



Tennessee Valley Authority Third-Party Websites and Applications Privacy Impact Assessment (TPWA PIA)

Just One Screening Platform

This TPWA PIA is a tool used by the TVA Privacy Program to identify privacy risks at the planning/initiation phase of the use of a third-party website or application. The PIA should be reviewed and updated every three years or sooner, if the website or application undergoes a major change. For additional guidance on how to complete this TPWA 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
February 2015





PROGRAM MANAGEMENT


Name of PIA Author	Chris Marsalis	
Date of Submission	July 8, 2015	System Owner Details
Responsible TVA Business Unit	TVA Police and Emergency Management	Name: Kristi Foxx Title: Manager, Personnel Security Phone: 865-632-2186 Email: ksfoxx@tva.gov
Name of Website or Application	Employment Background Investigations, Inc. Just One Screening Platform	
Configuration Item (if applicable)	N/A	
Reason for completing PIA	<input checked="" type="checkbox"/> New third-party website or application <input type="checkbox"/> Significant modification to an existing third-party website or application	


PRIVACY DETERMINATION

(To be completed by the TVA Privacy Program)

Privacy Office Comments	Add Privacy Act Statement to notify users how their information will be collected, maintained and used.
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The signatures below certify that the information in this document has been reviewed and approved:

1. 

 Kristi Foxx, System Owner 7/15/15
Date
2. 

 Christopher Marsalis, Senior Privacy Program Manager 7/16/15
Date
3. _____
 <Name>, Senior Agency Official for Privacy Date



SYSTEM OVERVIEW

1. Please describe the purpose of the third-party website or application:

TVA’s Personnel Security has the responsibility of conducting background investigations and adjudications for employment/re-employment, contract employment, special security clearances and continued employment to ensure they have the proper credentials and clearances for working at TVA’s locations. In order to obtain relevant background investigation information needed to properly screen potential and current employees and contractors, TVA is contracting background investigation service to Employment Background Investigations, Inc. (EBI).

After a conditional offer of employment is made and accepted by an external job applicant, the recruiter will request a Background Investigation in PLUS HCM as part of the hiring process. Applicant data is pulled from PLUS HCM from the initial application form stored in the Talent Acquisition Management (TAM) module (e.g. Name, Home Address, Home Phone Number, Home Email Address). This data is packaged, encrypted and transmitted to EBI via XML web service to prepopulate the background investigation order form. EBI will send an email to the applicant with instructions and a link to the EBI Just One Screening Platform to log in and complete the rest of the form with additional personal data (e.g. SSN, Date of Birth, etc.), as well as address, employment and criminal history. EBI may reach out to the applicant for additional information as part of the investigative process as needed to ensure a complete background review. Once the investigation is completed, EBI will send an email to TVA Personnel Security to log into the EBI website and review the results of the investigation. The Personnel Security Representative reviews the investigative results and downloads a PDF copy of the report which is merged with other investigation records and stored electronically in PLUS CRM as case notes as the document of record.

2. What type(s) of information will be made available to TVA? Check all that apply:

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



3. What type(s) of information will TVA retain?	<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 checked="" type="checkbox"/> Clearance Information <input type="checkbox"/> Log or Tracking Data	<input checked="" type="checkbox"/> Mother's Maiden Name <input checked="" type="checkbox"/> Date of Birth <input checked="" type="checkbox"/> Place of Birth <input checked="" type="checkbox"/> Employment Information <input checked="" type="checkbox"/> Criminal History <input type="checkbox"/> Biometric Information <input type="checkbox"/> Other:
4. Does the website or application allow individuals to submit comments, feedback, or messages?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> Yes, but the feature will be turned off	
5. Does the website or application use tracking or customization technologies, such as cookies or web beacons?	<input type="checkbox"/> No <input type="checkbox"/> Yes, but TVA does not have access to any collected information <input type="checkbox"/> Yes, TVA has access to the collected information, but only single-session technologies are used <input checked="" type="checkbox"/> Yes, TVA has access to the collected information, and multi-session technologies are used	
6. Is identical information collected from 10 or more individuals or organizations? (excluding agencies, instrumentalities or employees of the federal government)	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes Information collected is on individuals who have conditional offers of employment or are contractors or have an affiliation to TVA.	

