



PRIVACY IMPACT ASSESSMENT: JLST – VMS  
PIA Template Version 5 – August 2017

Affects Members Of the Public?	X
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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>

**MODULE I – PRIVACY NEEDS ASSESSMENT**

<b>Date</b>	07/19/2022
<b>Departmental Element &amp; Site</b>	Bonneville Power Administration Portland, Oregon
<b>Name of Information System or IT Project</b>	Vegetation Management System (VMS)
<b>Exhibit Project UID</b>	BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions
<b>New PIA Update</b>	This is an updated PIA (last PIA 04-11-2017)
<input type="checkbox"/>	
<input checked="" type="checkbox"/>	

	Name, Title	Contact Information Phone, Email
<b>Information System Owner</b>	Yvette Gill, JL-3, Supervisory IT Specialist	<a href="mailto:yrqill@bpa.gov">yrqill@bpa.gov</a> , 503-230-3947
<b>Information Owner</b>	Charles Sheppard, TFBV-DOB1	<a href="mailto:casheppard@bpa.gov">casheppard@bpa.gov</a> , 360-418-2987
<b>Local Privacy Act Officer</b>	Candice Palen Privacy Act Officer	503-230-5602 <a href="mailto:cdpalen@bpa.gov">cdpalen@bpa.gov</a>



## MODULE I – PRIVACY NEEDS ASSESSMENT

<b>Cyber Security Expert</b> reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi, JLS-3, IT Specialist	<a href="mailto:hchoi@bpa.gov">hchoi@bpa.gov</a> , 503-230-5397
<b>Person Completing this Document</b>	Eric Lowrance, JLST-2 Geographer	<a href="mailto:eblowrance@bpa.gov">eblowrance@bpa.gov</a> , 503-230-5759
<b>Purpose of Information System or IT Project</b>	<p>The VMS Solution provides technology and related processes to improve the capabilities of BPA’s integrated Vegetation Management Program. It is used to monitor utility corridor health, create contract content, plan and execute work, integrate with other systems and maintain WECC compliance. The VMS:</p> <ul style="list-style-type: none"> <li>• Provides technology to support visibility of utility corridor health and maintenance</li> <li>• Provides workflow processing for the vegetation management system</li> <li>• Tracks right-of-way information, including access roads, encroachments, vegetation management and clearing</li> <li>• Supports mobile data collection, inspection and integration</li> </ul> <p>This system collects name, address, and phone number for land owners and location of property by latitude and longitude. No other PII is collected.</p>	
<b>Type of Information Collected or Maintained by the System:</b>	<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 <input type="checkbox"/> Criminal History	



## MODULE I – PRIVACY NEEDS ASSESSMENT

	<input checked="" type="checkbox"/> Name, address, phone, Latitude, Longitude, LineName. Landowner parcel layer has been removed.  <input checked="" type="checkbox"/> Other – Login ID which is first initial and last name of users.
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<p><b>Has there been any attempt to verify PII does not exist on the system?</b></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>Yes – and non-sensitive PII is known to exist on the system.</p>
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<p><b>If “Yes,” what method was used to verify the system did not contain PII? (e.g. system scan)</b></p>	<p>Manual verification.</p>
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### Threshold Questions

<p><b>1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?</b></p>	<p>YES</p>
<p><b>2. Is the information in identifiable form?</b></p>	<p>YES</p>
<p><b>3. Is the information about individual Members of the Public?</b></p>	<p>YES</p>
<p><b>4. Is the information about DOE or contractor employees?</b></p>	<p>X Federal Employees X Contractor Employees</p> <p>Logon user names are First Initial/Last Name managed by the DMZ/VMS Windows Server.</p>

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 I – PRIVACY NEEDS ASSESSMENT

**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><b>1. AUTHORITY</b></p> <p><b>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</b></p>	<p>16 U.S.C. 832a(f); 16 U.S. Code Chapter 12G - PACIFIC NORTHWEST FEDERAL TRANSMISSION SYSTEM; and Presidential Decision Directive (PDD-63) Critical Infrastructure Protection</p>
<p><b>1. CONSENT</b></p> <p><b>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)?</b></p>	<p>Location Access Notices are created solely when requested by the occupant or owner of the property that must be accessed to reach the work location.</p> <p>Land owner name, address, latitude, longitude, and phone number are collected for contact purposes and consent is implied through individual participation when it is requested by the Natural Resource Specialist for that District of the landowner. There is no consent form in the VMS system.</p>



