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

Privacy Threshold Analysis
for the
Agency Administrative Support System (AASS)

U.S. Department of Commerce Privacy Threshold Analysis

USPTO Agency Administrative Support System (AASS)

Unique Project Identifier: PTOC-002-00

Introduction: This Privacy Threshold Analysis (PTA) is a questionnaire to assist with determining if a Privacy Impact Assessment (PIA) is necessary for this IT system. This PTA is primarily based from the Office of Management and Budget (OMB) privacy guidance and the Department of Commerce (DOC) IT security/privacy policy. If questions arise or further guidance is needed in order to complete this PTA, please contact your Bureau Chief Privacy Officer (BCPO).

Description of the information system: *Provide a brief description of the information system.*

The E-Government Act of 2002 defines "information system" by reference to the definition section of Title 44 of the United States Code. The following is a summary of the definition: "Information system" means a discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information. See: 44. U.S.C. § 3502(8).

Agency Administrative Support System (AASS) is a major application. It is designed to serve many purposes within the USPTO such as consolidating document imaging, providing a visual representation of the IT facility and resources, providing a centralized repository of information about USPTO IT facilities. It also provides automatic discovery of software, hardware, configuration file, and network devices, managing and tracking automated and software assets, providing USPTO enterprise-wide solutions to identify and track strategic goals and business and organizational information, providing a solution to store data and perform statistical analysis in a secured environment, and collecting, storing, and displaying organizational and performance metric data.

Address the following elements:

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

b) *System location*
AASS is located at 600 Dulany Street, Alexandria, VA 22314

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

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

Enterprise UNIX Services (EUS) consists of assorted UNIX operating system variants (OS), each comprised of many utilities along with a master control program, the kernel.

Service Oriented Infrastructure (SOI) provides a feature-rich and stable platform upon which USPTO applications can be deployed.

Database Services (DBS) is an infrastructure information system and provides a database infrastructure to support the mission of USPTO database needs.

Consolidated Financial System (CFS) - CFS is a Master System composed of the following four (4) subsystems: 1) Momentum 2) Concur Integration, 3) E-Acquisition (ACQ) and 4) VendorPortal.

Enterprise Desktop Platform (EDP) is an infrastructure information system which provides a standard enterprise wide environment that manages desktops and laptops running on the Windows 10 operating system (OS), providing United States Government Configuration Baseline (USGCB) compliant workstations.

Security and Compliance Services (SCS) provides a centralized command and control console with integrated enterprise log management, security information and event management network behavior analysis, and reporting through the collection of events, network/application flow data, vulnerability data, and identity information.

Enterprise Windows Servers (EWS) is an infrastructure information system and provides a hosting platform for major applications that support various USPTO missions.

Enterprise Software Services (ESS) provides Enterprise Directory Services, Role-Based Access Control System, Email as a Service, PTO Exchange Services, Symantec Endpoint Protection, Enterprise SharePoint Services, etc.

Intellectual Property Leadership Management System (IPLMSS) is a master system and facilitates grouping and managing of seven general support subsystems that collectively support the USPTO Director; Deputy Director; Office of the General Counsel (OGC), including OGC's components, the Office of General Law (OGL), Office of the Solicitor, and Office of Enrollment and Discipline (OED); Trademark Trial and Appeal Board (TTAB); Patent Trial and Appeal

Board (PTAB); Office of Patent Training (OPT); and Office of Policy and International Affairs (OPIA).

Patent Capture and Application Processing System-Examination Support (PCAPS-ES) consists of several applications that enable patent examiners and public users to search and retrieve application data and images and patent examiners and patent applicants to identify individuals and organizations with intellectual property, pre-grant, and published applications.

d) *The purpose that the system is designed to serve*

Agency Administrative Support System (AASS) is a major application and is designed to serve many purposes within the USPTO such as consolidating document imaging, providing a visual representation of the IT facility and resources, providing a centralized repository of information about USPTO IT facilities, providing automatic discovery of software, hardware, configuration file, and network devices, managing and tracking automated and software assets, providing USPTO enterprise-wide solutions to identify and track strategic goals and business and organizational information, providing a solution to store data and perform statistical analysis in a secured environment, and collecting, storing, and displaying organizational and performance metric data.

e) *The way the system operates to achieve the purpose*

AASS is a major application composed of the following subsystems:

Corporate Imaging Document Management System (CIDM) is a consolidation of all imaging document systems in Corporate Systems Division (CSD) that meets user requirements and conforms to USPTO system infrastructure requirements specified by the Chief Information Officer (CIO) for Automated Information Systems (AISs). CIDM provides similar content management requirements and functionalities to several offices including Vendor Management Division (VMD), Office of Commissioner for Patents (PEO), Office of Enrollment and Discipline (OED), Office of Patent Information Management (OPIM), and the Deputy Undersecretary (DUS).

