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



## Privacy Impact Assessment
## for the
## Information Delivery Product (IDP)

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☒ Concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Officer
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# U.S. Department of Commerce Privacy Impact Assessment
# USPTO Information Delivery Product (IDP)

**Unique Project Identifier: PTOC-003-00**

**<u>Introduction:</u> System Description**

*Provide a description of the system that addresses the following elements:*
*The response must be written in plain language and be as comprehensive as necessary to describe the system.*

IDP is a Master System composed of the following three (3) subsystems: 1) Enterprise Data Warehouse (EDW), 2) Electronic Library for Financial Management System (EL4FMS), and 3) Financial Enterprise Data Management Tools (FEDMT).

### Enterprise Data Warehouse (EDW)

The Enterprise Data Warehouse (EDW) is a United States Patent and Trademark Office (USPTO) system providing access to integrated USPTO data through various tools in support of not only reporting and visualizing but also analytics used in decision-making across USPTO.

**Data**

- EDW collects data from 20+ source systems including internal USPTO systems as well as external systems and organizes that data into five major subject areas: Financials, Revenue, Human Resources, IT Project Information, and Patents.

- EDW grants permissions to data sets, individual rows and/or individual columns of data.

- EDW delivers data to 15+ consuming systems aiding them with authoritative reference or financial data in support of their transactional data processing.

**Tools**

- EDW offers a secure reporting platform within SAP Business Objects, which currently hosts 1600+ individual reports including official financial reports as well as ad-hoc custom reports developed by everyday users taking advantage of EDW's self-service environment.

- EDW offers a secure visualization-hosting platform for Tableau visualizations sourcing data from EDW as well as those sourcing data from outside EDW.

- EDW has 75+ distinct Extract, Transform, and Load (ETL) jobs developed under SAP Data Services running at intervals of 1, 3, 5, 15, 60 minutes, or once daily, weekly, biweekly, monthly, quarterly, or annually performing approximately 200,000 loads of data every month.

- EDW offers the Enterprise Information Portal (EIP) consisting of a user interface that organizes all reports and visualizations as well as documents from our partner content management repository (EL4FMS) into a single, easy to access location.

**Electronic Library for Financial Management System (EL4FMS)**

The Electronic Library for Financial Management Systems (EL4FMS) is an automated information system (AIS) that provides access to USPTO financial-related documents to support the decision-making activities of managers and analysts. EL4FMS also supports users' business operations by providing access via FPNG to various financial documents relating to their FPNG account.

**Financial Enterprise Data Management Tools (FEDMT)**

FEDMT is a database/user interface solution utilizing the Oracle Application Express (APEX) product to build small applications to support Financial Reference data as well as Financial administrative tasks.

FEDMT currently has eight applications.

PPA Code Database to house PPA (Program, Project, and Activity) code data that previously existed in two standalone Microsoft Access databases, each separately maintained by OCIO FRMD and OCFO ABID. Both existing Access databases contained a complete listing of PPA codes; the differentiator is the OCIO database contained additional project-related attributes of interest to FRMD, and the ABID version was utilized as the official source to deliver PPA content to Momentum for financial purposes. The new APEX database serves the need of both OCFO and OCIO and contains additional attributes needed by FRMD.

EDW Security App allows EDW support personnel to administer the privileges approved for end users. Usage is limited to EDW personnel only.

IDP Admin App is utilized by EDW support staff in OFMS to create/manage content in standard reference or mapping tables, some associated with the EDW Enterprise Information Portal(EIP).

Access Request Management system (ARMS) allows users of financial systems to request access at a detailed system/role level, have those requests proceed through workflow approval processes, and alert system administrators when requests are approved and ready to implement.

Technology Business Management (TBM) app allows users in OFMS and FRMD to administer mappings of TBM data to financial reference data sets to integrate into broader reporting needs later within the EDW and other systems.

Product Management Console (PMC) aids product management staff in the recording of Key Performance Indicators and their results, as well as provide other product management reference

content and mappings to support Rally and GEARS data integration within EDW.

