



U.S. Department of the Interior PRIVACY IMPACT ASSESSMENT

Introduction

The Department of the Interior requires PIAs to be conducted and maintained on all IT systems whether already in existence, in development or undergoing modification in order to adequately evaluate privacy risks, ensure the protection of privacy information, and consider privacy implications throughout the information system development life cycle. This PIA form may not be modified and must be completed electronically; hand-written submissions will not be accepted. See the [DOI PIA Guide](#) for additional guidance on conducting a PIA or meeting the requirements of the E-Government Act of 2002. See Section 6.0 of the DOI PIA Guide for specific guidance on answering the questions in this form.

NOTE: See Section 7.0 of the DOI PIA Guide for guidance on using the DOI Adapted PIA template to assess third-party websites or applications.

Name of Project: Auction of Offshore Wind Lease System (AOWLS)

Bureau/Office: Bureau of Ocean Energy Management (BOEM)

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Point of Contact

Name: Melissa Allen

Title: BOEM Associate Privacy Officer

Email: boemprivacy@boem.gov

Phone: 202-208-7160

Address: 1849 C Street NW, MS-OBPC, Washington, DC 20240

Section 1. General System Information

A. Is a full PIA required?

- Yes, information is collected from or maintained on
 - Members of the general public
 - Federal personnel and/or Federal contractors
 - Volunteers
 - All

No

B. What is the purpose of the system?

BOEM carries out its responsibilities for offshore renewable energy development in Federal waters through the Office of Renewable Energy Programs (OREP). The program began in 2009 when the Department of the Interior (DOI) announced the final regulations for the Outer Continental Shelf (OCS) Renewable Energy Program, which was authorized by the Energy Policy Act of 2005. These regulations provide a framework for all the activities needed to



support the production and transmission of energy from sources other than oil and natural gas, such as offshore wind.

Through BOEM, DOI manages multiple active commercial wind energy leases off the Atlantic covering more than one million acres. OREP manages the commercial wind energy lease sale process. BOEM publishes a Final Sale Notice in the Federal Register to announce a commercial wind energy lease sale (i.e., auction) and describe the major deadlines and milestones in the auction process. Each eligible bidder (i.e., company) must submit a Bidder's Financial Form (which requests the non-sensitive, business-related contact information of company representatives) and an adequate bid deposit to BOEM by the published deadline. BOEM will conduct the monetary stage of the auction through AOWLS.

AOWLS provides a secure, Internet-based solution for BOEM to conduct auctions of offshore wind leases and is enabled by Power Auctions software. The Power Auctions software platform, which resides on a virtual machine in the FedRAMP authorized Amazon Web Services (AWS) GovCloud, is an auction application that provides a secure, Internet-based solution for customers to buy or sell products. The auction platform supports a number of auction designs such as simultaneous multi-round auctions, simultaneous ascending clock auctions, simultaneous descending clock auctions, sealed bid auctions, and combinatorial clock auctions. BOEM documents the specific auction design for a given project in the Auction Rules and the published Final Sale Notice.

C. What is the legal authority?

The Energy Policy Act of 2005 authorizes the Secretary of the Interior (who has delegated to BOEM) the authority to grant leases, easements, or rights-of-way for activities on the OCS that produce or support the production, transportation, or transmission of energy from renewable sources.

The Outer Continental Shelf Lands Act (OCSLA) at subsection 8(p) (43 U.S.C. 1337(p)) authorizes the Secretary of the Interior to issue leases, easements, or rights-of way on the OCS for activities that produce or support the production, transportation, or transmission of energy from sources other than oil and gas, including renewable energy. The Secretary delegated this authority to BOEM. BOEM has issued regulations for OCS renewable energy activities at 30 CFR Part 585, including sections 211 and 216.

D. Why is this PIA being completed or modified?

- New Information System
- New Electronic Collection
- Existing Information System under Periodic Review
- Merging of Systems
- Significantly Modified Information System
- Conversion from Paper to Electronic Records



- Retiring or Decommissioning a System
- Other

E. Is this information system registered in CSAM?

- Yes: 010-000001875 00-06-01-01-02-00; System Security and Privacy Plan for BOEM AOWLS System
- No

F. List all minor applications or subsystems that are hosted on this system and covered under this privacy impact assessment.

