

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



**Privacy Impact Assessment
for the
Patent Search System – Primary Search
and Retrieval (PSS-PS) System**

Reviewed by: John B. Owens, II, Bureau Chief Privacy Officer

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

CATRINA PURVIS

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DN: c=US, o=U.S. Government, ou=Department of Commerce, ou=Office of the
Secretary, cn=CATRINA PURVIS, 0.9.2342.19200300.100.1.1=13001002875743
Date: 2017.09.08 11:25:47 -04'00'

Signature of Senior Agency Official for Privacy/DOC Chief Privacy Officer

Date

**U.S. Department of Commerce Privacy Impact Assessment
USPTO Patent Search System – Primary Search and Retrieval (PSS-PS)
System**

Unique Project Identifier: PTOP-008-00

Introduction: System Description

Provide a description of the system that addresses the following elements:

(a) a general description of the information in the system

The PSS-PS master system has multiple AISs with search and retrieval automation tools that supports the USPTO Patent examiners legal determination of prior art of patent applications.

(b) a description of a typical transaction conducted on the system

Application Image Retrieval System (AIRS)

The purpose of AIRS is to provide patent application images and metadata to the following subsystems: Examiners Automated Search Tool (EAST), Hypertext Transfer Protocol (HTTP) Print Service (HPS), Order Entry Management System (OEMS) and the Web Examiner's Search Tool (WEST).

Application Images on the Web (AIW)

AIW is an internet application that runs outside the USPTO firewall and provides an access point for public users to retrieve domestic patent application images. The purpose of AIW is to provide images and metadata to the Application Full-Text (AppFT) subsystem.

The Patent Image Retrieval System (PIRS)

The purpose of PIRS is to provide Patent images and metadata to the following subsystems: Examiners Automated Search Tool (EAST), Hypertext Transfer Protocol (HTTP) Print Service (HPS), Order Entry Management System (OEMS), and Web Examiner's Search Tool (WEST).

Patent Images on the Web (PIW)

PIW is an internet application that runs outside the USPTO firewall and provides an access point for public users to retrieve domestic Patent images. The purpose of PIW is to provide images and metadata to the Patents Full-Text (PatFT) subsystem.

The Web-based Examiner's Search Tool (WEST)

WEST is a Web browser-based client interface, which utilizes HTTP as a front end to the Bibliographic Retrieval System (BRS) database system. It operates over the USPTO Transmission Control Protocol/Internet Protocol (TCP/IP) Intranet (PTONet). This intranet tool also supports text search capabilities and retrieval functions of abstracts, images, and full-text patent documents from other domestic, international, and commercial databases.

PubWEST

PubWEST is the publicly-accessible version of WEST. PubWEST, similarly to WEST, provides search access to most USPTO patent text searchable databases.

Enterprise Text Search 1 (ETS1)

The ETS1 system is a continuation of the Bibliographic Retrieval System (BRS) Middle-tier Phase 1 and BRS Middle-tier Phase 2 systems. ETS1 is a multi-tiered application that improves the scalability and the performance of the BRS search system while using fewer system resources.

Examiners Automated Search Tool (EAST)

A single user interface that can be used to search for prior art of any type, this application integrates with other activities performed by patent examiners to reduce the time required to examine applications. EAST provides full text and abstract text data search and retrieval of domestic and international, commercial and government databases using the BRS search engine.

Public Examiners Automated Search Tool (PubEAST)

This application is the publicly-available version of EAST. It provides search request capability to most of USPTO patent text searchable databases to the public users. It has full text search capabilities from the following databases: USPAT, USOCR, EPO, and JPO text/image databases.

Patent Linguistic Utility Search (PLUS)

PLUS uses the BRS query by example technology to compare keywords in a patent application to keywords in published patent applications and granted patents. Search results include

matching patent and/or patent application numbers, and classification and sub-classification for patents matched, along with relevance ranking for the match.

European Patent Office Query System (EPOQUE)

EPOQUE connects to the Trilateral Secure Virtual Private Network (TSVPN), part of the USPTO Trilateral Network (TriNet), to access and allow queries from US Patent Examiners and other users to the European Patent Office (EPO) at The Hague, Netherlands.

HTTP Print Service (HPS)

HPS allows USPTO internal users and users in the public search rooms to print patent/publication application images to designated Windows-based group printers.

Applications Full-Text (AppFT)

A standalone internet application that runs outside of the USPTO firewall and provides general public access to Pre-Grant, published patent applications. It connects to the PGPub/CSS application and AIW for images.

Patent Full Text on the Web (PATFT)

A stand-alone Internet application, which allows the general public to search and retrieve granted US patents. It runs outside the USPTO firewall with a copy of the USPTO Bibliographic Retrieval System (BRS) database that is provided to USPTO examiners.

