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	July 22, 2024
Departmental Element & Site	Bonneville Power Administration (BPA) HQ, 905 NE 11th Ave, Portland, OR
Name of Information System or IT Project	BPA Parking Program
Exhibit Project UID	BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions.
New PIA X **Update**	New PIA for an existing collection of SharePoint and hardcopy files.

	Name, Title	Contact Information Phone, Email
Information System Owner	Noah Carlson, NWPO Management & Program Analyst	(503) 230-5941 nmcarlson@bpa.gov
Information Owner	Frank Dunn, NWPO Operations & Planning Specialist	(360) 418-0657 fldunn@bpa.gov

PRIVACY PROGRAM

MODULE I – PRIVACY NEEDS ASSESSMENT

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.)	N/A	
Person Completing this Document	Frank Dunn, NWPO Operations & Planning Specialist	(360) 418-0657 fldunn@bpa.gov
Purpose of Information System or IT Project	BPA operates a parking program to manage the available parking at the Portland Headquarters site. The parking program is limited to BPA staff, visitor parking is not authorized in the HQ parking garage. Visitors supporting BPA programs are provided validated offsite parking at a nearby parking garage. Members of the public are not included in this program. The parking program is required to comply with GSA building management rules. The program operates primarily via SharePoint webforms for information collection, but also includes some hardcopy forms related to parking violation notices. In addition to parking registration for employees, the program also covers parking registration for disabled parking spots, contractors, carpool registration, ride share program, bicycle commuter registration, and mass transit program registration. The various programs provide BPA employees and contractors access to various commuting options to maximize the space available for parking and reduce the cost to both BPA and the users of these programs. The programs are for parking by both employees and contractors, bicycle commuting registration, transit commuting registration, and parking space management including ensuring appropriate use of the parking spaces. The various programs collect nearly identical information on participants, including name, BPA email/work email, HRMIS ID, permit number and/or transit pass number. The following five programs include, BFTE parking, CFTE parking, bicycle commuting, transit commuting, and parking space management. Parking violations may include a license plate number and state if no parking permit is present to allow for identification of the owner of the vehicle for communication purposes. The disabled parking registration collection includes the expiration date of the state issued parking placard. (The Reasonable Accommodations office coordinates with the Commuting office to provide access to short-term disabled parking. Registrants for this program do not share medical referrals with the Commuting office.)	
Type of Information Collected or	☐ SSN	

MODULE I – PRIVACY NEEDS ASSESSMENT

Maintained by the System:	☐ Medical & Health Information
	☐ Financial Information
	☐ Clearance Information
	☐ Biometric Information
	☐ Mother's Maiden Name
	☐ DoB, Place of Birth
	☐ Employment Information
	☐ Criminal History
	☒ Name, work phone number, work email address
	☒ Other – HRMIS ID number, parking program permit number, expiration date of state issued disabled parking permit, license plate # & state of issue, transit pass number

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, the above identified information is known to exist in the program
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

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 Project Act codified in 16 U.S.C. 832a, 41 CFR Part 102-74 Subpart B – Parking Facilities, Executive Order 13150, Federal Workforce Transportation.

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)?**	Individuals consent to collection as part of the program registration process as well as to abide by the rules outlined by the program for the safe operation of the programs.
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?**	SharePoint contract includes the standard privacy clauses. Contract employees that support the parking program have standard privacy clauses included in their contracts.
4. IMPACT ANALYSIS: **How does this project or information system impact privacy?**	BPA Privacy assesses the impacts of the Parking Program is LOW due to the efforts made to ensure low data field sensitivity of the collection.

PII Factors	Low	Med	High
Identifiability	X		
Quantity of PII		X	
Data Field Sensitivity	X		
Context of Use	X		
Obligation to Protect Confidentiality	X		
Access to & Location of PII	X		
Overall Privacy Risk Level	X		

FjDYAVN: NWPO – BPA Parking Program

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.**	This program retrieves information by identifiers including name, HRMIS ID, permit/pass number, and email address.
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*.**	DOE-16: Federal Employee Subsidy Program Records DOE-25: U.S. Commuter Locator and Parking Space Information System
7. SORNs **If the information system is being modified, will the SORN(s) require amendment or revision?**	Yes, edits already submitted as part of DOE SORN renewal process.
DATA SOURCES	
8. What are the sources of information about individuals in the information system or project?	The individual provides the information when they register for one or more of the programs.
9. Will the information system derive new or meta data about an individual from the information collected?	No

MODULE II – PII SYSTEMS & PROJECTS

10. Are the data elements described in detail and documented?	The structure of SharePoint is documented in the SharePoint System Security Plan. There is no description of the data elements for the Parking program because the data doesn't interface with any other systems at BPA. This is a standalone list of registered participants and a standalone list of parking violations associated to a permit number. In SharePoint each list describes the data elements, but nothing further exists.
DATA USE	
11. How will the PII be used?	The information will be used to ensure that only registered participants are using the program and that participants are following parking guidelines. While the parking program is currently free, this information may be used in the future to facilitate collection of fees. In the event of violations to the parking guidelines violators will be notified and supervisors may be notified.
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?	N/A
Reports	
14. What kinds of reports are produced about individuals or contain an individual's data?	N/A – current reports do not reference individuals rather they reference volumes with analysis.
15. What will be the use of these reports?	To manage the parking program.
16. Who will have access to these reports?	Members of the Business Operations & Services (NWPO) organization.
Monitoring	
17. Will this information system provide the capability to identify, locate, and monitor individuals?	No

MODULE II – PII SYSTEMS & PROJECTS

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.	Employees are responsible for updating their own information. Parking program processes are in place to update permit numbers associated with the employee if new numbers are issued.
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

Records Management

22. Identify the record(s).	The records include registration for the commuting program, which includes parking registration, mass transit registration, carpool registration, bicycle program registration, equipment assignment (bicycle lockers), facility access (bicycle commuters are provided access to the HQ gym to shower/change after commuting). Additionally, the program retains records related to parking violations to facilitate compliance with the program rules.
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)* SR-1200 Security Records - Short Term Business Use RETENTION: Destroy 6 years after the records are closed. CITATION: N1-305-07-001-15b

MODULE II – PII SYSTEMS & PROJECTS

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?	SharePoint uses roles-based access controls, the Commuting team verifies access and permissions annually to the Commuting SharePoint site. Physical controls such as securing the data in a locked filing cabinet inside an access-controlled office serve to protect the hardcopy data from unauthorized access.
26. Who will have access to PII data?	Business Operations & Services Operations and Planning Specialist, Business Operations & Services Management and Program Analyst, Business Operations & Services Contractors, and the Operations and Planning Manager.
27. How is access to PII data determined?	Permissions based access to organization SharePoint. Position and lawful government purpose for physical access to hardcopy PII data.
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
30. Who is responsible for ensuring the authorized use of personal information?	Information Owner and Information System 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)**	_____