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: 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	09/15/09
Departmental Element & Site	Bonneville Power Administration, HQ, JTS-2
Name of Information System or IT Project	Enterprise Applications GSS - Human Resources Management Information System (HRMIS)
Exhibit Project UID	BPA is a Non-Appropriated Federal agency and is exempt from Exhibit 300 submissions
New PIA [X] **Update** [ ]	

	Name, Title	Contact Information Phone, Email
System Owner	Roy Fox, Human Resources Manager	U.S. Department of Energy Bonneville Power Administration – NH P O Box 3621 Portland, OR 97208-3621 Phone 503 230-4627
Local Privacy Act Officer	Christina J. Brannon, Freedom of Information Act/Privacy Act Officer	U.S. Department of Energy Bonneville Power Administration – DK

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MODULE I – PRIVACY NEEDS ASSESSMENT

		P O Box 3621 Portland, OR 97208-3621 Phone 503-230-7303
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Jonathan Stanford, Chief Information Security Officer	U.S. Department of Energy Bonneville Power Administration – JB P O Box 3621 Portland, OR 97208-3621 Phone 503 230-4222
Person Completing this Document	Yvette R. Gill, Manager Software Development & Operations	U.S. Department of Energy, Bonneville Power Administration – JS P O Box 3621, Portland, OR 97208-3621 Phone 503-230-3947
Purpose of Information System or IT Project	HRMIS supports Federal Human Resources Management, Time Administration, and Payroll processing for Bonneville Power Administration. • Personnel Actions Request (PAR) - Supports the data capture necessary to produce official personnel records, such as the SF-50 Notification of Personnel Action and other personnel documents that support the full range and scope of personnel actions as defined and required by OPM and other law or regulation. • Position Management and Classification - Captures date and provides reporting capability for required position data to include position title, series, grade, FLSA determination, manager/supervisor code, LMR code, and related elements. • Recruitment – Tracks applicant data for internal and external recruitment actions, and provides reporting capability as required by OPM for merit staffing actions, delegated examination, and related employment authorities. • Salary Administration – Maintains salary tables for general schedule, senior executive schedule, blue collar (hourly) workforce, and miscellaneous compensation plans. • Performance Management – Maintains data to track and report on varied performance rating plans and appraisal patterns, rating period, and rating of record. • Training Administration - Captures and reports training data to include course dates, locations, duration, cost and completions. Provides content needed to	

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MODULE I – PRIVACY NEEDS ASSESSMENT

	publish course availability and capture training histories by student. Enables electronic workflow and routing/approval of course attendance requests. • Base Benefits –Captures and reports data supporting employee enrollment in benefit programs such as FEHB, FEGLI, and TSP. • Payroll - Processes employee pay including deductions and taxes. • Time & Labor – Tracks and reports employee time, including leave, compensatory time, overtime, and premium pay.
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 ☒ Employment Information ☐ Criminal History ☒ Name, Phone, Address ☒ Other – Name & SSN for employee dependents & others may be captured for Savings Bonds and FEHB processing.

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*	YES

MODULE I – PRIVACY NEEDS ASSESSMENT

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 system is queried and reviewed manually, especially during upgrade opportunities

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.

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

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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.; Privacy Act of 1974, Pub. L. 93–579 (5 U.S.C. 552a); General Accounting Office Policy and Procedures Manual; Personal Responsibility and Work Opportunity Reconciliation Act, Pub. L. 104–193. Government Employees Training Act of 1958; and 5 CFR parts 410 and 412; PL 108-136-NOV. 24, 2003.
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 information being collected is required for individuals to be employed and paid by BPA. It is necessary in order for BPA to properly pay and administer benefits to employees and track their performance and training needs. Privacy Act statements on data collection forms (SF171, OF612, ##) provide the purpose of data collection and impact of not providing the data.
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. Contractors have been involved in both the design and maintenance of HRMIS. Personal information may be disclosed to these contractors in the performance of their contract duties. Contractors are required to safeguard all information in accordance to the Privacy Act, BPA, and DOE Policy. All employees and contractors must complete Cyber Security training prior to being granted network access and yearly there after.
4. IMPACT ANALYSIS: **How does this project or information system impact privacy?**	This information is collected for standard business process. The Oracle/PeopleSoft product is built to insure we have the ability to restrict access to any PII data by role and manager. Privacy information is very highly regarded. Consistent reviews are performed on a regular basis.

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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.	Yes, data can be retrieved by Name, Employee ID, or Social Security Number. The main method of retrieval is Name and Employee ID, which is randomly generated by the system at the time of hire. Only the Human Capitol Office and the Payroll Office have the ability to retrieve information by SSN.
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.*	OPM/Gov-1 DOE-13 Payroll and Leave Records DOE-28 General Training Records
7. SORNs If the information system is being modified, will the SORN(s) require amendment or revision?	No

DATA SOURCES

8. What are the sources of information about individuals in the information system or project?	Information is individually provided and obtained from supervisors, timekeepers, and official personnel records.
9. Are the data elements described in detail and documented?	Oracle / Peoplesoft provides data models for the intended purposes of the data fields. Customizations would not be included. Development logs and change request documents will have this data.

