U.S. DEPARTMENT OF COMMERCE

UNITED STATES PATENT AND TRADEMARK OFFICE

Privacy Impact Assessment

Consolidated Financial System

PTOC-001-00

March 11, 2010

Privacy Impact Assessment

This Privacy Impact Assessment (PIA) is a requirement of the Privacy Act of 1987 and OMB Memorandum 03-22, *OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002.* A PIA documents the due diligence and oversight placed upon information associated with the project or system in question. Written from the System Owner's perspective for the American public, the PIA discloses what information is being collected, and how that information is protected. The intent is to build confidence that privacy information is secure, processes that utilize this information comply with Federal requirements, and more importantly, inform the privacy expectations of the American public.

The Privacy Threshold Analysis (PTA) is a separate artifact that must be completed prior to beginning this PIA. In many cases, the PTA will be the only required artifact to satisfy DOC privacy considerations.

SYSTEM DESCRIPTION

The Consolidated Financial System (CFS) is a Major Application (MA) that 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 five (5) Automated Information Systems:

- **Momentum:** 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. Momentum not only provides a solution for financial management, it also enhances usability, efficiency, timeliness, and accuracy of the United States Patent and Trademark Office's (USPTO) financial management transactions through its Graphical User Interface (GUI) that provides an integrated workflow facility including seamless integration with other administrative support systems. Momentum contains a third party product, webMethods, which is used to integrate the financial system with Vendor Self Service (VSS); a Web-based application that allows an agency and its vendors to complete and track their procurement and invoicing activities electronically. webMethods also supports the integration of the externally hosted FedTraveler AIS. System devices are physically located in the Data Center in the Madison East Building. The users of Momentum are USPTO employees and designated contractors in various Business Units.

- **Vendor Self Service (VSS):** VSS is a Web-based application that allows an agency and its vendors to complete their procurement and invoicing activities electronically. In addition to providing agencies with an online solution for procurement and invoicing, the VSS application provides vendors with the ability to track contracts from the offer through payment. VSS provides a method for vendors to view and respond to various business opportunities with real-time interaction. VSS is user friendly and increases the efficiency of vendor to agency interaction.

- **Activity Based Information System (ABIS):** ABIS utilizes a COTS product, Profitability and Cost Management (PCM), to streamline and automate business processes. The system capabilities include: 1) develop, update and maintain the Activity Based Costing (ABC) models, 2) prepare quarterly reports and briefings which are utilized to communicate with Program Managers and Executives in USPTO; 3) prepare quarterly Statement of Net Cost and supporting notes, and 4) provide cost input and analysis for the Annual Performance and Accountability Report perform ad hoc cost studies on proposed fee legislation, OMB and Congressional inquiries and internal management requests. System devices are physically located in the Data Center in the Madison East Building. ABIS users are Activity Based Information Staff in the Office of Finance and OFMS USPTO employees.

- **Corporate Planning Tool (CPT):** CPT improves the efficiency and effectiveness of the business processes for which the USPTO Office of Corporate Planning (OCP) and Financial Resources Management Division (FRMD) of OCIO are responsible. The CPT is a COTS product and possesses the ability to integrate and streamline the USPTO's formulation, execution, and performance processes. In addition, the tool serves as an improved means of gathering, analyzing, and reporting pertinent information.

  The CPT leverages information from all OCP and FRMD OCIO processes but focuses on the budget formulation and budget execution processes. With COTS software, OCP and FRMD OCIO are able to create a consistent process for generating, consolidating, and reporting information. Information can be reviewed and approved by the appropriate OCP and FRMD OCIO staff and then be shared among all OCP and FRMD OCIO staff and with the program areas. The CPT also allows OCP and FRMD OCIO staff to store and retrieve historical information.

While the vision for the CPT focuses on budget formulation and execution, it draws from and contributes to the strategic planning, fee workload analysis, and performance measurement reporting processes. System devices are physically located in the Data Center in the Madison East Building. CPT users are OCP and OCIO USPTO employees.

- **FedTraveler (FEDTV):** FedTraveler.com is a web-based travel and planning management solution owned, hosted, maintained and operated by EDS. In order to support the Department of Commerce's more broadly defined eTravel program, including funds control, accounting and fiscal management of Agency travel, the USPTO was required to construct an interface between the FedTraveler.com system and CGI's Momentum Financials. The USPTO has implemented a near real-time integration to FedTraveler.com using Web Services based on a Service Oriented Architecture (SOA).

