



United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT
WASHINGTON, DC 20240-0001

Department of the Interior **Privacy Impact Assessment**

Name of Project: Atlantic Offshore Wind Energy Development: Public Attitudes, Values, and Implications for Tourism and Recreation

Bureau: Bureau of Ocean Energy and Management

Project's Unique ID: None

Once the Privacy Impact Assessment (PIA) is completed and the signature approval page is signed, please provide copies of the PIA to the following:

- Bureau/Office IT Security Manager
- Bureau/Office Privacy Act Officer
- DOI OCIO IT Portfolio Division
- DOI Privacy Act Officer

Do not email the approved PIA directly to the Office of Management and Budget email address identified on the Exhibit 300 form. One transmission will be sent by the OCIO Portfolio Management Division.

Also refer to the signature approval page at the end of this document.

A. CONTACT INFORMATION:

- 1) **Who is the person completing this document?** (Name, title, organization and contact information).

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- 6) **Who is the Reviewing Official?** (According to OMB, this is the agency CIO or other agency head designee, who is other than the official procuring the system or the official who conducts the PIA).

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B. SYSTEM APPLICATION/GENERAL INFORMATION:

NOTE: The purpose of this PIA is to try to assess the risks associated with BOEM carrying out the proposed survey, *Atlantic Offshore Wind Energy Development: Public Attitudes, Values, and Implications for Tourism and Recreation*. This PIA must be approved before BOEM submits an Information Collection Request to OMB for review for compliance with the Paperwork Reduction Act. Upon OMB approval, the survey can be implemented. The survey will be launched by a contractor who will also establish the database on BOEM's behalf.

1) Does this system contain any information about individuals?

- a. **Is this information identifiable to the individual?**¹ *(If there is NO information collected, maintained, or used that is identifiable to the individual in the system, the remainder of the Privacy Impact Assessment does not have to be completed).*

No. An internet-based survey will be conducted by the University of Delaware for the Bureau of Ocean Energy Management (BOEM). The survey will be created and data from it analyzed by researchers at the University of Delaware. There is no information collected, maintained, or used from the survey that can be used (or any way manipulated) to identify individuals participating in the survey. In short, analysts at the University of Delaware, project officers at BOEM, and future users of the data will have no way of identifying individuals who participate in the survey.

The survey will be launched/administered by GfK Custom Research (formerly Knowledge Networks) using their KnowledgePanel -- a nationally representative on-line panel. The University of Delaware has specified a group of coastal states from which

¹ "Identifiable Form" - According to the OMB Memo M-03-22, this means information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors).

GfK will draw its sample. Respondents will be directed to the survey by e-mail. These e-mail addresses are proprietary – owned and held by GfK. The University of Delaware and BOEM will never see or have access to the e-mail list. It is entirely under the control of GfK. Furthermore, the response data received by University of Delaware for its analysis includes no information through which individual respondents could be identified indirectly or directly, such as by an address or phone number. This applies to all the information collected, maintained and used by the University of Delaware and BOEM through this system. Below is a statement from GfK, the survey research firm administering the survey.

Statement from GfK:

All records containing personally-identifiable information (PII), such as names, addresses, and emails, are kept secure and all data transfers from web-enabled devices (PCs and laptops used for survey administration) to the main servers are protected by encryption and a firewall. GfK never provides any respondent's PII to any external client or agency without the respondent's explicit and informed consent, and the client or agency must also sign a non-disclosure agreement. Any subcontractors or service providers that we may retain who handle PII and/or survey response data are subject to confidentiality and non-disclosure agreements.

GfK uses organizational controls including pseudonymous identifiers to segregate data and restrict access on a need-to-know basis. A master file linking research participants' names and addresses with their corresponding internally-generated ID numbers is kept secure with access limited to Panel Management staff members and IT administrators who must have access to maintain the computer systems. Thus, researchers, data processing, or coding staff who have a business need to analyze participant-level survey data are able to do so without seeing participants' PII. GfK's database contains field-specific permissions that restrict access to data by type of user, as described above, thus preventing unauthorized access.

As part of our work in conducting surveys in support of Food and Drug Administration (FDA) applications, GfK has implemented Good Clinical Practice guidelines to assure compliance with FDA requirements for systems documentation and privacy of stored survey data. Consequently, a system of standard operating procedures is in place for documenting all processes relating to maintaining confidentiality and the privacy of panel members. The survey response data are identified only by ID numbers. No PII is stored with survey data – PII is stored in a separate database accessible only to persons with a need to know, as described above.