IT Budget Formulation Tool (ITBFT) aids the Enterprise Budget Tool (EBT) by creating a user interface for IT Product Owners to create and update budget formulation requests during open periods.

Procurement Plan (PROC) will aid procurement personnel with planning, as well as managing vendor rate data.

### (a) *Whether it is a general support system, major application, or other type of system*
Information Delivery Product (IDP) is a Major Application.

### (b) *System location*
IDP resides at the USPTO facilities located in Alexandria, Virginia.

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

IDP interconnects with the following systems:
•Network and Security Infrastructure System (NSI)
•Corporate Administrative Office System (CAOS)
•Enterprise Software Services (ESS)
•Enterprise Unix Services (EUS)
•Enterprise Windows Services (EWS)
•Service Oriented Infrastructure System (SOI)
•Consolidated Financial System (CFS)
•Enterprise Desktop Platform (EDP)
•Patent Capture and Application Processing System –Examination Support (PCAPS-ES)
•Agency Administrative Support System (AASS)
•Fee Processing Next Generation (FPNG)
•Patent Trial and Appeal Board End to End (PTAB-E2E)
•Enterprise Records Management and Data Quality System (ERMDQS)
•Corporate Web Systems (CWS)
•Database Services (DBS)

### (d) *The way the system operates to achieve the purpose(s) identified in Section 4*
IDP provide users access to USPTO financial-related documents to support the decision-making activities of managers and analysts. The system provides an interface for users to access the database, generate reports and have the ability to visualize the data.

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

Information is retrieved via the Financial Enterprise Data Management Tools interface.

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

Communications utilize a minimum of TLS v1.2 with FIPS 140-2 compliant algorithms to provide transmission confidentiality and integrity for all connections outside the system boundary.

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

IDP supports users' business operations by providing access via FPNG to various financial documents relating to their FPNG account.

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

The USPTO collects customer financial information for fee processing under 35 U.S.C. 2 and 41 and 15 U.S.C.1113, as implemented in 37 CFR 1.16–1.28, 2.6–2.7, and 2.206–2.209. The authority for the USPTO employees' PII in IDP is E.O. 9397.

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

IDP is categorized as a Moderate system.

## 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 | ☐ | 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.

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

01-2017).

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

## Section 2: Information in the System

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

### Identifying Numbers (IN)

| | | | | | |
|---|---|---|---|---|---|
| a. Social Security* | ☒ | f. Driver's License | ☐ | j. Financial Account | ☒ |
| b. Taxpayer ID | ☒ | g. Passport | ☐ | k. Financial Transaction | ☒ |
| c. Employer ID | ☐ | h. Alien Registration | ☐ | l. Vehicle Identifier | ☐ |
| d. Employee ID | ☒ | i. Credit Card | ☒ | m. Medical Record | ☐ |
| e. File/Case ID | ☐ | | | | |
| n. Other identifying numbers (specify): | | | | | |

*Explanation for the business need to collect, maintain, or disseminate the Social Security number, including truncated form:

IDP maintains Social Security Numbers (SSNs) of USPTO employees for human resources reporting purposes. The source systems from which it receives SSNs are the U.S Department of Agriculture (USDA) National Finance Center (NFC) and the USPTO Patent Capture and Application Processing System– Examination Support (PCAPS-ES) Patent Application Location Monitoring (PALM) Infrastructure System (INFRA).