  Fedtraveler.com falls within the security boundary of the GSA and is Certified and Accredited by GSA; however the integration piece between FedTraveler and Momentum should be included in the USPTO Certification and Accreditation. The USPTO also has a Memorandum of Understanding (MOU) & Integration Security Agreement (ISA) in place with EDS & GSA. System devices are physically located in the Data Center in the Madison East Building. FedTraveler users are USPTO employees.

QUESTIONNAIRE

1. What information is collected (e.g., nature and source)?

The Consolidated Financial System (CFS) comprises the following subsystems: Momentum Financials (USPTO's financial and acquisition system of record), Activity Based Information System (ABIS), Corporate Planning Tool (CPT), and FedTraveler (FEDTV). A large number of financial, procurement and travel transactions are performed in CFS on a daily basis. Data is entered into CFS in numerous ways. Data is entered directly into Momentum Financials through a graphical user interface, which facilitates the data entry and processing of transactions. Data entered directly into FEDTV (externally hosted by EDS) is transmitted to Momentum Financials via COTS interfaces. In addition, payroll data is updated into Momentum Financials from the National Finance Center's transactions; from Revenue Accounting and Management System for revenue transactions; and data is sent to the Department of Treasury for disbursements.

Momentum captures the social security numbers, bank account numbers, credit card numbers, tax identification numbers, phone numbers, and email addresses of the vendors tracked in the system. Social security numbers are tracked for employees of PTO.

FedTraveler, ABIS, and CPT do not store any information related to an individual.

Customers:
Customers of the USPTO only have access to the Vendor Self Service (VSS) sub-component of Momentum Financials. The VSS is utilized to post selected simplified acquisition Requests for Quotes (RFQs) and enables pre-qualified vendors outside USPTO to view the RFQ postings and submit quotes electronically. These quotes are utilized in the Acquisitions subsystem in Momentum Financials for evaluation and award. All other portions of the CFS are for internal use and access only.

Employees:
The CFS components and their uses are listed below:

Momentum Financials: Employees utilize Momentum to process requisitions, procurement and non-procurement obligations, receivers, invoices, payments, billing documents for receivables; to record payroll transactions; for planning and budget execution; to record and depreciate assets; and to disburse payments. Momentum Financials houses the general ledger that is updated as financial transactions are processed. In addition, Momentum Financials has extensive querying capabilities including activities by vendor, general ledger, and budget execution.

VSS: Employees utilize VSS to complete their procurement and invoicing activities electronically. Employees within the Office of Procurement use VSS to receive quotes submitted in response to the RFQ's posted.

FedTraveler: Employees utilize this system to perform travel transactions in support of official travel including travel requests, vouchers, and advances

ABIS: Employees utilize ABIS to develop and maintain Activity Based Costing models, prepare reports, and provide cost input and analysis for ad hoc studies.

CPT: Employees utilize CPT to formulate the budget and to capture the process of executing the budget. Employees enter actuals into CPT and through the data model, projections are generated for user analysis.

Other:
There are no other direct users of the CFS. Momentum communicates with the National Finance Center to receive payroll files and with the Department of Treasury to transmit disbursement information. USPTO's Revenue Accounting and Management system transmits financial information to Momentum Financials on a daily basis, and Momentum Financials data populates universes in USPTO's Enterprise Data Warehouse.

2. Why is this information being collected (e.g., to determine eligibility)?

CFS is the USPTO's financial and acquisition system of record and is responsible for processing and maintaining all financial transactions in support of the USPTO mission. Data is collected and maintained in support of this mission.

On the PII level, Momentum captures the social security numbers for employees so that it may be used for payroll. Vendor bank account numbers are stored in Momentum to correctly process EFT payments, other Vendor information is synchronized with the government CCR site.

As for Publicly Releasable PII, business addresses and bank ids are also captured within Momentum. CCRC and VSS both maintain Vendor information in the same way that Momentum does, both through integrations and through data entry.

FedTraveler does not store PII, instead it keeps track of a unique momentum ID in place of PII. ABIS and CPT also do not collect PII.

3. What is the intended use of information (e.g., to verify existing data)?

CFS is the USPTO's financial and acquisition system of record. The use of collected data is to support this role of the CFS.

4. With whom will the information be shared (e.g., another agency for a specified programmatic purpose)?

Data is transmitted to the Department of Treasury for the processing of disbursements. Financial reports are prepared with data from CFS and provided to the various government agencies requesting the reports (i.e., Department of Commerce).

