

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



**Privacy Impact Assessment
for the
Rally Software: Rally Development System (RDS)**

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

CHARLES CUTSHALL Digitally signed by CHARLES CUTSHALL
Date: 2025.04.16 12:51:40 -04'00'

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

Date

U.S. Department of Commerce Privacy Impact Assessment USPTO Rally Software: Rally Development System (RDS)

Unique Project Identifier: EIPL-DS-08-00

Introduction: System Description

Provide a brief description of the information system.

The Rally Development System (RDS) is a Contractor information system that serves as an Agile Platform and development tool for United States Patent and Trademark Office (USPTO) employees and projects. Rally allows USPTO developers to continuously track and prioritize work, reallocate development resources, collaborate between teams, and align strategy and development with the USPTO System Development Lifecycle (SDLC) and strategic roadmap. The RDS is externally hosted in GCP (Google Cloud Platform) and is available to USPTO users via a web interface. DevOps engineers have production-level access to metadata in the Mongo database. The metadata does not include PII.

Address the following elements:

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

The RDS is a major application.

(b) System location

Broomfield, CO.

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

RDS connects to:

ICAM Identity as a Service (ICAM-IDaaS) - provides the enterprise services for the Identity and Access Management (IAM).

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

RDS allows USPTO developers to continuously track and prioritize work, reallocate development resources, collaborate between teams, and align strategy and development with the USPTO System Development Lifecycle (SDLC), and strategic roadmap.

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

The RDS is externally hosted and is available to USPTO users via a web interface.

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

All data in transit is encrypted and all requests that are made will automatically be directed to Hypertext Transfer Protocol Secure (HTTPS). Device management connections use Secure Shell (SSH), Public Key Infrastructure (PKI), and SecureID Virtual Private Network-based connections. User data connections use PKI and Secure ID VPN and Secure Socket Layer (SSL)/Transport Layer Security (TLS) and only authorized USPTO systems may access the internal PTONet.

(g) Any information sharing

Data repositories allow information to be shared with internal only. Rally Support Team has access to PII for technical support purposes upon customer request only. Rally Database Administrators have database access for technical support purposes only. The analytics team has access to performance-related data. Performance data does not contain PII.

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

The legal authority to collect PII and/or BII derives from 35 U.S.C. 2 and Federal Information Technology Acquisition Reform Act (FITARA).

(i) The Federal Information Processing Standards (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.)*

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 checked="" 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.

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 type="checkbox"/>
b. Taxpayer ID	<input type="checkbox"/>	g. Passport	<input type="checkbox"/>	k. Financial Transaction	<input type="checkbox"/>
c. Employer ID	<input type="checkbox"/>	h. Alien Registration	<input type="checkbox"/>	l. Vehicle Identifier	<input type="checkbox"/>
d. Employee ID	<input type="checkbox"/>	i. Credit Card	<input type="checkbox"/>	m. Medical Record	<input type="checkbox"/>
e. File/Case ID	<input 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 type="checkbox"/>
b. Maiden Name	<input type="checkbox"/>	i. Place of Birth	<input type="checkbox"/>	p. Medical Information	<input type="checkbox"/>
c. Alias	<input checked="" type="checkbox"/>	j. Home Address	<input 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 type="checkbox"/>	s. Marital Status	<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 checked="" type="checkbox"/>

c. Work Address	<input type="checkbox"/>	g. Work History	<input type="checkbox"/>	k. Procurement/contracting records	<input type="checkbox"/>
d. Work Telephone Number	<input type="checkbox"/>	h. Employment Performance Ratings or other Performance Information	<input type="checkbox"/>		
l. Other work-related data (specify):					

Distinguishing Features/Biometrics (DFB)					
a. Fingerprints	<input type="checkbox"/>	f. Scars, Marks, Tattoos	<input type="checkbox"/>	k. Signatures	<input type="checkbox"/>
b. Palm Prints	<input type="checkbox"/>	g. Hair Color	<input type="checkbox"/>	l. Vascular Scans	<input type="checkbox"/>
c. Voice/Audio Recording	<input type="checkbox"/>	h. Eye Color	<input type="checkbox"/>	m. DNA Sample or Profile	<input type="checkbox"/>
d. Video Recording	<input type="checkbox"/>	i. Height	<input type="checkbox"/>	n. Retina/Iris Scans	<input type="checkbox"/>
e. Photographs	<input type="checkbox"/>	j. Weight	<input type="checkbox"/>	o. Dental Profile	<input type="checkbox"/>
p. 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 checked="" type="checkbox"/>	f. 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 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 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.

