

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



**Privacy Impact Assessment
for the
Fee Processing Next Generation (FPNG)**

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

- Concurrence of Senior Agency Official for Privacy/DOC Chief Privacy Officer
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Date

U.S. Department of Commerce Privacy Impact Assessment USPTO Fee Processing Next Generation (FPNG)

Unique Project Identifier: PTOC-004-00

Introduction: 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.

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

Fee Processing Next Generation (FPNG) is a Major Application within USPTO.

(b) *System location*

FPNG 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)*

FPNG interconnects with the following systems:

- Consolidated Financial System (CFS)
- Data Storage Management System (DSMS)
- Enterprise Desktop Platform (EDP)
- Information Delivery Product (IDP)
- Enterprise Unix Services (EUS)
- Network and Security Infrastructure System (NSI)
- Service Oriented Infrastructure System (SOI)
- Enterprise Software Services (ESS)
- Patent Trial and Appeal Board (PTAB-E2E)
- Trademark Processing System (External)(TPS-ES)
- Patent Capture and Application Processing System (PCAPS-IP)
- Patent End to End (PE2E)
- Information Dissemination Support System (IDSS)
- Intellectual Property Leadership Management System (IPLMSS)
- U.S. Treasury (Financial Management Service)- Pay.gov
- U.S. Treasury (Financial Management Service)- OTCnet

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

FPNG provides USPTO customers a modern payment system. FPNG provides services to the public and internal facing functionality that will enable USPTO employees to support customers. FPNG has interfaces to various USPTO systems and also with the U.S. Treasury, which includes Pay.Gov and OTCNet services. FPNG allows internal and external users to manage payment accounts, perform profile updates, and make payments for USPTO goods and services, etc. via the FPNG User Interface (UI). It also provides all functionality related to managing payments and replenishing and transferring deposit account balances.

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

Information is retrieved via the FPNG User Interface UI.

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

Communications utilize a minimum of TLS 1.1 with FIPS 140-2 compliant algorithms to provide transmission confidentiality and integrity for all connections outside the system boundary. The externally-facing VIPs supporting FPNG are configured to only support TLS 1.1 and TLS 1.2.

(g) Any information sharing conducted by the system

Information about customers' credit card transactions is sent to (the U.S. Treasury's) Pay.gov system for authorization (real-time) and settlement (same day) and customers' banking information is sent to the Pay.gov system (daily batch- not real-time) for pre-notifications (new account verification-zero dollar transaction) and for EFT processing. Employee information is not shared with any other system or agency.

(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.

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

FPNG 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	<input type="checkbox"/>	d. Significant Merging	<input type="checkbox"/>	g. New Interagency Uses	<input type="checkbox"/>
b. Anonymous to Non-Anonymous	<input type="checkbox"/>	e. New Public Access	<input type="checkbox"/>	h. Internal Flow or Collection	<input type="checkbox"/>
c. Significant System Management Changes	<input type="checkbox"/>	f. Commercial Sources	<input type="checkbox"/>	i. Alteration in Character of Data	<input type="checkbox"/>
j. Other changes that create new privacy risks (specify):					

- This is an existing information system in which changes do not create new privacy risks, and there is not a SAOP approved Privacy Impact Assessment.
- This is an existing information system in which changes do not create new privacy risks, and there is a SAOP approved Privacy Impact Assessment (version 01-2015).
- 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 01-2017 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*	<input type="checkbox"/>	f. Driver's License	<input type="checkbox"/>	j. Financial Account	<input checked="" type="checkbox"/>
b. Taxpayer ID	<input type="checkbox"/>	g. Passport	<input type="checkbox"/>	k. Financial Transaction	<input checked="" type="checkbox"/>
c. Employer ID	<input type="checkbox"/>	h. Alien Registration	<input type="checkbox"/>	l. Vehicle Identifier	<input type="checkbox"/>
d. Employee ID	<input checked="" type="checkbox"/>	i. Credit Card	<input checked="" type="checkbox"/>	m. Medical Record	<input type="checkbox"/>
e. File/Case ID	<input checked="" type="checkbox"/>				
n. Other identifying numbers (specify):					
*Explanation for the business need to collect, maintain, or disseminate the Social Security number, including truncated form:					

