TVA

Tennessee Valley Authority
Privacy Impact Assessment (PIA)

ATLAS

This PIA is a tool used by the TVA Privacy Office to identify system privacy risks at the planning/initiation phase of the system development lifecycle (SDLC). The PIA should be reviewed and updated every three years in conjunction with the anniversary of the Authority to Operate (ATO) or sooner, if the system undergoes a major change. For additional guidance on how to complete this PIA, please refer to the TVA Guide to Completing Required Privacy Documentation. Questions regarding this document should be directed to camarsalis@tva.gov .

PIA should be submitted to:
Christopher Marsalis
TVA Senior Privacy Program Manager
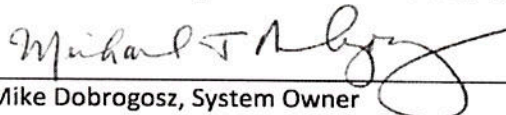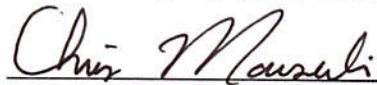(865) 632-2467
camarsalis@tva.gov

Version 1.0
August 2013

PRIVACY PROGRAM

PROGRAM MANAGEMENT

Name of PIA Author	Chris Marsalis	
Date of Submission	03/18/2015	**System Owner Details**
Responsible TVA Business Unit	Natural Resources & Real Property Svcs	Name: Mike Dobrogosz
Name of System/Collection	TIRIRIGA/ATLAS	Title: Sr ManagerReal Estate Strategy & Support Phone: (865) 632-3266 Email: MJDobrog@tva.gov
Configuration Item	TBD	
Reason for completing PIA	☒ New system ☐ Significant modification to an existing system ☐ To update existing PIA for a triennial security reauthorization	

PRIVACY DETERMINATION
(To be completed by the TVA Privacy Program)

Privacy Office Comments	Configuration Item Name: TRIRIGA Integrated Workplace Management System and TREES (TRIRIRGA)

The signatures below certify that the information in this document has been reviewed and approved:

1. _____   Mike Dobrogosz, System Owner   6/12/15
   Date

2. _____   Chris Marsalis, Senior Privacy Program Manager   6/12/15
   Date

3. _____   Dan Traynor, Senior Agency Official for Privacy   _____
   Date

SYSTEM OVERVIEW

1. Please describe the purpose of the system/collection:

<Develop a detailed description of the purpose(s) for which personally identifiable information (PII)[1] is collected, used, maintained, and shared. The section must tell a complete story including system name and acronym, the Business Unit that owns the system, mission of the Business Unit, purpose of the system, description of a typical transaction, the subjects of the collection, how information is collected (if not stated in the transaction), how information is retrieved, and any connections to other internal or external systems. If connections to other external systems exist, include information on relevant memorandum of understanding (MOU) allowing for the data sharing.>

Several years ago, TVA envisioned a system that would leverage the vast amount of information that several organizations and processes across the company collect and generate for each tract of land that TVA owns and/or uses to become the single "portal" for all Real Estate, Land Use, and Facilities data and transactions. A system that consolidates and logically organizes information associated with land acquisitions, disposals, licensing, permitting, land condition assessments, violations and encroachments, recreation inventory, GIS spatial components, facilities condition assessments, and lease management would transform this vision into a reality. A unified system such as this would

- Provide a platform for enabling the strategic real estate plan, which includes prioritization of funds, projects and disposal of real property

- Become the central version of the truth for land and facility records with full transaction history

- Allow for the retirement of legacy systems that currently exist on outdated and/or manually intensive platforms including LADS and numerous MS access databases and spreadsheets

- Allow for a reduced resource demand to manage and maintain core business information

Accomplishing this vision of an Integrated Property Management Systems is the mission of project ATLAS.

In October 2012, Information Technology began a project called "Land Acquisition and Disposal System (LADS) Replacement" (FP603916-001). The intent of that project was to find a replacement for the obsolete LADS application that would utilize modern technology and integrate other functionality or components necessary for ease of reporting and data mining. That project also assumed that some process re-engineering would need to occur and that some additional system interfaces to Property and Natural Resources systems would need to be created.

During the course of the LADS Replacement project, a Request-For-Proposal (RFP) was issued to several vendors. As part of that process, the preferred solution was determined to be IBM's TRIRIGA product. Because TRIRIGA is a product TVA already owns, the project team elected to end the RFP and leverage internal contracts to accomplish the goals of the project.

