

BPA Policy 470-6

Limited Personal Use of BPA IT Services and Equipment

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1. Purpose & Background

The purpose of this policy is to provide guidance for limited personal use of Bonneville Power Administration (BPA) Information Technology (IT) products and services. It describes conditions and restrictions under which BPA IT products and services may be used for personal as opposed to BPA business-only matters.

BPA IT products and services represent a significant investment of BPA resources and their use is essential to the efficiency of the service that BPA provides. The misuse of BPA IT products and services poses significant risks to the mission and business of BPA.

This allowance for personal use does not modify the requirements of the Standards of Ethical Conduct for Employees of the Executive Branch, Title 5 C.F.R. Part 2635], including the employee's responsibility to protect and conserve government property, to use it for authorized purposes only, and to use official time in an honest effort to perform official duties [5 CFR 2635.704(a) and (b)]. Nothing in this policy pertains to or restricts use of government property by an employee to carry out his or her official duties and responsibilities in furtherance of BPA's mission.

2. Policy Owner

The BPA Chief Information Officer (CIO) has overall responsibility for this policy.

3. Applicability

This policy applies to the use of all BPA IT services and equipment.

This policy applies whether the work is performed within the BPA work environment or from a remote location.

4. Terms & Definitions

A. **Authorized System Users:** BPA personnel who are:

1. validated to meet all pre-requisites, such as background checks, training, and physical access, as detailed by the relevant system, and
2. granted access to said system.

B. **BPA IT Equipment:** Includes but is not limited to any BPA-owned or leased device that can be attached or connected to, or interact with, any network, service, or application operated by, or on behalf of, BPA, including any IP-addressable equipment or devices. BPA IT equipment includes, but is not limited to, desktop computers, laptops, tablets, thin clients, firmware, software, shareware, freeware, desk telephones, digital cameras, cell phones, smart phones, facsimile machines, copiers, printers, scanners,

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multifunction devices (e.g., combined copier, printer, and scanner), servers, fixed or portable storage devices (e.g., USB flash drives), network routers and switches, and peripheral devices (e.g., monitors, keyboards, PIV readers). BPA IT equipment may be represented in physical, on-premises-virtual, and/or cloud-virtual (e.g., cloud-based IT services such as Desktop-as-a-Service, Software-as-a-Service, Platform-as-a-Service, Infrastructure-as-a-Service) forms.

- C. **BPA IT Services:** Any service performed by BPA IT personnel in relation to BPA IT equipment. Examples include trouble-shooting, repair, training, planning, installation and configuration, managing, etc.
- D. **Operational Technology (OT):** OT is a subset of IT software, hardware, or service whose function is to directly control or support the operation, maintenance, or monitoring of the electrical grid and that satisfies any of the following:
 1. accesses or contains memory or storage.
 2. has logical access.
- E. **Personal Use:** Use of BPA IT equipment for non-BPA business.

5. Policy

A. Limited personal use allowance

BPA IT services and equipment are to be used only for activities related to, and consistent with, the performance of BPA’s mission, or for limited personal use of designated BPA IT services and equipment as defined in this policy.

Connecting BPA equipment to the internet exposes BPA to additional cyber security risk. BPA employs several cyber security protections between its internal networks and the internet. The following circumstances apply to any personal use of BPA IT services and equipment unless specifically otherwise authorized by BPA Cyber Security:

- 1) Any personal use that requires connection to the internet must be routed through BPA’s internal network to the internet. This is accomplished by using one of the authorized methods to connect BPA IT equipment to BPA’s internal network. Contact the BPA IT Service Desk for currently authorized connection methods.
- 2) Any personal use that requires cellular or wi-fi phone calls, or text messaging, is authorized subject to any limitations described in this policy.
- 3) Any personal use that may be conducted while not connected to any network, e.g. working on documents stored on the local hard disk, is authorized subject to any limitations described in this policy.

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B. General Limitations

This policy does not grant to employees or create an inherent right to use Government resources. The privilege to use Government resources for personal purposes may be further limited or revoked at any time by an appropriate BPA official (e.g., a supervisor in the employee's organizational chain of command). Employees may use Government resources for personal purposes, but only where such use involves de minimis additional expense to the Government, does not interfere in any way with the mission or operations of the Department of Energy or BPA, and is otherwise permissible under BPA Policy, DOE Orders, and applicable state and federal laws and regulations.

