



PM-1003

Affects Members Of the Public?

Mark if Applicable

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: <http://www.directives.doe.gov/pdfs/doe/doetext/neword/206/o2061.pdf>

Please complete electronically: no hand-written submissions will be accepted.

This template may not be modified.

MODULE I – PRIVACY NEEDS ASSESSMENT

Date	May 18, 2010.	
Departmental Element & Site	US Department of Energy Bonneville Power Administration PO Box 3621 Portland, OR 97208	
Name of Information System or IT Project	SUNFLOWER	
Exhibit Project UID	BPA is a Non-Appropriated Federal agency and is exempt from Exhibit 300 submissions	
New PIA <input checked="" type="checkbox"/>	Please indicate whether this is a new PIA or an update to an existing PIA. List the name of the PIA being updated.	
Update <input type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
System Owner	Damian J. Kelly – BPA/DJP Purchasing/Property Governance Officer	(503) 230-5498 djkelly@bpa.gov
Local Privacy Act Officer	Christina J. Munro – BPA/DK FOIA/Privacy Act Officer	(503) 230-7303 cjmunro@bpa.gov
Cyber Security Expert reviewing this	Amber M. Kershaw – BPA/NJB	(503) 230-3979 amkershaw@bpa.gov



MODULE I – PRIVACY NEEDS ASSESSMENT

document (e.g. ISSM, CSSM, ISSO, etc.)		
Person Completing this Document	Katherine M. Baker – BPA/NJSH-3 Business Analyst	(503) 230-4601 KBaker@bpa.gov
Purpose of Information System or IT Project	The records are maintained and used by BPA to (a) provide inventories to satisfy other Federal Property Management Regulation requirements; (b) satisfy requirements of the BPA Manual and the BPA Asset Management Instructions; (c) to maintain a record of location and assignment of property tracked; (d) to provide management information necessary for the budgeting and allocation of equipment; and (e) to provide evidence of assignment, location, and value in the event that government property is stolen.	
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 <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> X Name, Phone, Address (Employee and Contractor Logonid, Name, BPA Phone, BPA Email, Position Name, Assigned Organization) <input type="checkbox"/> Other – Please Specify	
Has there been any attempt to verify PII does not exist on the system?	NO	
DOE Order 206.1, <i>Department of Energy Privacy Program</i> , defines PII as		



MODULE I – PRIVACY NEEDS ASSESSMENT

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.

If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)

The only PII information tracked in Sunflower is the Name, Logonid, BPA Phone, BPA organization, BPA Email, Position Name of BPA employees and Contract Employees.

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

X Federal Employees
X 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.



MODULE I – PRIVACY NEEDS ASSESSMENT

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?

42 U.S.C. 7101 et seq.; 50 U.S.C. 2401 et seq.; Federal Property and Administrative Services Act of 1949, section 202(b), 40 U.S.C. 483(b); and 41 CFR part 109, Federal Property Management Regulation (FPMR), Subchapter E, part 109. Also BPAM Chapter 805, and BPA Asset Management Instructions.

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)?

None.

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?

YES.

YES.



MODULE II – PII SYSTEMS & PROJECTS

<p>4. IMPACT ANALYSIS:</p> <p>How does this project or information system impact privacy?</p>	<p>The only items that are maintained are Employee name, BPA Logon ID, BPA Organization Code, BPA Position, BPA Phone, BPA Email Address for BPA and Contractor employees. These items should not affect privacy.</p> <p>There are no emerging technologies in use that would impact privacy.</p>
<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>Records may be retrieved by various fields, including: tag or license number of the equipment, custodian name, logonid, or organization code, user name, logonid, or organization, accounting information, catalog number, contract or purchase number, serial number, and storage location.</p>
<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.</p> <p>DOE-23.</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>Information in this system comes from the PEDS application, various internal Bonneville Power Administrative forms, accountable property representatives, BPA employees, and BPA contract employees.</p>



MODULE II – PII SYSTEMS & PROJECTS

9. Are the data elements described in detail and documented?

YES

DATA USE

10. How will the PII be used?

The records are maintained and used by BPA to (a) provide inventories to satisfy other Federal Property Management Regulation requirements; (b) satisfy requirements of the BPA Manual and the BPA Asset Management Instructions; (c) to maintain a record of location and assignment of property tracked; (d) to provide management information necessary for the budgeting and allocation of equipment; and (e) to provide evidence of assignment, location, and value in the event that government property is stolen.

11. With what other agencies or entities will an individual's information be shared?

1. A record from this system may be disclosed as a routine use to any law enforcement agency as needed to provide evidence of assignment, location, and value in the event that Government property is stolen.
2. A record from the system may be disclosed as a routine use to the appropriate local, State or Federal agency when records alone or in conjunction with other information, indicates a violation or potential violation of law whether civil, criminal, or regulatory in nature, and whether arising by general statute or particular program pursuant thereto.
3. A record from this system may be disclosed as a routine use for the purpose of an investigation, settlement of claims, or the preparation and conduct of litigation to a (1) person representing the Department in the investigation, settlement or litigation, and to individuals assisting in such representation; (2) others involved in the investigation, settlement, and litigation, and their representatives and individuals assisting those representatives; and (3) witness, potential witness, or their representatives and assistants, and any other person who possess information pertaining to the matter when it is necessary to obtain information or testimony relevant to the matter.
4. A record from this system may be disclosed as a routine use in court or administrative proceedings to the tribunals, counsel, other parties, witnesses, and the public (in publicly available pleadings, filings or discussion in open court) when such disclosure: (1) Is relevant to, and necessary for, the proceeding; and (2) is compatible with the purpose for which the Department collected the records; and (3) the proceedings involve:
 - (a) The Department, its predecessor agencies, current or former contractors of the Department, or other United States Government agencies and their components, or



