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	09/25/2023
Departmental Element & Site	Department of Energy (DOE) Bonneville Power Administration (BPA) Portland, Oregon
Name of Information System or IT Project	PeopleSoft Human Capital Management (HRMIS) BAE-GSS
Exhibit Project UID	BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions.
New PIA ☐ **Update** X	This is an updated PIA for an existing system. Previous PIA 05-04-2022. That expounds on the types of information collected and Privacy impact level.

	Name, Title	Contact Information Phone, Email
System Owner	Yvette Gill Supervisory IT Specialist	(503) 230-3947 yrgill@bpa.gov
Information Owner	James Johnson	(503)230-4610 jrjohnson@bpa.gov

MODULE I – PRIVACY NEEDS ASSESSMENT

	Supervisory Human Resources Specialist	
Local Privacy Act Officer	Privacy Act Officer Rachel Hull	503-230-5241 rlhull@bpa.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi Information System Security Officer (ISSO)	(503) 230-5397 hcchoi@bpa.gov
Person Completing this Document	James Johnson Supervisory Human Resources Specialist	(503)230-4610 jrjohnson@bpa.gov
Purpose of Information System or IT Project	The Bonneville Power Administration (BPA) Human Resources Management Information System (HRMIS) supports Federal Human Resources Management, Time Administration, and Payroll processing for BPA: • Personnel Actions Request (PAR) - Supports the data capture necessary to produce official personnel records, such as the SF-50 Notification of Personnel Action and other personnel documents that support the full range and scope of personnel actions as defined and required by the Office of Personnel Management (OPM) and other laws or regulations; • Position Management and Classification - Captures data and provides reporting capability for position information data to include position title, occupational series, pay grade, Fair Labor Standards Act determination, manager/supervisor code, bargaining unit code, and related elements; • Recruitment – Tracks applicant data for internal and external recruitment actions, and provides reporting capability as required by OPM for merit staffing actions, delegated examination, and related employment authorities; • Salary Administration – Maintains salary tables for general schedule, senior executive schedule, hourly workforce, and miscellaneous compensation plans; • Performance Management – Maintains data to track and report on performance rating plans and appraisal patterns, rating period, and rating of record; • Training Administration - Captures and provides ability to report on training data to include course dates, locations, duration, cost and completions; • Benefits –Captures data supporting employee enrollment elections in benefit programs such as Federal Employees Health Benefits (FEHB), Federal Employees Group Life Insurance Program (FEGLI), and Thrift Savings Plan (TSP) • Payroll – Processes employee pay including deductions and taxes;	

MODULE I – PRIVACY NEEDS ASSESSMENT

	• Time & Labor – Tracks and reports employee time, including leave, compensatory time, overtime, and premium pay; • Contact Information – Captures, maintains, and provides reporting capability for business continuity purposes, benefits, and manager use, including address, phone, and e-mail; • Health & Safety – Captures, maintains, and provides reporting capabilities for health and safety related functions such as workers comp claims and Family Medical Leave Act (FMLA) requests; • Telework Agreement – Includes telework schedule and location • Race and ethnicity information collected directly from the employee (previously collected from SF 181). • Employee photos for photo directory (voluntarily uploaded).
Type of Information Collected or Maintained by the System:	☒ SSN Social Security number ☐ ☒ Financial Information e.g. credit card number ☒ Clearance Information e.g. "Q" ☐ ☐ Mother's Maiden Name ☒ DoB, Place of Birth ☒ Employment Information ☐ Criminal History ☒ Name, Phone, Address ☒ Other – Please Specify Employee dependents and others' data (SSN, DOB, Name, etc.) may be captured to support processing of personnel actions, benefits elections, etc. Users may voluntarily enter profile pictures and race/ethnicity information. Per OPM, race/ethnicity collection is voluntary, but the agency must enter the information on behalf of the employee if missing.

MODULE I – PRIVACY NEEDS ASSESSMENT

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 ☒ 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.

