



PRIVACY IMPACT ASSESSMENT: JLSI – Agency Enterprise Portal - EPP
PIA Template Version 5 – August 2017

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	10-26-2021	
Departmental Element & Site	Bonneville Power Administration Department of Energy	
Name of Information System or IT Project	Agency Enterprise Portal (AEP) Enterprise Public Portal (EPP) BAE-GSS	
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 for a new system.	
Update <input type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
Information System Owner	Yvette Gill JL – Supervisory IT Specialist	yrgill@bpa.gov Phone: 503-230-3947



MODULE I – PRIVACY NEEDS ASSESSMENT

Information Owner	Ryan Zimmerman DKD – Manager Digital Media and Visual Design	rjzimmerman@bpa.gov Phone: 503-230-4327
Local Privacy Act Officer	Candice D. Palen Privacy Act Officer	cdpalen@bpa.gov Phone: 503-230-5602
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi Information System Security Officer	hcchoi@bpa.gov Phone: 503-230-5397
Person Completing this Document	Oliver Rose Jr. Business Applications	oxrose@bpa.gov Phone:503-230-3616
Purpose of Information System or IT Project	<p>Two existing sites make up the Agency Enterprise Portal (AEP) project. The first is the Enterprise Public Portal (EPP) at www.bpa.gov, and the second is the Customer Portal (CP) at www.customerportal.bpa.gov. The goals of the AEP project are:</p> <ol style="list-style-type: none"> 1. Create scalable, secure portals to provide searchable access to EPP and CP. EPP access will be public and CP access will provide customer and internal access. These portals will also demonstrate capability for expansion with an eye toward improving communication and customer capabilities across BPA. <ul style="list-style-type: none"> • EPP - General publicly available content; structured and un-structured as well as user submitted content (e.g. public comments and email signup forms). • CP –Power and Transmission data, including grid modernization projects, APSC projects, the Agency Metering System (AMS) replacement, the Customer Billing Center (CBC) replacement, Energy Imbalance Market (EIM) settlements, the Energy Efficiency replacement project, and other BPA external customer facing websites. 2. Improve management and publication of operational business data in a standard “BPA Style” with a configurable, scalable, secure web content management system. 3. Replace the existing BPA.gov website and Customer Portal (CP) with a single Enterprise Public Portal (EPP) which has a migration path and pass-through capabilities to information from other systems which will preserve current state functionality and demonstrate a repeatable migration process for future expansion. 	



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	<p>Addressing the future of EPP and CP supports BPA's Strategic Objectives in a number of ways. It will enhance the customer's experience and support BPA's responsiveness to customer needs by allowing customer access to data via automation, improved accuracy, and enhanced visibility. It will support BPA's ability to continuously evolve with market changes and improve commercial operations.</p> <p>This PIA covers the EPP portion of the project.</p> <p>EPP collects name and contact information for members of the public to respond to comments, as well as system login information for BPA personnel who access the system, and photos of executive leadership and other personnel.</p>
<p>Type of Information Collected or Maintained by the System:</p>	<ul style="list-style-type: none"> <input 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 <input type="checkbox"/> DoB, Place of Birth <input type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Phone, Address, Zip Code, Email (see below) <input checked="" type="checkbox"/> Other – system login and password. BPA leadership and personnel photos and work contact information.
<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</i></p>	<p>N/A – The system is known to contain PII.</p>



MODULE I – PRIVACY NEEDS ASSESSMENT

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.

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.

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?

Northwest Power Act: This act requires BPA to involve the public in major regional power policies (Section 4(g)(1)), specifically those concerning electric power, conservation and fish and wildlife issues which concern it.

National Environmental Policy Act (NEPA): NEPA requires BPA to seek public input on the environmental impacts of its actions.

Administrative Procedures Act: As a federal agency, BPA must comply with the Administrative Procedures Act, section 552, which provides due process to the public regarding the federal government’s adoption of any policy governing federal agencies’ activities. This requirement includes the following:

- Adequate and timely notice of proposals or actions
- Adequate information to apprise the public of the context, purpose, design and import or effect of the proposed action or policy
- Adequate and complete information on the proposed action and its effect
- Adequate and effective opportunity to comment on the proposed action or alternatives to the action, including not taking any action
- The obligation to consider, evaluate and respond to all relevant comments made
- A clear statement of the final decision and the reasons for the decision
- Notice of the same to the parties and general public by publication



