



PRIVACY IMPACT ASSESSMENT: JLS – CAST
PIA Template Version 5 – August 2017

Affects
Members
Of the Public?

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	01/21/2021	
Departmental Element & Site	Department of Energy (DOE) Bonneville Power Administration (BPA) Portland, Oregon	
Name of Information System or IT Project	Cultural Assessment Survey Tool (CAST)	
Exhibit Project UID	BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions.	
New PIA <input checked="" type="checkbox"/>	This is a new PIA for a new system	
Update <input type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
System Owner	Yvette Gill Supervisory IT Specialist - JL	503-230-3947 yrgill@bpa.gov



MODULE I – PRIVACY NEEDS ASSESSMENT

Information Owner	Maria Mondragon-Almy Diversity and Inclusion Manager in the CAO	(503) 230-4986 mdmondragon-almy@bpa.gov
Local Privacy Act Officer	Candice Palen Privacy Act Officer	503-230-5602 cdpalen@bpa.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi ISSO - JLS	(503) 230-5397 hcchoi@bpa.gov
Person Completing this Document	Fern Elledge	(503) 230-3613 fselledge@bpa.gov
Purpose of Information System or IT Project	<p>The cultural assessment survey tool will provide data to increase effectiveness of future diversity and inclusion efforts and inform BPA's People and Culture strategy teams, leading to the safe, positive and inclusive environment called for in BPA's strategic plan.</p> <p>The assessment (facilitated by an external vendor) will include both an online survey and follow up focus groups to explore the reasons for varied employee experiences based on different geographic locations or demographic backgrounds. The vendor will provide advice on the survey design and data elements.</p> <p>The selected vendor will provide an online survey tool to collect data from employees regarding their experience at BPA. The survey tool will also collect demographic information including race, ethnicity, gender, disability, location, organization/work group. It will not function as the source of record for demographic information.</p>	
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	



MODULE I – PRIVACY NEEDS ASSESSMENT

	<input type="checkbox"/> Mother's Maiden Name <input type="checkbox"/> DoB, Place of Birth <input checked="" type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input type="checkbox"/> Name, Phone, Address <input checked="" type="checkbox"/> Other – Please Specify: Demographic background, including race, ethnicity, gender, disability, location by district, work group level (including largest tier 2 and tier 3 orgs)
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<p>Has there been any attempt to verify PII does not exist on the system?</p> <p><i>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.</i></p>	N/A – PII is known to exist in the system.
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<p>If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)</p>	N/A
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Threshold Questions

<p>1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?</p>	YES
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<p>2. Is the information in identifiable form?</p>	YES
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<p>3. Is the information about individual Members of the Public?</p>	<p>NO</p> <p>(If "Yes," place an "X" in the box at the top of first page.)</p> <p><i>Member of the Public</i> refers to individuals in a non-employee or DOE contractor context. <i>Members of the Public</i> includes individuals for whom DOE maintains information,</p>
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MODULE I – PRIVACY NEEDS ASSESSMENT

	as required by law, who were previously employed or contracted by DOE
4. Is the information about DOE or contractor employees?	<p>YES or NO (If Yes, select with an "X" in the boxes below)</p> <p><input checked="" type="checkbox"/> Federal Employees</p> <p><input checked="" type="checkbox"/> Contractor Employees</p>

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



MODULE II – PII SYSTEMS & PROJECTS

<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>Executive Order 13583, Establishing a Coordinated Government-Wide Initiative to Promote Diversity and Inclusion in the Federal Workforce</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>Participation in the diversity and inclusion cultural assessment is voluntary.</p> <p>The survey landing page will include these statements:</p> <ul style="list-style-type: none"> • This survey is being administered by BCT Partners, a third-party consultant, which will be solely responsible for tabulating your confidential ratings. The survey itself is being hosted from a website that is external to BPA in order to assure that your responses remain entirely anonymous. • Your voluntary ratings and input are extremely important to this process. Thank you in advance for participating in the BPA Diversity and Inclusion Cultural Assessment.
<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. Privacy protection clauses are incorporated into the contract.</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>4. IMPACT ANALYSIS: How does this project or information system impact privacy?</p>	<p>Please describe how the use of this system and its technologies may impact an individual's privacy.</p> <p>Consider also the use of emerging technologies and how those technologies may impact privacy.</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></td> <td>X</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></td> <td>X</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		
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<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>The data will not be retrived by identifier.</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>N/A</p>																																



MODULE II – PII SYSTEMS & PROJECTS

<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 will be gathered directly from individuals when they voluntarily answer online survey questions.</p>
<p>9. Will the information system derive new or meta data about an individual from the information collected?</p>	<p>Yes, but it will not be connected to an identifier.</p>
<p>10. Are the data elements described in detail and documented?</p>	<p>Yes, the data elements are described in detail in the SSP.</p>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>The Diversity and Inclusion Office and the People and Culture Strategy will use the aggregated reports of survey results to prioritize future awareness and training objectives.</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>The data will not be part of an individual's record because it will not be connected to an identifier.</p>
<p>13. With what other agencies or entities will an individual's information be shared?</p>	<p>None. The information in aggregate form may be shared with the BPA workforce, but it will not be connected to individuals.</p>
<p>Reports</p>	



MODULE II – PII SYSTEMS & PROJECTS

<p>14. What kinds of reports are produced about individuals or contain an individual’s data?</p>	<p>The external vendor will provide aggregate reports that summarize individual survey responses. No reports will be produced about individuals.</p>
<p>15. What will be the use of these reports?</p>	<p>To develop strategies to move toward our aspirational diversity and inclusion culture at BPA</p>
<p>16. Who will have access to these reports?</p>	<p>BPA workforce will have access to aggregate reports that do not include individual identifiers</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 vendor will destroy individual records of survey responses at the end of the contract.</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 survey tool will be an externally hosted application provided to BPA as a Software-as-a-Service (SaaS).</p>
<p>Records Management</p>	
<p>22. Identify the record(s).</p>	<p>Survey responses.</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</p>	<p>NARA General Record Schedule 5.2, item 020: intermediary records</p>
<p>24. Records Contact</p>	<p>IGLM@bpa.gov</p>
<p>ACCESS, SAFEGUARDS & SECURITY</p>	
<p>25. What controls are in place to protect the data from unauthorized access, modification or use?</p>	<p>The System Owner has implemented and tested all baseline security controls appropriate to its FIPS categorization in accordance with the BPA CSPP cybersecurity objectives.</p>
<p>26. Who will have access to PII data?</p>	<p>Aggregated reports will be distributed to the Information Owner, and others as authorized by the Information Owner or direct delegate.</p>
<p>27. How is access to PII data determined?</p>	<p>Non-sensitive PII used for identifying survey respondents will be distributed on a need to know basis. This will likely only involve the initial phase technical implementation team.</p>
<p>28. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>None</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</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/>
Ken Hunt Chief Privacy Officer	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>



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