MODULE II – PII SYSTEMS & PROJECTS

(b) A current or former employee of the Department and its predecessor agencies, current or former contractors of the Department, or other United States Government agencies and their components, who is acting in an official capacity or in any individual capacity where the Department or other United States Government agency has agreed to represent the employee.

5. A record from the system may be disclosed as a routine use to a Federal, State, or local agency to obtain information relevant to a Departmental decision concerning the hiring or retention of an employee, the issuance of a security clearance, the letting of a contract, or the issuance of a license, grant, or other benefit. The Department must deem such disclosure to be compatible with the purpose for which the Department collected the information.

6. A record from this system may be disclosed to a Federal agency to facilitate the requesting agency's decision concerning the hiring or retention of an employee, the issuance of a security clearance, the reporting of an investigation of an employee, the letting of a contract, or the issuance of a license, grant, or other benefit, to the extent that the information is relevant and necessary to the requesting agency's decision on the matter. The Department must deem such disclosure to be compatible with the purpose for which the Department collected the information.

7. A record from the system may be disclosed as a routine use to DOE contractors in performance of their contracts, and their officers and employees who have a need for the record in the performance of their duties. Those provided information under this routine use are subject to the same limitations applicable to DOE officers and employees under the Privacy Act.

8. A record from this system of records may be disclosed as a routine use to a member of Congress submitting a request involving the constituent when the constituent has requested assistance from the member concerning the subject matter of the record. The member of Congress must provide a copy of the constituent's request for assistance.

Reports

12. What kinds of reports are produced about individuals or contain an individual's data?

Various reports are produced that show, for example, property assigned to an individual, property waiting to be assigned to an individual, property reported lost by an individual and the value of that property at the time of loss.



MODULE II – PII SYSTEMS & PROJECTS

<p>13. What will be the use of these reports?</p>	<p>The purposes of the reports are: to provide information on the location and assignment of equipment; to provide management information necessary for the budgeting and allocation of equipment; and to provide information of assignment, location, and value in the event that government property is lost, stolen, or destroyed.</p>
<p>14. Who will have access to these reports?</p>	<p>The ability to produce the reports is available to BPA employees and contractors whose official duties require access to the records.</p>
<p>Monitoring</p>	
<p>15. Will this information system provide the capability to identify, locate, and monitor individuals?</p>	<p>NO</p>
<p>16. What kinds of information are collected as a function of the monitoring of individuals?</p>	<p>N/A</p>
<p>17. Are controls implemented to prevent unauthorized monitoring of individuals?</p>	<p>N/A</p>
<p>DATA MANAGEMENT & MAINTENANCE</p>	
<p>18. 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>Annual inventories, active acceptance of inventory by custodians, random audits and compliance reviews.</p>
<p>19. 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 information system consists of a single database that is accessed from multiple sites, so all database fields are consistent.</p> <p>The application, configuration, security granting process, application training, etc., are administered centrally.</p>
<p>Retention & Disposition</p>	



MODULE II – PII SYSTEMS & PROJECTS

<p>20. What are the retention periods of data in the information system?</p>	<p>Records retention and disposal authorities are contained in the National Archives and Records Administration (NARA) General Records Schedule and DOE record schedules that have been approved by NARA.</p>
<p>21. What are the procedures for disposition of the data at the end of the retention period?</p>	<p>Records retention and disposal authorities are contained in the National Archives and Records Administration (NARA) General Records Schedule and DOE record schedules that have been approved by NARA.</p>
<p>ACCESS, SAFEGUARDS & SECURITY</p>	
<p>22. What controls are in place to protect the data from unauthorized access, modification or use?</p>	<p>Security access for Sunflower is controlled centrally by the Database Administrator using published security procedures.</p> <p>Ability to create and modify records requires additional levels of security and training.</p>
<p>23. Who will have access to PII data?</p>	<p>BPA Employees and contractors whose official duties require access to the records.</p>
<p>24. How is access to PII data determined?</p>	<p>Security access for Sunflower is controlled centrally by the Database Administrator using published security procedures.</p> <p>Ability to create and modify records requires additional levels of security and training.</p>
<p>25. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>We import employee name, organization, etc., from PEDS. Logonid is derived from Active Directory.</p> <p>We export data views to the internal data warehouse.</p>
<p>26. 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>We only import or export data internally so none is needed.</p>
<p>27. Who is responsible for ensuring the authorized use of personal information?</p>	<p>Organizational Property Management Officer</p>



MODULE II – PII SYSTEMS & PROJECTS

END OF MODULE II

SIGNATURE PAGE

	Signature	Date
PIA Approval Signatures	Original Copy Signed and On File with the DOE Privacy Office	08/24/2010