



PRIVACY IMPACT ASSESSMENT: NHE – eCards
PIA Template Version 5 – August 2017

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|--------------------------------|----------------------------|
| Affects Members Of the Public? | Mark if Applicable w/ an 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 | 06/06/2022 | |
| Departmental Element & Site | JTS-2 Data Center BPA Headquarters, 905 NE 11 th Ave, Portland OR | |
| Name of Information System or IT Project | eCards/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"/> | New PIA | |
| Update <input type="checkbox"/> | | |
| | Name, Title | Contact Information Phone, Email |
| System Owner | Yvette Gill Supervisory IT Specialist | 503-230-3947 yrgill@bpa.gov |
| Information Owner | James Mosley – NHE Employee and Labor Relations | 503.230.3339 jgmosley@bpa.gov |



MODULE I – PRIVACY NEEDS ASSESSMENT

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| Local Privacy Act Officer | Candice Palen, CGI Information Governance | (503) 230-3602 cdpalen@bpa.gov |
| Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.) | Nick Choi – JLS IT Specialist | 503.230.5397 hcchoi@bpa.gov |
| Person Completing this Document | Oliver Rose Jr. – JLSI Business Applications Support | 503.230.3616 oxrose@bpa.gov |
| Purpose of Information System or IT Project | eCards is a SaaS solution, providing non-monetary recognition services from employees to fellow employees in the form of an electronically mailed card. E-cards provide recognition for work related tasks and behaviors (leadership, going the extra mile, safety, appreciation). | |
| 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 checked="" type="checkbox"/> Employment Information: start date of employment, active employee <input type="checkbox"/> Criminal History <input type="checkbox"/> Name, Phone, Address <input checked="" type="checkbox"/> Other – Please Specify: Name, email address and employee ID. | |
| 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 | N/A – eCards contains PII | |



MODULE I – PRIVACY NEEDS ASSESSMENT

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.

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?

NO

4. Is the information about DOE or contractor employees?

- 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

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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>Title 5 U.S.C. Chapter 11: Office of Personnel Management</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>None. The application administrator pulls a query from the Human Resources Information System (HRMIS), the Human Resources Management Information System, and manually reviews information prior to uploading to the SaaS. There is no opportunity to consent.</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, this is an externally hosted SaaS. Privacy protection clause was included in the contract (# 00081496).</p> |



MODULE II – PII SYSTEMS & PROJECTS

| <p>4. IMPACT ANALYSIS: How does this project or information system impact privacy?</p> | <p>BPA assesses eCards as a low risk application.</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>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 | | |
|---|--|-------------------------|------|----------|------|-----------------|---|--|--|-----------------|---|--|--|------------------------|---|--|--|----------------|---|--|--|---------------------------------------|---|--|--|-------------------------------|---|--|--|----------------------|---|--|--|
| 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 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.</p> | <p>YES. PII can be retrieved by identifier. PII will routinely be retrieved by Employee Name or Employee ID.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>6. SORNs Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>? If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</p> | <p>OPM/GOVT-1: General Personnel Records</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |



MODULE II – PII SYSTEMS & PROJECTS

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| <p>7. SORNs</p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p> | <p>NO</p> |
| <p>DATA SOURCES</p> | |
| <p>8. What are the sources of information about individuals in the information system or project?</p> | <p>The source of this information is HRMIS. Only the needed data columns are extracted and uploaded manually by the application administrator in HR and uploaded to CAsort.com.</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 documented within the System Security Plan.</p> |
| <p>DATA USE</p> | |
| <p>11. How will the PII be used?</p> | <p>Email address will be used to login to the system and send and receive recognition email.</p> <p>Name will be used to identify ecard recipient and sender.</p> <p>Active employee/contractor will be used to determine system access.</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>NO</p> |

Reports



MODULE II – PII SYSTEMS & PROJECTS

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| <p>14. What kinds of reports are produced about individuals or contain an individual's data?</p> | <p>Metric reports to quantify use of system which includes:</p> <ul style="list-style-type: none"> • Number of ecards sent • Confirmation of information upload <p>Customized, individualized reports could be requested from the vendor.</p> |
| <p>15. What will be the use of these reports?</p> | <p>To confirm information is uploaded correctly and identifying if the ecard program is being used (System Use)</p> |
| <p>16. Who will have access to these reports?</p> | <p>BPA E-Cards Application Administrator</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> |
| <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>The application administrator pulls a query from HRMIS, the Human Resources Management Information System, and manually reviews information prior to uploading to the SaaS. A confirmation report is provided after upload.</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 information system is a SaaS.</p> |
| <p>Records Management</p> | |



MODULE II – PII SYSTEMS & PROJECTS

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| 22. Identify the record(s). | eCards are considered Transitory records. |
| 23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22. | DAA-GRS-2017-0003-0001 (General Records Schedule 5.2, Item 010) |
| 24. Records Contact | Information Governance & Lifecycle Management iglm@bpa.gov |

ACCESS, SAFEGUARDS & SECURITY

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|--|--|
| 25. What controls are in place to protect the data from unauthorized access, modification or use? | The System Owner has implemented and tested all baseline security controls appropriate to its FIPS categorization in accordance with the BPA Cybersecurity Program Plan (CSPP) and DOE Directives. |
| 26. Who will have access to PII data? | Employees and full time equivalent contractors will have access to PII data which includes names of Bonneville Full Time Equivalency (BFTE) and Contractor Full Time Equivalency (CFTE) Users. |
| 27. How is access to PII data determined? | General users will be able to lookup other users by name in order to send an e-card. |
| 28. Do other information systems share data or have access to the data in the system? If yes, explain. | NO |
| 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? | N/A |
| 30. Who is responsible for ensuring the authorized use of personal information? | The Information Owner |

END OF MODULE II



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| 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/> |
| Ken Hunt Chief Privacy Officer | <hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p> | <hr/> |



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