



PRIVACY IMPACT ASSESSMENT: JLS – GRB
PIA Template Version 5 – August 2017

Affects Members Of the Public?	Mark if Applicable w/ an X
--------------------------------------	----------------------------------

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

No hand-written submissions will be accepted.

This template may not be modified.

MODULE I – PRIVACY NEEDS ASSESSMENT

Date	April 30, 2020	
Departmental Element & Site	Department of Energy (DOE) Bonneville Power Administration (BPA) Portland, Oregon	
Name of Information System or IT Project	Government Retirement and Benefits (GRB)	
Exhibit Project UID	BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions.	
New PIA <input checked="" type="checkbox"/>	This is a new PIA.	
Update <input type="checkbox"/>		
Name, Title		Contact Information Phone, Email
System Owner	Minh-Chau Nguyen, JLSP Supervisory IT Specialist	(503) 230-3322 mnnguyen@bpa.gov



PRIVACY IMPACT ASSESSMENT: JLS – GRB
PIA Template Version 5 – August 2017

MODULE I – PRIVACY NEEDS ASSESSMENT

Information Owner	James Johnson, NHO Supervisory Human Resources Specialist	(503) 230-4610 jrjohnson@bpa.gov
Local Privacy Act Officer	Candice Palen, CGI Privacy/FOIA Officer	(503)230-3602 cdpalen@bpa.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi, JLS Cybersecurity Specialist	(503) 230-5397 hcchoi@bpa.gov
Person Completing this Document	Melissa Parent, NHB Supervisory Human Resources Specialist (Employee Benefits)	(503) 230-5508 mlparent@bpa.gov
Purpose of Information System or IT Project	<p>The GRB Platform is a Software-as-a-Service (SaaS) Federal Retirement and Benefits Administration solution used by the BPA Human Capital Management (HCM) department. It is a limited-access, stand-alone system. It is offered on a subscription basis for unlimited use and developed specifically for the Federal sector. The GRB Platform combines tools and capabilities for human resource specialists and HR Assistants into a common system. It is used to process Federal employee profile information, such as full/part time status, retirement/resignation date, employee retirement benefits, survivor benefits, etc. This system does not integrate with any other internal data sources; all data is entered manually by authorized HCM specialists and HCM assistants.</p>	
Type of Information Collected or Maintained by the System:	<input checked="" type="checkbox"/> SSN Social Security number <input type="checkbox"/> Medical & Health Information e.g. blood test results <input type="checkbox"/> Financial Information e.g. credit card number <input type="checkbox"/> Clearance Information e.g. "Q" <input type="checkbox"/> Biometric Information e.g. finger print, retinal scan <input type="checkbox"/> Mother's Maiden Name	



MODULE I – PRIVACY NEEDS ASSESSMENT

	<input checked="" type="checkbox"/> DoB, Place of Birth <input checked="" type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input type="checkbox"/> Name, Phone, Address <input type="checkbox"/> Other – Please Specify
--	--

<p>Has there been any attempt to verify PII does not exist on the system?</p> <p><i>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.</i></p>	N/A. The system contains the PII indicated above.
--	---

<p>If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)</p>	N/A
---	-----

Threshold Questions

<p>1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?</p>	YES
<p>2. Is the information in identifiable form?</p>	YES
<p>3. Is the information about individual Members of the Public?</p>	NO
<p>4. Is the information about DOE or contractor employees?</p>	<input checked="" type="checkbox"/> Federal Employees <input type="checkbox"/> 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.



MODULE I – PRIVACY NEEDS ASSESSMENT

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 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?

Department of Energy Authorization Act, Title 42 United States Code (U.S.C.) section 7101, et. seq.

The Bonneville Power Project: *Administrative Authority to Contract* (16 U.S.C. §§ 832a(f), 839f(a)) grants BPA authority to procure contracts to advance the agency’s mission. GRB enables BPA to serve its Federal workforce with direct access to information regarding retirement funds and other employee benefits.

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)?

This is an optional service. GRB is used to provide annuity estimates and service computation dates upon request. Any Federal employee wishing to utilize GRB’s capabilities must use personal data to access the system.



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, this is a SaaS hosted by a vendor. The appropriate privacy protection clause was included in the contract.

4. IMPACT ANALYSIS:

How does this project or information system impact privacy?

Confidentiality Factors	Low	Moderate	High
Identifiability		X	
Quantity of PII		X	
Data Field Sensitivity			X
Context of Use		X	
Obligation to Protect Confidentiality			X
Access to and Location of PII		X	
Overall Privacy Risk			X

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.

The data will be retrieved by personal identifier, such as name or social security number.