Subsystem Name	Purpose	Contains PII	Describe
None	None	No	N/A

G. Does this information system or electronic collection require a published Privacy Act System of Records Notice (SORN)?

- Yes
- No

H. Does this information system or electronic collection require an OMB Control Number?

- Yes
- No

Section 2. Summary of System Data

A. What PII will be collected? Indicate all that apply.

- Name
- Other: All AOWLS users must log into the system with valid multifactor authentication login credentials. Bidding in an auction is restricted to the authorized company representatives of qualified bidders who have valid AOWLS login credentials. BOEM collects the names and non-sensitive, business-related contact information (i.e., mailing address, phone number, fax number, and email address) of individuals authorized to bid on behalf of a company to facilitate creation of their AOWLS login credentials. During an auction period, auction service providers may use the collected contact information of authorized company representatives to troubleshoot reported



issues; no additional PII is collected. After completion of an auction, all data specific to the auction is deleted from the server by the auction services provider.

Auction-related financial transactions are processed on Pay.gov, a Web transaction portal for public access to Federal agency services that is sponsored by the United States Department of the Treasury's Bureau of the Fiscal Service. The Bureau of the Fiscal Service has made the PIA for Pay.gov available for review on its [PIA Web page](#). BOEM does not maintain information pertaining to financial transactions completed on Pay.gov in AOWLS.

B. What is the source for the PII collected? Indicate all that apply.

- Individual
- Federal agency
- Tribal agency
- Local agency
- DOI records
- Third party source
- State agency
- Other: Companies are responsible for providing all information required to participate in a BOEM auction in accordance with established procedures. Bidding in an auction is restricted to authorized company representatives who have valid AOWLS login credentials. Individuals who complete and sign a Bidder's Financial Form on behalf of a company must be on file with BOEM in the Company Qualification Package and are responsible for ensuring the form is complete and submitted properly in a timely manner to receive bidding authorization and valid AOWLS login credentials.

C. How will the information be collected? Indicate all that apply.

- Paper Format
- Email
- Face-to-Face Contact
- Website
- Fax
- Telephone Interview
- Information Shared Between Systems
- Other: Companies submit hard copy packages to BOEM for each lease sale in which they would like to participate in accordance with established procedures. Individuals authorized to bid in an auction on behalf of a company access the Internet-based AOWLS through issued login credentials. Auction-related financial transactions are processed on Pay.gov. BOEM does not maintain information pertaining to these transactions in AOWLS.



D. What is the intended use of the PII collected?

BOEM is responsible for 1) approving the list of bidders (companies) that can bid in the auction and 2) sending the list of individuals authorized to bid on behalf of qualified bidders to the auction services provider. The approved company representatives receive “authorized individual” login credentials from the auction services provider that allow them to place bids on behalf of their company via AOWLS. During an auction period, auction service providers may use the collected contact information of authorized company representatives to troubleshoot reported issues.

E. With whom will the PII be shared, both within DOI and outside DOI? Indicate all that apply.

Within the Bureau/Office: Companies seeking authorization to bid in an auction must provide BOEM with all required information in advance of the lease sale in accordance with established procedures. Authorized individuals within BOEM who are facilitating the auction will have access to company information as well as the names and non-sensitive, business-related contact information of individuals authorized to bid on behalf of a company via AOWLS. Authorized BOEM personnel can access the downloaded and archived AOWLS audit log for a completed auction at any point in time to support any investigations.

Other Bureaus/Offices

Other Federal Agencies: BOEM shares a summary of all bids received in an auction with the Department of Justice (DOJ) immediately following a lease sale. This information is used as part of an antitrust review conducted by the Department of Justice, pursuant to 43 U.S.C. 1337(c), prior to the execution of the lease. The DOJ review is acknowledged in the Final Sale Notice published by BOEM for each planned auction.

Tribal, State or Local Agencies

Contractor: Bidding in an auction is restricted to authorized company representatives who have valid AOWLS login credentials. BOEM is responsible for 1) approving the list of bidders (companies) that can bid in the auction and 2) sending the list of individuals authorized to bid on behalf of approved bidders to the auction services provider. The approved company representatives receive “authorized individual” login credentials from the auction services provider that allow them to place bids on behalf of their company via AOWLS.

