



PRIVACY IMPACT ASSESSMENT: *Meltwater News*
PIA Template Version 5 – August 2017

Affects Members Of the Public?	<input checked="" type="checkbox"/>
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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	05/26/2023	
Departmental Element & Site	BPA Headquarters	
Name of Information System or IT Project	Meltwater News	
Exhibit Project UID	Contract No. 87279	
New PIA <input checked="" type="checkbox"/>	This is a new PIA for an existing system	
Update <input type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
Information System Owner	Yvette Gill, JLS Supervisory IT Specialist	503-230-3947 yrgill@bpa.gov



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Information Owner	Maryam Habibi, Manager of Media Relations and Policy Writing	(503) 230-4413 maasgharian@bpa.gov
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, JLS IT Specialist	503-230-5397 hcchoi@bpa.gov
Person Completing this Document	Kevin Wingert, Media Relations Specialist	(503) 230-4140 kwingert@bpa.gov
Purpose of Information System or IT Project	<p>Meltwater News (Company News Meltwater) is an online media monitoring platform that BPA subscribes to in order to access relevant news clippings or public social media posts that pertain to our agency, mission or industry-related topics of interest. The platform also enables direct dissemination of news releases to members of the media and media outlets. Finally, the platform contains business contact information for those outlets and members of the media. BPA is a consumer of the content provided by Meltwater including news articles/stories as well as publically available information provided by members of the media including name, title, employer, and contact information.</p> <p>Login information and business contact information is provided to access the Meltwater system. Access to articles and a database that may contain PII on reporters (specifically their email addresses, work phone, work address) are accessible once a user is logged in. This is done principally to enable BPA users to contact reporters, potentially to provide them with additional information, new story ideas or possibly seek a correction for something already printed. This is a fundamental aspect of a BPA Media Relations Specialist’s job in media relations and is universal across the federal landscape.</p> <p>PII is exported on a limited basis, a Media Relations Specialist may export lists of reporters and their business contact information that they deal with on a routine basis or as relates to a specific topic or area of interest (reporters who cover utilities or government within our service territory or environmental reporters). The Meltwater system can potentially capture information of people/reporters who are highly critical of BPA. Most often, these are reporters that could be from a particular media outlet that has a specific political or social leaning.</p> <p>For example, if there is a bad experience or if a Media Relations Specialist sees a particularly negative story about BPA produced by a reporter that has errors or does</p>	



MODULE I – PRIVACY NEEDS ASSESSMENT

not contain balanced information, they might reach out to the reporter, establish contact, and ask if they'd like to hear BPA's side of the story. At a minimum, the Media Relations Specialists will make sure the reporter knows how to contact them next time they're doing a story related to BPA so there is some representation.

The Meltwater system provides professional/business contact information only. On the social media side, the only information provided is the name of the account of whomever or whichever organization made a public post. BPA does not provide content to Meltwater. BPA pitches stories to members of the media using contact and background information provided by Meltwater. BPA also leverages Meltwater to review publicly published stories for accuracy and submits requests for revisions/corrections as needed.

Meltwater collects name, login ID, password, and business contact information on three BPA employees with access to the system.

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
- Name, Login ID, Password, business contact information
- Other

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,

No. PII exists on the system.



MODULE I – PRIVACY NEEDS ASSESSMENT

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.

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?

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

<p>1. AUTHORITY</p> <p>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</p>	<p>Northwest Power Act, 839b(g). Public information; 839b(g)(1) To insure widespread public involvement in the formulation of regional power policies, the Council and Administrator shall maintain comprehensive programs to— 839b(g)(1)(A). Inform the Pacific Northwest public of major regional power issues.</p>
<p>2. CONSENT</p> <p>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)?</p>	<p>BPA employees have the option to provide their information (name, business number and business email) to login to Meltwater.</p>
<p>3. CONTRACTS</p> <p>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?</p>	<p>Privacy Act clauses were not included in the sub-contract, as they are not required when orders (BPA Awards) are placed against an existing Government-Wide Acquisition Contract that can be used by federal agencies and external Contractors. In this case, the existing government contract is with NASA.</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>4. IMPACT ANALYSIS:</p> <p>How does this project or information system impact privacy?</p>	<p>The overall privacy risk is LOW.</p> <p>Meltwater is designed to protect PII and mitigate privacy risk via the following administrative, technical, and physical controls:</p> <ul style="list-style-type: none"> • Strict access control enforcement based on need-to-know <table border="1" data-bbox="625 590 1409 972"> <thead> <tr> <th>Confidentiality Factors</th> <th>Low</th> <th>Moderate</th> <th>High</th> </tr> </thead> <tbody> <tr> <td>Identifiability</td> <td>x</td> <td></td> <td></td> </tr> <tr> <td>Quantity of PII</td> <td>x</td> <td></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>x</td> <td></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>x</td> <td></td> <td></td> </tr> </tbody> </table>	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		
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<p>5. SORNs</p> <p>How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?</p> <p>If yes, explain, and list the identifiers that will be used to retrieve information on the individual.</p>	<p>Data is typically retrieved by media outlet name or by doing a search on particular topics that either a media outlet or member of the media has written about. It is possible to search for a specific reporter or broadcaster by name, but this is unusual.</p>																																
<p>6. SORNs</p> <p>Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>?</p> <p>If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</p>	<p>No. (DOE maintains a Meltwater contract and has no SORN listing for the platform.)</p>																																



