



PRIVACY IMPACT ASSESSMENT:  
 BPA – Daily Activity Record Tracking (DART)  
 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](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](mailto:Privacy@hq.doe.gov)

No hand-written submissions will be accepted.

This template may not be modified.

**MODULE I – PRIVACY NEEDS ASSESSMENT**

<b>Date</b>	10/07/2021	
<b>Departmental Element &amp; Site</b>	Bonneville Power Administration Dittmer and Munro facilities	
<b>Name of Information System or IT Project</b>	Daily Activity Record Tracking (DART)	
<b>Exhibit Project UID</b>	BPA is a Non-Appropriated Federal agency and is exempt from Exhibit 300 submissions	
<b>New PIA</b> <input checked="" type="checkbox"/>	This is a new PIA for an existing system.	
<b>Update</b> <input type="checkbox"/>		
	<b>Name, Title</b>	<b>Contact Information Phone, Email</b>
<b>Information System Owner</b>	Pete Raschio Supervisory Electrical Engineer	360-418-2563 <a href="mailto:pjaschio@bpa.gov">pjaschio@bpa.gov</a>



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## MODULE I – PRIVACY NEEDS ASSESSMENT

<b>Information Owner</b>	Michelle Cathcart Vice President, Transmission System Operations, TO	360-418-8775 <a href="mailto:mmcathcart@bpa.gov">mmcathcart@bpa.gov</a>
<b>Local Privacy Act Officer</b>	Candice Palen, CGI FOIA/Privacy Act Officer	(503) 230-3602 <a href="mailto:cdpalen@bpa.gov">cdpalen@bpa.gov</a>
<b>Cyber Security Expert</b> reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Josh Perkins	jjperkins@bpa.gov
<b>Person Completing this Document</b>	Angie Sparland	<a href="mailto:acsparland@bpa.gov">acsparland@bpa.gov</a>
<b>Purpose of Information System or IT Project</b>	<p>The mission of DART is to support real-time dispatch and control of the Federal Columbia River Power System (FCRPS) to ensure safe, reliable, and economic operation.</p> <p>DART supports the capture, execution, and tracking of event data. It operates in planning, real-time, and after-the-fact operational windows to support Field and Dispatch activities and decision-making for operation and maintenance of the Transmission System.</p> <p>DART’s main functions include outage management, dispatch logging, and communication of and real-time access to outage and logging data for individuals, organizations, and external entities.</p> <p>This system authenticates user access through Active Directory. The system collects name, email address and permit related data to ensure that personnel are qualified to perform the job.</p>	
<b>Type of Information Collected or Maintained by the System:</b>	<input type="checkbox"/> SSN <a href="#">Social Security number</a> <input type="checkbox"/> Medical & Health Information <a href="#">e.g. blood test results</a> <input type="checkbox"/> Financial Information <a href="#">e.g. credit card number</a>	



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## MODULE I – PRIVACY NEEDS ASSESSMENT

	<input type="checkbox"/> Clearance Information e.g. "Q" <input type="checkbox"/> Biometric Information e.g. finger print, retinal scan <input type="checkbox"/> Mother's Maiden Name <input type="checkbox"/> DoB, Place of Birth <input type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, email, permit type and related data <input checked="" type="checkbox"/> Other – Please Specify – login ID and password for authentication to AD.
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<p><b>Has there been any attempt to verify PII does not exist on the system?</b></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>	YES
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<p><b>If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)</b></p>	Interview with Resource Managers and review of the System Security Plan.
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### Threshold Questions

<p><b>1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?</b></p>	Yes
<p><b>2. Is the information in identifiable form?</b></p>	Yes
<p><b>3. Is the information about individual Members of the Public?</b></p>	Yes
<p><b>4. Is the information about DOE or contractor employees?</b></p>	<input checked="" type="checkbox"/> Federal Employees <input checked="" type="checkbox"/> Contractor Employees



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## MODULE I – PRIVACY NEEDS ASSESSMENT

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?**

Federal Columbia River Transmission System Act  
 16 United States Code Chapter 12g (2006).  
 Act Of Oct.18, 1974, 88 Stat.1376.  
 Public Law No.93-454, S.3362.