MODULE I – PRIVACY NEEDS ASSESSMENT

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?**	• Title 5 U.S.C. Chapter 11: Office of Personnel Management • Title 5 U.S.C. Chapter 13: Special Authority • Title 5 U.S.C. Chapter 29: Commissions, Oaths, Records, and Reports • Title 5 U.S.C. Chapter 31: Authority for Employment • Title 5 U.S.C. Chapter 33: Examination, Selection, and Placement • Title 5 U.S.C. Chapter 41: Training • Title 5 U.S.C. Chapter 43: Performance Appraisal • Title 5 U.S.C. Chapter 61: Hours of Work • Title 5 U.S.C. Chapter 63; Leave • Title 5 U.S.C. Chapter 83: Retirement • Executive Order 9397: Federal Agency Use of Social Security Numbers • Executive Order 9830: Vesting Authorities in OPM for Personnel Administration • Executive Order 12107: Labor Management and the Civil Service Commission • Executive Order 12196: Occupational Safety and Health Programs for Federal Employees • Executive Order 12564: Drug Testing for Federal Employee

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)?

Most of the information being collected is required for individuals to be employed and paid by BPA, or contracted to provide services to BPA. Some information is collected voluntarily. Privacy Act statements on data collection forms (SF171 and OF612) provide the purpose of data collection and impact of not providing the data.

A Privacy Act statement is included on the system entry page; links to the statement will be provided on pages where data is collected directly from users.

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?

BPA uses supplemental labor to support federal staff with the design, development, and maintenance of the system. All work product contained in the system is owned and maintained by BPA. All contracts contain the applicable Privacy Act clauses.

4. IMPACT ANALYSIS:

How does this project or information system impact privacy?

The Privacy Impact is HIGH.

	Impact Level		
Confidentiality Factors	Low	Moderate	High
Identifiability			X
Quantity of PII			X
Date Field Sensitivity			X
Context of Use		X	
Obligation to Protect Confidentiality			x
Access to and Location of PII			X
Overall PII Confidentiality Level			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.**	YES. PII can be retrieved by an identifier. PII will routinely be retrieved by Employee ID, Social Security Number, and/or Employee Name.
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*.**	YES DOE SORNs: • DOE-2: Supervisor Maintained Personnel Records • DOE-11: Emergency Operations Notification Call List • DOE-13: Payroll and Leave Records • DOE-28: General Training Records • DOE-33: Personnel Medical Records Located at: Federal Register, Vol 74/No. 6, 1/09/2009, pp. 994-1035 Other SORNs: • OPM/GOVT-1: General Personnel Records • OPM/GOVT-10: Employee Medical File Systems Records Located at: Federal Register, Vol. 71/No. 117, 6/19/2006, p. 35342
7. SORNs **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 is individually provided and also obtained from supervisors, timekeepers, and official personnel records.

MODULE II – PII SYSTEMS & PROJECTS	
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. Data elements are described in the system support documentation.
DATA USE	
11. How will the PII be used?	To verify the identity of employees and their dependents, beneficiaries and contractors, and to support BPA's payroll, time management, benefits, recruiting, training, and performance management functions.
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

MODULE II – PII SYSTEMS & PROJECTS

13. With what other agencies or entities will an individual's information be shared?	• Concur – eGov travel system • Global AlertLink (GAL) • DOE – Updates DOE information for agency reporting • OPM – Enterprise Human Resources Integration (EHRI), eOPF, OPM FEHB Data Hub, and CFC (administered by the TASC Give Back Foundation) • NFC – Centralized Enrollment Reconciliation Clearinghouse (CLER) FEHB Health Benefits enrollment (administered by the USDA) • BENEFEDS (administered by Long Term Care Partners, LLC, with oversight by OPM) • Learning Nucleus (administered by PowerTrain, Inc., with oversight by DOE and OPM) • SSA (National Directory of New Hires (NDNH)) • U.S. Department of Treasury – Payroll payment files • FRTIB – TSP for participating employees • IRS – Withholding and tax payments • States – Withholding and tax payments • WageWorks, Inc. – Flexible spending accounts
Reports	