### General Personal Data (GPD)

| | | | | | |
|---|---|---|---|---|---|
| a. Name | ☒ | h. Date of Birth | ☒ | o. Financial Information | ☒ |
| b. Maiden Name | ☐ | i. Place of Birth | ☐ | p. Medical Information | ☐ |
| c. Alias | ☐ | j. Home Address | ☒ | q. Military Service | ☐ |
| d. Gender | ☒ | k. Telephone Number | ☒ | r. Criminal Record | ☐ |
| e. Age | ☒ | l. Email Address | ☒ | s. Physical Characteristics | ☐ |
| f. Race/Ethnicity | ☒ | m. Education | ☒ | t. Mother's Maiden Name | ☐ |
| g. Citizenship | ☐ | n. Religion | ☐ | | |
| u. Other general personal data (specify): | | | | | |

### Work-Related Data (WRD)

| | | | | | |
|---|---|---|---|---|---|
| a. Occupation | ☒ | e. Work Email Address | ☒ | i. Business Associates | ☐ |
| b. Job Title | ☒ | f. Salary | ☒ | j. Proprietary or Business Information | ☒ |
| c. Work Address | ☒ | g. Work History | ☒ | k. Procurement/contracting records | ☒ |

| | | | | | |
|---|---|---|---|---|---|
| d. Work Telephone Number | ☒ | h. Employment Performance Ratings or other Performance Information | ☐ | | |
| l. Other work-related data (specify): | | | | | |

**Distinguishing Features/Biometrics (DFB)**

| | | | | | |
|---|---|---|---|---|---|
| a. Fingerprints | ☐ | f. Scars, Marks, Tattoos | ☐ | k. Signatures | ☐ |
| b. Palm Prints | ☐ | g. Hair Color | ☐ | l. Vascular Scans | ☐ |
| c. Voice/Audio Recording | ☐ | h. Eye Color | ☐ | m. DNA Sample or Profile | ☐ |
| d. Video Recording | ☐ | i. Height | ☐ | n. Retina/Iris Scans | ☐ |
| e. Photographs | ☐ | j. Weight | ☐ | o. Dental Profile | ☐ |
| p. Other distinguishing features/biometrics (specify): | | | | | |

**System Administration/Audit Data (SAAD)**

| | | | | | |
|---|---|---|---|---|---|
| a. User ID | ☒ | c. Date/Time of Access | ☒ | e. ID Files Accessed | ☐ |
| b. IP Address | ☒ | f. Queries Run | ☒ | f. Contents of Files | ☐ |
| 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 | ☐ | Hard Copy: Mail/Fax | ☐ | Online | ☐ |
| Telephone | ☐ | Email | ☐ | | |
| Other (specify): | | | | | |

**Government Sources**

| | | | | | |
|---|---|---|---|---|---|
| Within the Bureau | ☒ | Other DOC Bureaus | ☐ | Other Federal Agencies | ☒ |
| State, Local, Tribal | ☐ | Foreign | ☐ | | |
| Other (specify): | | | | | |

**Non-government Sources**

| | | | | | |
|---|---|---|---|---|---|
| Public Organizations | ☐ | Private Sector | ☐ | Commercial Data Brokers | ☐ |
| Third Party Website or Application | | | ☐ | | |
| Other (specify): | | | | | |

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

| |
|---|
| Data is pulled from PTO authoritative sources which have the responsibility for data accuracy. USPTO implements security and management controls to prevent the inappropriate disclosure of sensitive information. Security controls are employed to ensure information is resistant to tampering, remains confidential as necessary, and is available as intended by the agency and expected by authorized users. Management controls are utilized to prevent the inappropriate disclosure of sensitive information. Access controls, including the concept of least privilege, are in place within the system to protect the integrity of this data as it is processed or stored. |

2.4    Is the information covered by the Paperwork Reduction Act?

| | |
|---|---|
| ☒ | Yes, the information is covered by the Paperwork Reduction Act. Provide the OMB control number and the agency number for the collection. <br><br> 0651-0043  Financial Transactions |
| ☐ | 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 (TUCPBNPD) | | | |
|---|---|---|---|
| Smart Cards | ☐ | Biometrics | ☐ |
| Caller-ID | ☐ | Personal Identity Verification (PIV) Cards | ☐ |
| Other (specify): | | | |

| | |
|---|---|
| ☒ | There are not any technologies used that contain PII/BII in ways that have not been previously deployed. |

### Section 3:  System Supported Activities

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

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

| | |
|---|---|
| ☒ | There are not any IT system supported activities which raise privacy risks/concerns. |

