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	August 29, 2023
Departmental Element & Site	Bonneville Power Administration Headquarters, 905 NE 11th Ave, Portland OR
Name of Information System or IT Project	Asset Management and Engineering Application GSS – Land Information System (LIS)
Exhibit Project UID	BPA is a self-funded Federal Agency and is exempt from Exhibit 300 submissions.
New PIA ☐ **Update** ☒	Update to 2013 Land Information System (LIS) PIA.

	Name, Title	Contact Information Phone, Email
Information System Owner	Yvette Gill, JL Supervisory IT Specialist	503-230-3947 yrgill@bpa.gov
Information Owner	Connie Reiner, TERO Real Property Services Projects Manager	503-230-4739 cjreiner@bpa.gov

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MODULE I – PRIVACY NEEDS ASSESSMENT

Local Privacy Act Officer	Rachel Hull Privacy Act Officer	503-230-5241 rlhull@bpa.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Steven Lohmann, JLST-2 IT Specialist, SSM Delegate	503-230-3073 srlohmann@bpa.gov
Person Completing this Document	Connie Reiner, TERO Real Property Services Projects Manager	503-230-4739 cjreiner@bpa.gov
Purpose of Information System or IT Project	Land Information System (LIS) is a database of information from official Real Property records of BPA's land rights. The database is used throughout BPA for running reports and is connected to the eGIS MapViewer to allow visualization of the affected property in relationship to transmission and power lines. Access to this information is permissions-based, and access is granted for lawful government purposes only. LIS is managed through the IT work management system for tracking. This application is used to support the legal rights BPA holds for maintenance of transmission lines, substations, and other grid assets. While land transaction is stored in LIS, no banking or financial information is retained in the system. User access requires BUD ID and username. Database includes property owner names, addresses, and phone number.	
Type of Information Collected or Maintained by the System:	☐ SSN ☐ Medical & Health Information ☐ Financial Information ☐ Clearance Information ☐ Biometric Information ☐ Mother's Maiden Name ☐ DoB, Place of Birth ☐ Employment Information ☐ Criminal History	

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MODULE I – PRIVACY NEEDS ASSESSMENT

	☒ Name, Phone, Address (**Landowner** – name, phone number, and address; **System Access** – name, BUD ID) ☐ Other – Please Specify
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 exists on this 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 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.

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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?**	The Bonneville Power Project 16 U.S.C. §§ 832a(f), 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)?**	Consent is provided by the landowner as part of the negotiation process. Land transactions are typically available in the public record. Users consent by requesting access to LIS.
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 Supplemental Labor contracts include the Privacy Act clause (5.1) as prescribed in the Bonneville Purchasing Instructions (BPI).

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="4">The privacy impact is LOW due to the limited amount of landowner information in the system.</td>
</tr>
<tr>
<td>

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 colspan="4">Data can be retrieved by landowner's name, tract ID (unique identifier for each record), and location.

System users can be searched by name or BUD ID.</td>
</tr>
<tr>
<td>6. SORNs

Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>?

If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</td>
<td colspan="4">DOE-24 Land Record System</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?**	Information is obtained from individual landowners, grantees, grantors, title report, or county records.
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 (SSP).
DATA USE	
11. **How will the PII be used?**	Landowner information is used to identify owners who need to be notified about BPA activities such as maintenance or construction activities that are primarily related to transmission lines, communication facilities, and fish and wildlife projects.
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?**	Information for specific impacted landowners may be shared with vendors contracting for rights review services to BPA (this is a service BPA contracts for where the vendor reviews data related to existing land rights so that BPA isn't wasting time or money attempting to purchase the same land right twice). Contracts include the standard Privacy clauses between BPA and the vendor.

MODULE II – PII SYSTEMS & PROJECTS

Reports	
14. What kinds of reports are produced about individuals or contain an individual's data?	Individual ownership reports (i.e. number of acquisitions across specific landowner, general queries for internal tracking, and historical information). Customizable reports of landowner by project may be manually created as needed. System user report generated and reviewed annually.
15. What will be the use of these reports?	Reports will be used to track acquisition landowners and to query historical information. Reports are also used to provide notification and communication between BPA and landowners regarding projects impacting their property. **System user report used to review and remove access as necessary, but at least annually.**
16. Who will have access to these reports?	Field Realty Specialists and Supervisors, Attorneys, and Right-of-Way Management Agents receive reports related to specific projects, but don't have access to the database. Role Based Access Controls in use with semi-annual review.
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.	Original information is provided by landowners, assessors' offices, and title companies. Information is collected at time of acquisition.
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 information system is not operated in multiple sites.
Records Management	
22. Identify the record(s).	Real property data
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) N1-305-07-001-10c
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?	Access to data through the LIS is limited to approved users through Roles Based Access Controls (RBAC). System security is documented in the LIS System Security Plan.
26. Who will have access to PII data?	Authorized users belonging to Landowner Information role group will be granted access to view the PII. Contractors working on specific projects will receive access to PII related to their projects, privacy clause is included in contracts.
27. How is access to PII data determined?	Access to this information is provided when needed for a lawful government purpose, and it is managed 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.	Yes, eGIS Live Map can view this information that is connected to the Land Information System (RPM-LIS), LiveMap, and the ArcGIS Enterprise System, which includes the ArcGIS Portal, Federated ArcGIS Server, ArcGIS Data Store and the Federated ArcGIS Image Server.
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 – same System Owner for the connected systems.
30. Who is responsible for ensuring the authorized use of personal information?	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)	_____
DOE Chief Privacy Officer	_____ (Print Name) _____ (Signature)	_____

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