



Tennessee Valley Authority Privacy Impact Assessment (PIA)

Economic Development Loans

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 Privacy Documentation Completion Guide*. 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 2.0
February 2016





PROGRAM MANAGEMENT

Name of PIA Author

Chris Marsalis

Date of Submission

07/10/2017

Responsible TVA Business Unit

Economic Development

Name of System/Collection

Economic Development Loans

System Owner Details

Name Alan Raymond

Title Mgr, Economic Investments

Phone 615-232-6083

Email alraymond@tva.gov

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

TVA Privacy Policy on landing page. Privacy statement on forms collecting personal information.

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

	Name	Signature	Date
System Owner	Alan Raymond		07/10/2017
Senior Privacy Program Manager	Chris Marsalis		07/10/2017
Senior Agency Official for Privacy			



SYSTEM OVERVIEW

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

Economic Development offers loans to eligible companies and communities for economic development projects. As with most loan programs, the process includes extensive amounts of documentation provided by loan applicants and reviewed by TVA. The applicant answers questions in loan the application form to determine their eligibility for the program.

2. What type of information can be collected, maintained, used, and/or disseminated?

Check all that apply:

- | | | |
|--|--|---|
| <input checked="" type="checkbox"/> Name | <input checked="" type="checkbox"/> Home Phone | <input checked="" type="checkbox"/> Home Address |
| <input checked="" type="checkbox"/> Social Security number (SSN) | <input type="checkbox"/> Medical or Health Information | <input checked="" type="checkbox"/> Financial Information |
| <input type="checkbox"/> Clearance Information | <input type="checkbox"/> Mother's Maiden Name | <input checked="" type="checkbox"/> Date of Birth |
| <input type="checkbox"/> Place of Birth | <input checked="" type="checkbox"/> Employment Information | <input type="checkbox"/> Criminal History |
| <input type="checkbox"/> Biometric Information | <input type="checkbox"/> Other: <input style="width: 200px;" type="text"/> | |

AUTHORITY AND PURPOSE

3. Legal authority to collect, use, maintain, and share data in the system:

Tennessee Valley Authority Act of 1933, 16 U.S.C. 831-831ee. TVA-29 Energy Program Participant Records

4. For each box checked above in Question 2, please provide the business need for the collection:

Economic Development Loans within the cloud version of CRM Dynamics, so that admin users can administer the ED Loans program via the CRM interface, and so applicants can submit and review their loan applications via the ED Loans CRM Portal.

5. Will the data in the system be retrieved using one or more of the identifiers listed in Question 2? Yes No

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 *Economic Development Loans* in accordance with the requirements of the Office of Management and Budget (OMB) Circular A-130.



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

Privacy training is included in the Annual Cyber Security training is required for all TVA Employees and contractors.

DATA QUALITY AND INTEGRITY

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

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

If collected via a form, please list form(s) name and number here:

Other:

Data taken directly from individuals

DATA MINIMIZATION AND RETENTION

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

6 years.

INDIVIDUAL PARTICIPATION AND REDRESS

10. How can an individual access their information and have it corrected, amended, or deleted?

Subject to the limitations of the Privacy Act, individuals may request access to information about themselves contained in a TVA system of records through TVA's Privacy Act/Freedom of Information Act (FOIA) procedures. TVA will review all Privacy Act requests on an individual basis and may as appropriate, waive applicable exemptions if the release of information to the individual would not detrimentally impact the law enforcement or national security purposes for which the information was originally collected or is subsequently being used. Submitting a Privacy Act Request is accomplished by sending a letter to the system manager listed on the cover of this PIA. The request should include the following:

- Name
- Mailing address
- Phone number or email address
- A description of the records sought, and if possible, the location of the records

Contesting record procedures: Individuals wanting to contest information that is contained in this system should make their requests in writing, detailing the reasons for why the records should be corrected. Requests should be submitted to the attention of the TVA Privacy Office at the address below:

*Tennessee Valley Authority
Privacy Office
400 W. Summit Hill Dr.
Knoxville, TN 37902-1499*

Individuals with concerns about privacy may also email the TVA Privacy Officer via the contact information provided in the privacy policy on the TVA's web site (<http://www.tva.gov/abouttva/privacy.htm>).

This information is provided in the Privacy Policy, posted visibly on the TVA Web site.



SECURITY

11. Has a FIPS 199 determination been made?

Not Applicable
 No
 Under Development
 Yes

Expected date of completion:
 Date:

Confidentiality

Low
 Moderate
 High

Integrity

Low
 Moderate
 High

Availability

Low
 Moderate
 High

12. What types of physical safeguards exist to protect the information?

Guards
 Biometrics
 Identification Badges
 Closed Circuit TV (CCTV)

Other:

13. What types of access controls are in place to protect the information?

User Identification
 Passwords
 Firewall
 Encryption
 Virtual Private Network (VPN)
 Public Key Infrastructure (PKI)
 Smart Cards
 Other:

14. What types of administrative safeguards exist to protect the information?

Contingency Plan
 User manuals for the system
 Regular Back-up of files
 Rules of Behavior
 Offsite storage of back up files
 Least privilege access
 User training
 Other:

15. What monitoring, recording, and auditing safeguards are in place to prevent or detect unauthorized access or inappropriate usage?

16. Discuss any other potential privacy vulnerabilities to the system and safeguards that are in place to mitigate those vulnerabilities:

TRANSPARENCY

17. How are individuals notified as to how their information will be collected, used, and/or shared within this system?



USE LIMITATION

18. Explain how the information in the system is limited to the uses specified in the notices discussed above.

Information used to determined credit risk and eligibility for the ED Loan Program.

19. With which (if any) internal TVA systems/collections is the information shared?

Treasury Office and the Office of General Counsel

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

None

Please submit completed form to:

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