MODULE II – PII SYSTEMS & PROJECTS

<p>7. SORNs</p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	<p>N/A</p>
<p>DATA SOURCES</p>	
<p>8. What are the sources of information about individuals in the information system or project?</p>	<p>Individuals or their employers provide the information.</p>
<p>9. Will the information system derive new or meta data about an individual from the information collected?</p>	<p>No.</p>
<p>10. Are the data elements described in detail and documented?</p>	<p>The data elements will be document in the System Security Plan (pending completion).</p>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>The PII provided by BPA is used to login into the system and provide contact information for participants.</p>
<p>12. If the system derives meta data, how will the new or meta data be used?</p> <p>Will the new or meta data be part of an individual's record?</p>	<p>N/A</p>
<p>13. With what other agencies or entities will an individual's information be shared?</p>	<p>BPA does not share the information found in Meltwater.</p>
<p>Reports</p>	



MODULE II – PII SYSTEMS & PROJECTS

<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>We produce daily news clippings that may contain both a reporter's name and email address, depending on whether the individual media outlet they are working for publishes that content on their own website. Additionally, we produce occasional reports on specific topics being covered in the media. If the media outlet has chosen to publish the name and email of the reporter on their own website, that will be reproduced in the report. Finally, in rare circumstances where we have repeated negative interactions with an individual reporter, we may produce a report of their published stories and use that report as part of a discussion with the individual outlet about any perceived biases or journalism ethics violations.</p>
<p>15. What will be the use of these reports?</p>	<p>To collect relevant news clippings or public social media posts that pertain to our agency, mission or industry-related topics of interest. As noted above, in rare circumstances where we have repeated negative interactions with an individual reporter, we may produce a report of their published stories and use that report as part of a discussion with the individual outlet about any perceived biases or journalism ethics violations.</p>
<p>16. Who will have access to these reports?</p>	<p>Our daily news clippings report is produced for all executives and managers at BPA. In instances where managers believe the report may be useful to their workgroups, we share these reports with them as well. Reports produced on topics are typically only shared with executives and media relations specialists. Individual reporter reports are only shared with members of the media relations team and the Director of Communications.</p>
<p>Monitoring</p>	
<p>17. Will this information system provide the capability to identify, locate, and monitor individuals?</p>	<p>No</p>
<p>18. What kinds of information are collected as a function of the monitoring of individuals?</p>	<p>N/A</p>
<p>19. Are controls implemented to prevent unauthorized monitoring of individuals?</p>	<p>N/A</p>

DATA MANAGEMENT & MAINTENANCE



MODULE II – PII SYSTEMS & PROJECTS

<p>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.</p>	<p>Meltwater routinely updates and validates listings of media outlets and media members multiple times a year.</p>
<p>21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?</p>	<p>Access to the Meltwater system is limited to three individual user accounts with passwords and a fourth media team shared account.</p>
<p>Records Management</p>	
<p>22. Identify the record(s).</p>	<p>There are no records associated with the Meltwater system itself.</p>
<p>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</p>	<p>N/A</p>
<p>24. Records Contact</p>	<p>IGLM@bpa.gov</p>
<p>ACCESS, SAFEGUARDS & SECURITY</p>	
<p>25. What controls are in place to protect the data from unauthorized access, modification or use?</p>	<p>The master contract contains contains Clause 15-17 for Information Assurance as well as FISMA language on cyber security controls requirements.</p>
<p>26. Who will have access to PII data?</p>	<p>BPA Media Relations Team, BPA Social Media Team</p>
<p>27. How is access to PII data determined?</p>	<p>BPA users do not determine access to PII. That is determined by Meltwater.</p>
<p>28. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>No</p>



MODULE II – PII SYSTEMS & PROJECTS

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?	Media Relations and Policy Writing Manager, Digital Media and Visual Design Manager

END OF MODULE II



SIGNATURE PAGE		
	Signature	Date
System Owner	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
Information Owner	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
Local Privacy Act Officer	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
DOE Chief Privacy Officer	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>



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