



Affects Members Of the Public?

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	May 24, 2023	
Departmental Element & Site	BPA Headquarters, 905 NE 11th Ave, Portland, OR	
Name of Information System or IT Project	Researching Images Video Etc Resources (RIVER) formerly called Digital Archive Management System (DAMS)	
Exhibit Project UID	Bonneville Power Administration is a self-funded Federal Agency and is exempt from Exhibit 300 submissions.	
New PIA <input type="checkbox"/>	This is an update for the DAMS PIA.	
Update <input checked="" type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
System Owner	Yvette Gill Supervisory IT Specialist - JLS	503-230-3947 yrgill@bpa.gov
Information Owner	Heidi Helwig Supervisory Public Affairs Specialist - DKE	503-230-3458 hyhelwig@bpa.gov



MODULE I – PRIVACY NEEDS ASSESSMENT

Local Privacy Act Officer	Candice Palen, CGI FOIA/Privacy Act Officer	503-230-3602 cdpalen@bpa.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi, JLS Information System Security Officer	503-230-5397 hcchoi@bpa.gov
Persons Completing this Document	Tina Kay, ECC Digital Asset Librarian	503-230-5913 tlkay@bpa.gov
Purpose of Information System or IT Project	<p>Researching Images Video Etc Resources (RIVER), formerly called Digital Archive Management System (DAMS), is a Service as a System (SaaS) for searching, retrieving, indexing, storing, sharing, and viewing photographs and other digital file types. Access to the images is bifurcated into public and internal-only access types.</p> <p>Internal Access provides access to data and information such as photos that are manually uploaded and stored in RIVER. There is no digital transfer from another system. Many of the files are physical and must be digitized at time of upload.</p> <p>If the names of individuals in a photo are known, the names are entered when photos or files are added to the system's index. Names are manually assigned to the photos by entering names into one or more of the following data fields: Title, Description, Keywords, File Name. Data sources include BPA library-created spreadsheets, human memory, and verbal verification. Some historical photos have metadata tags that are included in the upload. Many photos don't include names so searching by name produces limited results. Most of the photos in the archive are related to dam or transmission line construction, therefore, in the normal course of business, the archival video and photos are not searched by name. Most of the older archival items don't have names associated with the video or image. Additionally, where an image is tagged with a name, that person can request the removal of their name from the tag.</p> <p>The system stores photos and corresponding names for BPA employees/contractors and members of the public.</p> <p>Public Access is through a webpage that will be available upon request from BPA Library staff or through a link added to BPA's public-facing webpage. The photos included in the public collection will be reviewed prior to publication. Photos that include people will only be added to the public collection if they have a historical provenance associated with the photo. Names are not included on photos in the public collection, per established Library procedure. This website doesn't allow downloading, or searching beyond categories established by the librarians such as the name of a specific site or some other generalized term.</p>	



MODULE I – PRIVACY NEEDS ASSESSMENT

<p>Type of Information Collected or Maintained by the System:</p>	<p><input type="checkbox"/> SSN</p> <p><input type="checkbox"/> Medical & Health Information</p> <p><input type="checkbox"/> Financial Information</p> <p><input type="checkbox"/> Clearance Information</p> <p><input type="checkbox"/> Biometric Information</p> <p><input type="checkbox"/> Mother’s Maiden Name</p> <p><input type="checkbox"/> DoB, Place of Birth</p> <p><input type="checkbox"/> Employment Information</p> <p><input type="checkbox"/> Criminal History</p> <p><input checked="" type="checkbox"/> Name Internal Access site will contain some photos with the name(s) of individuals in either the title or the metadata. Public Access site will not include names in titles of photos, and no metadata is available to the public.</p> <p><input checked="" type="checkbox"/> Other – Please Specify: There will be <u>photos</u> (and likely videos) of individuals on the site. An example of the types of videos on the site can be found here: https://www.youtube.com/@BonnevillePower</p>
<p>Has there been any attempt to verify PII does not exist on the system?</p> <p><i>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.</i></p>	<p>N/A – there is PII.</p>
<p>If “Yes,” what method was used to verify the system did not contain PII? (e.g. system scan)</p>	<p>N/A</p>

Threshold Questions



MODULE I – PRIVACY NEEDS ASSESSMENT

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 <input checked="" type="checkbox"/> Federal Employees <input checked="" type="checkbox"/> 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>The Bonneville Power Project 16 U.S.C. §§ 832a(f), 839f(a), 44 U.S.C. § 1907 and 44 U.S.C. § 1911.</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>If a photo is taken for publication, initial consent is obtained at the time of event. An Individual can request immediate removal or masking if they do not want their likeness portrayed in a historical photograph.</p> <p>Photos considered for publication on the public site will be reviewed for historical provenance and have names removed before publication. Additionally, if someone requests that their photo is removed from the internal site it will also be removed from the public site if published there as well.</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>Yes. The appropriate privacy protection clause is included in the contract with the software vendor. Additionally, all BPA Supplemental Labor contracts include the Privacy Act clause (5.1) as prescribed in the Bonneville Purchasing Instructions (BPI).</p>



MODULE II – PII SYSTEMS & PROJECTS

4. IMPACT ANALYSIS:

How does this project or information system impact privacy?

