Department of Energy

Privacy Impact Assessment (PIA)

Affects Members Of the Public?	X

Guidance is provided in the template. See DOE Order 206.1, *Department of Energy Privacy Program,* Appendix A, Privacy Impact Assessments, for requirements and additional guidance for conducting a PIA: http://www.directives.doe.gov/pdfs/doe/doetext/neword/206/o2061.pdf

Please complete electronically: no hand-written submissions will be accepted.

This template may not be modified.

MODULE I – PRIVACY NEEDS ASSESSMENT

Date	August 4, 2009
Departmental Element & Site	Bonneville Power Administration
Name of Information System or IT Project	eGIS Portal
Exhibit Project UID	BPA is a Non-Appropriated Federal Agency and is exempt from Exhibit 300 submissions.
New PIA ☒ **Update** ☐	

	Name, Title	Contact Information Phone, Email
System Owner	Jeff Gilmour, Supervisor Asset Management & Engineering Applications	503-230-3425, jbgilmour@bpa.gov
Local Privacy Act Officer	Christina J. Brannon, FOIA/Privacy Act Officer	503-230-7303, cjbrannon@bpa.gov
Cyber Security	Darren Jungling, IT Specialist/Cyber Security	503-230-3553, dljungling@bpa.gov

MODULE I – PRIVACY NEEDS ASSESSMENT		
Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)		
Person Completing this Document	Jeff Gilmour, Supervisor, Asset Management & Engineering Applications	503-230-3425, jbgilmour@bpa.gov
Purpose of Information System or IT Project	The eGIS portal application is a data portal designed to deliver BPA transmission asset, real property, environmental and mapping data from disparate databases and electronic document management systems to the user.	
Type of Information Collected or Maintained by the System:	☐ SSN Social Security number ☐ Medical & Health Information e.g. blood test results ☐ Financial Information e.g. credit card number ☐ Clearance Information e.g. "Q" ☐ Biometric Information e.g. finger print, retinal scan ☐ Mother's Maiden Name ☐ DoB, Place of Birth ☐ Employment Information ☐ Criminal History ×☐ Name, Phone, Address ☐ Other – Please Specify	
Has there been any attempt to verify PII does not exist on the system? **DOE Order 206.1,** *Department of Energy Privacy Program,* **defines**		YES – The Land Information System and the Geographic Information System store and maintain Name, Address, Phone

MODULE I – PRIVACY NEEDS ASSESSMENT

PII as *any information collected or maintained by the Department about an individual, including but not limited to, education, financial transactions, medical history and criminal or employment history, and information that can be used to distinguish or trace an individual's identity, such as his/her name, Social Security number, date and place of birth, mother's maiden name, biometric data, and including any other personal information that is linked or linkable to a specific individual.*	number data. The eGIS Portal application accesses this information in a view only mode.
If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)	N/A

Threshold Questions

1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?	YES
2. Is the information in identifiable form?	YES
3. Is the information about individual Members of the Public?	YES
4. Is the information about DOE or contractor employees?	NO

Module II must be completed for all systems if the answer to any of the four (4) threshold questions is "Yes." All questions must be completed. If appropriate, an answer of N/A may be entered.

The goal of the threshold questions is to legitimately and efficiently determine whether additional assessment is necessary. If there is doubt, it is in the System Owner's best interest to complete Module II.

PIAs affecting Members of the Public are posted on the DOE Privacy website. For this reason, PIAs affecting Members of the Public should be written in plain language and at a high level so they are easily understandable and do not disclose sensitive information.

END OF PRIVACY NEEDS ASSESSMENT

MODULE I – PRIVACY NEEDS ASSESSMENT

MODULE II – PII SYSTEMS & PROJECTS

AUTHORITY, IMPACT & NOTICE

1. AUTHORITY **What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?**	Pursuant to the Bonneville Project Act of August 20, 1937, Ch. 720, 50 Stat. 731, as amended, 16 U.S.C. 832 (1977); the Federal Columbia River Transmission System Act of October 18, 1974, (P.L. 93-454), 88 Stat. 1376, 16 U.S.C. 838 (Supp IV); the Department of Energy Organization Act of August 4, 1977, (P.L. 95-91); and the Pacific Northwest Electric Power Planning and Conservation Act of December 5, 1980, (P.L. 96-501).
2. CONSENT **What opportunities do individuals have to decline to provide information (e.g. where providing information is voluntary) or to consent only to particular uses of the information (other than required or authorized uses)?**	N/A. Data is either collected and managed by BPA Land Records system or is in the public domain collected and managed by the county government.

