

**U.S. Department of Commerce
Office of the Secretary**



**Privacy Threshold Analysis
for
CARTS/Version Manager**

U.S. Department of Commerce Privacy Threshold Analysis

Office of Financial Management /CARTS / Version Manager

Unique Project Identifier: A Commerce Business System (CBS) Application OS-051 Application

Introduction: This Privacy Threshold Analysis (PTA) is a questionnaire to assist with determining if a Privacy Impact Assessment (PIA) is necessary for this IT system. This PTA is primarily based from the Office of Management and Budget (OMB) privacy guidance and the Department of Commerce (DOC) IT security/privacy policy. If questions arise or further guidance is needed in order to complete this PTA, please contact your Bureau Chief Privacy Officer (BCPO).

Description of the information system and its purpose:

CARTS is the change management application currently used at the CSC to create and track AR (Activity Request) tickets, SR (Service Request) tickets, and CR (Change Request) tickets. There is a custom workflow solution implemented for the ARs, SRs and CRs. CARTS was created using Serena Business Manager Software application. CARTS is used by the CBS software developers, testers, CSC Software Configuration Management team, functional leads and managers to track changes to the application code, documentation plus network and hardware configurations for the CSC.

Serena Version Manager is a Software Configuration Management (SCM) tool, which stores the “core” CFS, CPCS, Data Warehouse, CCR, and TIBCO application code. It is used by the CBS software developers, testers, and CSC Software Configuration Management team to track application code changes and maintain proper version control of all the application code. There is traceability to CARTS Activity Requests each time any software is updated by the development team. The SCM Team labels all software with a unique Release Number in Version Manager when software deliveries are performed.

PII (government issued phone number and government issued email address) is collected from Employees and Contractors for the sole purpose of initial account administration and help desk services. All PII is self-reported and is no different from the employee information on publically accessible Commerce websites. There is no connection to external applications for this information.

Questionnaire:**1. What is the status of this information system?**

_____ This is a new information system. *Continue to answer questions and complete certification.*

_____ This is an existing information system with changes that create new privacy risks.
Complete chart below, continue to answer questions, and complete certification.

Changes That Create New Privacy Risks (CTCNPR)					
a. Conversions		d. Significant Merging		g. New Interagency Uses	
b. Anonymous to Non-Anonymous		e. New Public Access		h. Internal Flow or Collection	
c. Significant System Management Changes		f. Commercial Sources		i. Alteration in Character of Data	
j. Other changes that create new privacy risks (specify):					

X ☐ This is an existing information system in which changes do not create new privacy risks. *Skip questions and complete certification.*

2. Is the IT system or its information used to support any activity which may raise privacy concerns?

NIST Special Publication 800-53 Revision 4, Appendix J, states "Organizations may also engage in activities that do not involve the collection and use of PII, but may nevertheless raise privacy concerns and associated risk. The privacy controls are equally applicable to those activities and can be used to analyze the privacy risk and mitigate such risk when necessary." Examples include, but are not limited to, audio recordings, video surveillance, building entry readers, and electronic purchase transactions.

_____ Yes. *Please describe the activities which may raise privacy concerns.*

X ☐ No

3. Does the IT system collect, maintain, or disseminate business identifiable information (BII)?

As per DOC Privacy Policy: "For the purpose of this policy, business identifiable information consists of (a) information that is defined in the Freedom of Information Act (FOIA) as "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential." (5 U.S.C.552(b)(4)). This information is exempt from automatic release under the (b)(4) FOIA exemption. "Commercial" is not confined to records that reveal basic commercial operations" but includes any records [or information] in which the submitter has a commercial interest" and can include information submitted by a nonprofit entity, or (b) commercial or other information that, although it may not be exempt from release under FOIA, is exempt from disclosure by law (e.g., 13 U.S.C.)."

_____ ☐ Yes, the IT system collects, maintains, or disseminates BII about: *(Check all that apply.)*

_____ ☐ Companies

_____ ☐ Other business entities

X ☐ No, this IT system does not collect any BII.

4. Personally Identifiable Information

4a. Does the IT system collect, maintain, or disseminate personally identifiable information (PII)?

As per OMB 07-16, Footnote 1: "The term 'personally identifiable information' refers to information which can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc.... alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc..."

☒ Yes, the IT system collects, maintains, or disseminates PII about: *(Check all that apply.)*

- ☒ ☐ DOC employees
- ☒ ☐ Contractors working on behalf of DOC
- ☐ ☐ Members of the public

☐ No, this IT system does not collect any PII.

If the answer is "yes" to question 4a, please respond to the following questions.

4b. Does the IT system collect, maintain, or disseminate PII other than user ID?

☒ Yes, the IT system collects, maintains, or disseminates PII other than user ID.

☐ No, the user ID is the only PII collected, maintained, or disseminated by the IT system.

4c. Will the purpose for which the PII is collected, stored, used, processed, disclosed, or disseminated (context of use) cause the assignment of a higher PII confidentiality impact level?

Examples of context of use include, but are not limited to, law enforcement investigations, administration of benefits, contagious disease treatments, etc.

☐ Yes, the context of use will cause the assignment of a higher PII confidentiality impact level.

☒ No, the context of use will not cause the assignment of a higher PII confidentiality impact level.

If any of the answers to questions 2, 3, 4b, and/or 4c are "Yes," a Privacy Impact Assessment (PIA) must be completed for the IT system. This PTA and the approved PIA must be a part of the IT system's Assessment and Authorization Package.

