



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	1/30/2024	
Departmental Element & Site	Bonneville Power Administration Headquarters, 905 NE 11 th Ave, Portland OR	
Name of Information System or IT Project	Columbia Basin Fish and Wildlife Program and Monitoring Resources	
Exhibit Project UID	BPA is a self-funded Federal Agency and is exempt from Exhibit 300 submissions.	
New PIA <input type="checkbox"/>	This is an updated PIA for an existing system (replaces Pisces).	
Update <input checked="" type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
System Owner	Yvette Gill, JL Supervisory IT Specialist	503-230-3947 yrgill@bpa.gov
Information Owner	Rodrigo George, EWB Program Manager	503-230-3260 rdgeorge@bpa.gov



MODULE I – PRIVACY NEEDS ASSESSMENT

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, JS Cyber Security Specialist	503-230-5397 hcchoi@bpa.gov
Person Completing this Document	Tom Ono, EWB Business Programs Analyst	503-230-3704 tkono@bpa.gov
Purpose of Information System or IT Project	<p>This PIA covers two websites: CBFish.org and MonitoringResources.org. Both websites include marking to identify the affiliation with BPA.</p> <p>The CBFish.org system is a contract management and tracking application that provides an external capability for submission, selection, and performance tracking of Fish & Wildlife projects that are approved by the Northwest Power & Conservation Council.</p> <p>The system is used by BPA’s Fish and Wildlife staff to manage fish and wildlife projects throughout the Columbia River Basin. CBFish provides a collaborative environment, where contractors and BPA project managers can create and manage statements of work based on work elements. Program partners can access reports on all aspects of the program’s activity.</p> <p>MonitoringResources.org is a suite of complementary tools designed to guide and assist monitors and researchers in collecting and analyzing data with their monitoring programs, from the early design stage through implementation and generation of descriptive statistics. This site also serves resource managers, funding entities, and policy makers by providing a comprehensive view of past and present monitoring programs and projects in a given spatial extent. In addition, natural resource managers and funding entities can use the tool to track information about Methods, Metrics, and Protocols in the Study Plan Summary, allowing them to recommend certain procedures to implement in their program.</p> <p>Personal information is occasionally contained in CBFish and MonitoringResorces as part of a proposal when one or more of the individuals involved in a project includes professional qualifications, work history, personal contact information, or other PII in the proposal submitted. There is a notice discouraging inclusion of PII.</p> <p>Administrative data includes:</p> <p>CBFish – contains account information for both internal BPA personnel and the public. Accounts granted based on contracts or reporting relationships. Name, work email, business address and business phone number.</p>	



MODULE I – PRIVACY NEEDS ASSESSMENT

	<p>MonitoringResources – name, email address, and organizational affiliation (companies, agencies, educational institutions).</p>
<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 type="checkbox"/> Employment Information</p> <p><input type="checkbox"/> Criminal History</p> <p><input checked="" type="checkbox"/> Name, Work Phone, Work Address, Work email</p> <p><input checked="" type="checkbox"/> Other – organizational affiliation (company, agency, educational institute)</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 – the above non-sensitive PII is known to exist on 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>



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 checked="" 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

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. CBFish and MonitoringResources are essential to allow 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. (See 16 U.S.C. § 832a(f); 16 U.S.C. § 839f(a)).



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>Consent is assumed through the account creation request.</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 contracts for the websites include the appropriate Privacy Act clauses.</p>																																
<p>4. IMPACT ANALYSIS:</p> <p>How does this project or information system impact privacy?</p>	<p>Privacy impacts of CBFish and Monitoring Resources are low due to the low-sensitive nature and limited volume of PII.</p> <p>The Impact Rating is LOW</p> <table border="1" data-bbox="625 1165 1243 1722"> <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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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>A user's "Person" record can be retrieved using that person's name or email address. For all users except for those with <i>system administrator level</i> permissions, this record displays the person's organization, work email, and work phone numbers. It also shows the projects to which the person has an association. System administrators see the permission roles assigned to the user.</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-18: Financial Accounting System</p> <p>DOE-82: Grant & Contract Records for Research Projects, Science Education, & Related Activities</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>Data is provided directly by individuals.</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, in the System Security Plan.</p>

DATA USE



MODULE II – PII SYSTEMS & PROJECTS

11. How will the PII be used?	User account information is used to administer accounts, and to link users to the projects and contracts to which they have a business role association.
12. If the system derives meta data, how will the new or meta data be used? Will the new or meta data be part of an individual's record?	N/A
13. With what other agencies or entities will an individual's information be shared?	Northwest Power and Conservation Council
Reports	
14. What kinds of reports are produced about individuals or contain an individual's data?	Project reports can be queried by those with appropriate roles: review of specific projects if associated with them, review of multiple projects providing oversight for those projects. Annual account activity review to remove stale accounts.
15. What will be the use of these reports?	To monitor project progress for oversight. To monitor for inactive accounts.
16. Who will have access to these reports?	Role-based access based on lawful government purpose.
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



MODULE II – PII SYSTEMS & PROJECTS

<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>Individuals are responsible for updating their contact information and the organization removes inactive accounts based off the annual account review.</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>N/A</p>
<p>Records Management</p>	
<p>22. Identify the record(s).</p>	<p>These are formed, managed and administered in CBFish: Contracts Projects Budgets Funding Program, project and contract performance (metrics)</p>
<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. <input type="checkbox"/> Unscheduled <input checked="" type="checkbox"/> Scheduled (<i>cite NARA authority(ies) below</i>) N1-305-07-001-0012c</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>Anonymous users may access CBFish and MonitoringResources, but are limited in what they can see. Users have Roles Based Access. The PII in CBFish is only accessible to users with specific permissions based on their role. A standard user will not be able to see all of the information within the projects (e.g., contractor’s contact information). The CBFish System Administrator determines whether an individual should be given a CBFish account based on lawful government purpose. User-submitted profile information on MonitoringResources is generally available.</p>



MODULE II – PII SYSTEMS & PROJECTS

26. Who will have access to PII data?	Bonneville Power Administration and Northwest Power and Conservation Council staff with a lawful government purpose are the only users who have access to PII data; they will use the information to conduct the review of the projects.
27. How is access to PII data determined?	Access is requested and granted by role and lawful government purpose. Only individuals who are logged in and have permissions to review proposals are allowed to see data for proposals that are not their own.
28. Do other information systems share data or have access to the data in the system? If yes, explain.	No
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?	N/A
30. Who is responsible for ensuring the authorized use of personal information?	The CBFish and MonitoringResources Information Owner and Product 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/>