MODULE II – PII SYSTEMS & PROJECTS

14. What kinds of reports are produced about individuals or contain an individual's data?	Standard reports are generated by the system on a regular schedule, including: • List of current active federal employees and contractors • List of federal employee dependents/beneficiaries (restricted to HR staff) • List of bargaining unit positions (restricted to HR staff and union representatives) • List of accessions, separations and internal moves • List of employees with personnel data such as salary, grade/step entry, service computation dates, and retirement eligibility information (restricted to HR staff) The following types of reports/queries can be run by HR staff: • Employees on Leave of Absence • Pending Future Actions • Personnel Actions History • Years of Service • Employee Contact Information • FMLA Status Report The following types pf reports/queries can be run by HR staff and authorized supervisors, managers, and support personnel: • Training History • NERC-CIP Summary • Leave Balances • Timecard Reports • Missing/Incomplete Timesheets • Organizational/Staffing Reports
15. What will be the use of these reports?	Reports are used for tasks such as supporting training/development, managing payroll and reimbursement of expenses, preparing for and validating benefits and personnel actions, classification and position management, and data analysis.
16. Who will have access to these reports?	Human Resources Staff Payroll Staff Timekeepers Managers/Support Personnel Applications Support Staff Salary and bargaining unit reports are available to all staff.
Monitoring	

MODULE II – PII SYSTEMS & PROJECTS	
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.	Online and batch edits are built into the system to prevent incomplete or incorrect data entry. Data entry is reviewed prior to finalizing actions that affect employee pay or benefits. Queries and reports within HRMIS are used to verify and validate information in the system regularly. System data is provided to EHRI, and error reports are returned to the agency for correction. Self-service access by employee and supervisors ensures the accuracy and completeness of information.
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	The system is operated on premise at BPA HQ.
Records Management	
22. Identify the record(s).	Human Resources administrative data, time & labor, and payroll data. Data is tightly integrated as one process supports other downstream processes.

MODULE II – PII SYSTEMS & PROJECTS	
23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	GRS 2.4 item 010 - Employee Payroll Records GRS 2.4, item 020 - Tax Withholding records GRS 2.4, item 030 - Time/Attendance Records GRS 2.6, item 010 - Employee Training (non-mission) GRS 2.6, item 030 – Training PB-1110 - (Employee Payroll Records) - Destroy 3 years after paying agency or payroll processor validates data, but longer retention is authorized if required for business use. PB-1130 - (Tax Withholding) - Destroy 4 years after superseded or obsolete, but longer retention is authorized if required for business use. BP-1120 - (Time/Attendance) - Destroy when 3 years old, or 3 yrs. after superseded or obsolete, whichever is appropriate, but longer retention is authorized if required for business use. TR-1120 - (Training - non-mission) - Destroy when 3 years old, or 3 yrs. after superseded or obsolete, whichever is appropriate, but longer retention is authorized if required for business use. TR-1110 - (Training records) - Destroy when superseded, 3 years old, or 1 year after separation, whichever comes first, but longer retention is authorized if required for business use.
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 Federal Information Processing Standards (FIPS) categorization in accordance with the BPA Cyber Security Program Plan (CSPP) and DOE Directives.
26. Who will have access to PII data?	Human Resources Staff Payroll Staff Supervisors Safety Office Staff Security Office Staff Applications Support Staff

MODULE II – PII SYSTEMS & PROJECTS	
27. How is access to PII data determined?	Access is based on the roles and responsibilities of the individual; authorized on a need-to-know, with the least privilege access necessary to complete job duties. Access to PII data is authorized through the Human Resources office and the Payroll office, based on job roles.
28. Do other information systems share data or have access to the data in the system? If yes, explain.	Yes. All Information systems that share data with HRMIS are documented in the PeopleSoft Human Capital Management Authorization Package (CART-0109 formerly known as HRMIS SSP).
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?	Yes, we have ISAs in place for systems where data flows outside of BPA, including to OPM and DOE.
30. Who is responsible for ensuring the authorized use of personal information?	The Information Owner
END OF MODULE II	

SIGNATURE PAGE

	Signature	Date
System Owner	YVETTE GILL (Print Name) Digitally signed by YVETTE GILL Date: 2023.10.16 08:51:14 -07'00' (Signature)	
Information Owner	JAMES JOHNSON (Print Name) Digitally signed by JAMES JOHNSON Date: 2023.10.16 09:03:41 -07'00' (Signature)	
Local Privacy Act Officer	RACHEL HULL (Print Name) Digitally signed by RACHEL HULL Date: 2023.10.16 18:05:31 -07'00' (Signature)	
Ken Hunt **Chief Privacy Officer**	William K. Hunt (Print Name) Digitally signed by William K. Hunt Date: 2023.10.12 15:10:14 -04'00' (Signature)	