



PRIVACY IMPACT ASSESSMENT: JN – AVTEC
PIA Template Version 5 – August 2017

Affects Members Of the Public?	Mark if Applicable w/ an X
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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	9/9/2022	
Departmental Element & Site	JTS-2 Data Center BPA Headquarters, 905 NE 11 th Ave, Portland OR	
Name of Information System or IT Project	AVTEC, a subsystem of the GSS.	
Exhibit Project UID	BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions.	
New PIA <input checked="" type="checkbox"/>	New	
Update <input type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
Information System Owner	Paul Dickson, JN Supervisory IT Specialist, JN	503-230-4075 prdickson@bpa.gov
Information Owner	O'Donnell, John Supervisory IT Specialist, JNP	503-230-4676 jpodonnell@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.)	Earl Evans Information Systems Security Engineer	503-230-3019 erevans@bpa.gov
Person Completing this Document	Jeff Gannaway IT Specialist	503-230-3106 jegannaway@bpa.gov
Purpose of Information System or IT Project	<p>This system is a Voice Over IP phone system that includes several lists that allow for easy reference to speed dial lists for Duty Schedulers in order to resolve issues. Types of information in the system include names, office phone numbers and personal phone numbers for only the BFTE employees who work as Duty Schedulers.</p> <p>The Avtec system’s consoles are not user-specific and don’t require user names or emails to access them. The Avtec consoles are a specific system that are housed in secured physical locations with no other access to the consoles.</p> <p>Updates to individual phone numbers are done by logging into the Server, logging into the Application and modifying a list of contacts and numbers. Editors need the correct Roles and Passwords to make these changes.</p>	
Type of Information Collected or Maintained by the System:	<input type="checkbox"/> SSN <input type="checkbox"/> Medical & Health Information <input type="checkbox"/> Financial Information <input type="checkbox"/> Clearance Information <input type="checkbox"/> Biometric Information <input type="checkbox"/> Mother’s Maiden Name <input type="checkbox"/> DoB, Place of Birth <input type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History	



MODULE I – PRIVACY NEEDS ASSESSMENT

- Name, Business Phone Numbers, and Duty Schedulers Personal Phone Numbers
- 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.

Not Applicable –

Non-sensitive PII is known to exist in the application

If “Yes,” what method was used to verify the system did not contain PII? (e.g. system scan)

Not Applicable

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.

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.



MODULE I – PRIVACY NEEDS ASSESSMENT

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

<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 Project Act of 1937, 16 U.S.C. § 832a(b), the BPA administrator must operate and maintain electric transmission facilities and structures. This system facilitates operations and maintenance activities.</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>Duty Schedulers are asked to provide the information but are not required to give it.</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, all BPA’s supplemental labor contracts involving contractor access to BPA records contain a clause that requires contractors to comply with the Privacy Act per BPA Purchasing Instructions Clause 23-4.</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>4. IMPACT ANALYSIS: How does this project or information system impact privacy?</p>	<p>The overall privacy impact is LOW</p> <table border="1"> <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>X</td> <td></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>X</td> <td></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 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.</p>	<p>Yes. Information is retrieved by name.</p>																																
<p>6. SORNs Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>? If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</p>	<p>Yes, DOE-11: Emergency Operations Notification Call List</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>Individual names and phone numbers are manually entered into the Avtec system. Persons assigned as Duty Scheduling Avtec SMEs and Voice & Video technicians are the only ones capable of accessing and making changes to the phone numbers list.</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>No</p>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>The call list is used in case of an illness or injury where the Duty Scheduling Center needs a short-notice replacement worker for a shift.</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>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.	<p>This is a manual process done by the Avtec SMEs when someone joins or leaves the group.</p> <p>(The SME's access is controlled by role groups, access to the server, access to the application and rights within the application to make the manual entries.)</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>Avtec consists of a single system and is only available to Duty Schedulers in a restricted area of the BPA HQ's 5th floor and the Vancouver Emergency Scheduling Center (ESC) building.</p>
Records Management	
22. Identify the record(s).	<p>Configuration (telephone numbers and IP addresses) and maintenance; back-up tapes.</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>DM-1100 (N1-305-07-001-18a) DM-1108 (GRS 3.2, item 051)</p> <p>Destroy when superseded, updated, replaced, or no longer applicable.</p> <p>Destroy immediately after the identical records have been deleted or replaced by a subsequent backup file, but longer retention is authorized if required for business use.</p>
<p>24. Records Contact</p>	<p>IGLM@bpa.gov</p>

ACCESS, SAFEGUARDS & SECURITY

<p>25. What controls are in place to protect the data from unauthorized access, modification or use?</p>	<p>Access to data in the system is controlled through Role Based Access Control (RBAC) security. Access controls will be tested as implemented.</p>
<p>26. Who will have access to PII data?</p>	<p>DSC Avtec SMEs and Unified Communications staff</p>
<p>27. How is access to PII data determined?</p>	<p>Persons assigned as Avtec SMEs and Voice & Video technicians are the only ones capable of accessing the phone numbers list.</p>
<p>28. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>N/A</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>The Avtec system uses a stand alone database that does not connect to other systems.</p>
<p>30. Who is responsible for ensuring the authorized use of personal information?</p>	<p>Unified Communications Group</p>

END OF MODULE II



SIGNATURE PAGE		
	Signature	Date
System Owner	<p>PAUL DICKSON</p> <hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
Information Owner	<p>BENJAMIN BERRY</p> <hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
Local Privacy Act Officer	<p>CANDICE PALEN</p> <hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
DOE Chief Privacy Officer	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>



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