Classification Data System (CDS)

CDS is a collection of applications and processes which support the capture and maintenance of patent and PGPub classification data of US documents as well as the maintenance of the USPC. CDS also supports the maintenance of the US to IPC Concordance and Limited Family data and is the data source of several classification publications.

Computer Search Systems (CSS)

CSS is a set of databases, conversion and load software, data administration tools, and procedures to maintain and keep available a number of internal, external, government, and commercial databases for text search and retrieval via other USPTO applications.

Electronic Patent Reference (EPR)

This is a single-user, client application that is downloaded on-demand from a Patent Application Information Retrieval (PAIR) server and installed on public personal computers. It provides patent references from PIW and AIW to applicants via the Private PAIR system.

(c) any information sharing conducted by the system

Data repositories allow information to be shared with internal stakeholders (e.g. patent examiners), and to the public.

(d) a citation of the legal authority to collect PII and/or BII

35 U.S.C. 1, 6, and 115; 5 U.S.C. 301: 5 U.S.C. 301 and 35 U.S.C. 6, 42(c).

(e) the Federal Information Processing Standard (FIPS) 199 security impact category for the system

Moderate

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.)*
- This is an existing information system in which changes do not create new privacy risks. *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):					

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"/>	e. File/Case ID	<input type="checkbox"/>	i. Credit Card	<input type="checkbox"/>
b. Taxpayer ID	<input type="checkbox"/>	f. Driver's License	<input type="checkbox"/>	j. Financial Account	<input type="checkbox"/>
c. Employer ID	<input type="checkbox"/>	g. Passport	<input type="checkbox"/>	k. Financial Transaction	<input type="checkbox"/>
d. Employee ID	<input type="checkbox"/>	h. Alien Registration	<input type="checkbox"/>	l. Vehicle Identifier	<input type="checkbox"/>
m. Other identifying numbers (specify):					
*Explanation for the need to collect, maintain, or disseminate the Social Security number, including truncated form:					
*If SSNs are collected, stored, or processed by the system, please explain if there is a way to avoid such collection in the future and how this could be accomplished:					

General Personal Data (GPD)					
a. Name	<input checked="" type="checkbox"/>	g. Date of Birth	<input type="checkbox"/>	m. Religion	<input type="checkbox"/>
b. Maiden Name	<input type="checkbox"/>	h. Place of Birth	<input type="checkbox"/>	n. Financial Information	<input type="checkbox"/>
c. Alias	<input type="checkbox"/>	i. Home Address	<input checked="" type="checkbox"/>	o. Medical Information	<input type="checkbox"/>
d. Gender	<input type="checkbox"/>	j. Telephone Number	<input checked="" type="checkbox"/>	p. Military Service	<input type="checkbox"/>
e. Age	<input type="checkbox"/>	k. Email Address	<input type="checkbox"/>	q. Physical Characteristics	<input type="checkbox"/>
f. Race/Ethnicity	<input checked="" type="checkbox"/>	l. Education	<input type="checkbox"/>	r. Mother's Maiden Name	<input type="checkbox"/>
s. Other general personal data (specify):					

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Work-Related Data (WRD)					
a. Occupation	<input type="checkbox"/>	d. Telephone Number	<input checked="" type="checkbox"/>	g. Salary	<input type="checkbox"/>
b. Job Title	<input type="checkbox"/>	e. Email Address	<input checked="" type="checkbox"/>	h. Work History	<input type="checkbox"/>
c. Work Address	<input checked="" type="checkbox"/>	f. Business Associates	<input type="checkbox"/>		
i. 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 type="checkbox"/>	c. Date/Time of Access	<input 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 type="checkbox"/>
Telephone	<input type="checkbox"/>	Email	<input type="checkbox"/>		
Other (specify):					

Government Sources					
Within the Bureau	<input checked="" 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 checked="" type="checkbox"/>	Private Sector	<input checked="" type="checkbox"/>	Commercial Data Brokers	<input type="checkbox"/>
Third Party Website or Application	<input type="checkbox"/>				
Other (specify):					

- 2.3 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 type="checkbox"/>
Other (specify):			

<input checked="" 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			
To determine eligibility	<input type="checkbox"/>	For administering human resources programs	<input type="checkbox"/>
For administrative matters	<input 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 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): To provide a comprehensive prior art search capability and the retrieval of patent and related information for dissemination to public based on requirements stated in USC statutory code 35 U.S.C. Section 122.			

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 data collected is of the public to provide user access to search the USPTO Patent data repositories, which allows

- the general public to search and retrieve domestic application images
- Patents examiners and applicants to identify individuals and organizations with intellectual property, pre- grant, and published applications.

