



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	10/21/20	
Departmental Element & Site	Bonneville Power Administration Portland, Oregon	
Name of Information System or IT Project	FlightTrak (FT) Scheduler Business Application Environment (BAE)	
Exhibit Project UID	BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions	
New PIA X Update	This is a new PIA for FT Scheduler, which replaces AVMOSYS.	
Name, Title Contact Information Phone, Email		
Information System Owner	Yvette R Gill, JLS Supervisory IT Specialist	503-230-3947 yrgill@bpa.gov





MODULE I – PRIVACY NEEDS ASSESSMENT		
Information Owner	Kenneth H. Tinseth, TAA Supervisory Aircraft Services Specialist	503-230-4115 khtinseth@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, JLS IT Specialist	503-230-5397 hcchoi@bpa.gov
Person Completing this Document	Dwayne A. Cook, JLST IT Specialist (SYSANALYSIS/APPSW)	360-418-1776 dacook@bpa.gov
Purpose of Information System or IT Project	To manage BPA's aviation operations for fixed wing airplanes and helicopters, FT Scheduler is used to schedule and track flights, assign crew and passengers to flights, track crew currency (fit-to-fly) status, and training. The application maintains passenger and crew personal information for aircraft operations and reporting, international travel requirements, and notification purposes as directed by the Federal Aviation Administration (FAA). Passengers are sometimes members of the public. PII is collected in accordance with NTSB, FAA, and United States and Canadian customs requirements. If there is an incident or accident, BPA Aircraft Services will provide next of kin information to first responders and to authorized members of BPA, the National Transportation Safety Board (per NTSB SPC9904 pages 8-9) and the Federal Aviation Administration. FT Scheduler is third party software application.	
Type of Information Collected or Maintained by the System:	□ SSN ☑ Medical & Health Information - Aviation medical certificate for pilots only □ Financial Information □ Clearance Information	





MODULE I – PRIVACY NEEDS ASSESSMENT			
	☐ Biometric Information		
	☐ Mother's Maiden Name		
	□ DoB, Place of Birth (DOB is only collected for international trips.)		
	☐ Employment Information		
	☐ Criminal History		
	Name, personal phone number, work address. Name and personal phone number for Emergency Contact/Next of Kin		
	☑ Other – see below:		
	Collected for all flights: Passenger weight Training certificate records		
	Collected for international flights only: Gender Country of Residence Date of Birth Citizenship Passport Number Country of Issuance Expiration Date Reason for Trip Length of Trip		
Has there been any attempt to verify PII does not exist on the system?		N/A – PII exists 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.			
If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)		N/A	





MODULE I – PRIVACY NEEDS ASSESSMENT

Threshold Questions		
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	
	YES	
4. Is the information about DOE or contractor employees?		

If the answer to <u>all</u> 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

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. Aircraft Services provides Bonneville personnel and other interested parties necessary and expedient access to Bonneville's domestic and foreign territories. FT Scheduler provides the support to schedule and operate aircraft used to advance Bonneville's business mission. (See 16 U.S.C. § 832a(f); 16 U.S.C. § 839f(a)).

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)?

Individuals who decline to provide information may not ride on BPA aircraft, and would need to make other travel arrangements.

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?

The Contracting Officer included the Privacy Act clause in the FlightTrak contract.





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4. IMPACT ANALYSIS: How does this project or information system impact privacy?	DOE has assessed FlightTrak (FT) Scheduler Business Application Environment (BAE) as a moderate risk system for confidentiality, integrity, and availability according to the criteria set forth in Federal Information Processing Standard (FIPS) 199 established by the National Institute of Standards and Technology (NIST). The risk rating is used to determine the effect to the agency should the system's confidentiality, integrity or availability be compromised. FT BAE is designed to protect PII and mitigate privacy risk via the following administrative, technical, and physical controls: • Strict access control enforcement based on need-to-know Authorized users operate FT BAE to schedule and track flights, assign crew and passengers to flights, track crew currency (fit-to-fly) status, and training. The Privacy Impact is moderate due to collection of Passport number and collection of PII from members of the public including Next of Kin.	
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, the data is retrieved by name.	





