



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

No hand-written submissions will be accepted.

This template may not be modified.

MODULE I – PRIVACY NEEDS ASSESSMENT

Date	October 3, 2024	
Departmental Element & Site	Bonneville Power Administration (BPA) HQ, 905 NE 11 th Ave, Portland, OR	
Name of Information System or IT Project	Agency Effectiveness Monitoring / AEmonitoring.org	
Exhibit Project UID	BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions.	
New PIA Update	<input checked="" type="checkbox"/> <input type="checkbox"/>	This system having an individual PIA is new. It was previously included in the Pisces PIA.
	Name, Title	Contact Information Phone, Email
Information System Owner	Yvette Gill, JL Supervisory IT Specialist	503-230-3947 yrgill@bpa.gov
Information Owner	Dave Kaplowe, EWM Supervisory Fish and Wildlife Administrator	503-230-5365 djkaplowe@bpa.gov



MODULE I – PRIVACY NEEDS ASSESSMENT

Local Privacy Act Officer	Candice Palen Privacy Act Officer	503-230-5602 cdpalen@bpa.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi, JLS ISSO	503-230-5397 hcchoi@bpa.gov
Person Completing this Document	Thomas Ono, EWB Management and Program Analyst	503-544-1869 tkono@bpa.gov
Purpose of Information System or IT Project	<p>The Bonneville Power Administration (BPA) and its partners have funded thousands of riverine restoration actions across the Columbia River Basin (CRB) to improve habitat for anadromous fish as part of the Northwest Power and Conservation Council's Fish and Wildlife Program. The Action Effectiveness Monitoring (AEM) Program was developed to address the need for a programmatic approach to project-level effectiveness monitoring in the CRB. The goals of the AEM Program are to quantify improvements in localized habitat and fish abundance as a function of restoration actions implemented in the CRB and to help guide future restoration and improvement efforts to ensure the BPA is investing in effective restoration techniques. Specifically, AEM is designed to programmatically evaluate projects across the interior CRB to determine 1) the effect of different action categories on juvenile Chinook salmon <i>Oncorhynchus tshawytscha</i> and steelhead <i>O. mykiss</i> and stream habitat at the reach scale, 2) why some projects within an action type are more effective than others, and 3) whether there are differences in project success among regions (Chinook ESUs).</p> <p>Restoration action categories evaluated under AEM include complete and partial fish passage barriers, instream structures (large woody debris), floodplain enhancement (levee modification, floodplain reconnection, and channel re-meandering), and riparian restoration (planting and invasive plant removal). A combination of extensive post-treatment (EPT) and multiple before-after control-impact (MBACI) monitoring designs are being used to evaluate project effectiveness.</p> <p>This website was designed to provide access for project sponsors, partners, and the public to AEM data, reports, and publications. This includes both raw data, summary data and metrics, project reports, and links to journal publications. Data can be filtered and downloaded based on restoration action category, study design, project name, and more.</p> <p>The site is maintained to allow access to previously collected data owned by BPA for the AEM project. Users can discover data via the map interface. The program has ended, and the website is no longer collecting new data. The data presented is static. AIM ID 1107.</p>	



MODULE I – PRIVACY NEEDS ASSESSMENT

<p>Type of Information Collected or Maintained by the System:</p>	<p><input type="checkbox"/> SSN</p> <p><input type="checkbox"/> Medical & Health Information</p> <p><input type="checkbox"/> Financial Information</p> <p><input type="checkbox"/> Clearance Information</p> <p><input type="checkbox"/> Biometric Information</p> <p><input type="checkbox"/> Mother's Maiden Name</p> <p><input type="checkbox"/> DoB, Place of Birth</p> <p><input checked="" type="checkbox"/> Employment Information (notes or publications may contain information related to education or employer for researchers)</p> <p><input type="checkbox"/> Criminal History</p> <p><input checked="" type="checkbox"/> Names, Email-Address (for fish sciences personnel and BPA's Program Manager on the "Contact Us" page of the website, names appear in the Raw Data, Crew table as well as the publication and reports contain the names of researchers)</p> <p><input type="checkbox"/> Other – Please Specify</p>
<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>	<p>No, the above non-sensitive PII is known to exist on the site.</p>
<p>If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)</p>	<p>N/A</p>
<p>Threshold Questions</p>	
<p>1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?</p>	<p>Yes</p>



MODULE I – PRIVACY NEEDS ASSESSMENT

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 <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.