The privacy impact is MODERATE due to video/photographic likeness and the inclusion of members of the public.

Researching Images Video Etc Resources (RIVER) is designed to protect PII and mitigate privacy risk via the controls outlined in this document and the System Security Plan (SSP).

RIVER is designed to protect PII and mitigate privacy risk via the following administrative, technical, and physical controls:

- Strict access control enforcement based on need-to-know
- Administrative and Technical controls

Privacy Impact Analysis	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	

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.

The routine use of the BPA photographic library will be to retrieve digital assets by event, subject, date, or name. "Name" is the only identifier used to search for data. Only applicable with Internal Access. No identifiers used with Public Access.



MODULE II – PII SYSTEMS & PROJECTS

<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>DOE-62 Historical Files—Published Information Concerning Selected Persons in the Energy Field.</p>
<p>7. SORNs</p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	<p>Yes, modify “Categories of Individuals Covered by the System” to include DOE employees, contractors and select personnel from the energy field. Modify the “Categories of Records” to include photographs and video. Modify the “Purpose” to records are used for historical information regarding DOE and subordinate elements. Modify the “System Location(s)” to include BPA.</p> <p>As of 8/31/23, the proposed revision to DOE-62 Historical Files—Published Information Concerning Selected Persons in the Energy Field SORN:</p> <p>“Employees and contractors (former and current) of the Department of Energy, including the National Nuclear Security Administration. Additionally, limited members of the public who are participating in DOE sponsored events.”</p> <p>Once these SORN modifications are approved, this PIA will be updated to reflect the SORN changes are in place.</p>
<p>DATA SOURCES</p>	
<p>8. What are the sources of information about individuals in the information system or project?</p>	<p>Information about individuals in the system is sourced from historical records created and/or maintained by BPA.</p>
<p>9. Will the information system derive new or meta data about an individual from the information collected?</p>	<p>The system will not create new data about individuals.</p>
<p>10. Are the data elements described in detail and documented?</p>	<p>The detailed data elements are described in a spreadsheet maintained by the BPA Library. High level data descriptions will be included in the system security plan and the BPA Librarian Administrative Guide.</p>

DATA USE



MODULE II – PII SYSTEMS & PROJECTS

<p>11. How will the PII be used?</p>	<p>Internal Access: names of individuals along with keywords, tags, locations and events associated with an archive will be used to search files.</p> <p>Public Access: no names will be visible, no searching.</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>The data will not be shared with other agencies or entities.</p>
<p>Reports</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>Internal Access: Activity log will indicate the number of times specific items have been viewed or downloaded, logging of photos accessed and downloaded, which will be reviewed semi-annually.</p> <p>Public Access: Total count of site visits.</p>
<p>15. What will be the use of these reports?</p>	<p>Review of popular items in the catalogue, identifying problematic usage.</p>
<p>16. Who will have access to these reports?</p>	<p>System Administrator and Information Owner</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>



MODULE II – PII SYSTEMS & PROJECTS

<p>19. Are controls implemented to prevent unauthorized monitoring of individuals?</p>	<p>N/A</p>
<p>DATA MANAGEMENT & MAINTENANCE</p>	
<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>Individuals provide information about themselves at the time the record is captured.</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>This is a Software as a Service (SaaS) application with the data residing on Azure provided hosting services.</p>
<p>Records Management</p>	
<p>22. Identify the record(s).</p>	<p>Records include digital photos, videos, audio files and PDF files.</p>
<p>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</p>	<p>Check appropriately and cite as required. <input type="checkbox"/> Unscheduled <input checked="" type="checkbox"/> Scheduled (cite NARA authority(ies) below) BPA schedule item N1-305-07-1-17d2, News Releases and Publications Records, Permanent.</p>
<p>24. Records Contact</p>	<p>Information Governance & Lifecycle Management 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>Role based access control (RBAC) through Active Directory to enforce least privilege and need-to-know concepts has been implemented and will be maintained by the Application Administrator and Information Owner.</p>
<p>26. Who will have access to PII data?</p>	<p>Internal Access: BPA workforce will have access to historical, non-sensitive PII data. Public Access: Access to view photos curated by BPA librarians, no access to PII or photo metadata.</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>27. How is access to PII data determined?</p>	<p>Internal Access: Images are placed in the database by BPA Library personnel. Some may have metadata providing the name of the person(s) in the photo.</p> <p>Public Access: no access to PII other than photos themselves, which are vetted for historical provenance.</p>
<p>28. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>No other systems share or have access to data within the Researching Images Video Etc Resources (RIVER) solution.</p>
<p>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?</p>	<p>N/A</p>
<p>30. Who is responsible for ensuring the authorized use of personal information?</p>	<p>The Information Owner is responsible for ensuring authorized use of the system.</p>

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)	_____