## 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 | ☐ | For administering human resources programs | ☒ |
| For administrative matters | ☒ | To promote information sharing initiatives | ☐ |
| For litigation | ☐ | For criminal law enforcement activities | ☐ |
| For civil enforcement activities | ☐ | For intelligence activities | ☐ |
| To improve Federal services online | ☐ | For employee or customer satisfaction | ☐ |
| For web measurement and customization technologies (single-session) | ☐ | For web measurement and customization technologies (multi-session) | ☐ |
| 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 Delivery Product integrates existing data from multiple USPTO sources and HR data from the U.S Department of Agriculture (USDA) National Finance Center (NFC). It makes data comparisons available for analysis. This systems collects, maintains, or disseminates information about DOC employees, Contractors (working for DOC) and Members of the Public.

This information is collected to support the decision-making activities of managers and analysts in the PTO's business areas to analyze USPTO data. Specifically, the information will provide managers and analysts the ability to analyze business processes, resource use and needs, and other facets of the business and provide the USPTO with the means of performing at a more efficient, accurate, and cost effective level.

One subject area of the IDP is the Human Resources Subject Area (HRSA). HRSA is a reporting mechanism for HR to allow authorized users (both within OHR and for managers throughout PTO) to run reports, such as staff listings, within Grade Increases projections, employee counts, accession/separation lists, etc. The data warehouse (which stores USDA NFC, U.S Treasury HR Connect, and general employee locator content) in conjunction with the Business objects reporting tool, allows for the dissemination of information to authorized users.

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.)

| |
|---|
| The potential danger in the PII/BII being compromised is the potential for sharing of information that is required to be held in confidence for a specified period of time per statute and regulation, e.g., 35 USC 122 and 37 CFR 1.211. Adversarial entities, insider threats, and foreign governments can be potential threats to privacy. All end-users and administrators of the BDR system have a valid need-to-know access to the system, and undergo the USPTO Annual IT Security Awareness Training provided by the agency. This training covers proper information handling, retention, and disposal at an enterprise level, which is applicable to all information systems. |

## 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 | ☒ | ☒ | ☒ |
| DOC bureaus | ☐ | ☐ | ☐ |
| Federal agencies | ☐ | ☐ | ☐ |
| State, local, tribal gov't agencies | ☐ | ☐ | ☐ |
| Public | ☐ | ☐ | ☐ |
| Private sector | ☐ | ☐ | ☐ |
| Foreign governments | ☐ | ☐ | ☐ |
| Foreign entities | ☐ | ☐ | ☐ |
| Other (specify): | ☐ | ☐ | ☐ |

| | |
|---|---|
| ☐ | 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?

| | |
|---|---|
| ☐ | Yes, the external agency/entity is required to verify with the DOC bureau/operating unit before re-dissemination of PII/BII. |
| ☐ | No, the external agency/entity is not required to verify with the DOC bureau/operating unit before re-dissemination of PII/BII. |
| ☒ | 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.

| | |
|---|---|
| ☒ | Yes, this IT system connects with or receives information from another IT system(s) authorized to process PII and/or BII.<br>Provide the name of the IT system and describe the technical controls which prevent PII/BII leakage:<br><br>• Corporate Administrative Office System (CAOS)<br>• Enterprise Software Services (ESS)<br>• Consolidated Financial System (CFS)<br>• Patent Capture and Application Processing System – Examination Support (PCAPS-ES)<br>• Agency Administrative Support System (AASS)<br>• Fee Processing Next Generation (FPNG)<br>• Patent Trial and Appeal Board End to End (PTAB-E2E)<br>• Corporate Web Systems (CWS)<br><br>The information transmitted between the systems is protected within USPTO's secure perimeter through the Network and Security Infrastructure (NSI) and the Security and Compliance Services (SCS) systems. All data transmissions are encrypted and require credential verification. All data transmissions not done through dedicated lines require security certificates. Inbound transmissions as well as outbound transmissions to government agencies pass through a DMZ before being sent to endpoint servers. SSNs and Taxpayer IDs are encrypted while at rest. |
| ☐ | 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 | ☐ | Government Employees | ☒ |
| Contractors | ☒ | | |
| 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.)*