AOWLS has a robust audit log that captures all events undertaken by all users in the system. Auction Managers monitor the AOWLS audit log for suspicious behavior. Approved individuals who are off-site (i.e., off-site System Administrator and technical support) are only permitted to access AOWLS when given permission to do so by the Lead Auction Manager.

Other Third Party Sources



F. Do individuals have the opportunity to decline to provide information or to consent to the specific uses of their PII?

Yes: Individuals representing companies that are seeking authorization to bid in an auction voluntarily provide company information, their name, and their business-related contact information via the Bidder's Financial Form. Company representatives may decline to provide their business-related contact information, but in doing so, BOEM may decline to authorize the company they represent to bid in an auction and the individuals will not receive AOWLS login credentials. Individuals who complete and sign a Bidder's Financial Form on behalf of a company must be on file with BOEM in the Company Qualification Package and are responsible for ensuring the form is complete to receive bidding authorization and valid AOWLS login credentials. Bidding in an auction is restricted to authorized company representatives who have valid AOWLS login credentials.

No

G. What information is provided to an individual when asked to provide PII data? Indicate all that apply.

Privacy Act Statement

Privacy Notice: Companies must submit their bid deposit via Pay.gov. Companies are responsible for designating a Pay.gov user and creating their user account. BOEM provides a Privacy Notice (or Privacy Act Statement, if applicable) on the forms the bureau has posted on Pay.gov, including forms accessed by companies submitting a bid deposit to participate in an auction. BOEM does not maintain information pertaining to auction-related financial transactions conducted through Pay.gov in AOWLS.

The login screen for AOWLS features a hyperlink to a Privacy Statement. The Privacy Statement explains what information the site collects and stores pertaining to users (akin to a website privacy policy).

BOEM also provides notice to individuals through the posting of this PIA on the [DOI PIA Web page](#).

Other: All AOWLS users must sign the AOWLS Rules of Behavior form prior to being granted access to the system. Non-bidding users must sign a Rules of Behavior form managed by the auction services provider. The Bidder's Financial Form that BOEM requires companies to submit in advance of the date published in the auction's Final Sale Notice includes detailed completion instructions that specify the purpose of the collection of information and notice that submission of the form is required for the company to be able to participate in the specified lease sale. Individuals submitting the form also sign a certification statement on behalf of their company. The certification statement page includes AOWLS bidder rules of behavior. All



individuals authorized to use AOWLS on behalf of the company must abide by system rules and attempts to misuse AOWLS are strictly prohibited and may result in criminal and civil penalties. The login screen for AOWLS features a warning banner text box. The warning banner text pertains to system activities and monitoring and appears as follows:

This website is operated for the U.S. Government. Any unauthorized access is prohibited. Access of this system may be monitored, recorded, and subject to audit. Use of this system indicates consent to the monitoring and recording of the user's use of the system. The data and documents on this system include Federal records that may contain sensitive information protected by various Federal statutes. Unauthorized user attempts or acts to (1) access, upload, change, delete or deface information on this system, (2) modify this system, (3) deny access to this system, or (4) otherwise misuse this system are strictly prohibited and may result in criminal and civil penalties.

None

H. How will the data be retrieved? List the identifiers that will be used to retrieve information (e.g., name, case number, etc.).

BOEM personnel, the AOWLS Auction Managers, and AOWLS System Administrators do not retrieve any data from AOWLS using personal identifiers. The output from AOWLS consists of a number of files not retrieved using personal identifiers, such as 1) the list of bids placed during the auction; 2) for each auction, the winning bidder(s) and winning prices; 3) summary information for each round (e.g., the number of bids placed in each round and the associated prices); and 4) a comprehensive audit log showing all transactions.

I. Will reports be produced on individuals?

Yes: AOWLS user accounts are monitored through audit logs. AOWLS has a robust audit log that captures all transactions. Auction Managers monitor the audit log for suspicious behavior. BOEM will download and archive the audit log following an auction. Authorized BOEM personnel can access the downloaded and archived audit log for a completed auction at any point in time to support any investigations.

