



PRIVACY IMPACT ASSESSMENT: **ORG NAME – SYSTEM NAME**  
 PIA Template Version 5 – August 2017

Affects Members Of the Public?	<input 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>	10-28-2021	
<b>Departmental Element &amp; Site</b>	Bonneville Power Administration, Portland, Oregon, HQ	
<b>Name of Information System or IT Project</b>	Project Requirements Diagram (PRD) Comment Tracking System	
<b>Exhibit Project UID</b>	BPA is a self-funded Federal agency exempt from Exhibit 300 Submissions.	
<b>New PIA</b> <input checked="" type="checkbox"/>	This is a new PIA for an existing system	
<b>Update</b> <input type="checkbox"/>		
	<b>Name, Title</b>	<b>Contact Information Phone, Email</b>
<b>Information System Owner</b>	Yvette Gill Supervisory IT Specialist	(503) 230-3947 yrgill@bpa.gov



## MODULE I – PRIVACY NEEDS ASSESSMENT

<b>Information Owner</b>	Kyle Kohne TPM - Supervisory Electrical Engineer	360-619-6839 krkohne@bpa.gov
<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 JS - IT Specialist (ISSO)	503-230-5397 hcchoi@bpa.gov
<b>Person Completing this Document</b>	Jeffrey Gilmour Supervisory IT Specialist	503-230-3425 jbgilmour@bpa.gov
<b>Purpose of Information System or IT Project</b>	<p>The Project Requirements Diagram (PRD) Comment Tracking System (CTS) is a website with forms that capture user comments on PRDs as well as engineer resolutions to those comments. This data is written to a newly created table in an existing SQL Server database. The page also presents PRD metadata (pulled from ProjectWise) to give context about what is being commented on and to facilitate navigation/searchability within CTS.</p> <p>The information and business processes supported by this new system are critical to the Transmission Capital Acquisition Process. The system serves as a record that feedback on preliminary PRDs has been sought, received, and adequately managed. This feedback reduces the risk (in terms of cost and safety) of poorly crafted designs, and may even suggest efficiencies that were not considered in the original design.</p> <p>The system collects login info, name and contact information derived from Active Directory for the purpose of user authentication.</p>	
<b>Type of Information Collected or Maintained by the System:</b>	<input type="checkbox"/> SSN <a href="#">Social Security number</a> <input type="checkbox"/> Medical & Health Information <a href="#">e.g. blood test results</a> <input type="checkbox"/> Financial Information <a href="#">e.g. credit card number</a> <input type="checkbox"/> Clearance Information <a href="#">e.g. "Q"</a> <input type="checkbox"/> Biometric Information <a href="#">e.g. finger print, retinal scan</a> <input type="checkbox"/> Mother's Maiden Name	



## MODULE I – PRIVACY NEEDS ASSESSMENT

- DoB, Place of Birth
- Employment Information
- Criminal History
- Name, Phone, email 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 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, the above listed PII is known to exist in the system.

**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?**

No

**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.**



## 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?**

The Bonneville Power Project Act provides administrative authority to contract to fulfill Bonneville Power Administration’s mission. The PRD CTS will increase efficiencies and reduce risk in support of BPA’s business mission. (See 16 U.S.C. § 832a(f); 16 U.S.C. § 839f(a)).

#### 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)?**

None. The information is either user information (log-in, change-history, etc.) or business contact information for individuals inside BPA.



## MODULE II – PII SYSTEMS & PROJECTS

<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. All of these contractors are supplemental labor CFTEs. BPA Supplemental Labor Management Office (SLMO) ensures the appropriate clauses are included in all supplemental labor contracts.</p>																																
<p><b>4. IMPACT ANALYSIS:</b></p> <p><b>How does this project or information system impact privacy?</b></p>	<p>The Privacy Impact is LOW</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr style="background-color: #4f81bd; color: white;"> <th style="text-align: left;">Confidentiality Factors</th> <th style="text-align: center;">Low</th> <th style="text-align: center;">Moderate</th> <th style="text-align: center;">High</th> </tr> </thead> <tbody> <tr> <td style="background-color: #4f81bd; color: white;">Identifiability</td> <td style="text-align: center;">x</td> <td></td> <td></td> </tr> <tr> <td style="background-color: #4f81bd; color: white;">Quantity of PII</td> <td style="text-align: center;">x</td> <td></td> <td></td> </tr> <tr> <td style="background-color: #4f81bd; color: white;">Date Field Sensitivity</td> <td style="text-align: center;">x</td> <td></td> <td></td> </tr> <tr> <td style="background-color: #4f81bd; color: white;">Context of Use</td> <td style="text-align: center;">x</td> <td></td> <td></td> </tr> <tr> <td style="background-color: #4f81bd; color: white;">Obligation to Protect Confidentiality</td> <td style="text-align: center;">x</td> <td></td> <td></td> </tr> <tr> <td style="background-color: #4f81bd; color: white;">Access to and Location of PII</td> <td style="text-align: center;">x</td> <td></td> <td></td> </tr> <tr style="background-color: #4f81bd; color: white;"> <td style="text-align: right;">Overall PII Confidentiality Level</td> <td style="text-align: center;">x</td> <td></td> <td></td> </tr> </tbody> </table>	Confidentiality Factors	Low	Moderate	High	Identifiability	x			Quantity of PII	x			Date Field Sensitivity	x			Context of Use	x			Obligation to Protect Confidentiality	x			Access to and Location of PII	x			Overall PII Confidentiality Level	x		
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<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>The data is not retrieved by personal identifier in the regular course of business.</p>																																