The survey data extraction system exports survey data that has been rendered anonymous with only the Panel Member ID number. Data analysts with access to the survey data extraction system do not have access to PII and cannot join survey data to panel members' PII. For their part, Panel Management staff members do not have access to the survey data extraction system, and therefore cannot join survey data to panel members' PII.

- b. Is the information about individual members of the public?** *(If YES, a PIA must be submitted with the OMB Exhibit 300, and with the IT Security C&A documentation).*

Yes. But again, none of the information is retrievable by name, address, personal code, or personal identifier.

- c. Is the information about employees?** *(If yes and there is no information about members of the public, the PIA is required for the DOI IT Security C&A process, but is not required to be submitted with the OMB Exhibit 300 documentation).* No

2) What is the purpose of the system/application?

An analysis based on the survey will be used by BOEM to assess the impact of offshore wind power projects on coastal recreation and tourism. The impact will be assessed for east-coast states from Massachusetts to South Carolina and will consider the impacts of wind projects at varying distances offshore. The impact will also be assessed by different type of beach (e.g., natural versus developed). The primary impacts of interest are whether the presence of a wind project will make a person's beach experience worse or better and, more importantly, if it would cause a person not to visit a beach. For those choosing another beach, we are also interested in what they would do instead – go to another beach, engage in some other form of recreation and so forth. These effects will be analyzed in the context of an economic model that will provide an assessment of impact on economic welfare.

This information, along with other economic and physical information, would be used in offshore leasing decisions at BOEM, marine spatial planning efforts at BOEM, and for local coastal planning efforts by states and coastal communities.

3) What legal authority authorizes the purchase or development of this system/application?

BOEM is required under multiple statutes (the Outer Continental Shelf Lands Act (OCSLA), 43 USC § 1345; the National Environmental Policy Act (NEPA), 42 USC §§ 4321-4347; and the National Historic Preservation Act (NHPA), 16 USC § 470) to take into consideration the impacts of OCS activities on recreational and cultural resources.

C. DATA in the SYSTEM:

1) What categories of individuals are covered in the system?

Individuals over 17 years old and living in one of the following states are eligible to participate in the survey: ME, NH, VT, MA, RI, CT, NY, NJ, PA, DE, MD, VA, NC, SC, TN, WV, KY, OH.

2) What are the sources of the information in the system?

- a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?**

Respondents provide information about themselves. But again, the information will not be traceable to the individuals.

- b. What Federal agencies are providing data for use in the system? None.**
- c. What Tribal, State and local agencies are providing data for use in the system? None.**
- d. From what other third party sources will data be collected? None.**
- e. What information will be collected from the employee and the public?**

The survey will gather data on each respondent's last beach trip (where, how long, expenditures, etc.), a reaction to a hypothetical wind project offshore (dislike/like, cancel trip, etc.), information on the closest substitute for beach last visited, demographic data (age, income, family size, etc.), and miscellaneous attitudinal data concerning wind projects and environmental issues.

3) Accuracy, Timeliness, and Reliability

- a. How will data collected from sources other than DOI records be verified for accuracy?**

Data will be collected directly from respondents in an internet-based survey so we will work with original "records."

- b. How will data be checked for completeness?**

Each survey response will be checked by question for any errors in entry or accidental omission.

- c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).**

This survey is a distinct data collection effort in Fall 2014. The data will become a part of our data set weeks after the survey is complete.

- d. Are the data elements described in detail and documented? If yes, what is the name of the document?**

The data elements are described in the survey itself and will be described in the Information Collection Request that will be submitted to the Office of Management and Budget.

D. ATTRIBUTES OF THE DATA:

- 1) **Is the use of the data both relevant and necessary to the purpose for which the system is being designed? Yes.**
- 2) **Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**

Yes, new data will be created and will be maintained in a spreadsheet at the University of Delaware and at the Bureau of Ocean and Energy Management.

- 3) **Will the new data be placed in the individual's record? No.**
- 4) **Can the system make determinations about employees/public that would not be possible without the new data?**

Yes, the system will allow us to determine where and when people use beaches on the east coast of the United States and, in turn, how the presence of wind projects offshore might affect beach going.

- 5) **How will the new data be verified for relevance and accuracy?**

The data is relevant by virtue of the questions we have chosen to ask. Results of the study will be peer reviewed. As far as accuracy is concerned, we are working with primary/original data sets available directly in spreadsheet form from the internet-based survey.