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



MODULE II – PII SYSTEMS & PROJECTS

<p>1. AUTHORITY</p> <p>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</p>	<p>The Bonneville Power Project Act provides administrative authority to contract to fulfill Bonneville Power Administration’s mission. AEmonitoring allows both personnel in Bonneville’s Fish & Wildlife organization to conduct their work in connection with regulatory requirements and advance BPA’s statutory obligations to fund fish and wildlife projects as well as the public to access the data from the associated research. (See 16 U.S.C. § 832a(f); 16 U.S.C. § 839f(a)).</p>
<p>2. CONSENT</p> <p>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)?</p>	<p>Access to the information doesn’t require account creation and access logs are not generated. Personnel associated with data entries would have consented at the time of collection to having their names associated with the information they collected as good data collection practices require for research. Those personnel listed on the “Contact Us” page consented to having their work information provided since it is part of their job duties.</p>
<p>3. CONTRACTS</p> <p>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?</p>	<p>Yes. The contract for the website includes the appropriate Privacy Act clauses.</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>4. IMPACT ANALYSIS:</p> <p>How does this project or information system impact privacy?</p>	<p>Privacy impacts of aemonitoring.org are LOW due to the limited amount of work related PII collected and limited volume of PII.</p> <table border="1" data-bbox="625 457 1243 1010"> <thead> <tr> <th>Confidentiality Factors</th> <th>Low</th> <th>Moderate</th> <th>High</th> </tr> </thead> <tbody> <tr> <td>Identifiability</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Quantity of PII</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Data Field Sensitivity</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Context of Use</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Obligation to Protect Confidentiality</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Access to and Location of PII</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Overall Privacy Risk</td> <td>X</td> <td></td> <td></td> </tr> </tbody> </table>	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		
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<p>5. SORNs</p> <p>How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?</p> <p>If yes, explain, and list the identifiers that will be used to retrieve information on the individual.</p>	<p>Data is available to and downloadable by the public. In one table, crew members' names and role labels are displayed. The data can be retrieved using name or role.</p>																																
<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>DOE-82: Grant & Contract Records for Research Projects, Science Education, & Related Activities</p>																																



MODULE II – PII SYSTEMS & PROJECTS

<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>The data was provided by the individuals at the time of data collection to comply with accepted scientific research practices to maintain integrity of data collection. Names and contact information are also provided to allow future researchers to communicate questions related to the data.</p>
<p>9. Will the information system derive new or meta data about an individual from the information collected?</p>	<p>No</p>
<p>10. Are the data elements described in detail and documented?</p>	<p>Not for the website. For the research the data is aggregated from approximately 60 projects and each of those projects has its own data management practices and policies, but that information may not be available from the website.</p>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>Project managers may use PII to assess surveyor accuracy or to find a person associated with a worksite.</p>
<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>System does not derive new metadata. The data presented is historic and static.</p>
<p>13. With what other agencies or entities will an individual's information be shared?</p>	<p>The data is publicly available.</p>
<p>Reports</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>None</p>



MODULE II – PII SYSTEMS & PROJECTS

15. What will be the use of these reports?	N/A
16. Who will have access to these reports?	N/A
Monitoring	
17. Will this information system provide the capability to identify, locate, and monitor individuals?	No
18. What kinds of information are collected as a function of the monitoring of individuals?	N/A
19. Are controls implemented to prevent unauthorized monitoring of individuals?	N/A
DATA MANAGEMENT & MAINTENANCE	
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.	N/A – data is not updated.
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	N/A
Records Management	
22. Identify the record(s).	<p>Data: The data on the site is field data collected from worksites in the area of the study. It is intended to describe the environmental conditions and the condition of the species of study.</p> <p>Documents: 1) Reports produced directly by the program. 2) There are links to journal articles associated with the program.</p>



MODULE II – PII SYSTEMS & PROJECTS

<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>N1-305-07-001-0012d</p> <p>ER-1400 Destroy 30 years after the records are inactive/closed.</p>
<p>24. Records Contact</p>	<p>IGLM@bpa.gov</p>
<p>ACCESS, SAFEGUARDS & SECURITY</p>	
<p>25. What controls are in place to protect the data from unauthorized access, modification or use?</p>	<p>Vendor is responsible for data integrity, however information could be downloaded and modified, but for those in the scientific community it would be easy to verify the data and determine if it had been manipulated.</p>
<p>26. Who will have access to PII data?</p>	<p>Public</p>
<p>27. How is access to PII data determined?</p>	<p>No access restrictions.</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</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/>
DOE Chief Privacy Officer	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>