

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



**Privacy Threshold Analysis
for the
Consolidated Financial System (CFS)**

U.S. Department of Commerce Privacy Threshold Analysis

USPTO Consolidated Financial System

Unique Project Identifier: PTOC-001-00

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 and its purpose: *Provide a general description (in a way that a non-technical person can understand) of the information system that addresses the following elements:*

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).

The Consolidated Financial System (CFS) provides financial management, procurement, and travel management in support of the USPTO mission. CFS communicates with other federal agencies as part of these activities and includes the following four subsystems:

Momentum: 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. The Momentum system empowers the USPTO program offices to tie together many financial accounting functions, including plans, purchasing transactions, fixed assets, travel accounting, accounts receivable, accounts payable, reporting, security and workflow processes, general ledger, external reports, budget, payroll and automated disbursements through an integrated relational database.

Concur Government Edition (CGE): CGE is a web-based travel and planning management solution owned, hosted, maintained and operated by Concur, Inc. This is a general support application of the Federal Government's more broadly defined eTravel 2 (ETS2) program, including funds control, accounting and fiscal management of Agency travel, the USPTO was required to construct an interface between the CGE and Momentum. The CGE application falls within the security boundary of the General Services Administration (GSA) and is authorized to operate by GSA. The USPTO has a Memorandum of Understanding (MOU) and an Interconnection Security Agreement (ISA) in place with GSA for this integration.

eAcquisition Tool (ACQ): ACQ is a web-based COTS solution to support users in the acquisition community at the USPTO. This general support application allows procurement users to create acquisition plans and track the life of procurement actions and documents associating

with the plan. ACQ integrates with Momentum, Vendor Portal, Enterprise Data Warehouse (EDW), and the Electronic Library for Financial Management Systems (EL4FMS).

VendorPortal: VendorPortal is a web-based COTS solution to provide a platform for interaction and information exchange between USPTO and the vendor community. This general support application provides the ability to publish notices, solicitations and award announcements; enables vendor offer, invoice and receipt submission, and provides vendors insight into awards, deliverables and invoice statuses.

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

CFS is a major application

b) System location

Momentum

Momentum is located in Alexandria, Virginia PTO DataCenter; disaster recovery is located in Boyers, PA.

Concur Government Edition (CGE)

Concur integration is located in Alexandria, Virginia PTO DataCenter; disaster recovery is located in Boyers, PA. The Concur application is externally hosted and managed by GSA.

eAcquisition Tool (ACQ)

ACQ is located in Alexandria, Virginia PTO DataCenter; disaster recovery is located in Boyers, PA.

VendorPortal

VendorPortal is located in Alexandria, Virginia PTO DataCenter; disaster recovery is located in Boyers, PA.

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

Momentum: Momentum interconnects with:

- eAcquisition Tool (ACQ)
- VendorPortal
- Enterprise Data Warehouse (EDW)
- Electronic Library for Financial Management Systems (FL4FMS)
- Fee Processing Next Generation (FPNG)
- General Services Administration Concur Government Edition (CGE)

- General Services Administration System Award Management (SAM)
- Central Contractor Registration Connector (CCRC)
- Department of Agriculture National Finance Center (NFC)
- Department of Treasury Do Not Pay (DNP)
- Department of Treasury Payment Application Modernization (PAM)

Concur Government Edition (CGE): Concur interconnects with:

- Momentum
- Enterprise Data Warehouse (EDW)

eAcquisition Tool (ACQ): ACQ interconnects with:

- Momentum
- Vendor Portal
- Enterprise Data Warehouse (EDW)
- Electronic Library for Financial Management Systems (EL4FMS)

VendorPortal: VendorPortal interconnects with ACQ.

d) The purpose that the system is designed to serve

Momentum

Momentum serves as accounting software package that permits full integration of the processing of financial transactions with other normal business processes. The system empowers the USPTO program offices to tie together many financial accounting functions, including plans, purchasing transactions, fixed assets, travel accounting, accounts receivable, accounts payable, reporting, security and workflow processes, general ledger, external reports, budget, payroll and automated disbursements through an integrated relational database.

Concur Government Edition (CGE)

CGE serves as a web-based travel and planning management solution owned, hosted, maintained and operated by Concur, Inc. In order to support the Federal Government's more broadly defined eTravel 2 (ETS2) program, including funds control, accounting and fiscal management of Agency travel, the USPTO was required to construct an interface between the CGE and Momentum. The CGE application falls within the security boundary of the General Services Administration (GSA) and is authorized to operate by GSA.

eAcquisition Tool (ACQ)

ACQ serves as a web-based COTS solution to support users in the acquisition community at the USPTO. ACQ allows procurement users to create acquisition plans and track the life of procurement actions and documents associating with the plan. ACQ integrates with Momentum,

Vendor Portal, Enterprise Data Warehouse (EDW), and the Electronic Library for Financial Management Systems (EL4FMS).

