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

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	11/27/2017
Departmental Element & Site	USDOE/Bonneville Power Administration (BPA), Ross Complex Warehouse
Name of Information System or IT Project	Hazmat Labeling Solution – LabelMaster DGIS (Dangerous Good Information System) - Software as a Service (SaaS) for hazmat shipping compliance
Exhibit Project UID	**US DOE BPA IT Project Management Office – Proposal/Project 34280**
New PIA [x] **Update** [ ]	New PIA

	Name, Title	Contact Information Phone, Email
System Owner	Yvette Gill Supervisor IT Specialist	503-230-3947 yrgill@bpa.gov
Information Owner	Michael Ware, NSL – WHSE Sup General Supply Specialist	360-418-2021 mkware@bpa.gov

MODULE I – PRIVACY NEEDS ASSESSMENT

Local Privacy Act Officer	Christopher M. Frost FOIA/Privacy Act Officer	503-230-5602 cmfrost@bpa.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Jessica Rackley, JBC IT Specialist(INFOSEC)	503-230-4416 jlrackley@bpa.gov
Person Completing this Document	Michael Ware, NSL – WHSE Sup General Supply Specialist	360-418-2021 mkware@bpa.gov
Purpose of Information System or IT Project	BPA is becoming compliant in its Dangerous Goods/Hazardous Materials (HazMat) shipping program. This project is to implement a Hazardous Material shipping process that incorporates required DOT shipping-related documentation, accurate labels and handling procedures for items being shipped by BPA. Currently BPA has an unassisted, manual process for classifying hazardous materials and creating the correct Hazmat paperwork. The new IT system will automate the process and produce the appropriate paperwork and assist with choosing the correct label, packaging and process to correctly ship the package. This augmented system would cross reference items identified by BPA staff with an on-line and up-to-date materials database. It will identify appropriate handling, labeling and shipping requirements and produce the required documentation, including Material Data Sheets and ERG's for shipping. This new process reduces processing time and avoids producing an incorrect label or paperwork that could potentially generate fines and result in the possible loss of UPS and/or FedEx as shipping partners. Department of Defense and many other government agencies currently utilize this software. BPA is implementing this system to come into compliance with current business practices and industry requirements. The software will offer cost saving by reducing man hours used in the current research process that is required per package, being sent by the Ross Warehouse.	
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	

MODULE I – PRIVACY NEEDS ASSESSMENT

	☐ Clearance Information e.g. "Q"	
	☐ Biometric Information e.g. finger print, retinal scan	
	☐ Mother's Maiden Name	
	☐ DoB, Place of Birth	
	☐ Employment Information	
	☐ Criminal History	
	☒ Name, Phone, Address	
	☐ Other – Please Specify	

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.*	The system is known to have the PII listed 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?	No
4. Is the information about DOE or contractor employees?	Yes ☒ Federal Employees ☒ Contractor Employees

MODULE I – PRIVACY NEEDS ASSESSMENT

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

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. Safe and compliant shipping of hazardous materials is essential for BPA to advance its business mission and meet its regulatory obligations. (See 16 U.S.C. § 832a(f); 16 U.S.C.§ 839f(a)).

MODULE II – PII SYSTEMS & PROJECTS

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)?	There are no planned mechanisms for individuals to consent to or decline the use of their personal information (.ie., name, phone, and work address) in the system.
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, all BPA's 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.
4. IMPACT ANALYSIS: How does this project or information system impact privacy?	Labelmaster only stores name, phone number and work address. Accordingly, the privacy impact is LOW.
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.	PII will not be retrieved.

MODULE II – PII SYSTEMS & PROJECTS

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.**	N/A
7. SORNs **If the information system is being modified, will the SORN(s) require amendment or revision?**	N/A
DATA SOURCES	
8. What are the sources of information about individuals in the information system or project?	The shipping information will be provided by the individual, the BPA shipping module, and/or the BPA blue book page.
9. Will the information system derive new or meta data about an individual from the information collected?	No
10. Are the data elements described in detail and documented?	Names and addresses are described and documented.
DATA USE	
11. How will the PII be used?	Names and addresses will be used for the shipment of hazmat materials.

MODULE II – PII SYSTEMS & PROJECTS

12. If the system derives meta data, how will the new or meta data be used? Will the new or meta data be part of an individual's record?	N/A
13. With what other agencies or entities will an individual's information be shared?	None, no individual information will be shared with other agencies or entities.
Reports	
14. What kinds of reports are produced about individuals or contain an individual's data?	The system is capable of creating an audit report of what hazmat materials were sent, the quantity sent, and to whom it was sent.
15. What will be the use of these reports?	Auditing
16. Who will have access to these reports?	Data in the system is restricted using a role-based authorization model DGIS Enterprise licensed users (Admin Users) – currently there are 2 of these licesnses
Monitoring	
17. Will this information system provide the capability to identify, locate, and monitor individuals?	No
18. What kinds of information are collected as a function of the monitoring of individuals?	N/A
19. Are controls implemented to prevent unauthorized monitoring of individuals?	N/A
DATA MANAGEMENT & MAINTENANCE	

MODULE II – PII SYSTEMS & PROJECTS

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.	Names and addresses will be manually entered into the system, not stored for retrieval. The shipping information will be provided by the individual, the BPA shipping module, and/or the BPA blue book page.
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	N/A, the system is operated in only one location.

Records Management

22. Identify the record(s).	Hazmat Labeling Solution does not contain federal records. Department of Transportation and IATA regulations stipulate a mandatory minimum 2 year retention but NSL has agreed to comply with BPA's 3 year retention policy for short term records.
23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	Unscheduled Retention: BPA's 3-year short term record retention.
24. Records Contact	Matt Boris, Records Analyst mjboris@bpa.gov 503-230-3071

ACCESS, SAFEGUARDS & SECURITY

25. What controls are in place to protect the data from unauthorized access, modification or use?	Data in system is restricted using a role-based authorization model
26. Who will have access to PII data?	DGIS Enterprise licensed users (Admin Users) – currently 2 users DGIS Business licensed users – Currently 13 users

MODULE II – PII SYSTEMS & PROJECTS

27. How is access to PII data determined?	Access is determined based on need-to-know.
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, no integration with any other systems.
30. Who is responsible for ensuring the authorized use of personal information?	The Information Owner.

END OF MODULE II

SIGNATURE PAGE

	Signature	Date
System Owner	<u>Yvette Gill</u> **(Print Name)** **From:** Gill,Yvette R (BPA) - JS-3 **Sent:** Thursday, November 30, 2017 11:19 AM **To:** Cruz-Lomeli,Reyna E (CONTR) - JP-3 **Subject: Approve:** HLS Privacy Impact Assessment (PIA) | Approval Requested **(Signature)**	YVET TE GILL — Digitally signed by YVETTE GILL Date: 2022.07.15 13:12:17 -07'00' **11/30/2017**
Information Owner	<u>Michael Ware</u> **(Print Name)** **From:** Ware,Michael K (BPA) - NSL-WHSE **Sent:** Thursday, November 30, 2017 10:59 AM **To:** Cruz-Lomeli,Reyna E (CONTR) - JP-3 **Subject: Approve:** HLS Privacy Impact Assessment (PIA) | Approval Requested **(Signature)**	*Julie Ann Jenkin* 7/19/22 **11/30/2017**
Local Privacy Act Officer	**(Print Name)** **(Signature)**	
Ken Hunt **Chief Privacy Officer**	**(Print Name)** William K. Hunt — Digitally signed by William K. Hunt Date: 2022.07.07 13:32:15 -04'00' **(Signature)**	