MODULE II – PII SYSTEMS & PROJECTS

<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>Members of the public who decline to provide information cannot submit comments in this system, but may still comment in other forums (public meetings, emailing BPA directly, etc.). The specific fields listed above (Name, Phone, Address, Zip Code, Email) are required when a comment is submitted to this system.</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>The Privacy Clause is included in the Master Agreements with Contractors.</p>																																
<p>4. IMPACT ANALYSIS:</p> <p>How does this project or information system impact privacy?</p>	<p>The Privacy Impact is moderate.</p> <table border="1" data-bbox="625 1056 1243 1612"> <thead> <tr> <th>Confidentiality Factors</th> <th>Low</th> <th>Moderate</th> <th>High</th> </tr> </thead> <tbody> <tr> <td>Identifiability</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Quantity of PII</td> <td></td> <td>X</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>X</td> <td></td> <td></td> </tr> <tr> <td>Obligation to Protect Confidentiality</td> <td></td> <td>X</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></td> <td>X</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	
Confidentiality Factors	Low	Moderate	High																														
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MODULE II – PII SYSTEMS & PROJECTS

<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>The data is not retrieved by identifier in the regular course of business.</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>N/A</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>

DATA SOURCES

<p>8. What are the sources of information about individuals in the information system or project?</p>	<p>Active Directory (BPA staff) and from the individuals themselves (members of the public).</p>
<p>9. Will the information system derive new metadata about an individual from the information collected?</p>	<p>No. Web analytics will be collected, but this information is focused on web traffic and it is anonymous.</p>
<p>10. Are the data elements described in detail and documented?</p>	<p>Yes. The System Security Plan has the data elements and their confidentiality, integrity and availability thresholds outlined in detail.</p>

DATA USE



MODULE II – PII SYSTEMS & PROJECTS

<p>11. How will the PII be used?</p>	<p>BPA Users (BFTE and CFTE) who administer the system will apply user and role permissions by their logon identifier. Content Creators will publish information to be seen by the public. The metadata attached to the logon identifier during any creation or modification of data elements within the system, will display the user’s last name, first name, and work organization.</p> <p>Executive Information about the agency will be displayed publicly on BPA’s front facing website as a part of the agency’s information. This will include the names and photos of those individuals.</p> <p>Photos of BPA personnel used on the website will be used with their permission and acknowledgment that their photo is being published publicly.</p> <p>Public Comments is an opt-in feedback mechanism that allows users of the public to comment on public processes, programs and projects. The form to begin the public comment gathers information about the user which includes, first name, last name, middle initial, email, phone, address, city, state, and zip code. This information is not shared publicly. On the front facing website, the commenter’s first name and their public comment is displayed.</p> <p>Tech form is an opt-in email subscription that allows the public to sign up to receive email regarding BPA topics. The form collects a person’s email, name and company name. Only an email is required.</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>No, new metadata will not be part of individual’s record. Web analytics do not use the PII metadata. Web analytics is used by BPA to specifically review:</p> <p>Social media viewership, likes, etc.</p> <p>bpa.gov traffic (number of views and duration on page)</p> <p>Connection traffic (number of views and duration on page)</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>13. With what other agencies or entities will an individual's information be shared?</p>	<p>Public comments received as part of a rate-making process or NEPA process are filed in the Federal Register.</p>
<p>Reports</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>Public comments that are reviewed for public comment periods will contain the commenter's name.</p>
<p>15. What will be the use of these reports?</p>	<p>Responses to public comments may be used in a Record of Decision (BPA Policy 250-1).</p>
<p>16. Who will have access to these reports?</p>	<p>Authorized individuals in Communications who have direct business justification, and limited IT personnel.</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>
<p>DATA MANAGEMENT & MAINTENANCE</p>	
<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>Completed forms are submitted by the public and reviewed for new information to be considered.</p>



MODULE II – PII SYSTEMS & PROJECTS

<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 system is externally hosted as a SaaS.</p> <p>This application will be externally hosted in the cloud and provided to BPA as a Software-as-a-Service (SaaS).</p>
<p>Records Management</p>	
<p>22. Identify the record(s).</p>	<p>The website will host BPA-produced content and allow information exchange between customers and BPA necessary for managing Power, Transmission, Energy Efficiency and Environment, Fish & Wildlife products and services.</p>
<p>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</p>	<p>We have two retentions for AEP:</p> <ol style="list-style-type: none"> 1. Schedule for the content is: N1-305-07-001-21a 2. Operational Records are schedule under GRS: GRS 3.1.020
<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>The System Owner has implemented and tested all baseline security controls appropriate to its FIPS categorization in accordance with BPA’s Cybersecurity Program Plan (CSPP) and DOE Directives.</p>
<p>26. Who will have access to PII data?</p>	<p>BPA.gov Web Site Manager BPA Communications Team</p>
<p>27. How is access to PII data determined?</p>	<p>Role-based and need-to-know basis.</p>
<p>28. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>No systems will connect to BPA.gov for interconnected/shared data.</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 systems will connect to BPA.gov for interconnected/shared data.

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

EPP Information Owner

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/>



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