



PRIVACY IMPACT ASSESSMENT: BAE – Schedule Anywhere
PIA Template Version 5 – August 2017

Affects Members Of the Public?	<input 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	May 23, 2023	
Departmental Element & Site	BPA Headquarters, 905 NE 11th Ave, Portland, OR	
Name of Information System or IT Project	Schedule Anywhere – Third Party Website	
Exhibit Project UID	BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions.	
New PIA Update	<input checked="" type="checkbox"/>	This is a new PIA for a third party website.
	<input type="checkbox"/>	
	Name, Title	Contact Information Phone, Email
System Owner	Yvette Gill Supervisory IT Specialist	503-230-3904 yrgill@bpa.gov
Information Owner	Bradley Hansen Supervisory Public Utilities Specialist	509-822-4506 bthansen@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 ISSO	503-230-5397 hcchoi@bpa.gov
Person Completing this Document	Justin Steel Supervisory IT Specialist	503-230-3854 jasteel@bpa.gov
Purpose of Information System or IT Project	<p>Schedule Anywhere is the employee shift scheduling software for Transmission Scheduling. The tools on this website primarily supports scheduling of a 24/7 rotational workforce. Schedule Anywhere is considered the source of record for scheduling with the union and the workforce. This website aids users in providing communication directly with employees via text and email.</p> <p>The Schedule Anywhere software is used by one small team of 30 people in System Operations for Power Transmission at BPA; these real time operations roles require 24/7 coverage and this is a tool that allows managers the flexibility to create and update work schedules. All personnel belong to the Real Time Operations organization in specific scheduling sub-groups for a few locations including Dittmer and Munro. This Software on this website is the source of record for scheduling, which means if there was an issue, a report would be generated to validate who was supposed to be working their respective shifts.</p> <p>Schedule Anywhere is a web based scheduling tool that specializes in 24 hour coverage and allows flexibility in creating and modifying shifts. While it isn't connected to any BPA systems it allows for manager's to create the shifts for coverage and employees to be assigned to the shifts or volunteer to cover open shifts. Time keeping is conducted through another system, but can be verified against the records in this system.</p> <p>Website where additional information can be found about this software: Employee Scheduling Software Staff Scheduling Software (scheduleanywhere.com).</p>	
Type of Information Collected or	<input type="checkbox"/> SSN	



MODULE I – PRIVACY NEEDS ASSESSMENT

Maintained by the System:	<input type="checkbox"/> Medical & Health Information <input type="checkbox"/> Financial Information <input type="checkbox"/> Clearance Information <input type="checkbox"/> Biometric Information <input type="checkbox"/> Mother’s Maiden Name <input type="checkbox"/> DoB, Place of Birth <input type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Phone, (email address personal or business, first and last name and personal phone number) <input type="checkbox"/> Other – Please Specify
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Has there been any attempt to verify PII does not exist on the system? DOE Order 206.1, <i>Department of Energy Privacy Program</i> , 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 the system.
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If “Yes,” what method was used to verify the system did not contain PII? (e.g. system scan)	N/A.
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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?

Department of Energy Authorization Act, Title 42 United States Code (U.S.C.) Section 7101, et seq.

Chapter 61 of Title 5 of the United States Code establishes the basic 40-hour workweek for federal employees and authorizes agencies to use flexible or alternative schedules.



MODULE II – PII SYSTEMS & PROJECTS

<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>Employees can elect to not input their email or phone number, but they would then have to login to the website to check for updates to the schedule.</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>The NIST Rev 800-53 Rev 5 Security and Privacy requirements are included in the contract.</p>																																
<p>4. IMPACT ANALYSIS:</p> <p>How does this project or information system impact privacy?</p>	<p>The overall privacy risk is LOW (only 30 people use the system)</p> <p>Schedule Anywhere 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 1222 1243 1770"> <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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MODULE II – PII SYSTEMS & PROJECTS

<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>An open shift would trigger a requirement to identify personnel who could cover the shift. From that list personnel would receive communication until the shift is filled.</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>DOE-2: Personnel Supervisor Maintained Personnel Records.</p>
<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>Email, first and last name, and phone number are entered manually at the time of account creation.</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>Yes, the data elements are documented in the System Security Plan.</p>
<p>DATA USE</p>	



MODULE II – PII SYSTEMS & PROJECTS

11. How will the PII be used?	For scheduling of open shifts for Public Utilities Specialist (Transmission Scheduling) at Dittmer or Munro locations.
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?	Yes, the schedules assigned to an individual.
13. With what other agencies or entities will an individual's information be shared?	None.
Reports	
14. What kinds of reports are produced about individuals or contain an individual's data?	Number and name of employees assigned to transmission scheduling shifts. Log of system changes is also generated.
15. What will be the use of these reports?	To ensure shift coverage, evidence of work obligation.
16. Who will have access to these reports?	Users will have access to the schedule.
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

<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>All users will have the ability to update or remove their contact information at any time should they chose.</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>N/A.</p>
<p>Records Management</p>	
<p>22. Identify the record(s).</p>	<p>Schedule Anywhere is Transmission Scheduling’s source of record for shift work requirements. Transmission Scheduling is a 24/7/365 business unit. The employees work six twelve hour shifts and one eight hour shift per pay period. Schedule anywhere provides a web-based system for establishing, modifying and viewing the employee’s work schedule. Employees know when they are required to work via the schedule in Schedule Anywhere.</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.</p> <p><input type="checkbox"/> Unscheduled <input checked="" type="checkbox"/> Scheduled (cite NARA authority(ies) below)</p> <p>GRS 2.4.030</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 System Owner has implemented and tested all baseline security controls appropriate to its FIPS categorization in accordance with BPA’s Cybersecurity Program Plan (CSPP) directives and requirements.</p>
<p>26. Who will have access to PII data?</p>	<p>Users can only access their own information. Admins have access to PII for all personnel. The only PII that is available is Name, Phone, Address (email address personal or business, first and last name and personal phone number)</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>27. How is access to PII data determined?</p>	<p>Permissions set for administrative personnel who are managing filling open shifts.</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>
<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.</p>

END OF MODULE II

SIGNATURE PAGE

	Signature	Date
<p>System Owner</p>	<p>_____</p> <p>(Print Name)</p> <p>_____</p> <p>(Signature)</p>	<p>_____</p>
<p>Information Owner</p>	<p>_____</p> <p>(Print Name)</p>	<p>_____</p>



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	<hr/> <p>(Signature)</p>	
Local Privacy Act Officer	<hr/> <p>(Print Name)</p>	
	<hr/> <p>(Signature)</p>	
<i>Ken Hunt</i> Chief Privacy Officer	<hr/> <p>(Print Name)</p>	
	<hr/> <p>(Signature)</p>	