbox"/>
Video surveillance	<input type="checkbox"/>	Electronic purchase transactions	<input type="checkbox"/>
Other (specify): Click or tap here to enter text.			

<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.)

<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 checked="" 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): To send published materials to members of the public that are subscribed to the system using their email address.			

## **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).

<p>Federal Employees and Contractors: Name, email address, and phone number are collected and maintained in the GovDelivery Communications Cloud (CC) application. This information is used for identification (name and email address as User ID) and authentication (phone number for SMS multi-factor authentication) to the system.</p> <p>Members of the Public: Email address is collected and maintained in audit logs, and that information is used to communicate with the public, for information sharing initiatives and to help improve Federal services online.</p>
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- 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.)

Insider threats, loss of confidentiality and compromise to integrity are the potential threats to the system as identified by USPTO. USC (the USPTO system) and GovDelivery Communications Cloud (the FedRAMP authorized SaaS provider) have implemented security and 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 data is available for authorized users only (Access Control). Management controls are utilized to prevent the inappropriate disclosure of sensitive information. In addition, GovDelivery Communications Cloud provide additional automated transmission and monitoring mechanisms to ensure that PII is protected and not breached by any outside entities. In the event of disposal, GovDelivery Communications 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 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"/>

☐ The PII/BII in the system will not be shared.



- 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"/>	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:  ID-AUTH
<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 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="https://www.uspto.gov/privacy-policy">https://www.uspto.gov/privacy-policy</a>	
<input checked="" type="checkbox"/>	Yes, notice is provided by other means.	Specify how: The following notice is provided: "Your contact information is

		used to deliver requested updates or to access your subscriber preferences.” That notice is provided on the subscription page; the URL is: <a href="https://public.govdelivery.com/accounts/USPTO/subscriber/new">https://public.govdelivery.com/accounts/USPTO/subscriber/new</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: For USPTO employees, the authorization process automatically passes the users name and USPTO email address to USC via the USPTO computer used to access content. Additionally, phone number is required for multifactor authentication, and a user cannot decline providing their phone number due to non-compliance with USPTO’s multi- factor authentication requirements for both privileged and non-privileged accounts.  For members of the public, the service is voluntary, but it can only be provided via email. Therefore, they cannot decline to provide their email address if they want to enroll in the service.

## 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: For USPTO Employees and Contractors, they do not have the ability to consent to particular uses of their PII. They consent to providing their name (which is then used for email address) and phone number as part of accepting employment at USPTO. That information is then used for the primary purpose of acquiring access to applications and the network during on boarding.  For members of the public, the service is voluntary, but it can only be provided via email. Therefore, they cannot decline to provide their email address if they chose to enroll in the service.

## 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 can update their user profiles on their own and/or contact a USC administrator to review/update the PII held in their account profiles.
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		Members of the public can login and change their email address and subscription preferences
<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 type="checkbox"/>	All users signed a confidentiality agreement or non-disclosure agreement.
<input 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 (from both members of the public and USPTO employees and contractors) is recorded and stored in the GovDelivery Cloud Communications SaaS database. That PII is monitored and tracked by USPTO on an as needed basis.
<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): 1/27/2025 <input 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 5 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. 5; the USC System Security Plan (SSP) 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 SSP is reviewed on an annual basis. In addition, annual assessments and Continuous Monitoring reviews are conducted on the USC data. The

USPTO Cybersecurity Division CD) conducts these assessments and reviews based on NIST SP 800-53 Revision 5, Security and Privacy Controls for Federal Information Systems and Organizations and NIST SP 800-53 Revision 5 Assessing Security and Privacy Controls in Federal Information Systems and Organizations. The results of these assessments and reviews are documented in the USC Security Assessment Package as part of the system's Security Authorization process.

USC implements security and management controls to prevent the inappropriate disclosure of sensitive information. Automated mechanism 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 sensitive information. USC 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 USC. During the enhancement of any component, the security controls are reviewed, re-evaluated, and updated in the System Security Plan. The System Security Plan 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 sensitive data.

In order for internal users (federal employees and government contractors) to access USC, they must first identify and authenticate via multi-factor authentication.

## **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>  <a href="#">COMMERCE/PAT-TM-23</a> , User Access for Web Portals and Information Requests
<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 3.2:010 Information Systems Security Records Systems and data security 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 checked="" 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.
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<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: For members of the public, email address is the only information that is collected. Members of the public cannot be definitively identified via their email address. For USPTO employees and contractors, the non-sensitive data of name, phone number, and email address could be used to identify an individual.
<input checked="" type="checkbox"/>	Quantity of PII	Provide explanation: USC system personnel consider the quantity of PII (name, phone number, and email address for USPTO employees and contractors; email address for members of the public) to be limited.
<input checked="" type="checkbox"/>	Data Field Sensitivity	Provide explanation: PII (name, phone number, and email address for USPTO employees and contractors; email address for members of the public) is collected for USC.
<input checked="" type="checkbox"/>	Context of Use	Provide explanation: Federal Employees and contractors: Name, phone number, and email address are collected and maintained in audit logs, and that information is only used for identification and authentication.  Members of the Public: Email collected and maintained in audit logs, and that information is only used to provide the service, which helps to improve Federal services online and promote information sharing initiatives.
<input checked="" type="checkbox"/>	Obligation to Protect Confidentiality	Provide explanation: In accordance with NIST 800-53 Rev. 5, USC implements both AR-2 (Privacy Impact and Risk Assessment) and AR-7 (Privacy-Enhanced System Design and Development) security controls to ensure the confidentiality of all users is protected.
<input checked="" type="checkbox"/>	Access to and Location of PII	Provide explanation: The non-sensitive Personally Identifiable Information in USC is secured using appropriate administrative, physical and technical safeguards in accordance with the FedRAMP Li-SaaS Authorization. Authorized USPTO staff and contractors have access to the data stored on the USC System. USC does not disseminate PII information to any other systems.
<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.)

USPTO has identified and evaluated potential threats to privacy and determined they are insider threats, loss of confidentiality, and compromised integrity of the PII that is collected and used. Based upon USPTO's threat assessment and the fact that the PII for employees is only used for identification and authentication and the PII for members of the public is voluntary if they want the service, the Agency has implemented a baseline of security controls to mitigate the risk to sensitive information to an acceptable level.
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- 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.