| | | |
|---|---|---|
| ☒ | Yes, notice is provided pursuant to a system of records notice published in the Federal Register and discussed in Section 9. | |
| ☒ | 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 | |
| ☒ | Yes, notice is provided by other means. | Specify how: IDP receives PII/BII indirectly from other application systems (i.e. front end systems). Individuals may be notified that their PII/BII is collected, maintained, disseminated by the primary application ingress system. |
| ☐ | No, notice is not provided. | Specify why not: |

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

| | | |
|---|---|---|
| ☐ | Yes, individuals have an opportunity to decline to provide PII/BII. | Specify how: |
| ☒ | No, individuals do not have an opportunity to decline to provide PII/BII. | Specify why not: IDP receives PII/BII indirectly from other application systems (i.e. front end systems). These front end systems provide this functionality for the data that is being collected. IDP has no authorization to decline any type of information since it's owned by the primary application. |

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

| | | |
|---|---|---|
| ☐ | Yes, individuals have an opportunity to consent to particular uses of their PII/BII. | Specify how: |
| ☒ | No, individuals do not have an opportunity to consent to particular uses of their PII/BII. | Specify why not: IDP receives PII/BII indirectly from application systems (i.e front end systems). These front end systems provide this functionality for data that is being collected. USPTO Employees and Contractors do not have the ability to consent to particular uses of their PII. They consent to providing their name, SSN, and phone number etc. as part of accepting employment at USPTO. |

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

| | | |
|---|---|---|
| ☐ | Yes, individuals have an opportunity to review/update PII/BII pertaining to them. | Specify how: |
| ☒ | No, individuals do not have an | Specify why not: |

| | |
|---|---|
| opportunity to review/update PII/BII pertaining to them. | IDP receives PII/BII indirectly from other application systems (i.e. front end systems). These front end systems provide this functionality for the data that is being collected. IDP has no authorization to review/update any type of information since it's owned by the primary application. |

## <u>Section 8</u>:  Administrative and Technological Controls

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

| | |
|---|---|
| ☒ | All users signed a confidentiality agreement or non-disclosure agreement. |
| ☒ | All users are subject to a Code of Conduct that includes the requirement for confidentiality. |
| ☒ | Staff (employees and contractors) received training on privacy and confidentiality policies and practices. |
| ☒ | Access to the PII/BII is restricted to authorized personnel only. |
| ☒ | Access to the PII/BII is being monitored, tracked, or recorded.<br>Explanation: The EDW system has implemented logging, auditing, and monitoring tools to track access to PII/BII. |
| ☒ | The information is secured in accordance with the Federal Information Security Modernization Act (FISMA) requirements.<br>Provide date of most recent Assessment and Authorization (A&A): 9/14/2020_____<br>☐   This is a new system.  The A&A date will be provided when the A&A package is approved. |
| ☒ | The Federal Information Processing Standard (FIPS) 199 security impact category for this system is a moderate or higher. |
| ☒ | NIST Special Publication (SP) 800-122 and NIST SP 800-53 Revision 4 Appendix J recommended security controls for protecting PII/BII are in place and functioning as intended; or have an approved Plan of Action and Milestones (POA&M). |
| ☒ | A security assessment report has been reviewed for the information system and it has been determined that there are no additional privacy risks. |
| ☒ | Contractors that have access to the system are subject to information security provisions in their contracts required by DOC policy. |
| ☐ | Contracts with customers establish DOC ownership rights over data including PII/BII. |
| ☐ | Acceptance of liability for exposure of PII/BII is clearly defined in agreements with customers. |
| ☐ | 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).*

| |
|---|
| Management Controls:<br>The USPTO uses the Life Cycle review process to ensure that management controls are in place for the IDP. 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 UserID; (4) restricted data display, as required; and (5) restricted access.