- 6) **If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**

We will organize, manage and compile the data in a database wherein all records are treated as confidential, proprietary information, and managed in a manner that ensures protection. There will be no release of the data into the public domain or other researchers or organizations. Everyone working on the project will sign non-disclosure agreements pertaining to release of data.

- 7) **If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.**

No processes are being consolidated.

- 8) How will the data be retrieved? Does a personal identifier retrieve the data? (If yes, explain and list the identifiers that will be used to retrieve information on the individual.)**

The data will not be retrieved using personal identifiers. It will not be possible for BOEM to do so. No analysis is being conducted that calls for the use of a single record or small group of records, so retrieval is not relevant. All work with the data set calls for using all records simultaneously.

- 9) What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

It will not be possible to produce individual reports on individuals. There will be no way to retrieve the names of individual respondents, or other information that could lead to their direct identification, from the database. The data in the system could not lead, directly or indirectly, to the identification of an individual respondent.

- 10) What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent.)**

The survey is optional. Each individual will receive a notification requesting them to participate in the survey and will be told at that time participation is optional. At anytime during the survey a person can stop participating.

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:

- 1) If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?**

The system is operated on one site.

- 2) What are the retention periods of data in this system?**

Records retention schedule is pending review at the National Archives under proposed BOEM Bucket 4- Energy and Mineral Leases - item 4L: Alternative Energy Stakeholder Outreach. The proposed retention is "temporary, destroy 25 years after activity is completed."

- 3) What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented? See above.**

- 4) Is the system using technologies in ways that the DOI has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)? No.**

- 5) How does the use of this technology affect public/employee privacy?**

The proposed data collection does not affect public/employee privacy. No names are recorded databases and no identifiers exist in the data BOEM will receive to trace data to individuals.

6) **Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain. No.**

7) **What kinds of information are collected as a function of the monitoring of individuals? None.**

8) **What controls will be used to prevent unauthorized monitoring?**

The system does not monitor individuals.

9) **Under which Privacy Act systems of records notice does the system operate? Provide number and name.**

The system does not invoke the Privacy Act.

10) **If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.**

The system is new and will not be modified.

F. ACCESS TO DATA:

1) **Who will have access to the data in the system? (E.g., contractors, users, managers, system administrators, developers, tribes, other)**

Members of the research team at the University of Delaware and project manager(s) at BOEM.

2) **How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?**

There is a small circle of researchers at the University of Delaware working on the project (2 Professors and 2 Graduate Students) and two project managers at BOEM. These people and only these people will be given access to the data.

3) **Will users have access to all data on the system or will the user's access be restricted? Explain.**

Users are restricted to those mentioned in the previous question.

4) **What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access? (Please list processes and training materials)**

Information will pass between the University of Delaware and BOEM using secure drop boxes and never posted on-line. Both sites will keep the data stored in a centralized archive.

- 5) Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?**

The Bureau has a Cooperative Agreement with the University of Delaware to design a study and analysis the results. Researchers at the University will design the survey instrument which will not lead to the collection of information that could directly or indirectly identify an individual. Therefore, the information will not be covered by the Privacy Act, and there are no Privacy Act clauses in the Cooperative Agreement.

GfK will then implement the survey and provide raw data (absent any personally identifying information) to the University of Delaware who will then maintain and analyze the data. All data and final analysis will be provided to BOEM. BOEM does not have a contract with GfK. The contract is between the University of Delaware and GfK.

- 6) Do other systems share data or have access to the data in the system? If yes, explain.**

GfK, the survey contractor through the University of Delaware, will have access to the data. See Section B(1)a for a statement from GfK concerning their handling of the data.

- 7) Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**

The system manager

- 8) Will other agencies share data or have access to the data in this system (Federal, State, local, Other (e.g., Tribal))? No.**

- 9) How will the data be used by the other agency? N/A**

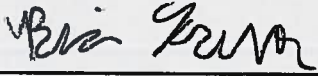
- 10) Who is responsible for assuring proper use of the data?**

The system manager, the contractor, and the University of Delaware researchers

See Attached Approval Page

The Following Officials Have Approved this Document

1) System Manager

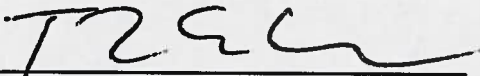


Brian Krevor
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08/07/14

Dated

2) IT Security Manager



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Dated

4) Reviewing Official



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Dated