Collection of Economic Analysis Tools (COEAT) is a COTS product that contains tools needed for data analysis, data management, and graphics and is used by OPIA and USPTO to respond to official requests related to various data sets. COEAT is used by the Chief Economist's office of the USPTO to store data and perform statistical analysis in a secured environment and is fully integrated with the current Windows desktop environment and is accessible to users via the USPTO Intranet (PTONet). COEAT includes hundreds of statistical tools and many data-management commands that provide complete control of all types of data that include byte, integers, long, float, double, and string variables. COEAT generates publication-quality, distinctly styled graphs using an integrated graph editor. To ensure that no unauthorized users access the system, the COEAT applicant has built-in security controls.

COEAT collects and maintains PII related to patent examiners and applicants such as age, race, national status, disability status, veteran status, sex, length of service, etc.

Data Center Facilities Management System (DCFMS) creates a centralized repository of information about USPTO IT facilities. Aperture Vista 600 provides a visual representation of the IT facility that is linked to detailed information about the IT resources within that facility. Aperture Vista 600 will allow the IT facility manager to document and track equipment locations, network connectivity, Heating, Ventilation, and Air Conditioning (HVAC) requirements and capacity, and electronic connectivity and capacity. DCFMS is based on Aperture commercial off-the-shelf (COTS) products by Emerson Network Power. DCFMS does not collect, maintain, or disseminate any PII.

Global Enterprise Architecture Repository System (GEARS) provides a holistic view of the USPTO enterprise and helps identify and track strategic goals, business functions, business processes, roles, organizational structures, business information, key performance metrics to technologies including software applications, services, platforms, and network infrastructure. GEARS presents views, roadmaps, and analytics of the current as-is and future to-be state of the enterprise. GEARS supports Enterprise Architecture Division which extends the enterprise interests and relationships to key partners, suppliers, and customers. GEARS is developed using a Commercial-off-the-Shelf (COTS) product called TrouxTM. The repository offered by Troux allows for a flexible foundation to store data about the agency's business objectives, capabilities, and processes, along with the business linkages to the supporting IT assets. Additionally, Troux ships with a pre-built web front end application that allows users to analyze data relationships, execute and view reports, and (if given sufficient privilege) add or update repository data. GEARS does collect, maintain, or disseminate PII, for example internal names of product owners.

OCIO Data Driven Dash Board (OCIO-DDD) is an intranet only web application that collects, stores and displays organizational and performance metric data for the OCIO office. OCIO-DDD consists of a .NET custom code base. Users have varying levels of permission to view, add, and update metrics and measurements and to view various metric status charts. OCIO-DDD does not collect, maintain, or disseminate any PII.

f) A general description of the type of information collected, maintained, used, or disseminated by the system

AASS may include PII collected, maintained, used or disseminated about employees, contractors, and members of the public. PII about employees could include information such as employee ID and other work-related data. Information collected by members of the public may include information about prospective or current practitioners, including their application status or grievances and disciplinary actions, and inventors seeing legal help or certification. AASS

also collects system administration and audit data such as user ID and date and time of access information.

g) Identify individuals who have access to information on the system
USPTO employees, contractors, other federal government personnel and members of the public have access to the system.

h) How information in the system is retrieved by the user
Information in AASS is retrieved via USPTO intranet access, dashboard, SharePoint, and registered accounts.

i) How information is transmitted to and from the system
Information is encrypted and transmitted to AASS via HTTPS (TLS 1.2) and SSH.

Questionnaire:

1. Status of the Information System
1a. What is the status of this information system?

☐   This is a new information system. *Continue to answer questions and complete certification.*

☒   This is an existing information system with changes that create new privacy risks.
    Complete chart below, continue to answer questions, and complete certification.

Changes That Create New Privacy Risks (CTCNPR)					
a. Conversions	☐	d. Significant Merging	☐	g. New Interagency Uses	☐
b. Anonymous to Non-Anonymous	☐	e. New Public Access	☐	h. Internal Flow or Collection	☒
c. Significant System Management Changes	☐	f. Commercial Sources	☐	i. Alteration in Character of Data	☐
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. *Continue to answer questions and complete certification.*

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

1b. Has an IT Compliance in Acquisitions Checklist been completed with the appropriate signatures?

☐   Yes. This is a new information system.

☐   Yes. This is an existing information system for which an amended contract is needed.

☐   No. The IT Compliance in Acquisitions Checklist is not required for the acquisition of equipment for specialized Research and Development or scientific purposes that are not a National Security System.

☒   No. This is not a new information system.