---

[1] OMB Memorandum 07-16, *Safeguarding Against and Responding to the Breach of Personally Identifiable Information*, defines PII as information which can be used to distinguish or trace an individual's identity such as their name, social security number, biometric records, etc., alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc.

In addition, there was a separate on-going project called "TRIRIGA" (FP606359-001) that was intended to expand the use of the IBM TRIRIGA application suite supporting TREES to include Facility Assessment and Facility Lease Management.

Once the decision was made to move forward with TRIRIGA, it was determined that the vision described above could best be realized by merging the two projects.

This newly merged project is now known as ATLAS and has retained the same funding project number as the LADS Replacement project (FP603916).

The Business Unit that owns this system is Natural Resources & Real Property Services. Facilities has a key stake in the area of the system that supports the Facilities and Lease Management business functions.

The majority of the information entered into this system is collected through direct data entry within the application. Information can be retrieve via queries within the application or via BIRT reports which are also maintained within the TRIRIGA product.

Since this system is replacing the LADS application functionality, the previous assessment performed for that application may still be relevant and should be referenced for additional information.

2. What type of information can be collected, maintained, used, and/or disseminated? Check all that apply:		
	☒ Name	☐ Mother's Maiden Name
	☒ Home Phone	☐ Date of Birth
	☒ Home Address	☐ Place of Birth
	☒ Social Security number (SSN)	☐ Employment Information
	☐ Medical or Health Information	☐ Criminal History
	☐ Financial Information	☐ Biometric Information
	☐ Clearance Information	☐ Other: <Please specify>

AUTHORITY AND PURPOSE

3. Legal authority to collect, use, maintain, and share data in the system:
<Include information on the legal authority that permits the collection, use, maintenance, and sharing of data in this system. The system of records notice (SORN) will contain details regarding the authorities. If SSNs are collected, please specify the legal authority for that collection.> Tennessee Valley Authority Act of 1933, 16 U.S.C. 831–831ee; Pub. L. 87–852, 76 Stat. 1129; Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.

4. For each box checked above in Question 2, please provide the business need for the collection:	"Name/Home Phone/Home Address" - Land Owner/Buyer information for Sale/Disposal of Land Tracts "SSN" - Required to populate IRS 1099 form for Land Sale transactions. SSN is viewable only by authorized users within the application. Otherwise it will be masked. This information is not released to the public; Tax ID needed for Federally required reporting Name, SSN etc needed to distingish between individuals w/same name. Correct propery owners need to be identfied to receive correct payment SSN needed for IRS 1099 reporting. The SSN information will be encrypted.
5. Will this information be retained in a Privacy Act <u>System of Records Notice (SORN)</u>? If data in the system can be retrieved using one or more of the identifiers listed in Question 2, this system is subject to the Privacy Act and requires a SORN.	☐ No ☒ Yes TVA-34 (Project/Tract Files), TVA-36 26a (Permit Application Records

ACCOUNTABILITY, AUDIT, AND RISK MANAGEMENT

6. What TVA employees and business units are responsible for the privacy governance and administration of this system?

TVA's Office of the Chief Information Officer is the responsible program owner for TVA's Information Security and Privacy Programs, ensuring compliance with TVA-SPP-12.02, TVA Information Management Policy. TVA-SPP-12.02 implements the various privacy laws based on the Privacy Act of 1974 (the Privacy Act), the E-Government At of 2002 (Public Law 107-347), the Federal Information Security Management Act (FISMA), Office of Management and Budget (OMB) mandates, and other applicable North American Electric Reliability Corporation (NERC) and TVA Records Management procedures and guidance. In addition to these practices, additional policies and procedures will be consistently applied, especially as they relate to protection, retention and destruction of federal records. Federal and contract employees are given clear guidance in their duties as they relate to the collection, use, processing and security of privacy data. Guidance is provided in the form of mandatory annual security and privacy awareness training, including "TVA Information Security Training". (See: TVA-SPP-12.01 §3.2.10.) The TVA Privacy Office will conduct period privacy compliance reviews of the [INSERT SYSTEM NAME] (ACRONYMN) in accordance with the requirements of the Office of Management and Budget (OMB) Circular A-130.
ATLAS

7. What privacy orientation or training is provided to authorized users of the system?

<Describe privacy orientations or training provided authorized users of the system, including if the training is tailored to differentiate and emphasize the privacy requirements of the specific system instead of simply covering basic topics common to any system. Describe any features about the operation and administration of the system that make users continuously aware of their access responsibilities.>
Standard TVA training regarding the protection of TVA information/data. Application will display security warnings/policies throughout the application where appropriate.

