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** | May 24, 2023 |
| **Departmental Element & Site** | BPA Headquarters, 905 NE 11th Ave, Portland, OR |
| **Name of Information System or IT Project** | ChargePoint |
| **Exhibit Project UID** | BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions. |
| **New PIA** ☒ **Update** ☐ | New PIA. |

| | Name, Title | Contact Information Phone, Email |
|---|---|---|
| **Information System Owner** | Yvette Gill<br>Supervisory IT Specialist | 503-230-3947<br>yrgill@bpa.gov |
| **Information Owner** | Julie Jenkins<br>Supervisory Supply Systems Analyst | 360-418-2653<br>jajenkins@bpa.gov |

# MODULE I – PRIVACY NEEDS ASSESSMENT

| | | |
|---|---|---|
| **Local Privacy Act Officer** | Candice Palen<br>Privacy Act Officer | 503-230-5602<br>cdpalen@bpa.gov |
| **Cyber Security Expert** reviewing this document (e.g. ISSM, CSSM, ISSO, etc.) | Nick Choi<br>ISSO | 503-230-5397<br>hcchoi@bpa.gov |
| **Person Completing this Document** | Ron McIntire<br>Supply Systems Analyst | 360-418-8092<br>rlmcintire@bpa.gov |
| **Purpose of Information System or IT Project** | ChargePoint offers electric vehicle charging solutions, which includes hardware for the actual charging and software solutions for managing electric vehicle fleets.<br><br>ChargePoint collects information related to the charging of electric fleet vehicles and provides the charging information to BPA. The information documented in ChargePoint includes the following information for government-owned electric vehicles in BPA's fleet: the license plate number, assigned Radio Frequency Identification (RFID) number, fleet assignment, Vehicle Identification Number (VIN), Departmental code, and an email address that serves as the driver ID for the vehicle custodian. The VIN and license plate numbers are tied to the vehicle custodian who would be responsible for a number of vehicles. This information is only collected for Electric Vehicles in BPA's fleet, not personal vehicles.<br><br>For administrative access, the system collects BPA employee or contractor first and last name, business email, business address, and business phone number. | |
| **Type of Information Collected or Maintained by the System**: | ☐ SSN<br>☐ Medical & Health Information<br>☐ Financial Information<br>☐ Clearance Information<br>☐ Biometric Information<br>☐ Mother's Maiden Name<br>☐ DoB, Place of Birth | |

# MODULE I – PRIVACY NEEDS ASSESSMENT

| | |
|---|---|
| | ☐ Employment Information<br>☐ Criminal History<br>☒ Name, Work Phone, Work Email Address<br>☐ Other –<br>This information would be stored in ChargePoint's system. This is only for a limited group of people namely the Admin for the system and the fleet custodians and supervisors. Information is retained as long as BPA retains a contract with the vendor for this service and is removed if/when the contract ends. |
| **Has there been any attempt to verify PII does not exist on the system?**<br>**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.* | N/A |
| **If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)** | Non-sensitive PII is stored on the system. |

## 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<br>☒ Federal Employees<br>☒ 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 I – PRIVACY NEEDS ASSESSMENT

**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**<br>**What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?** | 42 U.S.C. § 7101; Federal Property and Administrative Services Act of 1949, sec. 202(b); 40 U.S.C. § 483(b); and 41 CFR 109: DOE Property Management Regulations, Fixing America's Surface Transportation Act (FAST Act), Executive Order 13693 section 7(f), and Executive Order 13693 section 3(h)(vii) |
| **2. CONSENT**<br>**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)?** | Fleet users have no opportunity to consent to specific uses or decline to provide information. Fleet custodians are entered into the system by the administrator and only name, work email and work phone number are entered into the system. Because access to a website is required and that requires measures to control access and to identify who accessed the information and if they made any changes to the information. |

# 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 Privacy Impact is Low.

Chargepoint 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

| **Privacy Impact Analysis** | 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 | | |

**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.**

No information will be retrieved by name or user ID.