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>2. CONTRACTS</b></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 Privacy Act clauses were included in the contracts.</p>																																
<p><b>3. IMPACT ANALYSIS:</b></p> <p>How does this project or information system impact privacy?</p>	<p>The Privacy Impact is LOW</p> <table border="1" data-bbox="626 772 1542 1373"> <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>Date 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 PII Confidentiality Level</td> <td>x</td> <td></td> <td></td> </tr> </tbody> </table>	Confidentiality Factors	Low	Moderate	High	Identifiability	x			Quantity of PII	x			Date Field Sensitivity	x			Context of Use	x			Obligation to Protect Confidentiality		x		Access to and Location of PII	x			Overall PII Confidentiality Level	x		
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<p><b>4. SORNs</b></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 only retrieved either by latitude and longitude on the map location or selection list of Work Order Number, not by personal identifier.</p>																																



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>5. SORNs</b></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><b>6. SORNs</b></p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	<p>N/A</p>
<p><b>DATA SOURCES</b></p>	
<p><b>7. What are the sources of information about individuals in the information system or project?</b></p>	<p>Land owner Contact name, phone number, and address when requested by land owner or occupant for the purposes of making requested access arrangements. There are free-form text "Comment" fields; users are instructed to not include any sensitive PII. The County parcel data that was in the system prior has been removed.</p>
<p><b>8. Will the information system derive new or meta data about an individual from the information collected?</b></p>	<p>The system captures entry date and use when a Location Access Notice is entered; Latitude and Longitude is derived with the manual data entry.</p>
<p><b>9. Are the data elements described in detail and documented?</b></p>	<p>Yes, the data elements are described in the VMS System Security Plan.</p>
<p><b>DATA USE</b></p>	
<p><b>10. How will the PII be used?</b></p>	<p>BPA will use this information to notify landowners of planned vegetation maintenance work and to create Location Access Notices to facilitate requested notification and/or arrangements for access to a work location.</p>



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>11. If the system derives meta data, how will the new or meta data be used?</b></p> <p><b>Will the new or meta data be part of an individual's record?</b></p>	<p>N/A</p>
<p><b>12. With what other agencies or entities will an individual's information be shared?</b></p>	<p>None</p>
<p><b>Reports</b></p>	
<p><b>13. What kinds of reports are produced about individuals or contain an individual's data?</b></p>	<p>None</p>
<p><b>1. What will be the use of these reports?</b></p>	<p>N/A</p>
<p><b>2. Who will have access to these reports?</b></p>	<p>N/A</p>
<p><b>Monitoring</b></p>	
<p><b>3. Will this information system provide the capability to identify, locate, and monitor individuals?</b></p>	<p>No</p>
<p><b>4. What kinds of information are collected as a function of the monitoring of individuals?</b></p>	<p>N/A</p>
<p><b>5. Are controls implemented to prevent unauthorized monitoring of individuals?</b></p>	<p>N/A</p>
<p><b>DATA MANAGEMENT &amp; MAINTENANCE</b></p>	



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>6. 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.</b></p>	<p>Location Access Notices are updated by the TFBV Natural Resource Specialist when they are contacted by the requestor – typically after receiving a notice of work to be performed or while inspecting the vegetation conditions on site.</p>
<p><b>7. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?</b></p>	<p>N/A</p>
<p><b>Records Management</b></p>	
<p><b>8. Identify the record(s).</b></p>	<p>Vegetation work packages, right-of-way information and location access information.</p>
<p><b>9. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</b></p>	<p>N1-305-07-001-11a and N1-305-07-001-11b File codes: FE-1100 and FE-1200</p>
<p><b>10. Records Contact</b></p>	<p>IGLM@bpa.gov</p>
<p><b>ACCESS, SAFEGUARDS &amp; SECURITY</b></p>	
<p><b>11. What controls are in place to protect the data from unauthorized access, modification or use?</b></p>	<p>Access to data in VMS is limited to approved users in role based groups.</p>
<p><b>12. Who will have access to PII data?</b></p>	<p>Program Support Specialist, IT Application Support, Program Supervisor, Project Manager and Natural Resource Specialist and other BPA staff are granted access based on a need to know basis</p>
<p><b>13. How is access to PII data determined?</b></p>	<p>The Information Owner will authorize access based on business justification.</p>
<p><b>14. Do other information systems share data or have access to the data in the system? If yes, explain.</b></p>	<p>No</p>





## MODULE II – PII SYSTEMS & PROJECTS

<b>15. 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?</b>	N/A
<b>16. Who is responsible for ensuring the authorized use of personal information?</b>	Information Owner.

**END OF MODULE II**



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



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