



Affects Members Of the Public?	<input checked="" type="checkbox"/>
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## Department of Energy

### Privacy Impact Assessment (PIA)

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: <https://www.directives.doe.gov/directives-documents/200-series/0206.1-BOrder/@@images/file>

Please complete form and return via email to [Privacy@hq.doe.gov](mailto:Privacy@hq.doe.gov)

No hand-written submissions will be accepted.

This template may not be modified.

## MODULE I – PRIVACY NEEDS ASSESSMENT

<b>Date</b>	November 25, 2019	
<b>Departmental Element &amp; Site</b>	Department of Energy (DOE) Bonneville Power Administration (BPA) Portland, Oregon	
<b>Name of Information System or IT Project</b>	Electronic Geographic Information System (eGIS) Web Internal Environment/BAE-GSS	
<b>Exhibit Project UID</b>	BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions.	
<b>New PIA</b> <input type="checkbox"/>	Update to eGIS Web Internal PIA of 2012	
<b>Update</b> <input checked="" type="checkbox"/>		
	<b>Name, Title</b>	<b>Contact Information Phone, Email</b>
<b>System Owner</b>	Carl Senner, JLST Supervisor, Asset Management & Engineering Applications	503-230-3455 crsenner@bpa.gov
<b>Information Owner</b>	Jim Burgess, TERG Supervisory Civil Engineer	360-619-6475 jfburgess@bpa.gov



## MODULE I – PRIVACY NEEDS ASSESSMENT

<b>Local Privacy Act Officer</b>	Candice Palen, CGI FOIA/Privacy Act Officer	503-230-3602 cdpalen@bpa.gov
<b>Cyber Security Expert</b> reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi, JLS ISSO, Software Development & Ops	503-230-5397 hcchoi@bpa.gov
<b>Person Completing this Document</b>	Eric Lowrance, JLST Geographer	503-230-5759 eblowrance@bpa.gov
<b>Purpose of Information System or IT Project</b>	<p>The eGIS Web Internal Environment is a system designed to deliver BPA transmission asset, real property, environmental and mapping data from disparate databases and electronic document management systems to the user.</p> <p>eGIS Web Internal Environment collects BPA contact information such as email and phone number of Regional Customer Support Specialists. Additional information captured in the system is name, phone number, and landowner information.</p> <p>Landowner information is sourced from a specialized external data subscription service providing landowner information that is publicly available through local county offices.</p>	
<b>Type of Information Collected or Maintained by the System:</b>	<ul style="list-style-type: none"> <li><input type="checkbox"/> SSN <a href="#">Social Security number</a></li> <li><input type="checkbox"/> Medical &amp; Health Information <a href="#">e.g. blood test results</a></li> <li><input type="checkbox"/> Financial Information <a href="#">e.g. credit card number</a></li> <li><input type="checkbox"/> Clearance Information <a href="#">e.g. "Q"</a></li> <li><input type="checkbox"/> Biometric Information <a href="#">e.g. finger print, retinal scan</a></li> <li><input type="checkbox"/> Mother's Maiden Name</li> <li><input type="checkbox"/> DoB, Place of Birth</li> <li><input type="checkbox"/> Employment Information</li> <li><input type="checkbox"/> Criminal History</li> <li><input checked="" type="checkbox"/> Name, Phone, Address</li> </ul>	



## MODULE I – PRIVACY NEEDS ASSESSMENT

Other – Please Specify: email, address of landowner

**Has there been any attempt to verify PII does not exist on the system?**

**DOE Order 206.1, *Department of Energy Privacy Program*, defines 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.**

No. This system contains the non-sensitive PII indicated above.

**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?**

YES

Federal Employees

Contractor Employees

If the answer to all four (4) Threshold Questions is “No,” you may proceed to the signature page of the PIA. Submit the completed PNA with signature page to the CPO.

**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.



## MODULE I – PRIVACY NEEDS ASSESSMENT

### END OF PRIVACY NEEDS ASSESSMENT

## MODULE II – PII SYSTEMS & PROJECTS

### AUTHORITY, IMPACT & NOTICE

<p><b>1. AUTHORITY</b></p> <p><b>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</b></p>	<p>The Bonneville Power Project Act provides administrative authority to contract to fulfill Bonneville Power Administration’s mission. (See 16 U.S.C. § 832a(f); 16 U.S.C.§ 839f(a)). The eGIS system provides the agency transmission asset, real property, environmental and mapping data necessary to advance its mission.</p>
<p><b>2. CONSENT</b></p> <p><b>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)?</b></p>	<p>There is no opportunity for individuals to consent. Data is either collected and managed by the BPA Land Records System or is in the public domain, collected and managed by county governments.</p> <p>The BPA Land Records System is used to track land right information resulting from property right acquisitions, licenses, transfers, exchanges, permits, outgrants (where BPA is giving rights to Fee/Easement property use for a specific purpose i.e. , fences, trees, utilities, etc.) encroachments and disposals in support of construction and maintenance programs</p>
<p><b>3. CONTRACTS</b></p> <p><b>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?</b></p>	<p>Yes, contractors are involved in the maintenance of the system. Privacy act clauses are included in BPA IT Supplemental labor pool contracts.</p>