| MODULE II – PII SYSTEMS & PROJECTS | |
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| **6. SORNs**<br>**Has a Privacy Act System of Records Notice (SORN) been published in the *Federal Register*?**<br>**If "Yes," provide name of SORN and location in the *Federal Register*.** | N/A |
| **7. SORNs**<br>**If the information system is being modified, will the SORN(s) require amendment or revision?** | No |
| **DATA SOURCES** | |
| **8. What are the sources of information about individuals in the information system or project?** | Information collected on fleet vehicles will include time of use, vehicle information, and amount of power consumption. |
| **9. Will the information system derive new or meta data about an individual from the information collected?** | No |
| **10. Are the data elements described in detail and documented?** | Documented in the SSP. The information identified is the only data collected. |
| **DATA USE** | |
| **11. How will the PII be used?** | Fleet data (not PII) will be used for reporting on fuel consumption and greenhouse gas reduction requirements. |
| **12. If the system derives meta data, how will the new or meta data be used?**<br>**Will the new or meta data be part of an individual's record?** | N/A |

| MODULE II – PII SYSTEMS & PROJECTS | |
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| **13. With what other agencies or entities will an individual's information be shared?** | No PII will be shared with other agencies. |
| **Reports** | |
| **14. What kinds of reports are produced about individuals or contain an individual's data?** | System log reports will contain a custodian name assigned to ensure maintenance for a vehicle; system access reports will show who has accessed the system. |
| **15. What will be the use of these reports?** | Fleet energy use will be tracked for performance targets and operational cost profiles. System access reports will be used as necessary. |
| **16. Who will have access to these reports?** | Information Owner approved individuals with a need-to-know will be provided access. |
| **Monitoring** | |
| **17. Will this information system provide the capability to identify, locate, and monitor individuals?** | The system does not monitor people. |
| **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.** | Fleet custodian information will be manually entered into Chargepoint by the fleet specialist when the Radio Frequency Identification (RFID)/dongle/account is established for the associated vehicle and updated manually as necessary. |

| MODULE II – PII SYSTEMS & PROJECTS | |
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| **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 externally hosted Software as a Service (SaaS). |
| **Records Management** | |
| **22. Identify the record(s).** | The system will contain information on BPA-owned and GSA-leased electric vehicles, and associated charging information. Vehicle information will include: Equipment ID (License Plate Number), Year, Make, Model, Serial Number. Additional information will included Radio Frequency Identification (RFID) card (issued by ChargePoint) associated to the vehicle, and assigned equipment custodian and department. Charging information will be recorded and reported at the vehicle level. |
| **23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.** | Check appropriately and cite as required.<br><br>☐ Unscheduled ☒ Scheduled (cite NARA authority(ies) below)<br><br>Agency File Plan File Code FE-1110 (FE-1110 Facility, Space, Vehicle, Equipment, Stock and Supply Administrative and Operational Records); GRS 5.4.010 |
| **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?** | Access to data in the system is controlled through Role Based Access Control (RBAC); periodic review of accounts will be performed to ensure appropriate level of access. |
| **26. Who will have access to PII data?** | System Administrator, Information Owner and authorized delegates. |
| **27. How is access to PII data determined?** | Need-to-know basis or as the Information Owner deems necessary. |
| **28. Do other information systems share data or have access to the data in the system? If yes, explain.** | No |

| MODULE II – PII SYSTEMS & PROJECTS | |
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| **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?** | Information Owner |
| **END OF MODULE II** | |

| SIGNATURE PAGE | | |
|---|---|---|
| | **Signature** | **Date** |
| **System Owner** | YVETTE GILL<br>**(Print Name)**<br>Digitally signed by YVETTE GILL<br>Date: 2023.10.16 08:44:48 -07'00'<br>**(Signature)** | _____ |
| **Information Owner** | JULIE JENKINS<br>**(Print Name)**<br>Digitally signed by JULIE JENKINS<br>Date: 2023.10.17 07:13:12 -07'00'<br>**(Signature)** | _____ |
| **Local Privacy Act Officer** | RACHEL HULL<br>**(Print Name)**<br>Digitally signed by RACHEL HULL<br>Date: 2023.10.17 08:51:16 -07'00'<br>**(Signature)** | _____ |
| **DOE Chief Privacy Officer** | William K. Hunt<br>**(Print Name)**<br>Digitally signed by William K. Hunt<br>Date: 2023.10.12 15:11:27 -04'00'<br>**(Signature)** | _____ |