Electronic storage of personal files is not to exceed a volume of 5GB in aggregate to avoid greater than de minimis cost to BPA.

C. Application of national threat levels to limited personal use allowance

The limited personal use allowance may be modified by BPA's Office of Cyber Security due to changes in the national threat level, or other credible threats. Should additional limits, such as web site or email blocking, or complete revocation of limited personal use, become necessary, BPA's Office of Cyber Security shall use official communication channels to notify the workforce.

D. Specific prohibitions

Authorized Systems Users are prohibited from using BPA IT Equipment:

1. for any personal use that interferes with employees' official duties or reflects badly on the conduct of the federal service (All communications that use BPA IT equipment must be professional, including instances of personal use.).
2. for any personal use, that violates federal, state or local law.
3. to maintain or support a private business or to assist family, friends or other persons in such activities.
4. in any manner that violates the Standards of Ethical Conduct for Employees of the Executive Branch.

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5. in any manner that expressly or impliedly represents that BPA or the federal government has sanctioned or endorsed any personal use or that gives the impression that the user is acting in an official capacity.
6. in any manner that is an express or implied threat or violates the BPA Code of Conduct.
7. in any manner that supports hate speech, or materials that ridicule others on the basis of sex (pregnancy, sexual orientation, gender Identity), age, race, color, religion, disability, national origin, genetic information, educational or economic level.
8. in any manner that creates a risk to BPA IT equipment systems (e.g., when such use creates or increases the possibility of threats to BPA IT equipment by malicious software).
9. any personal use of BPA Operational Technology (OT) equipment such as Instrument Controllers (ICs) under any circumstances.
10. at a remote location (outside of BPA facilities) if personal use is the sole reason for removing such equipment from the BPA work environment. However, when there is a BPA business requirement to relocate BPA IT equipment, such relocation may be done through the BPA established processes, and that equipment may be used for limited personal use as described in this policy.
11. to purchase products for personal use, except for the BPA IT equipment set up for personal use in the BPA Library.
12. any personal use of any BPA IT equipment that is designated for classified use under the National Security Act.
13. any personal use that imposes more than minimal additional expense to BPA unless authorized by BPA.
14. any personal use that requires the downloading (i.e., copying) of files including, but not limited to, documents, attachments, motion or still images, digital audio files, and data into BPA IT equipment in such volume that it noticeably affects the production performance of network, compute, or storage resources.
15. any personal use of a program or internet site that provides continuous data streams to BPA IT equipment, even if such streams are not stored as files within BPA

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IT equipment (e.g., continuous stock quotes, radio broadcasts, news headlines, weather, etc.).

16. for creating, downloading, viewing, storing, copying or transmitting sexually explicit or sexually oriented materials using BPA IT equipment.
17. to participate in charitable fund-raising activities, except the Combined Federal Campaign (CFC) or other federally authorized activities.
18. to participate in political activities, as prohibited by the Hatch Act.
19. any frequent personal use that may cause congestion, delay, or disruption of service to any BPA IT equipment, including audio, and streaming video and audio, etc., unless authorized by Cyber Security.
20. any personal use that involves unauthorized acquisition, use, reproduction, transmission, or distribution of controlled information (e.g., computer software and data; classified, business sensitive, or other nonpublic data; proprietary data; export controlled software or data; or any information in violation of the Privacy Act, copyright, trademark, or other intellectual property rights beyond fair use).
21. any use that involves gaining unauthorized access to internal or external systems or networks.
22. any use that involves gambling of any kind.
23. any use that involves trading or procurement of weapons, including ammunition, of any kind.

E. No privacy expectation

There is no right to privacy related to the use of BPA IT services or equipment. Communications using, or information captured by or stored on, BPA IT equipment are not private and are subject to routine monitoring, interception, and search, and may be disclosed or used for any legitimate business reason. At any time, authorized personnel may inspect and seize any information stored on BPA IT equipment.

F. Guidance for allowed personal use

The following examples of appropriate limited personal use of BPA IT equipment are provided solely for the purpose of guidance for Authorized Systems Users and BPA supervisors to understand what may be allowed as personal use of BPA IT equipment. Authorized Systems Users and BPA supervisors should not rely on these examples as

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specific grants of authority for the uses described. If Authorized Systems Users or BPA supervisors are in doubt about whether a specific personal use is or is not allowed by this policy, they should always seek specific authority from their supervisors or Cyber Security.