MODULE II – PII SYSTEMS & PROJECTS

<p>6. SORNs</p> <p>Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>?</p> <p>If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</p>	<p>Yes, Privacy Act System of Records Notice for OPM GOVT-1 <i>General Personnel Records</i> has been published.</p> <p>Located: 71 FR 35342.</p>
<p>7. SORNs</p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	<p>N/A</p>
<p>DATA SOURCES</p>	
<p>8. What are the sources of information about individuals in the information system or project?</p>	<p>Information is entered manually by HCM personnel into GRB. The information entered can come directly from employees, the electronic official personnel file (eOPF), and/or the Human Resources management information system (HRmis).</p>
<p>9. Will the information system derive new or meta data about an individual from the information collected?</p>	<p>The system will generate new information regarding annuity estimates and service computation dates.</p>
<p>10. Are the data elements described in detail and documented?</p>	<p>Data elements are described in the System Security Plan (SSP), available on the JLS Compliance Documentation SharePoint site: https://secureportal.bud.bpa.gov/corp/JSSecurityCompliance/SitePages/Home.aspx.</p>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>PII is used to process employee profile information such as full/part time status, deferments, disability, survivor benefits, etc. in order to provide annuity estimates and service computation dates.</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>12. If the system derives meta data, how will the new or meta data be used?</p> <p>Will the new or meta data be part of an individual's record?</p>	<p>Annuity estimates and service computation dates are produced and provided to candidates upon request.</p>
<p>13. With what other agencies or entities will an individual's information be shared?</p>	<p>Information will be shared with OPM when required to administer employee benefits.</p>
<p>Reports</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>The only reports produced are composed of annuity estimates and service computation dates.</p>
<p>15. What will be the use of these reports?</p>	<p>The reports will be used to document and track retirement benefits estimates.</p>
<p>16. Who will have access to these reports?</p>	<p>Individuals will have access to reports about their own benefits estimates. Additional access will be determined based on need to know.</p>
<p>Monitoring</p>	
<p>17. Will this information system provide the capability to identify, locate, and monitor individuals?</p>	<p>No</p>
<p>18. What kinds of information are collected as a function of the monitoring of individuals?</p>	<p>N/A</p>
<p>19. Are controls implemented to prevent unauthorized monitoring of individuals?</p>	<p>N/A</p>

DATA MANAGEMENT & MAINTENANCE



MODULE II – PII SYSTEMS & PROJECTS

<p>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.</p>	<p>Manual verifications for accuracy, relevance, and completeness will occur when HCM personnel enter the information.</p>
<p>21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?</p>	<p>The GRB Platform is a Software-as-a-Service (SaaS) Federal Retirement and Benefits Administration solution used by the BPA HCM department; this is a limited-access, stand-alone system.</p>
<p>Records Management</p>	
<p>22. Identify the record(s).</p>	<p>To provide annuity estimates and service computation dates, employee profile information (e.g. – time status, retirement, resignation, benefits, disability, survivor benefits, etc.) is needed and used.</p> <p>Retain while Active* + 1 year, and then dispose.</p>
<p>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</p>	<p>Check appropriately and cite as required.</p> <p><input type="checkbox"/> Unscheduled <input checked="" type="checkbox"/> Scheduled (<i>cite NARA authority(ies) below</i>)</p> <p>National Archives (NARA) General Records Schedule (GRS) 2.5, item 020</p>
<p>24. Records Contact</p>	<p>Information Governance & Lifecycle Management iglm@bpa.gov</p>

ACCESS, SAFEGUARDS & SECURITY



MODULE II – PII SYSTEMS & PROJECTS

<p>25. What controls are in place to protect the data from unauthorized access, modification or use?</p>	<p>The Information Owner has implemented and tested all baseline security controls appropriate to its FIPS categorization in accordance with the Cyber Security Program Plan (CSPP) Appendices and DOE Directives.</p>
<p>26. Who will have access to PII data?</p>	<p>Human Resources Staff with responsibilities related to benefits or personnel actions will have access to GRB.</p>
<p>27. How is access to PII data determined?</p>	<p>Access is based on the roles and responsibilities of the individual; authorized on a need-to-know, with the least privilege access necessary to complete job duties.</p>
<p>28. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>No</p>
<p>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?</p>	<p>N/A</p>
<p>30. Who is responsible for ensuring the authorized use of personal information?</p>	<p>The Information Owner or manager of the Benefits function in the HR service center authorizes access based on specific job role in the BPA HR Service Center. Access is based on the roles and responsibilities of the individual; authorized on a need-to-know, with the least privilege access necessary to complete job duties.</p>

END OF MODULE II



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



PRIVACY IMPACT ASSESSMENT: JLS – GRB
PIA Template Version 5 – August 2017