DATA QUALITY AND INTEGRITY

7. How is data quality is ensured throughout the data lifecycle and business processes associated with the use of the data? Check all that apply.

☒ Cross referencing data entries with other systems   ☒ Character limits on text submissions

☐ Third party data verification   ☒ Numerical restrictions in text boxes

☒ Data taken directly from individuals via a form(s).   ☐ Other: <Please specify>
Please list form(s) name and number here:
Email; Printed ApplicationDirect Entry into 26a
Application form

DATA MINIMIZATION AND RETENTION

8. What are the retention periods for the data in the system?

< Please describe policies, processes and procedures (if any) for retaining data in the system. This information should be consistent with the TVA records disposition schedules (RDS) published by National Archives and Records Administration. If your system does not have a RDS, please work with Records Management to complete and submit the Standard Form (SF) 115 to obtain a job number and include details here regarding the proposed records schedule.>
One of the key features of this application is the ability to view all the historical activity that has ever occurred on a TVA tract of land. For this reason, this system is highly dependent upon the availability of historical data within the system so data is not expected to be purged from the application database.

13. What types of administrative safeguards exist to protect the information?	☐ Contingency Plan ☒ Regular Back-up of files ☒ Offsite storage of back up files ☒ User training	☒ User manuals for the system ☐ Rules of Behavior ☐ Least privilege access ☐ Other: <Please specify>
14. What monitoring, recording, and auditing safeguards are in place to prevent or detect unauthorized access or inappropriate usage?	Standard TVA practices to protect servers and data apply here . SSN data will be encrypted through SSL. Application level security provides audit logs.	
15. Discuss any other potential privacy vulnerabilities to the system and safeguards that are in place to mitigate those vulnerabilities:	The existing external interface that supports the 26a process is also being replaced with this application. The same safeguards that are in place today for the 26a process will be utilized so it is expected that those safeguards will be adequate for the ATLAS interface as well.	

TRANSPARENCY

16. How are individuals notified as to how their information will be collected, used, and/or shared within this system?
Individuals will be notified through TVA republication of TVA SORN's TVA - 34, Project/Tract Files and TVA - 36, 26a Permit Application Records as well as posting the PIA on TVA's external website.

USE LIMITATION

17. Explain how the information in the system is limited to the uses specified in the notices discussed above.
Tracts aquistion and disposal of land and land rights by TVA. Maps, property descriptions,appraisal reports, and title documents on real property; reports on contracts and transaction progress; contracts and options; records of investigations, claims, and/or payments related to land transactions, damage restitution, and relocation assistance; related correspondence and reports Tax ID needed for Federally required reporting Name, SSN etc needed to distingish between individuals w/same name. Correct propery owners need to be identfied to receive correct payment and the SSN will be needed for IRS 1099 reporting..

18. With which (if any) internal TVA systems/collections is the information shared?
TVA's Oracle Financial Application, People Lifestyle Unified System (PLUS), Entract, Pay.Gov., GIS(ARCMAP)

19. With which (if any) organizations external to TVA is information shared?

< For each instance of sharing, please provide how the information is share, for what reason the information is shared, and what safeguards are in place for the sharing arrangement(s). If contractors are authorized to access and/or administer the system, please also include that information here.>

RS 1099 hard copies stored in Realty Services filing area on BR 4B-C. 1099 goes to Realty, GIS, & Land Records-Records Officer(s). Filed based on category, not the individual. Some records also kept in Federal Records Center (Ellenwood, GA). Paper records are not destroyed or disposed of. Tract files are for "life of agency". On demand reports are shredded after use.

IRS - 1099

20. What methods are used to analyze the data?

Data queries and Business Intelligence Reporting Tool (BIRT) will be utilized to produce reports required by functional areas.

END FORM

Please submit completed form to:
> **Christopher Marsalis**
> **TVA Senior Privacy Program Manager**
> **(865) 632-2467**
> **camarsalis@tva.gov**