5. What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how can individuals grant consent?

Within Momentum, an individual's social security information is collected upon becoming a USPTO employee. Vendor and employee information are stored in Momentum and VSS and are retained indefinitely.

All transactions are financial in-nature and required for the CFS. There is no consent required from individuals.

6. How will the information be secured (e.g., administrative and technological controls)?

Management Controls:
The USPTO utilizes the Life Cycle Management review process to ensure that all management controls are in place for CFS. During the upgrade, maintenance or enhancement of any component of CFS, the security controls are reviewed and reevaluated in the CFS Aggregate System Security Plan. This plan specifically addresses the management, operational, and technical controls that are in place and planned during the upgrade, maintenance or enhancement of the project. The USPTO ensures that all government and contractor staff has a National Agency Check performed.

At the CFS level a Financial Application Security Registration has been implemented and maintained for each user authorized access to any component of CFS, including data entry-level access through system development access. Each USPTO employee and designated on-site contractor support staff who has completed a Financial Application Security Registration form may obtain access to the CFS. Both the employee's supervisor approval and the Momentum Financials Security Administrator's approval are required before access is granted to the system. The level of access to the system is determined based on the user's job function and office policy. The specific access to the data and level of authority is defined in the Momentum Financials' Security Role table. System users include: program office data entry personnel; Office of Finance and Office of Corporate Planning employees for financial and budget transactions; Office of Procurement staff for procurement transactions; managers throughout USPTO for approval and query purposes; system administrators for system security, assurance, and monitoring purposes; on-site contractor staff for user assistance, development of complex reports, and issue resolution; and database administrators.

Operational Controls:
Operational controls include securing all hardware associated with this system in the USPTO's Data Center. The Data Center is controlled by access card entry and is physically secured by a Guard Service to restrict access to the components. The Infrastructure Disaster Recovery Plan documents the contingency plan for the Data Center. In addition to securing the hardware, there are controls in place for safeguarding the databases and operating systems to include: daily, weekly, monthly back-ups; physical terminal identification; restricted admin accounts; etc.

Technical Controls:
The CFS is secured by the USPTO's infrastructure component and other OCIO established technical controls to include password authentication at the server and database levels.

7. How will the data extract log and verify requirement be met?

For Momentum and FedTraveler (FEDTV) applications, the database extracts are performed by an automated process that is managed by the Oracle DBAs. The logs for these database exports are automatically generated by Oracle and are maintained within the Oracle databases. The database exports are cleaned up using scrub scripts that remove all PII data. Since no PII data is contained in the cleaned up version of the database exports, the verify requirement is not applicable. Data extracts sent to Treasury for disbursement of funds are exempt from the log and verify requirement since this data is required by law and Department of Treasury must retain this information. Momentum, VSS, and FedTraveler do not support a database extract by end-users. ABIS and CPT do not contain PII so the data extract log and verify requirement does not apply.

8. Is a system of records being created under the Privacy Act, 5 U.S.C. 552a?

No, records contained in these systems do not constitute a new system of records within the meaning of the Privacy Act. However, the existing Privacy Act System of Records Notices (SORNs) apply to the following systems:

DEPT-1; Attendance, Leave, and Payroll Records of Employees and Certain Other Persons
* PTOC-001-01 Momentum

DEPT--2 Accounts Receivable
* PTOC-001-01 Momentum
* PTOC-001-05 FedTraveler

DEPT--9 Travel Records (Domestic and Foreign) of Employees and Certain Other Persons
* PTOC-001-05 FedTraveler

9. Are these records covered by a record control schedule approved by the National Archives and Records Administration (NARA)?

Yes, both the paper input records and the electronic records are covered by a NARA approved record control schedule according to Section 7 (CFO) of the USPTO Comprehensive Records Schedule (Dec. 2009).

SIGNATORY AUTHORITIES

Agreed: /s/ Gita Zoks   3/12/2010

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Gita Zoks   Date

Information System Owner for CFS

Agreed: /s/ Rod Turk   3/15/2010

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Rod Turk   Date

Senior Agency Information Security Officer for CFS

Agreed: /s/ John B. Owens II   4/6/2010

_____   _____/_____/_____

John B. Owens II   Date

Chief Information Officer

Co-Authorizing Official for CFS

Agreed: /s/ Karen Strohecker   4/19/2010

_____   _____/_____/_____

Karen Strohecker   Date

Acting Chief Financial Officer

Co-Authorizing Official for CFS