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	Yes. DOE-26: Official Travel Records.	
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.	Categories: Name, address, telephone number, social security number, authorization number, travel itinerary, mode and purpose of travel, advance amount, expenses claimed, amounts reimbursed, charge card account numbers, residential sales records, and receipts. The Purpose is includes applicable record categories	
	Purpose: For those records described in <i>Categories of Records in the System</i> , such records are maintained and used by DOE to document official domestic and foreign travel and relocation expenditures and to support reimbursement of allowable expenses.	
	Note that Passport number, DOB, passenger weight, and next of kin are not approved categories.	
7. SORNs		
If the information system is being modified, will the SORN(s) require amendment or revision?	BPA recommends amendment to include Passport number, DOB, passenger weight, and next of kin.	
DATA SOURCES		
8. What are the sources of information about individuals in the information system or project?	The information is provided by individual passengers to Aircraft Services directly when using the required flight mission request protocol. The information is obtained over the phone or via email with password protection or encryption. Crew training and certificate information is provided by crew member	
	or standardization staff.	
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?	Yes	
DATA USE		





MODULE II – PII SYSTEMS & PROJECTS		
11. How will the PII be used?	 Pilots use passenger weight for aircraft weight, balance, and performance requirements. Emergency contact is required in case of incident or accident per the FAA. Communication with the customer requesting contact information via work cell or personal cell. For International flights a Passport Number, Expiration Date, and DOB is required for Canadian and US customs. This information is not collected for domestic flights. Electronic records for the crew ensure they are current and qualified. 	
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?	Information is shared with both Canadian and US Customs when traveling internationally. In case of incident or accident, information will be shared with the FAA, the NTSB, and local law enforcement/first responders. Information will be verified and stored in FT Scheduler application.	
Reports		





MODULE II – PII SYSTEMS & PROJECTS		
	Known reports are:	
	Report of all senior executive travel	
14. What kinds of reports are produced about individuals or contain an individual's	 Customer list – a list of all individuals that fly with BPA, including BPA employees, employees of other federal entities, and a very limited number of members of the general public (such as representatives of Tribal governments) who fly with BPA on official government business only 	
data?	 Flight Dispatch Sheet – the sheet that the pilot receives prior to flights that include passengers, passenger weights, and contact information 	
	Pilot currency and training report – the pilot(s) name and details of required crew trainings/certifications that prove crew member are currently able to fly	
15. What will be the use of these reports?	See Question 11, above.	
	Ops Mgmt (Aircraft Services Manager and Chief Pilot)	
16. Who will have access to	Scheduling/Dispatch Crew Members (Rotary and Fixed Wing Pilots)	
these reports?	System Administrator (Primary Internal Application and Vendor Support)	
	JLST Business Analyst	
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	





MODULE II – PII SYSTEMS & PROJECTS

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DATA MANAGEMENT & MAINTE	NANCE	
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.	Aircraft Services flight request system has a function to keep information updated. Each new flight mission request includes requests for passengers and requestors to review their information for accuracy.	
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	This application is externally hosted and cloud-based. The PII information is updated manually.	
Records Management		
22. Identify the record(s).	Information about aircraft, pilots, and individual passengers as required for scheduling and operating aircraft used by BPA.	
23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	□ Unscheduled X Scheduled (cite NARA authority(ies) below) GRS 5.4. item 120, Aircraft flight operations records. Records of day-to-day aircraft operations documenting flight requests, departures, takeoffs, destinations, and passengers; flight orders; flight plans; load manifests; dispatch releases; flight logs; and similar records. Retention: Temporary. Destroy when 3 years old, but longer retention is authorized if required for business use.	
24. Records Contact	IGLM@bpa.gov	
ACCESS, SAFEGUARDS & SECURITY		
25. What controls are in place to protect the data from unauthorized access, modification or use?	Security access within FT Scheduler restricts what users are allowed to view or update PII stored within the application database. Access is granted by IO or other designated User Admin based on user's business needs.	





MODULE II – PII SYSTEMS & PROJECTS		
	Scheduling	
	Pilots	
26. Who will have access to PII	IO and IO Designee	
data?	If there is an incident or accident Aircraft Services will provide next of kin information to First responders and authorized members of BPA, NTSB, FAA,	
	FlightTrak Support since they maintain administrator permissions	
27. How is access to PII data determined?	Access is restricted on a need to know basis as decided by IO and/or their designee. Aircraft Services scheduler maintains current PII. When an entity requires PII, the scheduler provides only what is necessary.	
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		

END OF MODULE II





Signature Date System Owner (Print Name)	SIGNATURE PAGE		
System Owner (Print Name)		Signature	Date
(Signature)	System Owner		
Local Privacy Act Officer (Print Name) (Signature)	Local Privacy Act Officer		
Ken Hunt Chief Privacy Officer (Signature)	Chief Privacy		