General Personal Data (GPD)					
a. Name	<input checked="" type="checkbox"/>	h. Date of Birth	<input type="checkbox"/>	o. Financial Information	<input checked="" 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 checked="" 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. Physical Characteristics	<input type="checkbox"/>
f. Race/Ethnicity	<input type="checkbox"/>	m. Education	<input type="checkbox"/>	t. Mother's Maiden Name	<input type="checkbox"/>
g. Citizenship	<input type="checkbox"/>	n. Religion	<input type="checkbox"/>		
u. Other general personal data (specify):					

Work-Related Data (WRD)					
a. Occupation	<input type="checkbox"/>	e. Work Email Address	<input checked="" type="checkbox"/>	i. Business Associates	<input type="checkbox"/>
b. Job Title	<input type="checkbox"/>	f. Salary	<input type="checkbox"/>	j. Proprietary or Business Information	<input type="checkbox"/>
c. Work Address	<input checked="" type="checkbox"/>	g. Work History	<input type="checkbox"/>		
d. Work Telephone Number	<input type="checkbox"/>	h. Employment Performance Ratings or other Performance Information	<input type="checkbox"/>		
k. Other work-related data (specify):					

Distinguishing Features/Biometrics (DFB)					
a. Fingerprints	<input type="checkbox"/>	d. Photographs	<input type="checkbox"/>	g. DNA Profiles	<input type="checkbox"/>
b. Palm Prints	<input type="checkbox"/>	e. Scars, Marks, Tattoos	<input type="checkbox"/>	h. Retina/Iris Scans	<input type="checkbox"/>
c. Voice Recording/Signatures	<input type="checkbox"/>	f. Vascular Scan	<input type="checkbox"/>	i. Dental Profile	<input type="checkbox"/>
j. 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 type="checkbox"/>	d. 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 type="checkbox"/>	Other DOC Bureaus	<input type="checkbox"/>	Other Federal Agencies	<input type="checkbox"/>
State, Local, Tribal	<input type="checkbox"/>	Foreign	<input type="checkbox"/>		
Other (specify):					

Non-government Sources					
Public Organizations	<input type="checkbox"/>	Private Sector	<input type="checkbox"/>	Commercial Data Brokers	<input type="checkbox"/>
Third Party Website or Application			<input type="checkbox"/>		
Other (specify):					

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

<p>From a technical implementation, 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. In addition, the Perimeter Network (NSI) and EMSO provide additional automated transmission and monitoring mechanisms to ensure that PII/BII information is protected and not breached by external entities.</p>

2.4 Is the information covered by the Paperwork Reduction Act?

<input checked="" type="checkbox"/>	Yes, the information is covered by the Paperwork Reduction Act. Provide the OMB control number and the agency number for the collection. 0651-0043 Financial Transactions
<input 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 (TUCPBNPD)			
Smart Cards	<input type="checkbox"/>	Biometrics	<input type="checkbox"/>
Caller-ID	<input type="checkbox"/>	Personal Identity Verification (PIV) Cards	<input type="checkbox"/>
Other (specify):			

<input checked="" type="checkbox"/>	There are not any technologies used that contain PII/BII in ways that have not been previously deployed.
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Section 3: System Supported Activities

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

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

<input type="checkbox"/>	There are not any IT system supported activities which raise privacy risks/concerns.
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Section 4: Purpose of the System

4.1 Indicate why the PII/BII in the IT system is being collected, maintained, or disseminated. (Check all that apply.)

Purpose			
For a Computer Matching Program	<input type="checkbox"/>	For administering human resources programs	<input type="checkbox"/>
For administrative matters	<input checked="" type="checkbox"/>	To promote information sharing initiatives	<input 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): For financial transactions			

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 USPTO collects customer financial information for fee processing. Under 35 U.S.C, Section 41 and 15 U.S.C. Section 1113, as implemented in 37 CFR, the USPTO charges fees for processing and services related to patents, trademarks, and information products. In the case of payments, we collect information about the payment method in order to troubleshoot or complete a chargeback should there be a problem with the payment. All employee information is collected in order to identify the FPNG fee processor and organization in which they work. The FPNG system is set up with role-based privileges, so an employee only has access to those specific functions permitted within their organization or by their required duties.

