Affects Members Of the Public?	Mark if Applicable w/ an 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	1/24/2023
Departmental Element & Site	Bonneville Power Administration
Name of Information System or IT Project	FlightDocs/BAE-GSS
Exhibit Project UID	BPA is a Non-Appropriated Federal agency and is exempt from Exhibit 300 submissions
New PIA ☐ **Update** ☒	Revision to the FlightDocs PIA, adding Flight Trak Scheduler module, which replaces FlightTrak Scheduler.

	Name, Title	Contact Information Phone, Email
Information System Owner	Yvette Gill Supervisory IT Specialist, JL	(503) 230-3947 yrgill@bpa.gov
Information Owner	Jon Guyer Aircraft Machinist Foreman III, TAA	503-230-4120 jtguyer@bpa.gov

MODULE I – PRIVACY NEEDS ASSESSMENT

Local Privacy Act Officer	Candice Palen Privacy Act Officer	503-230-5602 cdpalen@bpa.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi ISSO, JLS	(503) 230-5397 hcchoi@bpa.gov
Person Completing this Document	Jeff Gilmour Supervisory IT Specialist, JLST	(503) 230-3425 jbgilmour@bpa.gov
Purpose of Information System or IT Project	This application provides two main functions: 1) The maintenance module tracks aircraft maintenance for aircraft operated by Bonneville Power Administration. This information is used to create official maintenance records, airworthiness release, reviewing projected maintenance, and recording scheduled and unscheduled maintenance activities on aircraft. The maintenance module is also used to track aircraft parts inventory, including creation of purchase orders for parts and materials, receipt of items on issued purchase orders, assigning parts to aircraft, and assigning to inventory for future use. This module collects name, certificate number, and work email for members of the Aircraft Services team as part of user profiles in the system. 2) The flight module manages BPA's aviation operations for fixed wing airplanes and helicopters and is used to schedule and track flights, assign crew and passengers to flights, track crew currency (fit-to-fly) status, and record training. The module maintains passenger and crew personal information for aircraft operations and reporting, international travel requirements, and notification purposes as directed by the Federal Aviation Administration (FAA). PII is collected in accordance with NTSB, FAA, and United States and Canadian customs requirements. In the event of an incident or accident, BPA Aircraft Services provides emergency contact information to first responders, the National Transportation Safety Board (per NTSB SPC9904 pages 8-9) and the Federal Aviation Administration.	
Type of Information Collected or	☐ SSN Social Security number ☒ Medical & Health Information – Aviation medical certificate for pilots only	

MODULE I – PRIVACY NEEDS ASSESSMENT

Maintained by the System:	☐ Financial Information e.g. credit card number
	☐ Clearance Information e.g. "Q"
	☐ Biometric Information e.g. finger print, retinal scan
	☐ Mother's Maiden Name
	☒ DoB, Place of Birth – DOB is only collected for international trips
	☐ Employment Information
	☐ Criminal History
	☒ Name, (pilots - Federal Aviation Administration certification number), BPA email
	☒ Other –**all flights:** passenger weight, passenger cell phone number, passenger's emergency contact info; pilots - training certificate records (applies to approximately 800 people annually) **international flights only:** gender, country of residence, citizenship, and passport information (applies to approximately 20 people annually).

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 –PII is known to exist in the application
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

MODULE I – PRIVACY NEEDS ASSESSMENT

| | ☒ 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. Aircraft Services provides Bonneville personnel and other interested parties necessary and expedient access to Bonneville's domestic and foreign territories. FlightDocs provides the support to schedule and operate aircraft used to advance Bonneville's business mission. (See 16 U.S.C. § 832a(f); 16 U.S.C.§ 839f(a)).
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)?**	Maintenance module – consent provided through participation. Flight module – consent is assumed when the individual provides the information required to travel on a BPA aircraft.
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, this is a SaaS and the relevant Privacy clauses are included in the contracts.

MODULE II – PII SYSTEMS & PROJECTS

4. IMPACT ANALYSIS: **How does this project or information system impact privacy?**	Flightdocs 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 • Baseline Security Control testing • Account Reviews The overall privacy impact is Moderate <table><tr><td>**Confidentiality Factors**</td><td>Low</td><td>Moderate</td><td>High</td></tr><tr><td>Identifiability</td><td></td><td>X</td><td></td></tr><tr><td>Quantity of PII</td><td></td><td>X</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></td><td>X</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></td><td>X</td><td></td></tr></table>
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.**	Yes, the data is retrieved by name.