No

Section 3. Attributes of System Data

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

Representatives of companies seeking authorization to bid in an auction voluntarily provide company information and their non-sensitive, business-related contact information for each auction. The representatives authorized to bind the company are required to certify to the truth



and accuracy of the statements and information they have provided in the Bidder's Financial Form on behalf of the company.

B. How will data be checked for completeness?

The individual who completes and signs the Bidder's Financial Form must be on file with BOEM in the Company Qualification Package and is responsible for ensuring the form is complete and submitted in accordance with established BOEM procedures. Following a review of required information, BOEM will provide the auction services provider with the business-related contact information of representatives of companies authorized to bid in an auction via AOWLS.

C. What procedures are taken to ensure the data is current? Identify the process or name the document (e.g., data models).

Companies seeking authorization to bid in an auction must submit their information for each auction that is run in accordance with established procedures. Company representatives who are authorized to bind the company are required to certify to the truth and accuracy of the statements and information they have provided in the Bidder's Financial Form they submitted on behalf of their company. If the information is not accurate, the authorized company representative will not receive the login credentials; delivery will not be possible. BOEM personnel will be responsible for following up with the bidder to receive updated location information.

D. What are the retention periods for data in the system? Identify the associated records retention schedule for the records in this system.

BOEM maintains lease bid and sale records in accordance with N1-589-12-4 (Item 4F). These records have a temporary disposition with a cutoff at the close of the fiscal year, or when the activity is completed. BOEM retains these records either onsite or at an offsite storage facility and deletes/destroys them 25 years after the cutoff.

E. What are the procedures for disposition of the data at the end of the retention period? Where are the procedures documented?

The auction services provider creates AOWLS user accounts and encrypts and stores the qualified bidders list provided by BOEM in the auction archive for review in the event the auction is contested. BOEM will download the auction archive files and audit log and maintain the records in accordance with the applicable records schedule. After completion of an auction, all data specific to the auction is deleted from the server by the auction services provider.

Approved disposition methods include shredding or pulping for paper records, and degaussing or erasing for electronic records, in accordance with NARA Guidelines and Departmental policy. Media disposal procedures are documented in the AOWLS System Security and Privacy Plan.



F. Briefly describe privacy risks and how information handling practices at each stage of the “information lifecycle” (i.e., collection, use, retention, processing, disclosure and destruction) affect individual privacy.

BOEM will conduct the monetary stage of auctions of commercial wind energy leases through AOWLS. AOWLS is rated as a Federal Information Security Modernization Act of 2014 (FISMA) moderate system based upon the type and sensitivity of data and requires the implementation of strict security and privacy controls to protect the confidentiality, integrity, and availability of the sensitive data contained in the system.

There are minimal risks to the privacy of individuals throughout the AOWLS information lifecycle. The PII that BOEM collects and uses to conduct an auction is limited to the non-sensitive, business-related contact information of individuals authorized to represent companies seeking to conduct business with BOEM to issue login credentials and troubleshoot issues encountered during an auction. BOEM collects the minimum amount of information necessary to conduct commercial wind energy lease auctions in accordance with the applicable legal authorities and does not collect any sensitive personal information from business representatives. BOEM will evaluate the potential privacy risks generated by any proposed changes to the categories of information collected from individuals during any stage of the auction process prior to the bureau’s implementation of those changes.

There is a risk that individuals may not receive adequate notice of BOEM privacy practices or the extent of the use of the information that BOEM is authorized to collect to conduct auctions. Companies that BOEM has acknowledged as eligible bidders in a Final Sale Notice published in the Federal Register are responsible for providing all information required to participate in a BOEM auction in accordance with established procedures. Companies and their designated representatives who will interact with BOEM and its service providers are provided by BOEM with notice at various points throughout the auction process. Beyond the opportunity to thoroughly review the published Final Sale Notice and the Bidder’s Financial Form, companies and their designated representatives may also review the notice provided on Pay.gov as they submit a bid deposit. Authorized company representatives must review and sign a rules of behavior form before acquiring access to AOWLS. Before logging into AOWLS, users may also review a Privacy Statement and the warning banner text. All AOWLS users may submit general or system-related privacy questions to BOEM at any time. BOEM also provides general notice through the publication of this PIA.

