Department of Energy

Privacy Impact Assessment (PIA)

| Affects Members Of the Public? | |

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	04/15/2022
Departmental Element & Site	Department of Energy (DOE) Bonneville Power Administration (BPA) Portland, Oregon
Name of Information System or IT Project	Corrigo Project Name: Integrated Facilities Management – (IFM) Managed Services Vendor name: Jones Lang LaSalle (JLL)
Exhibit Project UID	BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions.
New PIA ☐ **Update** ☒	This is an update to an exiting PIA.

	Name, Title	**Contact Information Phone, Email**
System Owner	Yvette Gill, Supervisory IT Specialist, JL	yrgill@bpa.gov 503-230-3947
Information Owner	Pete Emerson	pmemerson@bpa.gov 360-418-2728

MODULE I – PRIVACY NEEDS ASSESSMENT

	Supervisory Facility Operations Specialist, NWF	
Local Privacy Act Officer	Candice Palen, CGI Privacy Act Officer	503-230-3602 cdpalen@bpa.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi, JS Information System Security Officer (ISSO)	hcchoi@bpa.gov 503-230-5397
Person Completing this Document	Marian Waggener, IT Specialist – JLST Jesse Hausmann, Lead Building Management Specialist, NWF	mawaggener@bpa.gov 360.619.6866 jjhausmann@bpa.gov 503-230-5958

Purpose of Information System or IT Project	Integrated Facilities Management (IFM) is a Managed Services contract with Jones Lang LaSalle (JLL) for the maintenance of BPA facility assets. JLL's Computerized Maintence Management, Corrigo, is a cloud-based facilities management platform that allows for tracking maintenance through the creation of work orders that are then dispatched to service providers.
	
	IFM users at BPA will use two separate Corrigo interfaces as well as a data collection tool called BEAM.
	
	• Corrigo Enterprise
	  Used by Facilities Maintenance staff to track asset maintenance and history
	
	• Corrigo Customer Portal
	  Available for all BPA Employees to submit service requests for maintenance
	
	• BEAM Software
	  Used by JLL/ProSite employees running on non-BPA mobile devices to collect asset data and upload to Corrigo
	
	Corrigo will act as the nervous system for BPA's facilities operations and maintenance. It is the repository for asset, system, and equipment information and history. It assists in the management of facilities maintenance programs and is used to assemble performance and budget data. Corrigo enables proactive maintenance	

MODULE I – PRIVACY NEEDS ASSESSMENT

	activities and provides the necessary data to drive value added business decisions and adherence to compliance regulations.
	Corrigo will collect and maintain BPA employee/contractor name and work contact information (email and phone) for the purpose of application user access as well as assigning and tracking maintenance work. Corrigo will also collect training and certifications for JLL employees. There is no information collected on members of the public.

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
	
	☐ Mother's Maiden Name
	
	☐ DoB, Place of Birth
	
	☐ Employment Information
	
	☐ Criminal History
	
	☒ Name, Phone, Address
	
	    • Name
	    • BPA Contact Information (phone and email)
	
	☒ Other – Please Specify: Training and Certifications for users

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*	N/A. The above listed PII is known to exist in the system.

MODULE I – PRIVACY NEEDS ASSESSMENT

data, and including any other personal information that is linked or linkable to a specific individual.	
If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)	

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 ☒ 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?**	Bonneville Power Administration is authorized to procure and operate a Computerized Maintenance Management System pursuant to 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.
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)?**	Users are not provided an opportunity to consent to specific uses of PII, however, individual participation is required when logging into the system for the first time and providing PII.
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?**	This is a SaaS solution that is designed, developed and maintained by the vendor, JLL. The contract includes the necessary privacy assurance clause.

MODULE II – PII SYSTEMS & PROJECTS

<table>
<tr><td rowspan="2">4. IMPACT ANALYSIS:

How does this project or information system impact privacy?</td><td colspan="2">The system is rated as LOW impact.</td></tr>
<tr><td colspan="2">

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		

</td></tr>
<tr><td>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.</td><td>PII information cannot be searched by identifier.</td></tr>
<tr><td>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.</td><td>N/A</td></tr>
</table>

MODULE II – PII SYSTEMS & PROJECTS

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?	User information is manually entered into the system.
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?	The data elements are described in the System Security Plan.

DATA USE

11. How will the PII be used?	The PII will be used to identify contact information to generate a service ticket and assign work. Currently there are no external workflows for the Service Requests.
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

MODULE II – PII SYSTEMS & PROJECTS

14. What kinds of reports are produced about individuals or contain an individual's data?	Hours to complete a specific task, hours of availability, area of responsibility, shop locations, training and certifications held by JLL (vendor) employees.
15. What will be the use of these reports?	These reports will be used to plan, schedule, assign, and monitor maintenance activities on BPA Facility Assets.
16. Who will have access to these reports?	The following user groups will have access to various reports based on their role: Facilities Managers/Leads Maintenance Planners/Schedulers Facilities Technicians

Monitoring

17. Will this information system provide the capability to identify, locate, and monitor individuals?	Technicians have GPS check-in and notification capabilities through their mobile devices. GPS acts as a compliance measure. Technicians whose GPS does not locate them near the location of a work order cannot check-in and bill hours for the assignment. Corrigo Customer Portal checks against the IP location and matches to the closest property for entering a new work order. The GPS monitoring is only activated on vendor devices. These devices are not used by BPA BFTE or CFTE, only non-CFTE who are JLL employees. No BPA personnel have access to the monitoring feature. If GPS is turned OFF and not used, the system will show the check-in and out times as highlighted yellow text. This indicates that there may be an issue with the check-in/out times.
18. What kinds of information are collected as a function of the monitoring of individuals?	The application is capable of tracking the amount of time spent on a work order using GPS. It tracks how long it takes a specific technician to arrive on-site, perform the requested work, and provides status updates to the requestor.

MODULE II – PII SYSTEMS & PROJECTS

19. Are controls implemented to prevent unauthorized monitoring of individuals?	Yes

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.	User PII is limited to business contact information for employees, and training/certification information for JLL (vendor) employees. It will be updated manually by JLL Admins after approval by the BPA COR for new user requests and terminated user requests. Accuracy, relevance and completeness of provided data is handled by the client. Metadata is used in an aggregated manner for analytics and benchmarking.
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 application is hosted in the cloud by an external vendor.

Records Management

22. Identify the record(s).	BPA Facilities Asset Data only. The purpose of the data is to manage the life cycle of the asset from acquisition to disposal.
23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	DAA-GRS-2016-0011-0001 and DAA-GRS-2016-0011-0008 GRS 5.4 - 010 (inventories) and GRS 5.4 - 070 (inspection, maintenance & service records) / Retain for life of asset + 3 years.
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.

MODULE II – PII SYSTEMS & PROJECTS

26. Who will have access to PII data?	Data in this application is controled using role-based-access-control RBAC). All users have visibility to the non-sensitive PII listed above.
27. How is access to PII data determined?	Access to PII data in reports is determined on a need-to-know-basis and as authorized by the Information Owner (IO) and delegates. All users have visibility to the PII. User access must be approved by the IO/IO delegate based on need-to-know.
28. Do other information systems share data or have access to the data in the system? If yes, explain.	No. There is no interconnection to BPA Active Directory or any other BPA systems.
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?	The Information Owner

END OF MODULE II

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)	_____