



Affects
Members
Of the Public?

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	07/24/2023	
Departmental Element & Site	Department of Energy (DOE) Bonneville Power Administration (BPA) Portland, Oregon	
Name of Information System or IT Project	Budget, Planning, Forecasting, and Analysis System (BPFAS) Oracle Hyperion Public Sector Budgeting and Planning.	
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 an existing system	
Update <input type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
System Owner	Yvette Gill, Supervisory IT Specialist Information System Owner (ISO)	(503) 230-3947 yrgill@bpa.gov



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Information Owner	Valerie Gonzales Darling Supervisory, Financial Systems Analyst Information Owner (IO)	(503) 230-5018 vsgonzales@bpa.gov
Local Privacy Act Officer	Candice Palen Privacy Act Officer	(503) 230-3602 cdpalen@bpa.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi IT Specialist ISSO	(503) 230-5397 hcchoi@bpa.gov
Person Completing this Document	Michael Larson Financial Business Analyst	(503) 230-3622 mglarson@bpa.gov
Purpose of Information System or IT Project	<p>The Budget Planning, Forecasting and Analysis System (BPFAS) is a budgeting, planning and analysis tool that reduces the need for manual data manipulation. It provides a centralized, transparent means of developing and documenting cost estimates and budgets across all BPA departments. The system offers easy decentralized access for analysts tasked with entering or reviewing and managing data.</p> <p>Information from BPFAS is pulled into Excel Cubes containing multiple pivot tables. These provide analysts and reviewers with up-to-date information that is used for reports and presentations.</p> <p>The system imports Personal Identifiable Information (PII) on employees (name, salary, position, grade). The employee (name, salary, position and grade) is used by the budget analysts as they discuss the detailed budgets with managers. This information is then rolled up to show what the expected budget is for an organization. The employee salaries are only one aspect of the budget, other items, like, travel, awards, contracts, supplemental labor are also used to forecast an organization's budget.</p>	



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<p>Type of Information Collected or Maintained by the System:</p>	<p><input type="checkbox"/> SSN Social Security number</p> <p><input type="checkbox"/> Medical & Health Information e.g. blood test results</p> <p><input type="checkbox"/> Financial Information e.g. credit card number</p> <p><input type="checkbox"/> Clearance Information e.g. "Q"</p> <p><input type="checkbox"/> Biometric Information e.g. finger print, retinal scan</p> <p><input type="checkbox"/> Mother's Maiden Name</p> <p><input type="checkbox"/> DoB, Place of Birth</p> <p><input type="checkbox"/> Employment Information</p> <p><input type="checkbox"/> Criminal History</p> <p><input checked="" type="checkbox"/> Name, (Employee Name, position, Grade, salary)</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>N/A – PII is known to exist in the system.</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>
<p>2. Is the information in identifiable form?</p>	<p>Yes</p>
<p>3. Is the information about individual Members of the Public?</p>	<p>No</p>



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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?

The Bonneville Power Project Act provides administrative authority to contract to fulfill Bonneville Power Administration’s mission. The Budget Planning, Forecasting and Analysis System is essential to BPA’s financial operations and to advance BPA’s business mission. (See 16 U.S.C. 832a(f); 16 U.S.C. 839f(a)). BPFAS is also authorized by the Debt Collection Improvement Act (31 U.S.C. 3701, et seq.).



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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)?

There is no opportunity to consent for data sharing between the source systems (Human Resources Management Information System (HRMIS) and Financial Management System (FMS)) and this system.

Users who require a login consent by requesting access.

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?

The Privacy Act clauses are included in the contract.

4. IMPACT ANALYSIS:

How does this project or information system impact privacy?

The Privacy Impact is Low.

BPFAS is designed to protect PII and mitigate privacy risk via the following administrative, technical, and physical controls:

- Strict access control enforcement based on need-to-know

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		



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>No, the information is not regularly retrieved by identifier. Salary information is typically retrieved by GS level.</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>
<p>DATA SOURCES</p>	
<p>8. What are the sources of information about individuals in the information system or project?</p>	<p>HRMIS – Name, GS salary, position, grade</p> <p>FMS – (actual) Salary (includes adjustments, bonuses, etc.)</p> <p>Active Directory – Name and Email address</p>
<p>9. Will the information system derive new or meta data about an individual from the information collected?</p>	<p>The budget system will create forecast scenarios, such as potential salary increases for employees, to determine how this will impact budgets and forecasts.</p>



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<p>10. Are the data elements described in detail and documented?</p>	<p>Yes, data elements are described in the System Security Plan (SSP) and supporting project documentation.</p>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>BPA will use information about employee salaries to determine future budgets and forecasts for BPA short and long-term planning. Department managers will use employee salary information to adjust hiring plans and work priorities to align with budgets.</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 meta data about individuals will be developed.</p>
<p>13. With what other agencies or entities will an individual's information be shared?</p>	<p>Aggregated budget forecasts at the department level will be shared with our stakeholders (people involved in the analysis as well as the audience for the reports). Data about individual employees will not be distributed outside of BPA.</p>
<p>Reports</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>Reports are produced on employee work status and the percent of the pay period worked.</p>
<p>15. What will be the use of these reports?</p>	<p>The employee work status and the percent of the pay period worked will be used to determine actuals and forecast for future (Full Time Equivalent) FTE numbers and salaries. This information is used for building aggregate reports and will be pushed to Excel report cubes.</p> <p>The names and identifiers are stripped from the salary information when aggregate reports are created.</p>



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<p>16. Who will have access to these reports?</p>	<p>Employees with access to BPFAS and HR organizations will have access to the details that are only in the BFPAS and this will have limited roles approved to access.</p> <p>Analysts and Managers have been granted access to Excel cube reports that give them the appropriate information based on their job.</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>The source of record for the employee data is HRMIS and FMS. Integrations between these systems is done nightly and data is shared in our data warehouse tables.</p>
<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 ISO and IO will work with the other SMEs and data stewards to ensure that information is consistently used. A data dictionary, business rules, processes and procedures will be developed.</p>
<p>Records Management</p>	
<p>22. Identify the record(s).</p>	<p>Budget forecasting data and supporting documents.</p>



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<p>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</p>	<p>N1-305-07-001-9c PB-1300 Destroy no sooner than 10 years after the records are 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>BPFAS has implemented role based access control (RBAC) to enforce need-to-know access privileges.</p>
<p>26. Who will have access to PII data?</p>	<p>As authorized by the Information Owner and delegates, business unit and supporting staff including IT will have access to PII.</p>
<p>27. How is access to PII data determined?</p>	<p>Access to PII data will be determined based on a need-to-know and must be authorized by the Information Owner or approved delegates.</p>
<p>28. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>The Enterprise Data Warehouse Data (EDW-DATA) staging table will be the source of all incoming data, outgoing data returns to EDW-DATA for reporting. BPFAS also has the capability to produce Narrative Reports which once created and approved can be published on the external bpa.gov site. The Narrative Reports do not contain PII.</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 current system is already connected and in use.</p>
<p>30. Who is responsible for ensuring the authorized use of personal information?</p>	<p>Information Owner.</p>



MODULE II – PII SYSTEMS & PROJECTS

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/>