Technical Controls:
Technical controls include password authentication (UserID and passwords). At the client PCs', access is managed through a password authentication (UserID and passwords) based on certification in a Financial Access Request Management (FARM) system. Requests are approved first by the user's supervisor, then require additional approval from Human Resources based on a justification of need.
Technical controls include password authentication (UserID and passwords). At the client PCs', access is managed through a password authentication (UserID and passwords) based on certification on a Financial Application Security Registration form. The security form must be signed by a supervisor, and requires additional approval from Human Resources 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."

| | |
|---|---|
| ☒ | Yes, this system is covered by an existing system of records notice (SORN). Provide the SORN name, number, and link. *(list all that apply)*:<br><br>Existing System of Records notices cover the information pulled from other systems residing in the Enterprise<br>Data Warehouse. These include:<br>• Commerce/PAT-TM 3, Employee Production records;<br>• Commerce/PAT-TM-7, Patent Application Files;<br>• Commerce/PAT-TM 10, Patent Deposit Accounts System; and<br>• Commerce/DEPT-18, Employee Personnel Files Not Covered by Notices of Other Agencies. |
| ☐ | Yes, a SORN has been submitted to the Department for approval on (date). |
| ☐ | 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.)*

| | |
|---|---|
| ☒ | There is an approved record control schedule.<br>Provide the name of the record control schedule: GRS 4:3:031 records schedule |
| ☐ | No, there is not an approved record control schedule.<br>Provide the stage in which the project is in developing and submitting a records control schedule: |
| ☒ | Yes, retention is monitored for compliance to the schedule. |
| ☐ | 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 | ☒ | Overwriting | ☒ |
| Degaussing | ☒ | Deleting | ☒ |
| 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.)*

| | |
|---|---|
| ☐ | Low – the loss of confidentiality, integrity, or availability could be expected to have a limited adverse effect on organizational operations, organizational assets, or individuals. |
| ☐ | Moderate – the loss of confidentiality, integrity, or availability could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals. |
| ☒ | 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.)*

| | | |
|---|---|---|
| ☒ | Identifiability | Provide explanation:<br>Social Security Number (SSN), name,<br>gender, age, race/ethnicity, home/business address, email address,<br>telephone number, financial information all of these factors can |

| | | |
|---|---|---|
| | | be used to identify a person. |
| ☒ | Quantity of PII | Provide explanation: Collectively, the number of records maintained generate an enormous amount of PII and a breach in such large numbers of individual PII must be considered in the determination of the impact level. |
| ☒ | Data Field Sensitivity | Provide explanation: Combination of name, SSN, and financial information may be more sensitive. |
| ☒ | Context of Use | Provide explanation: PII is stored to support the decision making activities of managers and analysts in the PTO's business areas to analyze USPTO data. |
| ☒ | Obligation to Protect Confidentiality | Provide explanation: Based on the data collected USPTO must protect the PII of each individual in accordance to the Privacy Act of 1974. |
| ☒ | Access to and Location of PII | Provide explanation: Due to obtaining PII, necessary measures must be taken to ensure the confidentiality of information during processing, storing and transmission |
| ☐ | 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.)

IDP resides in USPTO East production environment. Access to IDP is very limited and controlled by the IDP PM team. IDM accounts must be created by Operations for new accounts requested by members of the IDP PM team. Data is protected in transit through TLS 1.2. Administrative access to the back-end is limited to trusted individuals on the development team. Access to the IDP is controlled through RBAC enforcement. The correspondence related to non-published applications are made public when the application is made public (typically after a period of 18 months). Given the limited access under this category, the threat of BII 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 kept internally within the USPTO network.

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

| | |
|---|---|
| ☐ | Yes, the conduct of this PIA results in required business process changes.<br>Explanation: |
| ☒ | 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.

| | |
|---|---|
| ☐ | Yes, the conduct of this PIA results in required technology changes.<br>Explanation: |
| ☒ | No, the conduct of this PIA does not result in any required technology changes. |