	Affects Members Of the Public? **X**

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	10/12/2021
Departmental Element & Site	Department of Energy (DOE) Bonneville Power Administration (BPA) Portland, Oregon
Name of Information System or IT Project	E2 Shop System (aka Shop Tech) BAE-GSS
Exhibit Project UID	BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions.
New PIA X **Update**	This is a new PIA for an existing system.

	Name, Title	**Contact Information Phone, Email**
System Owner	Yvette Gill Supervisory IT Specialist	(503) 230-3947 yrgill@bpa.gov
Information Owner	Loren Bradd, TFHS Supervisory Work Planner Scheduler	(360) 619-6951 ljBradd@bpa.gov

MODULE I – PRIVACY NEEDS ASSESSMENT

Local Privacy Act Officer	Candice Palen, CGI FOIA/Privacy Act Officer	(503-230-3602) cdpalen@bpa.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi, JLS ISSO	(503) 230-5397 hcchoi@bpa.gov
Person Completing this Document	Jeffrey Gilmour, TTB Supervisory IT Specialist	(503) 230-3425 jbgilmour@bpa.gov
Purpose of Information System or IT Project	E2 Shop is a Commercial off the Shelf (COTS) application used in the BPA Fabrication Shop, a shop responsible for producing customized tools, parts, storage units, etc. The application will be used to: 1) Manage and track the work performed in the fabrication shop 2) Estimate and reconcile the use of parts and tools available in the inventory 3) Facilitate internal work scheduling for fabrication, including entering time estimates to serve as production control application. Primary types of information will be pertaining to list of raw materials, and parts to complete a job including their specifications and dimensions. As a part of scheduling production control, non-sensitive PII is gathered including name and business contact information. This information is obtained by the IO organization manually (of approximately 20 vendors) through the request for quote process (RFQ).	
Type of Information Collected or Maintained by the System:	☐ SSN Social Security number ☐ Medical & Health Information e.g. blood test results ☐ Financial Information e.g. credit card number ☐ Clearance Information e.g. "Q" ☐ Biometric Information e.g. finger print, retinal scan	

MODULE I – PRIVACY NEEDS ASSESSMENT

<table>
<tr>
<td rowspan="6"></td>
<td>☐ Mother's Maiden Name</td>
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<td>☐ DoB, Place of Birth</td>
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<td>☐ Employment Information</td>
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<td>☐ Criminal History</td>
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<td>☐ Name, Phone, Address:</td>
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<tr>
<td>☒ Other – Please Specify: Vendor company name, address and sales representative contact information (first and last name, email and phone numbers) in addition to BPA staff business contact information (user name, first and last name, business phone and email).</td>
</tr>
</table>

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.*	N/A – Non-sensitve PII is known to exist in the system.
If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)	N/A

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?**	Yes
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 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 **What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?**	The Bonneville Purchasing instructions provide organizations with the authority to purchase goods, services and construction under the Bonneville Project Act of 1937. Within the Act the Bonneville Administrator under section 16 USC 832a(f) has the authorization in the name of the United States to enter into contracts, agreements and arrangements including the amendment, modification, adjustment, or cancelation thereof and the compromise or final settlement of any claim arising thereunder, and to make such expenditures, upon such terms and conditions and in such manner as they may deem necessary.

MODULE II – PII SYSTEMS & PROJECTS

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)?	Consent is obtained when there is a Request for Quote. Individuals also consent by voluntarily providing their information.
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?	No – This is a COTS product that will be hosted internally by BPA staff.

4. IMPACT ANALYSIS:

How does this project or information system impact privacy?

The Privacy Impact is LOW.

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

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.**	Information is retrived by company name, not individual name, in the regular course of business. No SORN is required.
6. SORNs **Has a Privacy Act System of Records Notice (SORN) been published in the *Federal Register*?** **If "Yes," provide name of SORN and location in the *Federal Register*.**	N/A
7. SORNs **If the information system is being modified, will the SORN(s) require amendment or revision?**	N/A
DATA SOURCES	
8. What are the sources of information about individuals in the information system or project?	PII is obtained through email and uploaded manually for vendor information by the business. For internal PII, they are also obtained manually and entered from existing data sources.
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?	Yes, the data elements are described in the System Security Plan.
DATA USE	

MODULE II – PII SYSTEMS & PROJECTS

11. How will the PII be used?	Vendors loaded into the E2 database are contacted to source materials.
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?	None

Reports	
14. What kinds of reports are produced about individuals or contain an individual's data?	N/A
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

MODULE II – PII SYSTEMS & PROJECTS

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.	Manual and periodic review of user accounts (and associated non-sensitive PII) is performed by the IO and workgroup (of approximately 9 unique user accounts and profiles).
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	This is a locally hosted web application operated within one network and physical location. Regular backup and recovery services will be provided by the infrastructure services teams.
Records Management	
22. Identify the record(s).	The system contains data (vendors, part numbers, job numbers and shops) for each production/fabrication in each shop. Reports can be run on a shop, a part (which goes through several shops) or an individual user to see the work completed. This is used for historical purposes, employee efficiency, and planning future production runs.
23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	N1-305-07-001-11b FE-1200 - Destroy 5 years after the records are closed, approved, submitted, or become inactive.
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?	The System Owner has implemented and tested all baseline security controls appropriate to its FIPS categorization in accordance with the BPA Cybersecurity Program Plan (CSPP) and DOE Directives.
26. Who will have access to PII data?	Authorized BPA application administrators as approved by the Information Owner will be provided access to the system and access to the PII.
27. How is access to PII data determined?	Permissions will be granted by the BPA application administrator based on a need-to-know basis and periodically reviewed by the Information Owner.

MODULE II – PII SYSTEMS & PROJECTS

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?	Information Owner

END OF MODULE II

PRIVACY
PROGRAM

SIGNATURE PAGE

	Signature	Date
System Owner	_____ **(Print Name)** _____ **(Signature)**	_____
Information Owner	_____ **(Print Name)** _____ **(Signature)**	_____
Local Privacy Act Officer	_____ **(Print Name)** _____ **(Signature)**	_____
Ken Hunt **Chief Privacy Officer**	_____ **(Print Name)** _____ **(Signature)**	_____

PRIVACY
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