



PRIVACY IMPACT ASSESSMENT: Real-Time Scheduling – Nimble Schedule
PIA Template Version 4– June 2014

Affects Members Of the Public?	Mark if Applicable w/ an X
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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: <http://www.directives.doe.gov/pdfs/doe/doetext/neword/206/o2061.pdf>

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	October 23, 2017	
Departmental Element & Site	Bonneville Power Administration Portland, Oregon	
Name of Information System or IT Project	Nimble Schedule Software as a Service (“SaaS”)	
Exhibit Project UID	BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions.	
New PIA <input checked="" type="checkbox"/>		
Update <input type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
Information Owner	Brad Hansen Supervisor, Transmission Scheduling (Munro)	(509) 822-4506 bthansen@bpa.gov
Local Privacy Act Officer	Christopher Frost Privacy Act Officer	(503) 230-5602 cmfrost@bpa.gov
Cyber Security Expert reviewing this	Darren Jungling IT Specialist	(503)230-3553 dljungling@bpa.gov





MODULE I – PRIVACY NEEDS ASSESSMENT

document (e.g. ISSM, CSSM, ISSO, etc.)		
Person Completing this Document	Brad Hansen Supervisor, Transmission Scheduling (Munro)	(509) 822-4506 bthansen@bpa.gov
Purpose of Information System or IT Project	Nimble Schedule is an online employee scheduling and time clock software used to track employee shift schedules across teams, departments, and locations.	
Type of Information Collected or Maintained by the System:	<input type="checkbox"/> SSN <i>Social Security number</i> <input type="checkbox"/> Medical & Health Information <i>e.g. blood test results</i> <input type="checkbox"/> Financial Information <i>e.g. credit card number</i> <input type="checkbox"/> Clearance Information <i>e.g. "Q"</i> <input type="checkbox"/> Biometric Information <i>e.g. finger print, retinal scan</i> <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 checked="" type="checkbox"/> Name, Phone, Address <input checked="" type="checkbox"/> Other – Please Specify: Work and/or personal phone, work and/or personal e-mail, employee shift and out of office information.	
Has there been any attempt to verify PII does not exist on the system? DOE Order 206.1, <i>Department of Energy Privacy Program</i> , 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	NO	



MODULE I – PRIVACY NEEDS ASSESSMENT

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)

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

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

<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>The Bonneville Project Act authorizes BPA to contract for products and services that advance the agency’s business mission. See 16 U.S.C. § 832i, 16 U.S.C. § 832a(f), 16 U.S.C. § 839f(a); and 42 U.S.C. § 7101 <i>et seq.</i></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>Providing information is not voluntary. Individuals have no opportunity to decline to provide either a work or personal phone number and a work or personal e-mail address, as well as their shift schedules and out of office schedules. Individuals may decline to provide their name and instead use a pseudonym. There is no notice provided as to how information is collected or used.</p>
<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. Nimble Schedule is considered “Software as a Service.” The contract includes the appropriate Privacy Act clauses.</p>



MODULE II – PII SYSTEMS & PROJECTS

	Impact Level		
	Low	Moderate	High
4. IMPACT ANALYSIS: How does this project or information system impact privacy?	Confidentiality Factors		
	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 PII Confidentiality Level		X
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.	The PII can and will be routinely retrieved by employees' name or pseudonym established by the individual.		
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> .	Yes Federal employees only: DOE-13: Payroll and Leave Records, 74 FR 1012-14. OPM/GOVT-1: General Personnel Records, 77 FR 73694-99.		



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>The source of information is either entered directly into Nimble Schedule by the employee, or may be entered by the employee's supervisor/manager.</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>N/A</p>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>Employee PII will be used to keep track of shifts, allow for shift swapping, shift dropping, and other similar features, providing for easier tracking of team and individual shift coverage via the web and smartphones.</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>N/A</p>
<p>13. With what other agencies or entities will an individual's information be shared?</p>	<p>None</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>Reports can be produced showing individual employee's shift hours or out of office information.</p>
<p>15. What will be the use of these reports?</p>	<p>Reports will be used to manage employee work schedules, assist with shift-swap requests, verify employee time worked in different locations, and for auditing purposes.</p>
<p>16. Who will have access to these reports?</p>	<p>Reports can be accessed by the Administrator and Manager group.</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>Records can only be verified for accuracy, relevance, and completeness if the employee either self-updates the system or asks his or her manager to update the system.</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>N/A</p>

Records Management



MODULE II – PII SYSTEMS & PROJECTS

22. Identify the record(s).	Does not contain Federal records.
23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	<p>Unscheduled</p> <p>Disposition Authority (proposed): N1-305-07-1-7/a.</p> <p>Retention Period (per Authority): Retain until superseded, updated, replaced or no longer applicable.</p>
24. Records Contact	<p>Jeff C. Johnson, Records Analyst (503)230-5254 jcjohnson@bpa.gov</p>

ACCESS, SAFEGUARDS & SECURITY

25. What controls are in place to protect the data from unauthorized access, modification or use?	Nimble Schedule has successfully completed the BPA Security Authorization Process. An Authority to Operate was granted by the Authorizing Official on April 21, 2014.
26. Who will have access to PII data?	Access to PII data is granted to the Administrator and Manager groups.
27. How is access to PII data determined?	All with system access can see the PII data, but only those who have a need to it are granted access to the system.
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
30. Who is responsible for ensuring the authorized use of personal information?	The Information Owner

END OF MODULE II



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SIGNATURE PAGE

	Signature	Date
Information Owner	<p>Brad Hansen (Print Name)</p> <p><i>Brad Hansen</i> (Signature)</p>	<p><u>11-16-2018</u></p>
Local Privacy Act Officer	<p>Christopher Frost (Print Name)</p> <p>_____ (Signature)</p>	<p>_____</p>
Ken Hunt Chief Privacy Officer	<p>Ken Hunt (Print Name)</p> <p>_____ (Signature)</p>	<p>_____</p>