MODULE II – PII SYSTEMS & PROJECTS

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*.**	OPM GOVT-1 General Personnel Records DOE-11: Emergency Operations Notification Call List DOE-26: Official Travel Records. DOE-27: Foreign Travel Management System DOE-28: General Training Records DOE-33: Personnel Medical Records
7. SORNs **If the information system is being modified, will the SORN(s) require amendment or revision?**	BPA is working to add "weight" to DOE-26 and add BPA to DOE-27 as well as adding "passport and visa information".

DATA SOURCES

8. What are the sources of information about individuals in the information system or project?	BPA email accounts and Federal Aviation Authority (FAA) entered into the system by the Flightdocs administrator The information is provided by individual passengers to Aircraft Services directly when using the required flight mission request protocol. The information is obtained over the phone or via email with password protection or encryption in accordance with BPA policy. Crew training and certificate information is provided by crew member or standardization staff. Medical certificate is provided from physician providing flight physical for pilots.
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 in the system security plan

DATA USE

PRIVACY PROGRAM

MODULE II – PII SYSTEMS & PROJECTS

11. How will the PII be used?	Non-sensitive PII is used to identify BPA personnel who work on and sign off on aircraft maintenance activities. For all flights: • Pilots use passenger weight for aircraft weight, balance, and performance requirements. • Emergency contact is required in case of incident or accident per the FAA and National Transportation Safety Board (per NTSB SPC9904 pages 8-9). • Contact information for communicating with the customer. For International flights: Passport Number, Expiration Date, and DOB is required for Canadian and US customs. Electronic records for crew qualification and certification.
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?	Passport information is shared with both Canadian and US Customs for international travel. In case of incident or accident, information will be shared with the FAA, the NTSB, and local law enforcement/first responders.
Reports	
14. What kinds of reports are produced about individuals or contain an individual's data?	Aircraft maintenance records / reports. Senior executive travel report. Customer list (includes all individuals that fly with BPA: federal employees, contractors and the public). Flight dispatch sheet (contains passenger information including weight). Pilot currency and training report.

MODULE II – PII SYSTEMS & PROJECTS

15. What will be the use of these reports?	To track maintenance and aviation operations.
16. Who will have access to these reports?	Aviation Operations personnel (including aircraft services manager, pilots, and schedulers/dis). System Administrator (Primary Internal Application and Vendor Support) IT Asset Management and Engineering Business Analyst
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	
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.	Names and FAA number are managed by the application administrator role and reviewed according to the account management processes defined in the system security plan. Aircraft Services flight request system has a function to keep information updated. Each new flight mission request includes a request for passengers and requestors to review their information for accuracy.
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 – this is a SaaS application
Records Management	
22. Identify the record(s).	Aircraft maintenance records Information about aircraft, pilots, and individual passengers as required for scheduling and operating aircraft used by BPA.

MODULE II – PII SYSTEMS & PROJECTS

23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	Check appropriately and cite as required. ☐Unscheduled ☒ Scheduled *(cite NARA authority(ies) below)* File Code: FE-1140, Aircraft flight operations records. Retention: Destroy when 3 years old, but longer retention is authorized if required for business use. Citation:GRS 5.4.120 File Code: FE-1210, Aircraft inspection, maintenance, and modification records. Retention: Destroy 6 years after disposing of aircraft or removing equipment from inventory, but longer retention is authorized if required for business use. Citation: GRS 5.4.100.
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 BPA's Cybersecurity Program Plan Directives. This system has gone through reauthorization, artifacts have been updated, remediating one item pertaining to passwords.
26. Who will have access to PII data?	BPA SaaS administrator and other users as designated and authorized by the information owner.
27. How is access to PII data determined?	BPA SaaS administrator will implement permissions based on a need-to-know basis. Accounts will be reviewed as specified in the system security plan.
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

MODULE II – PII SYSTEMS & PROJECTS

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**_____ (Print Name) _____ (Signature)	_____
Information Owner	**Jon Guyer**_____ (Print Name) _____ (Signature)	_____
Local Privacy Act Officer	**Candice Palen**_____ (Print Name) _____ (Signature)	_____
DOE Chief Privacy Officer	_____ (Print Name) _____ (Signature)	_____