Examples:

1. Occasionally using email, telephone, or internet-based communications, including voice mail, to keep in touch with family members or significant others regarding work and/or school schedules (e.g., Authorized Systems Users call or email spouse to inform spouse of required overtime work; Authorized Systems Users call or email dependent’s school to confirm time of parent-teacher meeting, etc.).
2. Using email, telephone, or internet-based communications to check on the status of bank, credit union or TSP accounts during non-work time.
3. Preparing and storing a current resume and related materials on their local hard drive, subject to the electronic storage of personal files limitation of 5GB in aggregate.
4. Conducting research regarding personal travel arrangements or consumer matters (e.g., Kelly Blue Book information) on web sites during non-work time.
5. Checking current or predicted weather on web sites.
6. Personal electronic images may be stored on the local hard drive if one exists, subject to the electronic storage of personal files limitation of 5GB in aggregate.

6. Policy Exceptions

There are no exceptions to this policy unless specifically granted by the Office of Cyber Security or the Office of the CIO.

7. Responsibilities

A. The BPA Chief Information Officer (CIO)

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1. Sponsors and administers this policy including: overseeing periodic review, ensuring consistency with BPA strategic and operational plans, and meeting regulatory requirements.
 2. Reviews and approves or rejects any requests for exception to this policy.
 3. Reports any significant violations of this policy, or the standards and operations procedures referenced in this policy, to the BPA executive governance body.
- B. Authorized Systems Users
1. Are required to be familiar with current BPA policy regarding the use of BPA IT services and equipment, including the limits of personal use established in this policy, and conforming their use of these BPA resources to policy requirements.
- C. BPA Supervisors and Managers
1. Are responsible for ensuring that their organizations are current in their understanding of BPA policy regarding the use of BPA IT services and equipment.
 2. Have an obligation to understand this policy and observe the activities of BPA federal employees sufficiently to ensure that their conduct is consistent with this policy.
- D. The BPA Chief Information Security Officer (CISO), head of the Office of Cyber Security
1. The CISO develops and maintains BPA’s information security program to ensure effective implementation and maintenance of required information security policies, procedures, and control techniques. Federal requirements for cyber security are interpreted solely by the CISO.
 2. Reviews and recommends to the CIO approval or rejection of any requests for exception to this policy.
- E. Contracting Officer Representatives (CORs) and Field Inspectors
1. Are responsible for ensuring that contracts providing companies with access to BPA IT services or equipment include a clause requiring adherence to this policy.
 2. Have an obligation to understand this policy and observe the activities of contractor employees sufficiently to ensure that their conduct is consistent with this policy.

8. Standards & Procedures

Written policy exception requests will be reviewed by both Cyber Security and the CIO. The CIO will respond to the request in writing. Requests and responses will be retained for at

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least seven years beyond the date on which the CIO determines the exception is no longer approved.

9. Performance & Monitoring

On a continuous basis, a delegate assigned by the CIO shall report to the CIO any significant violations of this policy. These violations shall also be reported to the BPA executive governance body.

10. Authorities & References

This policy is promulgated under the authority of Title III – Information Security, Federal Information Security Management Act of 2002, Chapter 35 of Title 44, United States Code, § 3544. Federal agency responsibilities A.3.(C) “developing and maintaining information security policies, procedures, and control techniques to address all applicable requirements.”

- A. BPA Policy 473-2 Information Technology Policies
- B. BPA Policy 470-8 Business Use of BPA IT Services and Equipment
- C. BPA Policy 470-7 Mobile Technology Management
- D. Title 40 U.S. Code Subtitle III Information Technology Management
- E. 5 CFR § Part 2635, Standards of Ethical Conduct for Employees of the Executive Branch
- F. BPA Cyber Security Program Plan (CSPP)

11. Review

This policy shall be reviewed by the policy owner at least every three years for relevant purpose, content, currency, effectiveness, and metrics.

12. Revision History

| Version Number | Issue Date | Brief Description of Change or Review |
|----------------|------------|--|
| 1.0 | 05/15/24 | Initial publication after conversion from BPAM |
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