2. **Is the IT system or its information used to support any activity which may raise privacy concerns?**

   NIST Special Publication 800-53 Revision 4, Appendix J, states "Organizations may also engage in activities that do not involve the collection and use of PII, but may nevertheless raise privacy concerns and associated risk. The privacy controls are equally applicable to those activities and can be used to analyze the privacy risk and mitigate such risk when necessary." Examples include, but are not limited to, audio recordings, video surveillance, building entry readers, and electronic purchase transactions.

   ☐   Yes. *(Check all that apply.)*

Activities			
Audio recordings	☐	Building entry readers	☐
Video surveillance	☐	Electronic purchase transactions	☐
Other (specify):			

   ☒   No.

3. **Does the IT system collect, maintain, or disseminate business identifiable information (BII)?**

   As per DOC Privacy Policy: "For the purpose of this policy, business identifiable information consists of (a) information that is defined in the Freedom of Information Act (FOIA) as "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential." (5 U.S.C.552(b)(4)). This information is exempt from automatic release under the (b)(4) FOIA exemption. "Commercial" is not confined to records that reveal basic commercial operations" but includes any records [or information] in which the submitter has a commercial interest" and can include information submitted by a nonprofit entity, or (b) commercial or other information that, although it may not be exempt from release under FOIA, is exempt from disclosure by law (e.g., 13 U.S.C.)."

   ☒   Yes, the IT system collects, maintains, or disseminates BII.

   ☐   No, this IT system does not collect any BII.

4. **Personally Identifiable Information (PII)**
4a. **Does the IT system collect, maintain, or disseminate PII?**

   As per OMB 17-12: "The term PII refers to information that can be used to distinguish or trace an individual's identity either alone or when combined with other information that is linked or linkable to a specific individual."

☒ Yes, the IT system collects, maintains, or disseminates PII about: *(Check all that apply.)*

☒ DOC employees
☒ Contractors working on behalf of DOC
☒ Other Federal Government personnel
☒ Members of the public

☐ No, this IT system does not collect any PII.

If the answer is "yes" to question 4a, please respond to the following questions.

4b. Does the IT system collect, maintain, or disseminate Social Security numbers (SSNs), including truncated form?

☐ Yes, the IT system collects, maintains, or disseminates SSNs, including truncated form.

Provide an explanation for the business need requiring the collection of SSNs, including truncated form.
Provide the legal authority which permits the collection of SSNs, including truncated form.

☒ No, the IT system does not collect, maintain, or disseminate SSNs, including truncated form.

4c. Does the IT system collect, maintain, or disseminate PII other than user ID?

☒ Yes, the IT system collects, maintains, or disseminates PII other than user ID.

☐ No, the user ID is the only PII collected, maintained, or disseminated by the IT system.

4d. Will the purpose for which the PII is collected, stored, used, processed, disclosed, or disseminated (context of use) cause the assignment of a higher PII confidentiality impact level?

Examples of context of use include, but are not limited to, law enforcement investigations, administration of benefits, contagious disease treatments, etc.

☒   Yes, the context of use will cause the assignment of a higher PII confidentiality impact level.

☐   No, the context of use will not cause the assignment of a higher PII confidentiality impact level.

If any of the answers to questions 2, 3, 4b, 4c, and/or 4d are "Yes," a Privacy Impact Assessment (PIA) must be completed for the IT system. This PTA and the SAOP approved PIA must be a part of the IT system's Assessment and Authorization Package.

CERTIFICATION

☒ The criteria implied by one or more of the questions above **apply** to the Agency Administrative Support System (AASS) and as a consequence of this applicability, a PIA will be performed and documented for this IT system.

☐ The criteria implied by the questions above **do not apply** to the Agency Administrative Support System (AASS) and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

System Owner Name: Myles Roberts Office: Office of the Chief Information Officer (OCIO) Phone: (571) 272-9182 Email: Myles.Roberts@uspto.gov Signature: _____ Date signed: _____	**Chief Information Security Officer** Name: Don Watson Office: Office of the Chief Information Officer (OCIO) Phone: (571) 272-8130 Email: Don.Watson@uspto.gov Signature: _____ Date signed: _____
Privacy Act Officer Name: Ezequiel Berdichevsky Office: Office of General Law (O/GL) Phone: (571) 270-1557 Email: Ezequiel.Berdichevsky@uspto.gov Signature: _____ Date signed: _____	**Bureau Chief Privacy Officer and Authorizing Official** Name: Henry J. Holcombe Office: Office of the Chief Information Officer (OCIO) Phone: (571) 272-9400 Email: Jamie.Holcombe@uspto.gov Signature: _____ Date signed: _____
Co-Authorizing Official Name: N/A Office: N/A Phone: N/A Email: N/A Signature: _____ Date signed: _____	