



PRIVACY IMPACT ASSESSMENT: BAE-GSS – Enterprise GIS SDE
PIA Template Version 5 – August 2017

Affects Members Of the Public?	<input checked="" 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	December 7, 2023	
Departmental Element & Site	Bonneville Power Administration Headquarters, 905 NE 11 th Ave, Portland, OR	
Name of Information System or IT Project	Enterprise Geographic Information System Spatial Database Engine (SDE)	
Exhibit Project UID	BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions.	
New PIA Update	<input checked="" type="checkbox"/> <input type="checkbox"/>	New (breaking out eGIS PIA from 2019 to more accurately reflect and track components of the system)
	Name, Title	Contact Information Phone, Email
Information System Owner	Yvette Gill, JL Supervisory IT Specialist	503-230-3947 yrgill@bpa.gov
Information Owner	James Burgess, TERG Supervisory Civil Engineer	360-619-6475 jfburgess@bpa.gov



MODULE I – PRIVACY NEEDS ASSESSMENT

Local Privacy Act Officer	Rachel Hull, CGI Privacy Act Officer	503-230-5241 rlhull@bpa.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi, JLS ISSO	503-230-5397 hcchoi@bpa.gov
Person Completing this Document	James Burgess, TERG Supervisory Civil Engineer	360-619-6475 jfburgess@bpa.gov
Purpose of Information System or IT Project	<p>The Enterprise Geographic Information System Spatial Database Engine (SDE) is a system designed to store BPA agency asset location and attribute/description information (access road, environmental, cultural data points that are part of a spatially enabled database tables information that can be viewed in the eGIS LiveMap viewer).</p> <p>The Spatial Database Engine (SDE) contains nonsensitive PII for two groups. Group one is land owner parcel data (including names and address) for the BPA service area. The data in this group also contains the previous owner’s name, which is used during valuation calculations (no contact information is collected for the previous owner). Group two is BPA Field Realty Specialists and their Supervisors (name and work phone number).</p> <p>Access to the SDE is through Active Directory with Roles Based Access Controls. Database administrative access is through SQL Connection files and specialized access as well as privileges to view or edit the data in the database, which is reviewed quarterly.</p>	
Type of Information Collected or Maintained by the System:	<input type="checkbox"/> SSN <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	



MODULE I – PRIVACY NEEDS ASSESSMENT

- Criminal History
- Name (both groups), Phone (both groups), Address (current landowners)
- Other –

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.

NO

This system contains the non-sensitive PII indicated above.

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?

YES

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.



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

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 Act provides administrative authority to contract to fulfill Bonneville Power Administration’s mission. (See 16 U.S.C. § 832a(f); 16 U.S.C. § 839f(a)). The Federal Columbia River Transmission Act provides that BPA shall operate and maintain the Federal transmission system within the Pacific Northwest. (See 16 U.S.C. § 838b). The Enterprise Spatial Database Engine (SDE) provides the agency transmission asset location for real property, environmental, and mapping data necessary to advance its mission.

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)?

For landowners there is no opportunity for individuals to consent; information is publicly available and purchased from a vendor. Import of data is limited to landowners in BPA’s service area.

For BPA Field Realty Specialists and Supervisors, data is required for performance of the job and is maintained in the SDE by the Field Realty Specialists with edit privileges. Consent is assumed when they take the position.



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>BPA’s supplemental labor contracts involving contractor access to BPA records contain a clause that requires contractors to comply with the Privacy Act per BPA Purchasing Instructions Clause 23-4.</p> <p>Contractor for landowner data has no access to BPA’s data and they are providing publicly available data.</p>																																
<p>4. IMPACT ANALYSIS:</p> <p>How does this project or information system impact privacy?</p>	<p>The overall privacy impact is MODERATE due to the identifiability of the information and the quantity of records.</p> <table border="1" data-bbox="625 745 1243 1299"> <thead> <tr> <th>Confidentiality Factors</th> <th>Low</th> <th>Moderate</th> <th>High</th> </tr> </thead> <tbody> <tr> <td>Identifiability</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Quantity of PII</td> <td></td> <td></td> <td>X</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></td> <td>X</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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<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>Searches conducted by landowner name, parcel identification number, and address.</p> <p>The Field Realty Specialist layer is not searchable by name; it is searched by region.</p>																																