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 as expected by authorized users. Management controls are utilized to prevent the inappropriate disclosure of PII. Rally does not validate, manage, or share with 3rd party the USPTO user's data (First/Last Names and email addresses). The USPTO provides and manages PII on an individual basis or through a federated SSO. Rally does require an "email format" ID to procure the user onto the system. First/Last name is optional. PII pertaining to individuals can be reviewed in RDS. PII can be updated by a RDS power user or RDS administrator only. The individual will have to contact RDS support team or their RDS administrator to update their PII information. Once the PII is updated in front end system, it is saved real time in the back end and the user can log into RDS immediately.

2.4 Is the information covered by the Paperwork Reduction Act?

<input type="checkbox"/>	Yes, the information is covered by the Paperwork Reduction Act. Provide the OMB control number and the agency number for the collection.
<input checked="" 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 type="checkbox"/>
Other(specify): Click or tap here to enter text.			

<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			
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 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):			

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 in RDS is about PTO employees as well as contractors. RDS must process PII to deliver its core features. RDS is responsible for setting up a Subscription with Subscription Administrator ID, email address, First and Last name. Rally Users login through their browser with a user ID (email format) and password. Also, the user's full name, persistent ID, and public IP address are processed. RDS uses personal information for setting up a USPTO Subscription with Subscription Administrator ID, email address, First and Last name. The USPTO is responsible to maintain subscription user base.

- 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.)

Insider threats and foreign entities are the main threat to the information system: RDS Support Team has access to PII for technical support purposes upon customer request only. RDS Database Administrators have database access for technical support purposes only.

RDS Super Administrators have subscription configuration access, including personal information for technical (procurement, licensing) support purposes.

The Segregation of Duties Policy is in place and enforced. RDS segregation of duties include logical access controls. Access logged and monitored. RDS storing data in PostgreSQL Database with AES-256 disk-level encryption. All data-in-transit is encrypted with TLS 1.2.

RDS has Privacy and Data Protection Policy, PII Handling and Protection Policy Annual Privacy and Data Protection training is mandatory for all employees and contractors. Annual Security Awareness training is mandatory for all employees and contractors.

USPTO has implemented NIST security controls (encryption, access control, auditing) to reduce the insider threat risk. Mandatory IT Awareness and role-based training is required for staff who have access to Rally. Users are taught how to handle, retain, and dispose of data properly, and reporting requirements for potential insider threat, incidents, or breaches.

NIST security controls are in place to ensure that information is handled, retained, and disposed of appropriately. For example, advanced encryption is used to secure the data both during transmission and while stored at rest. Access to individual's PII is controlled through the application and all personnel who access the data must first authenticate to the system at which time an audit trail is generated when the database is accessed. USPTO requires annual

security role based training and annual mandatory security awareness procedure training for all employees. All offices of the USPTO adhere to the USPTO Records Management Office's Comprehensive Records Schedule or the General Records Schedule and the corresponding disposition authorities or citations.

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 type="checkbox"/>	<input 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 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 Does the DOC bureau/operating unit place a limitation on re-dissemination of PII/BII shared with external agencies/entities?

<input type="checkbox"/>	Yes, the external agency/entity is required to verify with the DOC bureau/operating unit before re-dissemination of PII/BII.
<input type="checkbox"/>	No, the external agency/entity is not required to verify with the DOC bureau/operating unit before re-dissemination of PII/BII.
<input checked="" type="checkbox"/>	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.

<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> <p>ICAM IDaaS</p> <p>NIST security controls are in place to ensure that information is handled, retained, and disposed of appropriately. For example, advanced encryption is used to secure the data both during transmission and while stored at rest. Access to individual's PII is controlled through the application and all personnel who access the data must first authenticate to the system at which time an audit trail is generated when the database is accessed. USPTO requires annual security role based training and annual mandatory security awareness procedure training for all employees. All offices of the USPTO adhere to the USPTO Records Management Office's Comprehensive Records Schedule that describes the types of USPTO records and their corresponding disposition authority or citation.</p>
<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.

6.4 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	<input 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: https://www.uspto.gov/privacy-policy	
<input checked="" type="checkbox"/>	Yes, notice is provided by other means.	Specify how: This PIA serves as a notice.
<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:
<input checked="" type="checkbox"/>	No, individuals do not have an opportunity to decline to provide PII/BII.	Specify why not: USPTO Employees and Contractors do not have the opportunity to decline to provide their PII. They consent to providing their name (which is then used for the email address) and phone number as part of accepting employment at USPTO. That information is then used for the primary purpose of acquiring access to applications and the network during on boarding.