There are risks of unauthorized access to information collected by BOEM to conduct the auction process. BOEM and its service providers can mitigate the risks of unauthorized access and unauthorized use by controlling and monitoring access to the system and auction-related information. AOWLS has various access controls in place to limit access to authorized Federal employee, contractor, and bidder users. All access to AOWLS is role-based to prevent fraudulent activity. BOEM is responsible for 1) determining who has privileged access (e.g., Auction Managers and BOEM staff), 2) approving the list of bidders (companies) that can bid in the auction, and 3) sending the list of individuals authorized to bid on behalf of approved bidders to the auction services provider. All users must complete a Rules of Behavior form before being



granted system access through multifactor login credentials (as part of the Bidder's Financial Form, authorized individuals for companies must sign a certification statement that contains AOWLS rules of behavior for bidders; non-bidding users must sign a Rules of Behavior form managed by the auction services provider). Approved individuals who are off-site (i.e., off-site System Administrator and technical support) are only permitted to access AOWLS when given permission to do so by the Lead Auction Manager. Auction Managers must only use their designated read-only account, except when given permission from the Lead Auction Manager to use the read/write Auction Manager account. In between auctions, the system is not online and cannot collect or process data. After each auction, all bidders' system access is disabled. At BOEM, only authorized bureau personnel can access archived commercial wind energy lease sale records for official business purposes. Authorized BOEM personnel can access the downloaded and archived audit log for a completed auction at any point in time to support any investigations. Processes are in place to remove access to AOWLS and auction-related records for Federal employees and contractors that have been terminated for both favorable and non-favorable termination.

All AOWLS users are warned through the system warning banner that use of the system is monitored and unauthorized system use may result in civil or criminal penalties. The Power Auctions software platform has a robust audit log that captures all transactions to protect system and data integrity. During an auction, the Auction Manager team monitors the AOWLS audit log for suspicious activity. For each action, an audit log entry is created that includes the date and time, what type of event occurred, what user identification is associated with the event, and the outcome of the event. After completion of an auction, all data specific to the auction is deleted from the server by the auction services provider. BOEM will download and securely archive the audit log and will authorize and monitor records access to prevent unauthorized access.

BOEM and its auction service providers can further mitigate the risks of unauthorized access and unauthorized use of AOWLS and auction-related information by implementing applicable security and privacy policies, procedures, and training requirements. BOEM employees and contractors with access to the DOI computer network and information resources are required to complete security and privacy awareness training, sign DOI Rules of Behavior, and complete role-based security and privacy training (as applicable) to properly understand and carry out their responsibilities to responsibly access, use, and safeguard privileged information. Federal employees and contractors are also prohibited from disclosing privileged information in accordance with Federal requirements, confidentiality clauses, and non-disclosure agreements, as applicable. All AOWLS users must safeguard their login credentials and immediately report any lost or compromised credentials in accordance with established procedures.

There is a risk that data in AOWLS will be maintained for longer than necessary. This risk is mitigated by managing records in accordance with a NARA-approved records schedule.



Section 4. PIA Risk Review

A. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

Yes: AOWLS provides a secure, Internet-based solution for BOEM to conduct auctions of offshore wind leases. The data BOEM collects from companies seeking authorization to bid in a lease sale is both relevant and necessary to conducting auctions of offshore wind leases. The auction services provider uses the business-related PII that BOEM provides to create AOWLS login credentials for representatives of companies authorized to bid in an auction.

No

B. Does this system or electronic collection derive new data or create previously unavailable data about an individual through data aggregation?

Yes

No

C. Will the new data be placed in the individual's record?

Yes

No

D. Can the system make determinations about individuals that would not be possible without the new data?

Yes

No

E. How will the new data be verified for relevance and accuracy?

AOWLS does not derive new data or create previously unavailable data about an individual through data aggregation.

F. Are the data or the processes being consolidated?

Yes, data is being consolidated.

Yes, processes are being consolidated.



No, data or processes are not being consolidated.