MODULE II – PII SYSTEMS & PROJECTS

<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>Yes, DOE-24 Land Record System</p>
<p>7. SORNs</p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	<p>Yes, the system is being modified to cover the broader inclusion of all landowner data within service area for the purpose of communication with landowners regarding support of construction and maintenance programs, right-of-way tracking for transmission line vegetation management, and line maintenance.</p>
<p>DATA SOURCES</p>	
<p>8. What are the sources of information about individuals in the information system or project?</p>	<p>Landowner information data is publicly available and purchased from vendor Digital Map Products. Data is furnished securely through File Transfer Protocol (FTP), data is placed on a file server then BPA downloads the data and uploads to the Spatial Database Engine (SDE). No data is shared with the vendor.</p> <p>Field Realty Specialist and Supervisor data is manually entered and updated regularly by a Realty staff member to ensure accuracy.</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, in the SSP.</p>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>Landowner information is used to identify impacted or affected owners from BPA activities such as maintenance or construction primarily related to transmission lines, communication facilities, and fish and wildlife projects.</p>



MODULE II – PII SYSTEMS & PROJECTS

<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>Information for specific impacted landowners may be shared with vendors contracting to provide engineering or construction services to BPA. Contracts include the standard Privacy clauses between BPA and engineering or construction firms.</p>
<p>Reports</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>Customizable reports of landowners by project may be manually created as needed.</p>
<p>15. What will be the use of these reports?</p>	<p>Reports used to provide notification and communication between BPA and landowners regarding projects impacting their property.</p>
<p>16. Who will have access to these reports?</p>	<p>Field Realty Specialists and Supervisors, Natural Resource Specialists, and Right-of-Way Management Agents have access to the reports, but not the database.</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>



MODULE II – PII SYSTEMS & PROJECTS

DATA MANAGEMENT & MAINTENANCE

<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>Landowner information is maintained via subscription service, which provides updates to the data quarterly.</p> <p>Field Realty Specialists information is updated manually and maintained as needed as staffing changes occur with regular reviews of personnel with access to the SDE.</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>The SDE replicates the database in the LiveMap/Taslines Map Services ArcGIS Servers. Manual replication quarterly for landowner data and nightly scheduled replication for realty staff information. SDE is the source of record. LiveMap servers improve data performance.</p>
<p>Records Management</p>	
<p>22. Identify the record(s).</p>	<p>BPA-maintained geospatial information pertaining to electric transmission assets including physical asset locations, descriptions, ratings, network connectivity, real property alignments and boundaries, transportation network routes, vegetation management and maintenance data, and cultural and environmental compliance requirements.</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 (<i>cite NARA authority(ies) below</i>)</p> <p>N1-305-07-001-19b2</p> <p>GS-1300 - Transfer permanently valuable records to NARA in 5-year blocks when records are 10 years old in accordance with NARA regulations and procedures in place at the time of transfer. IGLM is responsible for coordinating transfers of permanent records to NARA. We work with the organization that owns the information to submit a Transfer request to NARA.</p>
<p>24. Records Contact</p>	<p>IGLM@bpa.gov</p>

ACCESS, SAFEGUARDS & SECURITY



MODULE II – PII SYSTEMS & PROJECTS

<p>25. What controls are in place to protect the data from unauthorized access, modification or use?</p>	<p>Access to data through the SDE is limited to approved users through Roles Based Access Controls (RBAC). SDE is the source of record. System security is documented in the eGIS System Security Plan.</p>
<p>26. Who will have access to PII data?</p>	<p>Only authorized users belonging to Landowner Information role group will be granted access to view the PII.</p>
<p>27. How is access to PII data determined?</p>	<p>Access to this information is provided on a need-to-know basis and managed by the Information Owner.</p>
<p>28. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>Yes, information is manually replicated on the LiveMap server. ArcGIS Pro can access and update the SDE data.</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 same System and Information Owners</p>
<p>30. Who is responsible for ensuring the authorized use of personal information?</p>	<p>Information Owner</p>

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/>
DOE Chief Privacy Officer	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>