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: USPTO Employees and Contractors do not have the ability to consent to particular uses of their PII. They consent to providing their name (which is then used for the email address) and phone number as part of accepting employment at USPTO. That information is then used for the primary purpose of acquiring access to applications and the network during on boarding.

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: USPTO employees and contractors may update their information (name, preferred name) by submitting changes to Human Resources.
<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 checked="" 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: Auditing and Monitoring is in place and enforced.
<input checked="" type="checkbox"/>	The information is secured in accordance with the Federal Information Security Modernization Act (FISMA) requirements. Provide date of most recent Assessment and Authorization (A&A): 4/16/2024

<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 5 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 information system and it has been determined that there are no additional privacy risks.
<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 DOC 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).*

<p>Access logged and monitored through Splunk.</p> <p>RDS storing data in PostgreSQL DB with AES-256 disk-level encryption.</p> <p>All data-in-transit is encrypted with TLS 1.2.</p> <p>All Virtual Machine (VM's) has end-point protection, ClamAV, and Symantec.</p> <p>Data backed up daily. Backups are securely replicated to an alternative location limiting data loss to no more than 24 hours in the event of primary data location disaster.</p> <p>Backups are stored locally and off-site with the same security and encryption mechanism.</p> <p>Backups are tested monthly.</p> <p>Recovery Point Objective (RPO): 24 hours</p> <p>Recovery Time Objective (RTO): 4 hours</p>

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."

<input checked="" type="checkbox"/>	Yes, this system is covered by an existing system of records notice (SORN). Provide the SORN name, number, and link. <i>(list all that apply):</i> DEPT-25. Access Control and Identity Management System
<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.)*

[General Records Schedules \(GRS\) / National Archives](#)

<input checked="" type="checkbox"/>	There is an approved record control schedule. Provide the name of the record control schedule: GRS 3.1: 001-051; General Technology Management Records GRS 6.3: 010; Information Technology program and capital investment planning records GRS 6.3: 020; Enterprise architecture records GRS 3.1 Information technology operations and maintenance records. (Includes audit, security, system logs)
<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 type="checkbox"/>	Overwriting	<input type="checkbox"/>
Degaussing	<input type="checkbox"/>	Deleting	<input checked="" type="checkbox"/>
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.)

<input checked="" type="checkbox"/>	Low – the loss of confidentiality, integrity, or a 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 a 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 a 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.)

<input checked="" type="checkbox"/>	Identifiability	Provide explanation: Name, a alias and work email address are PII that can be combined to identify individuals.
<input checked="" type="checkbox"/>	Quantity of PII	Provide explanation: The PII collected is commensurate with the number of subscribed Rally users at USPTO, the number of which is in the thousands.
<input checked="" type="checkbox"/>	Data Field Sensitivity	Provide explanation: Together, the fields of Subscription Administrator ID, email address, First and Last name is non-sensitive.
<input checked="" type="checkbox"/>	Context of Use	Provide explanation: RDS uses PII for setting up a USPTO Subscription with Subscription Administrator ID, email address, First and Last name.
<input checked="" type="checkbox"/>	Obligation to Protect Confidentiality	Provide explanation: This system is governed by The Privacy Act of 1974, which prohibits the disclosure of information from a system of records absent of the written consent of the subject individual.
<input checked="" type="checkbox"/>	Access to and Location of PII	Provide explanation: Access to PII (user information, user ID and email address) is controlled through Segregation of Duties access controls via role-based access controls. Privileged users are the only one that have control to provision users within the system.
<input type="checkbox"/>	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.)

Insider threats and foreign entities are the main threat to the information system: RDS Support Team has access to PII for technical support purposes upon customer request only. RDS Database Administrators have database access for technical support purposes only. RDS Super Administrators have subscription configuration access, including personal information for technical (procurement, licensing) support purposes.

The Segregation of Duties Policy is in place and enforced. RDS segregation of duties include logical access controls. Access logged and monitored. RDS storing data in PostgreSQL DB with AES-256 disk-level encryption. All data-in-transit is encrypted with TLS 1.2

RDS has Privacy and Data Protection Policy, PII Handling and Protection Policy Annual Privacy and Date Protection training is mandatory for all employees. Annual Security Awareness training is mandatory for all employees.

Rally does require an “email format” ID to procure the user onto the system. First/Last name is optional. Business Information collected for Support and Procurements purposes. The potential loss of this data will expose the current list of Rally users, including their email addresses and first and last names.

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.

Appendix A

WARNING: Unauthorized access to this system is forbidden and will be prosecuted by law. By accessing this system, you agree that your actions may be monitored if unauthorized usage is suspected.

