Affects Members Of the Public? X

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	03/11/2021	
Departmental Element & Site	Bonneville Power Administration Portland, Oregon	
Name of Information System or IT Project	Webex	
Exhibit Project UID	BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions	
New PIA X **Update**	This is a new PIA for a new system	
	Name, Title	**Contact Information Phone, Email**
Information System Owner	Paul Dickson, JN Infrastructure Service Manager	503-230-4075 prdickson@bpa.gov
Information Owner	Benjamin Berry, J Chief Information Officer	503-230-4072 blberry@bpa.gov

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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.)	ISSO JND-2 – ISSE (CONTR) – Earl Evans	503-230-3019 erevans@bpa.gov
Person Completing this Document	ISSO JND-2 – ISSE (CONTR) – Earl Evans	503-230-3019 erevans@bpa.gov

Purpose of Information System or IT Project	WebEx is an online interactive meeting and webinar platform. It enables collaboration between BPA staff, external partners and vendors. WebEx at BPA consists of the following functions:
	• Cisco Webex Meetings
	  ○ Host and attend video meetings: Present information, share applications, and collaborate on projects.
	• Cisco Webex Training
	  ○ Deliver online training and e- learning.
	• Cisco Webex Events
	  ○ Stage large-scale online events and webinars.
	WebEx is a FedRAMP moderate authorized information system. Meeting sessions can be hosted with end-to-end encryption if needed to protect sensitive information.
	WebEx collects, or has the potential to collect, name, email address, phone number, registration information (from hosts) and any information shared by an individual in chat or via voice.	

Type of Information Collected or Maintained by the System:	☐ SSN Social Security number
	☐ Medical & Health Information e.g. blood test results
	☐ Financial Information e.g. credit card number
	☐ Clearance Information e.g. "Q"
	☐ Biometric Information e.g. finger print, retinal scan
	☐ Mother's Maiden Name
	☐ DoB, Place of Birth
	☐ Employment Information
	☐ Criminal History
	☒ Name, Phone, ~~Address~~
	☒ Other – Please Specify
	• Email address
	• Chat
	• Q/A (if used)
	• Host's personal avatar (if host elects to upload one)
	• Local IP address of computer connecting to WebEx
	• Type of browser used to connect to WebEx
	• Meeting join and leave time
	• Meeting "attention" time – amount of time WebEx user is paying attention to the meeting (when WebEx is in the foreground)
	• Registration fields (individually selectable) if requested when the host creates the meeting:
	  ○ Job Title
	  ○ Company Name
	  ○ Address
	  ○ City
	  ○ State
	  ○ Zip/Post Code
	  ○ Country/Region
	  ○ Work Phone
	  ○ Fax
	• Audio/video of meeting if recorded, which can include audio from the meeting and video from individual's webcams
	• Files shared or created during a meeting
	  ○ Uploaded files (turned off by default for meetings, can be used in trainings)

MODULE I – PRIVACY NEEDS ASSESSMENT

	○ Whiteboard ○ Notes • Polls Unstructured data fields can theoretically contain any data that a user chooses to enter; however, data contents are limited through policy and guidance. BPA users receive regular training concerning the appropriate forums for sharing sensitive PII.
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 PII listed above exists in the system.
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?	Yes
4. Is the information about DOE or contractor employees?	☒ Federal Employees ☒ Contractor Employees

MODULE I – PRIVACY NEEDS ASSESSMENT

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 Power Project: Administrative Authority to Contract, Title 16 U.S.C. §§ 832a(f), 839f(a) grants BPA authority to procure contracts to advance the agency's mission.

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)?

The current consent screen advises attendees that the call may be recorded:

"Cisco Webex can be used to record meetings. By participating in this meeting, you agree that your communications may be monitored or recorded at any time during the meeting."

Collection of information is done directly from users – consent is obtained through individual participation.

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?

WebEx was purchased via "Purchase Card." There is not a formal contract in place. A contract may be in place next year.

4. IMPACT ANALYSIS:

How does this project or information system impact privacy?

Information collected is provided directly to WebEx from participants, and is limited to non-sensitive PII such as name, email address and phone number.

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**		

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.**	PII will not be retrieved by identifier in the regular course of business. A SORN is not applicable.
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*.**	N/A
7. SORNs **If the information system is being modified, will the SORN(s) require amendment or revision?**	N/A
DATA SOURCES	
8. What are the sources of information about individuals in the information system or project?	Meeting participants are the source of most information collected by WebEx (e.g., name, email address, phone number,registration fields if provided, audio/video, chat, Q/A). Browser, IP address, and meeting join/leave/attention time are collected automatically by WebEx servers.
9. Will the information system derive new or meta data about an individual from the information collected?	WebEx does not derive metadata from the information collected.