MODULE II – PII SYSTEMS & PROJECTS	
3. CONTRACTS **Are contractors involved with the design, development and maintenance of the system? If yes, was the Privacy Order CRD or Privacy Act clauses included in their contracts?**	YES, and YES. Privacy Act Clauses are included in BPA IT Supplemental labor pool contracts.
4. IMPACT ANALYSIS: **How does this project or information system impact privacy?**	There is minimal impact to privacy since county parcel data is public record and can be accessed through direct request of the county records. Select BPA employees will have access, through the eGIS mapping interface to county parcel data, provided by the counties, that may include owner names, addresses, phone numbers and Taxlot ID #. Select BPA employees with permission to BPA's Land Record System can access acquisition owner information through eGIS. Acquisition owner information includes name and phone numbers.
5. SORNs **How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?** **If yes, explain, and list the identifiers that will be used to retrieve information on the individual.**	No county data PII information can be retrieved by an identifier through eGIS. BPA Land Record System owner information can be accessed through BPA Tract IDs which is an internal unique identifier for BPA acquisition agreements. This is only available to personnel with approved access to BPA Land Record System. eGIS allows users (with approved access to BPA Land Record System) to input Tract IDs which are tied to acquisition owner information.

MODULE II – PII SYSTEMS & PROJECTS

6. SORNs **Has a Privacy Act System of Records Notice (SORN) been published in the *Federal Register*?** **If "Yes," provide name of SORN and location in the *Federal Register*.**	SORN is not required.
7. SORNs **If the information system is being modified, will the SORN(s) require amendment or revision?**	YES, NO, N/A

DATA SOURCES

8. What are the sources of information about individuals in the information system or project?	County parcel data is collected and maintained by county records. Acquisition land owner information is collected and maintained by BPA.
9. Are the data elements described in detail and documented?	YES

DATA USE

10. How will the PII be used?	Land owner information is used to generate mailing lists and support other BPA business processes that require current and past land owner information.
11. With what other agencies or entities will an individual's information be shared?	NONE

Reports

MODULE II – PII SYSTEMS & PROJECTS

12. What kinds of reports are produced about individuals or contain an individual's data?	Mailing/Current/Historic owners lists
13. What will be the use of these reports?	To identify and contact current and past owners in support of BPA notification, land and acquisition processes.
14. Who will have access to these reports?	County parcel data is available to non-Power Services personnel. Land Records data is available to select BPA employees with approved access to the eGIS view of the Land Records System.

Monitoring

15. Will this information system provide the capability to identify, locate, and monitor individuals?	NO
16. What kinds of information are collected as a function of the monitoring of individuals?	N/A
17. Are controls implemented to prevent unauthorized monitoring of individuals?	N/A

DATA MANAGEMENT & MAINTENANCE

18. How will records about individuals be kept current and verified for accuracy, relevance and completeness? Include PII data collected from sources other than DOE records.	County parcel data is updated on regular cycles as provided by the counties. BPA maintains an active log of acquisition date to track vintage of the data. Land Record System data accessed through eGIS is maintained in accordance with the BPA Land Record System maintenance policies.
19. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	Data is accessed from a single resource.

MODULE II – PII SYSTEMS & PROJECTS

Retention & Disposition

20. What are the retention periods of data in the information system?	County data is kept current in the system and is retained on server backup for a one year period. BPA Land Record System data retention policy is: Data in the system consists of land records and include land acquisition for transmission line facilities, original legal conveyance instruments, title policies, General Counsel's final opinion, appraisals, and related data. The records designated "Active" as long as the land is in the possession of BPA. Because of the volume of land owned by BPA, these records are reviewed every ten years. At that time, if a particular piece of land is removed from inventory or is no longer maintained by BPA, the record is pulled from the active list of land. Once the land is removed from inventory or is no longer maintained by BPA, the record is disposed of by BPA. These procedures are in accordance with BPA's records management schedules.
21. What are the procedures for disposition of the data at the end of the retention period?	County parcel data disposed of in accordance with BPA backup retention policies.

ACCESS, SAFEGUARDS & SECURITY

22. What controls are in place to protect the data from unauthorized access, modification or use?	Access to data through eGIS is limited to approved users in specified active directory roles. System security is documented in the eGIS System Security Plan. (eGIS is a web application, currently it is in Phase 2, release 1, Sept. 2009). Access to data is controlled via Read-Only, pre-defined queries in the application.
23. Who will have access to PII data?	Only approved users in the active directory roles will have read access to the PII.
24. How is access to PII data determined?	Information is restricted to a limited set of PII, name, address, phone #, and lot ID #.
25. Do other information systems share data or have access to the data in the system? If yes, explain.	eGIS is an endpoint. No other system connects to eGIS components that reference PII.

MODULE II – PII SYSTEMS & PROJECTS

26. For connecting information systems, is there an Interconnection Security Agreement (ISA) or other agreement between System Owners to ensure the privacy of individuals is protected?	Yes, additional security is in place to limit access to BPA Land Record System data through eGIS tools.
27. Who is responsible for ensuring the authorized use of personal information?	BPA performance managers of employees with access to eGIS system. (eGIS is a web application, currently it is in Phase 2, release 1, September 2009)

END OF MODULE II

SIGNATURE PAGE		
	Signature	Date
PIA Approval Signatures	Original Copy Signed and On File with the DOE Privacy Office	