VendorPortal

VendorPortal serves as a web-based COTS solution to provide a platform for interaction and information exchange between USPTO and the vendor community. VendorPortal provides the ability to publish notices, solicitations and award announcements; enables vendor offer, invoice and receipt submission, and provides vendors insight into awards, deliverables and invoice statuses

e) The way the system operates to achieve the purpose

Momentum

Momentum operates as 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 Government Edition (CGE)

CGE operates as a web-based travel and planning management solution owned, hosted, maintained and operated by Concur, Inc. In order to support the Federal Government's more broadly defined eTravel 2 (ETS2) program, including funds control, accounting and fiscal management of Agency travel, the USPTO was required to construct an interface between the CGE and Momentum.

eAcquisition Tool (ACQ)

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VendorPortal

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

Momentum - Financial information

Concur - Travel information

ACQ - Procurement information

VP - Invoice information

g) Identify individuals who have access to information on the system

Momentum - Government Employees; Contractors

Concur - Government Employees; Contractors

ACQ - Government Employees; Contractors

VP - Government Employees; Contractors; General Public

h) How information in the system is retrieved by the user

Momentum – Graphical User Interface (GUI)

Concur – Graphical User Interface (GUI)

ACQ – Graphical User Interface (GUI)

VP – Graphical User Interface (GUI)

i) How information is transmitted to and from the system

Momentum

Momentum information is transmitted via various integrations and user data entry, as explained in introduction (C).

Concur Government Edition (CGE)

Concur - information is transmitted via various integrations and user data entry, as explained in introduction (C).

eAcquisition Tool (ACQ)

ACQ information is transmitted via various integrations and user data entry, as explained in introduction (C).

VendorPortal

VendorPortal information is transmitted via various integrations and user data entry, as explained in introduction (C).

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	<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. *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 (version 01-2015 or 01-2017). *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 (version 01-2019 or later). *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	<input type="checkbox"/>	Building entry readers	<input type="checkbox"/>
Video surveillance	<input type="checkbox"/>	Electronic purchase transactions	<input type="checkbox"/>
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.

Required on vendor records for payments.

Provide the legal authority which permits the collection of SSNs, including truncated form.

31 USC 3325, 5 U.S.C. 301; 31 U.S.C. 3512, 3322; 44 U.S.C. 3101, 3309
5 U.S.C. 5701-09, 31 U.S.C. 3711, 31 CFR Part 901, Treasury Financial Manual
Budget and Accounting Act of 1921; Accounting and Auditing Act of 1950
Federal Claim Collection Act of 1966; 35 U.S.C. 2 and 41 and 15 U.S.C. 1113

☐ 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 PIA and the SAOP approved PIA must be a part of the IT system’s Assessment and Authorization Package.

CERTIFICATION

☒ I certify the criteria implied by one or more of the questions above **apply** to the Consolidated Financial System and as a consequence of this applicability, I will perform and document a PIA for this IT system.

☐ I certify the criteria implied by the questions above **do not apply** to the Consolidated Financial System and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

<p>System Owner Name: Marci Etzel Office: Office of Financial Management Systems Phone: (571) 272-5415 Email: Marci.etzel@uspto.gov</p> <p>Signature: <u>Users, Etzel, Marci M.</u> <small>Digitally signed by Users, Etzel, Marci M. Date: 2021.03.29 14:12:13 -04'00'</small></p> <p>Date signed: _____</p>	<p>Chief Information Security Officer Name: Don Watson Office: Office of the Chief Information Officer (OCIO) Phone: (571) 272-8130 Email: Don.Watson@uspto.gov</p> <p>Signature: <u>DON R Watson</u> <small>Digitally signed by DON R Watson Date: 2021.03.31 13:26:32 -04'00'</small></p> <p>Date signed: _____</p>
<p>Privacy Act Officer Name: John Heaton Office: Office of General Law (O/GL) Phone: (571) 270-7420 Email: Ricou.Heaton@uspto.gov</p> <p>Signature: <u>Users, Heaton, John (Ricou)</u> <small>Digitally signed by Users, Heaton, John (Ricou) Date: 2021.03.29 11:08:15 -04'00'</small></p> <p>Date signed: _____</p>	<p>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</p> <p>Signature: <u>Deborah Stephens</u> <small>Digitally signed by Deborah Stephens Date: 2021.04.01 15:36:27 -04'00'</small></p> <p>Date signed: _____</p>
<p>Co-Authorizing Official Name: Jay Hoffman Office: Office of the Chief Financial Officer (OCFO) Phone: (571) 272-9200 Email: Jay.Hoffman@uspto.gov</p> <p>Signature: <u>Users, Mildrew, Sean</u> <small>Digitally signed by Users, Mildrew, Sean Date: 2021.04.07 19:14:28 -04'00'</small></p> <p>Date signed: _____</p>	