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
DOC bureaus	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Federal agencies	<input type="checkbox"/>	<input 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 checked="" 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 checked="" 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> <table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td style="text-align: center;">System Name</td> <td style="text-align: center;">Organization</td> </tr> <tr> <td style="text-align: center;">PSS-SS</td> <td style="text-align: center;">USPTO</td> </tr> </table> <p>By restricting access to the system via Active Directory, PSS-PS and PSS-PS' protection of PII data is performed by the implemented AD automated system. Automatic quality control for data checks exist. VPN is used for developer access. There is a network connection to the Internet via the Network Perimeter for PSS-PS and PSS-PS users. The PSS-PS and PSS-PS services are logically partitioned via a DMZ and an internal USPTO firewall is used as the boundary protection device that secures the communication between Internet users and the PSS-PS and PSS-PS. This connection is protected and controlled by the USPTO infrastructure.</p>	System Name	Organization	PSS-SS	USPTO
System Name	Organization				
PSS-SS	USPTO				
<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 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: _____.	
<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 type="checkbox"/>	Yes, individuals have an opportunity to decline to provide PII/BII.	Specify how:
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<input checked="" type="checkbox"/>	No, individuals do not have an opportunity to decline to provide PII/BII.	Specify why not: Individuals do not have the option to input any personal information into any PSS-PS application.
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7.3 Indicate whether and how individuals have an opportunity to consent to particular uses of their PII/BII.

<input type="checkbox"/>	Yes, individuals have an opportunity to consent to particular uses of their PII/BII.	Specify how:
<input checked="" type="checkbox"/>	No, individuals do not have an opportunity to consent to particular uses of their PII/BII.	Specify why not: Individuals do not have the option to input any personal information into any PSS-PS application.

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

<input type="checkbox"/>	Yes, individuals have an opportunity to review/update PII/BII pertaining to them.	Specify how:
<input checked="" type="checkbox"/>	No, individuals do not have an opportunity to review/update PII/BII pertaining to them.	Specify why not: Individuals do not have the option to input any personal information into any PSS-PS application.

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 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: 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): 9/16/2016 <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 (POAM).
<input 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 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.

Information in USPTO information systems are protected with operational and technical controls that documented in the PSS-PS System Security Plan. A Security Categorization compliant with the FIPS 199 and NIST SP 800-60 requirements was conducted for PSS-PS. The overall FIPS 199 security impact level for PSS-PS was determined to be Moderate. This categorization influences the level of effort needed to protect the information managed and transmitted by the system.

A Operational controls include securing all hardware associated with the PSS-PS in the USPTO Data Center. The Data Center is controlled by access card entry and is manned by a uniformed guard service to restrict access to the servers, their operating systems, and databases.

B Backups are managed by the Enterprise Tape Backup System (ETBS) and are secured off-site by First Federal.

C Windows and Linux servers within PSS-PS are regularly updated with the latest security patches by the Windows and Unix System Support Groups.

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"/>	<p>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>):</p> <p>The USPTO Publishes their SORNS in the Federal Register and can be accessed in the following location: http://www.uspto.gov/uspto-systems-records-notice. These SORNs are subject to required oversight processes for systems containing PII. The USPTO SORNs are kept current (updated at least annually) and contains statements from the Privacy Act of 1974.</p> <p>USPTO PKI Registration and Maintenance System--Commerce/PAT-TM-16 (http://www.uspto.gov/sites/default/files/sorn/uspto-pasorn-16.pdf) USPTO Patent Application Files—Commerce/PAT-TM-7</p>
<input type="checkbox"/>	Yes, a SORN has been submitted to the Department for approval on <u>(date)</u> .
<input type="checkbox"/>	No, a SORN is not being created.

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: United States Patent and Trademark Office Comprehensive Records Schedule FY2016 Edition See: http://ptoweb.uspto.gov/ptointranet/cisd/cio/records_mgmt/records_mgmt_crs.html
<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 checked="" 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.

<input checked="" 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 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 type="checkbox"/>	Identifiability	Provide explanation:
<input type="checkbox"/>	Quantity of PII	Provide explanation:
<input type="checkbox"/>	Data Field Sensitivity	Provide explanation:
<input checked="" type="checkbox"/>	Context of Use	Provide explanation: limited PII/BII
<input type="checkbox"/>	Obligation to Protect Confidentiality	Provide explanation:
<input type="checkbox"/>	Access to and Location of PII	Provide explanation:
<input type="checkbox"/>	Other:	Provide explanation:

Section 12: Analysis

12.1 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.

12.2 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.