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>6. SORNs</b></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>No</p>
<p><b>7. SORNs</b></p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</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>User data is automatically transferred from BPA Active Directory (user activity). There is also manual entry (if mentioned in a comment or response).</p>
<p><b>9. Will the information system derive new or meta data about an individual from the information collected?</b></p>	<p>No, the system will not derive any new or meta data about individuals.</p>
<p><b>10. Are the data elements described in detail and documented?</b></p>	<p>Yes, in the system design specification.</p>
<p><b>DATA USE</b></p>	
<p><b>11. How will the PII be used?</b></p>	<p>To identify the individual who is making the comment.</p>
<p><b>12. If the system derives meta data, how will the new or meta data be used?</b></p> <p>Will the new or meta data be part of an individual's record?</p>	<p>N/A</p>

**MODULE II – PII SYSTEMS & PROJECTS**

<b>13. With what other agencies or entities will an individual's information be shared?</b>	None.
<b>Reports</b>	
<b>14. What kinds of reports are produced about individuals or contain an individual's data?</b>	Comment memo contains the names of individuals who have commented.
<b>15. What will be the use of these reports?</b>	The comment memo is the document of record of the results of the review and comment portion of the PRD lifecycle.
<b>16. Who will have access to these reports?</b>	All users with ProjectWise access.
<b>Monitoring</b>	
<b>17. Will this information system provide the capability to identify, locate, and monitor individuals?</b>	No
<b>18. What kinds of information are collected as a function of the monitoring of individuals?</b>	None
<b>19. Are controls implemented to prevent unauthorized monitoring of individuals?</b>	N/A
<b>DATA MANAGEMENT &amp; MAINTENANCE</b>	
<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>	User / log-in information is updated automatically (BPA-wide) and changes apply in this system moving forward. Older references are not updated.



## MODULE II – PII SYSTEMS & PROJECTS

<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>N/A</p>
<p><b>Records Management</b></p>	
<p><b>22. Identify the record(s).</b></p>	<p>Project Requirement Diagrams (PRD) are created in the months prior to pursuing capital investment assets for Transmission. These projects are worked on by teams and revised over a period of weeks or months to ensure they meet project goals and objectives. Once the PRDs are posted (PDF), comments are solicited from hundreds of field engineers from up to 15 different districts throughout the Pacific Northwest as well as subject matter experts in planning, design, operations and field support staff, and construction. Engineers must comment on the PRDs to ensure the capital investments are constructed correctly. Each comment must be resolved by a PRD coordinating engineer, and once the process is completed, a federal record memorandum is drafted of the comments and resolutions.</p>
<p><b>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</b></p>	<p>N1-305-07-001-11b FE-1200 - Destroy 5 years after the records are closed, approved, submitted, or become inactive.</p>
<p><b>24. Records Contact</b></p>	<p>IGLM@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>Role based security is in place.</p>
<p><b>26. Who will have access to PII data?</b></p>	<p>Any internal BPA resource with ProjectWise access can access the CTS information.</p>
<p><b>27. How is access to PII data determined?</b></p>	<p>BPA managers determine which roles have a need-to-know and grant access to the CTS system accordingly.</p>
<p><b>28. Do other information systems share data or have access to the data in the system? If yes, explain.</b></p>	<p>Yes. The CTS system pulls data from ProjectWise.</p>





## MODULE II – PII SYSTEMS & PROJECTS

**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?**

No. The system only shares data with internal, BPA systems.

**30. Who is responsible for ensuring the authorized use of personal information?**

Information Owner

**END OF MODULE II**



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



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