



PRIVACY IMPACT ASSESSMENT: NSTP - ASSET SUITE 9
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	December 31, 2024	
Departmental Element & Site	Bonneville Power Administration (BPA) HQ, 905 NE 11 th Ave, Portland, OR	
Name of Information System or IT Project	Asset Suite 9 (AS9)	
Exhibit Project UID	BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions	
New PIA Update	<input type="checkbox"/> <input checked="" type="checkbox"/>	Update to Asset Suite PIA (2021) – edits include documentation of current IO, expansion of purpose information, and addition of IPP as a connected information system.
	Name, Title	Contact Information Phone, Email
System Owner	Yvette Gill, JL Supervisory IT Specialist	503-230-3947 yrgill@bpa.gov
Information Owner	Julie Jenkins, NSTP Supply Systems Supervisor	360-418-2653 jajenkins@bpa.gov



MODULE I – PRIVACY NEEDS ASSESSMENT

Local Privacy Act Officer	Candice Palen, CGI FOIA/Privacy Act Officer	503-230-3602 cdpalen@bpa.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi, JLS IT Specialist	503-230-5397 hcchoi@bpa.gov
Person Completing this Document		
Purpose of Information System or IT Project	<p>Asset Suite is a key component of the BPA-wide Enterprise Resource Planning System. This is the integrated management of business processes and is used to collect, store, manage, and interpret data from many business activities.</p> <p>At BPA, Asset Suite is the official source of record for:</p> <ul style="list-style-type: none"> • Work Management • Purchasing • Contract Management • Procurement Cards • Inventory Management • Materials Catalog • Invoice Entry and Matching <p>Tribal Student Funding information collection limited to a single set of students (4) that will complete education by 2030. Collection is based upon an agreement with the tribe and will be limited to the name of the student and year of graduation.</p> <p>BPA AIM ID: 1280</p>	
Type of Information Collected or Maintained by the System:	<input type="checkbox"/> SSN <input type="checkbox"/> Medical & Health Information <input checked="" type="checkbox"/> Financial Information <input type="checkbox"/> Clearance Information <input type="checkbox"/> Biometric Information <input type="checkbox"/> Mother's Maiden Name	



MODULE I – PRIVACY NEEDS ASSESSMENT

- DoB, Place of Birth
- Employment Information
- Criminal History
- Other: Name, Login credentials

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.

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?

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.



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. Asset Suite is critical to several of the agency’s core business functions. (See 16 U.S.C § 832a(f); 16 U.S.C § 839).

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)?

Individual vendors have the opportunity to decline to provide any specific piece of their contact details.

Bonneville employees and contractors may not decline to provide login credentials.



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. Contracts contain the relevant privacy clause.

4. IMPACT ANALYSIS:

How does this project or information system impact privacy?

The potential impact is MODERATE. The potential for privacy concerns if the system is compromised could be expected to have a serious adverse effect on individuals or BPA's operations or assets.

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

Data will be routinely retrieved by vendor name, which is most commonly a business name. When a vendor is a sole proprietor, PII may be retrieved by their name.



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>Information belonging to individual vendors only, not businesses, is part of DOE-18, <i>Financial Accounting System</i>, located at 74 FR 1020.</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>The information is first-party provided. The vendor provides the name and contact details, which are entered into PeopleSoft Financials and automatically transferred into Asset Suite.</p> <p>Federal employee login information is transferred from Peopledata DIL (Data Integration Layer) which is sourced from PeopleSoft HRMIS.</p> <p>Contract employee login information is stored within Asset Suite.</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>Yes, documentation exists. Refer to the System Security Plan.</p>

DATA USE



MODULE II – PII SYSTEMS & PROJECTS

<p>11. How will the PII be used?</p>	<p>In the rare instance of doing business with a sole proprietorship vendor, PII is used to:</p> <ul style="list-style-type: none"> • Procure goods and service that BPA needs to conduct business and • Process invoices for goods and services. <p>Federal and contract employee PII is used to:</p> <ul style="list-style-type: none"> • Designate application security and authority to perform jobs, based on logon ID. <p>Tribal Student PII used to administer funding cooperative agreement and is limited to a single set of students (4) that will complete education by 2030.</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>N/A</p>
<p>13. With what other agencies or entities will an individual's information be shared?</p>	<p>None</p>
<p>Reports</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>No reports are produced within Asset Suite containing individual data.</p>
<p>15. What will be the use of these reports?</p>	<p>N/A</p>
<p>16. Who will have access to these reports?</p>	<p>N/A</p>
<p>Monitoring</p>	
<p>17. Will this information system provide the capability to identify, locate, and monitor individuals?</p>	<p>No</p>



MODULE II – PII SYSTEMS & PROJECTS

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.	All information comes from Peopledata DIL (Data Integration Layer), which is sourcing from Peoplesoft HRMIS for DOE employee data and PS Financials for vendor data. Any updates in Peopledata DIL or PS Financials triggers an update to Asset Suite.
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).	Supply Chain data, purchasing, contracts, inventory and work management, inventory storage data, materials transactions, material requests.
23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	Currently unscheduled as the BPA records control schedule is being revised; Asset Suite will fall under the proposed records schedule “Asset Management Records.” Records residing in the system will be treated as permanent records, with no disposal, until a final schedule is published.
24. Records Contact	IGLM@bpa.gov
ACCESS, SAFEGUARDS & SECURITY	
25. What controls are in place to protect the data from unauthorized access, modification or use?	A full-time security employee monitors the data and removes access and/or deletes accounts when an employee changes department or terminates employment. Manager requests from potential and current users are required to effect changes to permissions.
26. Who will have access to PII data?	The Asset Suite support team, business and IT technical.



MODULE II – PII SYSTEMS & PROJECTS

<p>27. How is access to PII data determined?</p>	<p>Managers designate access for Business Analysts, and create the authority to view data on a 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>Oracle PeopleSoft Financials: to post agency work and supply chain transactions to maintain accurate general ledger and project cost data.</p> <p>Fieldglass SAP: to support all CFTE labor contracts and invoice processing.</p> <p>GEP: to support all Supply Chain eCommerce procurement and invoice transactions.</p> <p>IPP: to support Supply Chain Contract and electronic invoice transactions.</p> <p>Citibank: to support purchase card transactions</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>Yes</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/>
Chief Privacy Officer	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>