G. Who will have access to data in the system or electronic collection? Indicate all that apply.

Users

Contractors

Developers

System Administrator

Other: Access to AOWLS is restricted to users who have valid login credentials. A user's access level is based upon their assigned user role. Users are either bidders (i.e., companies) or non-bidding privileged users (e.g., Auction Managers and BOEM staff).

H. How is user access to data determined? Will users have access to all data or will access be restricted?

AOWLS access is based upon assigned user roles. Users are assigned a role that is the most restrictive, yet allows them to perform their tasks in accordance with the principle of least privilege. The only functions that a given user can access are those associated with that role.

Only authorized personnel within BOEM can access auction-related records. BOEM is responsible for 1) determining who has privileged access (e.g., Auction Managers and BOEM staff), 2) approving the list of bidders (companies) that can bid in the auction, and 3) sending the list of individuals authorized to bid on behalf of approved bidders to the auction services provider.

I. Are contractors involved with the design and/or development of the system, or will they be involved with the maintenance of the system?

Yes. All applicable privacy-related contract clauses and provisions are included in the contract.

No

J. Is the system using technologies in ways that the DOI has not previously employed (e.g., monitoring software, SmartCards or Caller ID)?

Yes

No



K. Will this system provide the capability to identify, locate and monitor individuals?

- Yes. AOWLS has a robust audit log that captures all events undertaken by all users in the system.
- No

L. What kinds of information are collected as a function of the monitoring of individuals?

The AOWLS audit log captures all transactions. For each action, an audit log entry is created including the date and time, what type of event occurred, what user identification the event is associated with, and the outcome of the event. During an auction, the Auction Manager team monitors the AOWLS audit log for suspicious activity.

M. What controls will be used to prevent unauthorized monitoring?

Monitoring of AOWLS is strictly limited to AOWLS System Administrators and Auction Managers who review audit logs after each auction. In between auctions, the system is not online and cannot collect or process data.

All privileged non-bidding users such as Auction Managers must sign a Rules of Behavior form acknowledging their access responsibilities and the potential civil and/or criminal penalties that may result from a violation of AOWLS rules.

N. How will the PII be secured?

(1) Physical Controls. Indicate all that apply.

- Security Guards
- Key Guards
- Locked File Cabinets
- Secured Facility
- Closed Circuit Television
- Cipher Locks
- Identification Badges
- Safes
- Combination Locks
- Locked Offices
- Other. Specific details regarding AWS GovCloud facility controls are described in the AWS SSP.



(2) Technical Controls. Indicate all that apply.

- Password
- Firewall
- Encryption
- User Identification
- Biometrics
- Intrusion Detection System (IDS)
- Virtual Private Network (VPN)
- Public Key Infrastructure (PKI) Certificates
- Personal Identity Verification (PIV) Card
- Other

(3) Administrative Controls. Indicate all that apply.

- Periodic Security Audits
- Backups Secured Off-site
- Rules of Behavior
- Role-Based Training
- Regular Monitoring of Users' Security Practices
- Methods to Ensure Only Authorized Personnel Have Access to PII
- Encryption of Backups Containing Sensitive Data
- Mandatory Security, Privacy and Records Management Training
- Other

O. Who will be responsible for protecting the privacy rights of the public and employees? This includes officials responsible for addressing Privacy Act complaints and requests for redress or amendment of records.

The AOWLS Information System Owner is responsible for the oversight and management of AOWLS and ensuring the implementation of adequate security and privacy controls. The Information System Owner and the Information System Security Officer, in consultation with the BOEM Associate Privacy Officer, are responsible for complying with applicable Federal laws and policies to protect individual privacy and addressing any reported system- or process-related privacy issues in a timely manner.



P. Who is responsible for assuring proper use of the data and for reporting the loss, compromise, unauthorized disclosure, or unauthorized access of privacy protected information?

The AOWLS Information System Owner has the responsibility for operational oversight and management of the system's security and privacy controls, ensuring to the greatest possible extent that the data is properly managed, and assuring that all access to the data has been granted in a secure and auditable manner. The AOWLS Information System Owner and Information System Security Officer are responsible for ensuring that any suspected or confirmed compromise of data is reported to the DOI Computer Incident Response Center (DOI-CIRC) and the proper DOI officials within 1-hour of discovery in accordance with Federal policy and established procedures.