- 5.2 Describe any potential threats to privacy 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.)

Inadvertent private information exposure is a risk and USPTO has policies, procedures and training to ensure that employees are aware of their responsibility of protecting sensitive information and the negative impact on the agency if there is a loss, misuse, or unauthorized access to or modification of sensitive private information. USPTO requires annual security role-based training and annual mandatory security awareness procedure training for all employees. The following are USPTO current policies; Information Security Foreign Travel Policy (OCIO-POL-6), IT Privacy Policy (OCIO- POL-18), IT Security Education Awareness Training Policy (OCIO-POL-19), Personally Identifiable Data Removal Policy (OCIO-POL-23), USPTO Rules of the Road (OCIO-POL- 36). All offices of USPTO adhere to USPTO Records Management Office's Comprehensive Records Schedule that describes the types of USPTO records and their corresponding disposition authority or citation.

Section 6: Information Sharing and Access

6.1 Indicate with whom the bureau intends to share the PII/BII in the IT system and how the PII/BII will be shared. *(Check all that apply.)*

Recipient	How Information will be Shared		
	Case-by-Case	Bulk Transfer	Direct Access
Within the bureau	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
DOC bureaus	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Federal agencies	<input checked="" type="checkbox"/>	<input checked="" 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 Indicate whether the IT system connects with or receives information from any other IT systems authorized to process PII and/or BII.

<input checked="" type="checkbox"/>	<p>Yes, this IT system connects with or receives information from another IT system(s) authorized to process PII and/or BII. Provide the name of the IT system and describe the technical controls which prevent PII/BII leakage:</p> <ul style="list-style-type: none"> • Consolidated Financial System (CFS) • Information Delivery Product (IDP) • Patent Trial and Appeal Board (PTAB-E2E) • Trademark Processing System (External)(TPS-ES) • Patent Capture and Application Processing System (PCAPS-IP) • Patent End to End (PE2E) • Information Dissemination Support System (IDSS) • Intellectual Property Leadership Management System (IPLMSS)
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	<ul style="list-style-type: none"> • U.S. Treasury (Financial Management Service)- Pay.gov • U.S. Treasury (Financial Management Service)- OTCnet
<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.

6.3 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 checked="" type="checkbox"/>	Government Employees	<input checked="" type="checkbox"/>
Contractors	<input checked="" type="checkbox"/>		
Other (specify):			

Section 7: Notice and Consent

7.1 Indicate whether individuals will be notified if their PII/BII is collected, maintained, or disseminated by the system. *(Check all that apply.)*

<input checked="" type="checkbox"/>	Yes, notice is provided pursuant to a system of records notice published in the Federal Register and discussed in Section 9.
<input checked="" type="checkbox"/>	Yes, notice is provided by a Privacy Act statement and/or privacy policy. The Privacy Act statement and/or privacy policy can be found at: http://www.uspto.gov/privacy-policy
<input type="checkbox"/>	Yes, notice is provided by other means. Specify how:
<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 checked="" type="checkbox"/>	Yes, individuals have an opportunity to decline to provide PII/BII. Specify how: Users have the option of making anonymous payments; however, certain PII is required for users creating and maintaining deposit accounts.
<input type="checkbox"/>	No, individuals do not have an opportunity to decline to provide PII/BII. Specify why not:

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

<input checked="" type="checkbox"/>	Yes, individuals have an opportunity to consent to particular uses of their PII/BII. Specify how: All financial information for payment processing described
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	PII/BII.	herein is required to obtain services related to intellectual property and the protection of intellectual property rights. Customers do have payment options, so they have the opportunity to decline the provision of credit card information if they would rather use a deposit account or a check.
<input type="checkbox"/>	No, individuals do not have an opportunity to consent to particular uses of their PII/BII.	Specify why not:

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: Users have access to their user profiles in order to update information as needed.
<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 checked="" type="checkbox"/>	All users are subject to a Code of Conduct that includes the requirement for confidentiality.
<input checked="" type="checkbox"/>	Staff (employees and contractors) received training on privacy and confidentiality policies and practices.
<input checked="" type="checkbox"/>	Access to the PII/BII is restricted to authorized personnel only.
<input checked="" type="checkbox"/>	Access to the PII/BII is being monitored, tracked, or recorded. Explanation: Through audit logs
<input checked="" type="checkbox"/>	The information is secured in accordance with FISMA requirements. Provide date of most recent Assessment and Authorization (A&A): <u>2/20/2020</u> <input type="checkbox"/> This is a new system. The A&A date will be provided when the A&A package is approved.
<input checked="" type="checkbox"/>	The Federal Information Processing Standard (FIPS) 199 security impact category for this system is a moderate or higher.
<input checked="" type="checkbox"/>	NIST Special Publication (SP) 800-122 and NIST SP 800-53 Revision 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).
<input checked="" type="checkbox"/>	A security assessment report has been reviewed for the supporting 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 ownership rights over data including PII/BII.
<input checked="" 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).

FPNG is secured by the USPTO's infrastructure systems and other OCIO established technical controls to include password authentication at the server and database levels. HTTPS is used for all data transmissions to and from the Internet, USPTO DMZ, and PTOnet. A dedicated socket is used to perform encryption and decryption. In supporting fee collection via Internet Web storefronts, FPNG uses a secure architecture. When a fee payment is required, users of a "legacy storefront" are redirected to a Secure Hypertext Transfer Protocol (HTTPS) URL from their specific storefront Web pages. After requesting a purchase transaction, the client's web browser is redirected to the load balanced edge servers located in the USPTO Sensitive DMZ.

Section 9: Privacy Act

- 9.1 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 and number <i>(list all that apply)</i> : COMMERCE/PAT-TM-10 Deposit Accounts and Electronic Funds Transfer Profiles.
<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 1.1:010: Financial transaction records related to procuring goods and services, paying bills, collecting debts, and accounting.
<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.)*

Disposal			
Shredding	<input checked="" type="checkbox"/>	Overwriting	<input type="checkbox"/>
Degaussing	<input checked="" type="checkbox"/>	Deleting	<input checked="" type="checkbox"/>
Other (specify):			

Section 11: NIST Special Publication 800-122 PII Confidentiality Impact Levels

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 as the Federal Information Processing Standards (FIPS) 199 security impact category.)

<input type="checkbox"/>	Low – the loss of confidentiality, integrity, or availability could be expected to have a limited adverse effect on organizational operations, organizational assets, or individuals.
<input type="checkbox"/>	Moderate – the loss of confidentiality, integrity, or availability could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals.
<input checked="" 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 levels.

(Check all that apply.)

<input checked="" type="checkbox"/>	Identifiability	Provide explanation: Name, home/business address, email address, telephone number, financial information for fee processing
<input checked="" type="checkbox"/>	Quantity of PII	Provide explanation: Collectively, the number of records collected 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.
<input checked="" type="checkbox"/>	Data Field Sensitivity	Provide explanation: Combination of name and financial information may be more sensitive.
<input checked="" type="checkbox"/>	Context of Use	Provide explanation: PII is collected in order to communicate with external customers in case there are any problems with fee sale or to identify the fee processor and organization.
<input checked="" type="checkbox"/>	Obligation to Protect Confidentiality	Provide explanation: Based on the data collected USPTO must protect the PII of each individual in accordance to the Privacy Act of 1974.
<input checked="" type="checkbox"/>	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.

<input type="checkbox"/>	Other:	Provide explanation:
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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.)

	Inadvertent private information exposure is a risk and USPTO has policies, procedures and training to ensure that employees are aware of their responsibility of protecting sensitive information and the negative impact on the agency if there is a loss, misuse, or unauthorized access to or modification of sensitive private information. USPTO requires annual security role-based training and annual mandatory security awareness procedure training for all employees. The following are USPTO current policies; Information Security Foreign Travel Policy (OCIO-POL-6), IT Privacy Policy (OCIO- POL-18), IT Security Education Awareness Training Policy (OCIO-POL-19), Personally Identifiable Data Removal Policy (OCIO-POL-23), USPTO Rules of the Road (OCIO-POL- 36). All offices of USPTO adhere to USPTO Records Management Office's Comprehensive Records Schedule that describes the types of USPTO records and their corresponding disposition authority or citation.
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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.