MODULE II – PII SYSTEMS & PROJECTS	
10. Are the data elements described in detail and documented?	Most data elements that are not self-evident (e.g., name, phone) are enumerated in the Cisco WebEx "Privacy Data Sheet", along with the purposes for which WebEx uses the data. Data types are enumerated in the WebEx SSP.
DATA USE	

11. How will the PII be used?	BPA uses the information for:
	
	• Hosts and Participants:
	  ○ Business function of the platform (e.g., meetings, trainings)
	  ▪ This may include sensitive PII being communicated during the meeting; however, it will be required that meetings with such contents not be recorded.
	  ○ Tracking meeting attendance, including trainings
	• WebEx Administrators
	  ○ Used for administration of the system
	  ○ Tracking WebEx utilization

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?	WebEx receives the information during the course of an attendee's participation in a meeting. BPA does not share this information with any other entity.
Reports	

MODULE II – PII SYSTEMS & PROJECTS	

14. What kinds of reports are produced about individuals or contain an individual's data?	The reports that can be produced include:
	• Session summary
	• Attendee Details
	• Storage Use
	• List of Host Accounts
	• Usage report (available at bpa.webex.com)
	  ○ Meetings
	  ○ Trainings
	  ○ Events

15. What will be the use of these reports?	Reports are used for: • Recording attendance at training sessions • Tracking storage space to ensure efficient usage • Tracking host accounts for internal management purposes
16. Who will have access to these reports?	• Session summary reports are available to account owners and webex administrators. Reports are available upon request if the host used an account owned by Conference Room Services. • Storage Use reports show the amount of space an individual account is using on the cloud; this is only available to webex administrators. • A list of active/inactive host accounts is available under User Management and can only be accessed by WebEx administrators.
Monitoring	
17. Will this information system provide the capability to identify, locate, and monitor individuals?	Individuals can be identified by name, phone number and email address. Individuals cannot be located unless they voluntarily provide location information (via optional registration fields). Meeting join, leave and "attention" time are monitored when attendees are participating in a WebEx session.

MODULE II – PII SYSTEMS & PROJECTS	
18. What kinds of information are collected as a function of the monitoring of individuals?	Meeting join time, meeting leave time, and meeting "attention" time, as measured by the WebEx application being in the foreground of the screen on the paticipant's computer.
19. Are controls implemented to prevent unauthorized monitoring of individuals?	All webex reports are available only to the WebEx Account Owner. For meetings that use a CRS-owned WebEx account, reports are only provided to the Meeting Organizer when they request their session report.
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.	Individuals enter their name, email address and (potentially) phone number at each meeting they attend, and are responsible for the accuracy of the information they enter. Additional registration information can be specified by the host for a meeting and entered by attendees. If so, the attendees are also responsible for the accuracy of this information.
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	WebEx is responsible for any information replication/backup in their cloud-based service.
Records Management	
22. Identify the record(s).	90 days of call logs and less than 60 days of recordings (this feature must be requested for each meeting and there is only 10 GB of space)
23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	DAA-GRS2017-00030001 GRS 5.2 item 010 - Retain for 90 days or less.
24. Records Contact	IGLM@bpa.gov
ACCESS, SAFEGUARDS & SECURITY	

MODULE II – PII SYSTEMS & PROJECTS	
25. What controls are in place to protect the data from unauthorized access, modification or use?	WebEx has successfully completed FedRAMP certification and has controls in place to protect data in accordance with NIST 800-53. For WebEx sessions where sensitive PII will be discussed, guidance will be provided by IT Help Desk for using the encrypted option. For all encrypted sessions, the recording feature and dial-by-phone feature are disabled. Guidance provided by the IT Help Desk to Host Account holders says: "Do not record sessions where privacy information is shared such as interviews with job applicants." Conference Room Services will disable recording on sessions identified as interviews or other sessions for sensitive information.
26. Who will have access to PII data?	BPA WebEx administrators will have access to the identified PII information and reports. BPA WebEx account owners have access to their host accounts usage report. BPA WebEx hosts can request reports from the administrators. WebEx will have access to the PII information.
27. How is access to PII data determined?	Access to reports is granted to BPA administrators via WebEx portal permissions. BPA WebEx account owners have access to their sessions data without the need of permission from the BPA WebEx administrator. Conference Room Services will provide attendance reports if the meeting organizer requests it from CRS.
28. Do other information systems share data or have access to the data in the system? If yes, explain.	The information is not shared with any other information system.

MODULE II – PII SYSTEMS & PROJECTS	
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?	This question will be addressed as part of the WebEx SSP assessment process.
30. Who is responsible for ensuring the authorized use of personal information?	Ben Berry, Information Owner (IO)
END OF MODULE II	

SIGNATURE PAGE

	Signature	Date
Information System Owner	PAUL DICKSON (Print Name) Digitally signed by PAUL DICKSON Date: 2022.10.04 12:42:42 -07'00' (Signature)	
Information Owner	Benjamin L Berry (Print Name) Digitally signed by Benjamin L Berry Date: 2022.10.04 12:57:22 -07'00' (Signature)	
Local Privacy Act Officer	CANDICE PALEN (Print Name) Digitally signed by CANDICE PALEN Date: 2022.10.04 13:09:58 -07'00' (Signature)	
Ken Hunt **Chief Privacy Officer**	William K. Hunt (Print Name) Digitally signed by William K. Hunt Date: 2022.10.03 10:48:14 -04'00' (Signature)	