



PRIVACY IMPACT ASSESSMENT: JLST – SkyRouter (SaaS)
PIA Template Version 5 – August 2017

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|--------------------------------|-------------------------------------|
| Affects Members Of the Public? | <input checked="" type="checkbox"/> |
|--------------------------------|-------------------------------------|

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

| | | |
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| Date | 11/17/2021 | |
| Departmental Element & Site | Department of Energy (DOE) Bonneville Power Administration (BPA) Portland, Oregon | |
| Name of Information System or IT Project | SkyRouter BAE-GSS | |
| Exhibit Project UID | BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions. | |
| New PIA <input checked="" type="checkbox"/> | This is a new PIA for a new system. | |
| Update <input type="checkbox"/> | | |
| | Name, Title | Contact Information Phone, Email |
| System Owner | Yvette Gill - Supervisory IT Specialist, JL | (503) 230-3947 yrgill@bpa.gov |
| Information Owner | Ken Tinseth - Supervisory Aircraft Services Specialist, TAA | (503) 230-4115 khtinseth@bpa.gov |



MODULE I – PRIVACY NEEDS ASSESSMENT

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| Local Privacy Act Officer | Candice D Palen 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, JLS | (503) 230-5397 hcchoi@bpa.gov |
| Person Completing this Document | Jeff Gilmour - Supervisory IT Specialist, JLST | (503) 230-3425 jbgilmour@bpa.gov |
| Purpose of Information System or IT Project | <p>Skyrouter is a SaaS system used in conjunction with GPS hardware installed on BPA aircraft. The software tracks real-time location information for BPA aircraft for operational response purposes. It also contains flight plan information entered by pilots and other personnel in the aviation office.</p> <p>The graphical user interface displays both map-based and tabular information on the aircraft's location, status, and flight plan information. This information is available for viewing by BPA control center operations and aircraft services personnel. The flight plan information is used to alert defined contacts of overdue aircraft.</p> <p>This application will NOT be used for scheduling flights and creating manifests.</p> <p>Pilots and aircraft services personnel can input passenger information including name and business contact information. Passengers include employees, contractors, and members of the public.</p> | |
| Type of Information Collected or Maintained by the System: | <input type="checkbox"/> SSN Social Security number <input type="checkbox"/> Medical & Health Information e.g. blood test results <input type="checkbox"/> Financial Information e.g. credit card number <input type="checkbox"/> Clearance Information e.g. "Q" <input type="checkbox"/> Biometric Information e.g. finger print, retinal scan <input type="checkbox"/> Mother's Maiden Name <input type="checkbox"/> DoB, Place of Birth <input type="checkbox"/> Employment Information | |



MODULE I – PRIVACY NEEDS ASSESSMENT

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| | <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name and business contact information (phone and email address) <input type="checkbox"/> Other – Please Specify |
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| <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> | N/A – Non sensitive PII is known to exist in the application |
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| <p>If “Yes,” what method was used to verify the system did not contain PII? (e.g. system scan)</p> | Manual review of SaaS |
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Threshold Questions

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| <p>1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?</p> | YES |
| <p>2. Is the information in identifiable form?</p> | YES |
| <p>3. Is the information about individual Members of the Public?</p> | YES |
| <p>4. Is the information about DOE or contractor employees?</p> | YES or NO (If Yes, select with an “X” in the boxes below) <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.



MODULE I – PRIVACY NEEDS ASSESSMENT

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

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| <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 Act provides administrative authority to contract to fulfill Bonneville Power Administration’s mission. Aircraft Services provides Bonneville personnel and other interested parties necessary and expedient access to Bonneville’s domestic and foreign territories. SkyRouter provides the support to schedule and operate aircraft used to advance Bonneville’s business mission. (See 16 U.S.C. § 832a(f); 16 U.S.C.§ 839f(a)).</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>No. The PII is manually entered by pilots using passenger manifests. Passenger manifest information is provided by individuals using “opt-in” consent.</p> |



MODULE II – PII SYSTEMS & PROJECTS

| <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, this is a SaaS and the relevant Privacy clauses will be included in the contracts.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|-------------------------|------|----------|------|-----------------|---|--|--|-----------------|---|--|--|------------------------|---|--|--|----------------|---|--|--|---------------------------------------|--|---|--|-------------------------------|---|--|--|----------------------|---|--|--|
| <p>4. IMPACT ANALYSIS:</p> <p>How does this project or information system impact privacy?</p> | <p>The overall privacy impact is LOW</p> <table border="1"> <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></td> <td>X</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 | | |
| 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 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <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>No, the information is not retrieved by identifier in the regular course of business.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |



MODULE II – PII SYSTEMS & PROJECTS

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| <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>N/A</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>Manually entered by pilots using passenger manifests.</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, data elements are described within the System Security Plan (SSP)</p> |
| <p>DATA USE</p> | |
| <p>11. How will the PII be used?</p> | <p>Non-sensitive PII is used to identify BPA aircraft passengers and notify them of flight status.</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> |



MODULE II – PII SYSTEMS & PROJECTS

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| <p>13. With what other agencies or entities will an individual's information be shared?</p> | <p>None</p> |
| <p>Reports</p> | |
| <p>14. What kinds of reports are produced about individuals or contain an individual's data?</p> | <p>Flight log reports retain historical flight information for up to 6 months.</p> |
| <p>15. What will be the use of these reports?</p> | <p>Flight logs will be generated as needed for business purposes.</p> |
| <p>16. Who will have access to these reports?</p> | <p>Aircraft Services Personnel</p> |
| <p>Monitoring</p> | |
| <p>17. Will this information system provide the capability to identify, locate, and monitor individuals?</p> | <p>Yes, only during the flight as the flight is tracked by Blue Sky GPS tracking hardware.</p> |
| <p>18. What kinds of information are collected as a function of the monitoring of individuals?</p> | <p>Names, phone numbers and emails of pilots and names of passengers</p> |
| <p>19. Are controls implemented to prevent unauthorized monitoring of individuals?</p> | <p>Yes. Access will be restricted and authorized based on a need-to-know basis. In addition, the BPA SaaS Administrator will carry out a review and verification of user accounts on a quarterly basis.</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>Names and records are manually entered prior to each flight.</p> |



MODULE II – PII SYSTEMS & PROJECTS

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| <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 – this is a SaaS application</p> |
| <p>Records Management</p> | |
| <p>22. Identify the record(s).</p> | <p>Flight location and trip data</p> |
| <p>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</p> | <p>GRS 5.4, item 120 FE-1140 - Destroy when 3 years old, but longer retention is authorized if required for business use.</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 Directives.</p> |
| <p>26. Who will have access to PII data?</p> | <p>BPA SaaS administrator and other users as designated and authorized by the Information Owner.</p> |
| <p>27. How is access to PII data determined?</p> | <p>BPA SaaS administrator will implement permissions based on a need-to-know basis. Accounts will be reviewed on a quarterly basis.</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>Information Owner</p> |



MODULE II – PII SYSTEMS & PROJECTS

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/> |
| <i>Ken Hunt</i> Chief Privacy Officer | <hr/> | |



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PIA Template Version 5 – August 2017

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| | (Print Name) _____ | |
| | (Signature) _____ | |