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## MODULE II – PII SYSTEMS & PROJECTS

<p><b>2. CONSENT</b></p> <p><b>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)?</b></p>	<p>The PII is obtained through Active Directory and manual data entry. There is no opportunity for a person to consent.</p>																																
<p><b>3. CONTRACTS</b></p> <p><b>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?</b></p>	<p>DART is internal; there is no contract for the system. All internal contractors have Privacy Act clauses in their contracts.</p>																																
<p><b>4. IMPACT ANALYSIS:</b></p> <p><b>How does this project or information system impact privacy?</b></p>	<p>The Privacy Impact is LOW.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="text-align: left;">Confidentiality Factors</th> <th style="text-align: center;">Low</th> <th style="text-align: center;">Moderate</th> <th style="text-align: center;">High</th> </tr> </thead> <tbody> <tr> <td>Identifiability</td> <td style="text-align: center;">X</td> <td></td> <td></td> </tr> <tr> <td>Quantity of PII</td> <td style="text-align: center;">X</td> <td></td> <td></td> </tr> <tr> <td>Data Field Sensitivity</td> <td style="text-align: center;">X</td> <td></td> <td></td> </tr> <tr> <td>Context of Use</td> <td style="text-align: center;">X</td> <td></td> <td></td> </tr> <tr> <td>Obligation to Protect Confidentiality</td> <td style="text-align: center;">X</td> <td></td> <td></td> </tr> <tr> <td>Access to and Location of PII</td> <td style="text-align: center;">X</td> <td></td> <td></td> </tr> <tr> <td><b>Overall Privacy Risk</b></td> <td style="text-align: center;"><b>X</b></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			<b>Overall Privacy Risk</b>	<b>X</b>		
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<p><b>5. SORNs</b></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>PII is not retrieved by identifier in the regular course of business.</p>
<p><b>6. SORNs</b></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><b>7. SORNs</b></p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	<p>N/A</p>
<b>DATA SOURCES</b>	
<p><b>8. What are the sources of information about individuals in the information system or project?</b></p>	<p>The PII information comes from Active Directory and manual entry.</p>
<p><b>9. Will the information system derive new or meta data about an individual from the information collected?</b></p>	<p>No</p>
<p><b>10. Are the data elements described in detail and documented?</b></p>	<p>Data elements are described in the System Security Plan.</p>



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### DATA USE

<b>11. How will the PII be used?</b>	The system uses name and email address for system administration. Permit data is used to ensure that personnel are qualified to work on specific jobs.
<b>12. If the system derives meta data, how will the new or meta data be used?</b>  <b>Will the new or meta data be part of an individual's record?</b>	No
<b>13. With what other agencies or entities will an individual's information be shared?</b>	California Independent System Operator – Name, email, permit type and related data
<b>Reports</b>	
<b>14. What kinds of reports are produced about individuals or contain an individual's data?</b>	Certified contractor and permit holder reports
<b>15. What will be the use of these reports?</b>	These reports are posted on SharePoint
<b>16. Who will have access to these reports?</b>	SharePoint users with access to the TOZ site
<b>Monitoring</b>	
<b>17. Will this information system provide the capability to identify, locate, and monitor individuals?</b>	None
<b>18. What kinds of information are collected as a function of the monitoring of individuals?</b>	N/A



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<b>MODULE II – PII SYSTEMS &amp; PROJECTS</b>	
19. Are controls implemented to prevent unauthorized monitoring of individuals?	N/A
<b>DATA MANAGEMENT &amp; MAINTENANCE</b>	
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.	Data is kept current and accurate via Active Directory and manual verification.
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	System is housed in the BPA Control Centers at Dittmer and Munro and the data is replicated between Control Center databases.
<b>Records Management</b>	
22. Identify the record(s).	Tracking Daily Outages on GRID
23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	N1-305-07-001-4d TL-1400 - Destroy 30 years after the records are closed.
24. Records Contact	IGLM@bpa.gov
<b>ACCESS, SAFEGUARDS &amp; SECURITY</b>	
25. What controls are in place to protect the data from unauthorized access, modification or use?	DART has an implemented and assessed System Security Plan that documents all appropriate baseline security controls as dictated by its assessed FIPS impact rating, DOE Directives, and Organizational security policies. These controls were assessed in July 2021 with final approval expected no later than October 2021.





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<p><b>26. Who will have access to PII data?</b></p>	<p>Roles with views to PII are documented within the System Account Management Plan.</p>
<p><b>27. How is access to PII data determined?</b></p>	<p>User access is restricted by assigned roles</p>
<p><b>28. Do other information systems share data or have access to the data in the system? If yes, explain.</b></p>	<p>Yes. This is documented within the DART System Security Plan. Regulation-required outage details are provided by the system to California Independent System Operator (CAISO), and the Integrated Curtailment and Redispatch System (iCRS) extracts data from DART on reported outages.</p>
<p><b>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?</b></p>	<p>Yes, there is an ISA with California Independent System Operator</p>
<p><b>30. Who is responsible for ensuring the authorized use of personal information?</b></p>	<p>The Resource Manager (System Administrator).</p>

**END OF MODULE II**



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SIGNATURE PAGE		
	Signature	Date
<b>System Owner</b>	<hr/> (Signature)	<hr/>
<b>Information Owner</b>	<hr/> (Signature)	<hr/>
<b>Local Privacy Act Officer</b>	<hr/> (Print Name) <hr/> (Signature)	<hr/>
<b>Chief Privacy Officer</b>	<hr/> (Print Name) <hr/> (Signature)	<hr/>