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>4. IMPACT ANALYSIS:</b></p> <p><b>How does this project or information system impact privacy?</b></p>	<p>DOE has assessed eGIS Web Internal Environment as a low risk system for confidentiality, integrity, and availability according to the criteria set forth in Federal Information Processing Standard (FIPS) 199 established by the National Institute of Standards and Technology (NIST). The risk rating is used to determine the effect to the agency should the system's confidentiality, integrity or availability be compromised.</p> <p>There is low impact to privacy since county parcel data are of the public record and can be accessed through direct request of the county. The eGIS Web Internal Environment is designed to protect PII and mitigate privacy risk via the following administrative, technical, and physical controls:</p> <ul style="list-style-type: none"><li>• Strict access control enforcement based on need-to-know</li><li>• Testing of all baseline security controls</li><li>• System reviews</li></ul> <p>While eGIS Web Internal contains some PII, the ensuing risk to the privacy of individuals is generally low as the focus of eGIS Web Internal Environment is to deliver BPA's data from disparate databases and electronic document management systems to the user, which does not require or encourage collection of sensitive PII and is not driven by analysis of PII.</p>
<p><b>5. SORNs</b></p> <p><b>How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?</b></p> <p><b>If yes, explain, and list the identifiers that will be used to retrieve information on the individual.</b></p>	<p>County data PII information can be retrieved by an identifier through eGIS by entering the Assessor's Parcel Number or Landowner Name with approved permissions only.</p> <p>BPA Land Record System owner information can be accessed through BPA Tract ID's which is an internal unique identifier for BPA acquisition agreements. This is only available to personnel with approved access to BPA Land Record System.</p>



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>6. SORNs</b></p> <p><b>Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>?</b></p> <p><b>If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</b></p>	<p>Yes, DOE-24 Land Records System.</p> <p>74 FR 1024.</p>
<p><b>7. SORNs</b></p> <p><b>If the information system is being modified, will the SORN(s) require amendment or revision?</b></p>	<p>N/A</p>
<p><b>DATA SOURCES</b></p>	
<p><b>8. What are the sources of information about individuals in the information system or project?</b></p>	<p>County parcel data is collected and maintained by county records offices and is compiled and delivered quarterly by a third-party vendor: Digital Map Products.</p> <p>Acquisition landowner information is collected directly from individuals and maintained by BPA.</p>
<p><b>9. Will the information system derive new or meta data about an individual from the information collected?</b></p>	<p>No</p>
<p><b>10. Are the data elements described in detail and documented?</b></p>	<p>Yes</p>
<p><b>DATA USE</b></p>	
<p><b>11. How will the PII be used?</b></p>	<p>Landowner information is used to generate mailing lists and support other BPA business processes that require current and past land owner information.</p>



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>12. If the system derives meta data, how will the new or meta data be used?</b></p> <p><b>Will the new or meta data be part of an individual's record?</b></p>	<p>N/A</p>
<p><b>13. With what other agencies or entities will an individual's information be shared?</b></p>	<p>None</p>
<p><b>Reports</b></p>	
<p><b>14. What kinds of reports are produced about individuals or contain an individual's data?</b></p>	<p>Reports are produced and used for mailing lists and current/historic landowner lists.</p>
<p><b>15. What will be the use of these reports?</b></p>	<p>Reports are used to contact current and past owners in support of BPA notification requirements and land acquisition processes.</p>
<p><b>16. Who will have access to these reports?</b></p>	<p>Reports are available to select BPA employees with approved access to the eGIS view of the Land Records System.</p>
<p><b>Monitoring</b></p>	
<p><b>17. Will this information system provide the capability to identify, locate, and monitor individuals?</b></p>	<p>No</p>
<p><b>18. What kinds of information are collected as a function of the monitoring of individuals?</b></p>	<p>N/A</p>
<p><b>19. Are controls implemented to prevent unauthorized monitoring of individuals?</b></p>	<p>N/A</p>
<p><b>DATA MANAGEMENT &amp; MAINTENANCE</b></p>	



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>20. 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.</b></p>	<p>County parcel data is updated on regular cycles as provided by the counties to our third-party supplier, Digital Map Products. BPA maintains an active log of acquisition dates to track the data.</p>
<p><b>21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?</b></p>	<p>The information system is not operated in multiple sites.</p>
<p><b>Records Management</b></p>	
<p><b>22. Identify the record(s).</b></p>	<p>Transmission asset, environmental, mapping, and real property data obtained from other databases and electronic document management systems (EDMS): Retain until superseded (but no more than three years), then dispose.</p>
<p><b>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</b></p>	<p><input type="checkbox"/> <b>Unscheduled</b>    <input checked="" type="checkbox"/> <b>Scheduled</b> (<i>cite NARA authority(ies) below</i>) N1-305-07-01-10/a</p>
<p><b>24. Records Contact</b></p>	<p>Candice Palen, Agency Records Officer cdpalen@bpa.gov</p>
<p><b>ACCESS, SAFEGUARDS &amp; SECURITY</b></p>	
<p><b>25. What controls are in place to protect the data from unauthorized access, modification or use?</b></p>	<p>The System Owner has implemented and tested all baseline security controls appropriate to its FIPS categorization in accordance with the BPA Cybersecurity Program Plan (CSPP) and DOE Directives.</p> <p>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.</p>
<p><b>26. Who will have access to PII data?</b></p>	<p>Only authorized users belonging to Active Directory role groups will be granted access to view the PII.</p>
<p><b>27. How is access to PII data determined?</b></p>	<p>Access to this information is provided on a need-to-know basis and managed by the Information Owner.</p>





## MODULE II – PII SYSTEMS & PROJECTS

<b>28. Do other information systems share data or have access to the data in the system? If yes, explain.</b>	eGIS is an endpoint. No other system connects to eGIS components that reference PII.
<b>29. 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?</b>	N/A
<b>30. Who is responsible for ensuring the authorized use of personal information?</b>	BPA performance managers of employees with access to eGIS system are responsible for ensuring the authorized use of personal information.

**END OF MODULE II**



SIGNATURE PAGE		
	Signature	Date
<b>System Owner</b>	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
<b>Local Privacy Act Officer</b>	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
<b><i>Ken Hunt</i> Chief Privacy Officer</b>	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>