DATA USE

MODULE II – PII SYSTEMS & PROJECTS

10. How will the PII be used?	To verify the identity of employees, contractors, and beneficiaries.
11. With what other agencies or entities will an individual's information be shared?	HRMIS provides transaction data to the following agencies: Department of Energy – Updates DOE Info for Agency reporting. Office of Personnel Management – Updates CPDF and eHRI data files. U.S. Department of Treasury – Payroll payment files. National Finance Center – TSP for participating employees. FEHB Centralized Enrollment Reconciliation Clearinghouse (CLER) – Health Benefits enrollment Internal Revenue Service – Withholding and tax payments. U.S. Federal Reserve – Savings Bonds. SHPS – Health flexible spending accounts and Long-term care insurance.
Reports	

MODULE II – PII SYSTEMS & PROJECTS

12. What kinds of reports are produced about individuals or contain an individual's data?	The system allows authorized Human Resources and Payroll staff the ability to produce reports on both individuals and groups. These reports are approved by HR and Payroll management and access to those reports is authorized by those organizations. Managers and Supervisors can run reports only on their organization and direct reports. Standard reports are generated by the system on a regular schedule. • List of current active employees (public information data) • List of current non-government people (contractors, volunteers, etc) (public information data) • List of bargaining unit positions (restricted to Labor-Management Staff and union representatives) • List of accessions, separations and internal moves (public information data) • List of employees with retirement eligibility dates (restricted to HR staff) The following reports can be run by authorized HR staff: • Employees on Leave of Absence • Pending Future Actions • Personnel Actions History • Temporary Appointments • Years of Service • Positions by Department ID • Department Transfers The following reports can be run by authorized supervisors and mangers: • Annual Training not Completed • Student Training History • Training History by Department • Leave Balance • Timecard Report • Missing/Incomplete Timesheet

MODULE II – PII SYSTEMS & PROJECTS

13. What will be the use of these reports?	The employee time and expense history may be used by the Human Resources department to manage payroll and reimbursement of expenses.
14. Who will have access to these reports?	Human Capital Managers & Staff Payroll Managers & Staff Timekeepers Various Managers

Monitoring

15. Will this information system provide the capability to identify, locate, and monitor individuals?	No
16. What kinds of information are collected as a function of the monitoring of individuals?	NA
17. Are controls implemented to prevent unauthorized monitoring of individuals?	NA

DATA MANAGEMENT & MAINTENANCE

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.	Online and batch edits are built into the system to prevent incomplete or incorrect data entry. Data entry is reviewed prior to finalizing actions that affect employee pay or benefits. Queries and reports within HRMIS are used to verify and validate information in the system regularly. System data is provided to the Central Personnel Data File (CPDF) and eHRI, and error reports are returned to the agency for correction. Self service access by employee and supervisors ensure the accuracy and completeness of information.

MODULE II – PII SYSTEMS & PROJECTS

19. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	The system is maintained and managed centrally at BPA Headquarters. Employees and managers access the system from the field and other locations on the BPA network. User training and guides are provided from an internal portal site and users can call a centralized Help Desk for further assistance.

Retention & Disposition

20. What are the retention periods of data in the information system?	Data retention for BPA records stored in this system are in accordance with BPA Records Retention Schedule 810/PE.
21. What are the procedures for disposition of the data at the end of the retention period?	Data retention and disposition procedures are covered by Department of Energy Order 243.1, Records Management Program, DOE Administrative Records Schedule: Electronic Records and Bonneville Power Administration Manual Chapter 1122, Records Management, with specific operating guidance contained in a Records Manual. These agency instructions and guidance are consistent with Federal record regulations.

ACCESS, SAFEGUARDS & SECURITY

22. 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 Senior DOE Management PCSP and DOE Directives. The system has a GSS and SSP and some identified POAMS since this is a legacy found to have mitigated risk to an acceptable level.
23. Who will have access to PII data?	Human Capital Managers & Staff, Payroll Managers & Staff and Various Supervisors all on a need-to-know basis.
24. How is access to PII data determined?	Access is based on the roles and responsibilities of the individual; authorized on a need-to-know, with the least privilege access necessary to complete job duties. Access to PII data is authorized through the Human Capitol Office and the Payroll Office, based on job roles.

MODULE II – PII SYSTEMS & PROJECTS

25. Do other information systems share data or have access to the data in the system? If yes, explain.	Peopledata, a web service that contains Name, Organization and Employee Id.
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?	No
27. Who is responsible for ensuring the authorized use of personal information?	Roy Fox, Human Resource Manager

END OF MODULE II

SIGNATURE PAGE

	Signature	Date
PIA Approval Signatures	**Original Copy Signed and On File with the DOE Privacy Office**	