AUTHORITY AND PURPOSE

7. Is the use of this third-party website or application consistent with all applicable laws, regulations, and policies?
<p>This third party application is consistent with the President's Transparency and Open Government Memorandum14 (January21, 2009) and the OMB Director's Open Government Directive Memorandum 15 directs federal departments and agencies to take advantage of new technologies to engage the public and serve as one of the primary authorities motivating TVA's efforts to utilize 3rd party technologies and solutions. In addition, OMB Memorandum M-10-23, requires Federal agencies to perform a PIA when using third-party sites and application to engage with the public. TVA-SPP-12.501, TVA's Privacy Program Policy provide guidelines for the proper collection, use, protection, disclosure, and disposal of personally identifiable information (PII) at TVA.</p>



<p>8. For each box checked above in Question 3, please provide the business need for the collection:</p>	<p>This information is required to be collected for background check purposes to determine suitability for employment at TVA.</p>
<p>9. Can you retrieve data in the system by using one or more of the identifiers listed in Question 2? If yes, this system is subject to the Privacy Act and requires a <u>System of Records Notice (SORN)</u>.</p>	<p><input type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> SORN already exists - TVA-37, U.S. TVA Security Records</p>

ACCOUNTABILITY, AUDIT, AND RISK MANAGEMENT

<p>10. What TVA employees and business units are responsible for monitoring the privacy governance and administration of this third-party website or application?</p>
<p>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 and TVA-SPP-12.501, TVA’s Privacy Program 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. TVA-SPP-12.501, TVA’s Privacy Program Policy provides guidance regarding the proper collection, use, protection, disclosure, and disposal of personally identifiable information (PII) at TVA.</p> <p>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. and TVA-SPP-12.05 §3.22) Enterprise Information Security and Policy, Senior Privacy Program Manager, is responsible for privacy governance of this system.</p>

DATA MINIMIZATION AND RETENTION

<p>11. Will TVA retain data and, if so, for how long?</p>
<p><i>< Please describe policies, processes and procedures (if any) for retaining data in the system. This information should be consistent with the <u>TVA records disposition schedules (RDS)</u> 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 <u>Standard Form (SF) 115</u> to obtain a job number and include details here regarding the proposed records schedule. Information will be retained in accordance to the TVA records retention schedule.</i></p>

SECURITY

<p>12. What types of physical safeguards exist to protect the information TVA retains?</p>	<p> <input checked="" type="checkbox"/> Guards <input checked="" type="checkbox"/> Identification Badges <input checked="" type="checkbox"/> Other: <i>Access Controls</i> </p> <p> <input type="checkbox"/> Biometrics <input checked="" type="checkbox"/> Closed Circuit TV (CCTV) <input type="checkbox"/> N/A </p>
<p>13. What types of access controls are in place to protect the information TVA retains?</p>	<p> <input checked="" type="checkbox"/> User Identification <input checked="" type="checkbox"/> Firewall <input type="checkbox"/> Virtual Private Network (VPN) <input type="checkbox"/> Smart Cards </p> <p> <input checked="" type="checkbox"/> Passwords <input checked="" type="checkbox"/> Encryption <input type="checkbox"/> Public Key Infrastructure (PKI) <input checked="" type="checkbox"/> Other: Data is encrypted at rest by Vormetric server. <input type="checkbox"/> N/A, TVA does not retain information </p>
<p>14. What types of administrative safeguards exist to protect the information TVA retains?</p>	<p> <input checked="" type="checkbox"/> Contingency Plan <input checked="" type="checkbox"/> Regular Back-up of files <input checked="" type="checkbox"/> Offsite storage of back up files <input type="checkbox"/> User training </p> <p> <input type="checkbox"/> User manuals for the system <input type="checkbox"/> Rules of Behavior <input type="checkbox"/> Least privilege access <input checked="" type="checkbox"/> Other: EBI has primary and backup servers located within the US. <input type="checkbox"/> N/A </p>
<p>15. What monitoring, recording, and auditing safeguards are in place to prevent or detect unauthorized access or inappropriate usage of TVA's third-party website account or of the application?</p>	<p>Vendor has monitoring and recording and has agreed by contract to notify TVA at its earliest possible opportunity, but in no event later than one hour, of any confirmed security incident in connection with the Cloud Services, or the unauthorized access or attempted access of TVA information.</p>
<p>16. Discuss any other potential privacy vulnerabilities and safeguards that are in place to mitigate those vulnerabilities.</p>	<p>There are no known vulnerabilities.</p>



TRANSPARENCY

17. What types of transparency mechanisms are in place to notify individuals as to how their information will be collected, used, and/or shared?
<input type="checkbox"/> TVA Privacy Notice on the website or application (see OMB 10-23 for content requirements) <input type="checkbox"/> An exit notice explaining to users moving from an official TVA site to the third-party website that they are being directed to a non-TVA website <input checked="" type="checkbox"/> Third-Party's Privacy Policy <input checked="" type="checkbox"/> PIA <input checked="" type="checkbox"/> Privacy Act Statements <input checked="" type="checkbox"/> System of Records Notice (SORN) <input type="checkbox"/> Other <Please specify>

USE LIMITATION

18. Explain how the information in the system is limited to the uses specified in the notices discussed above.
This information is used for the sole purpose of conducting background checks. The results from the background check are used to determine applicant suitability for employment, contractor eligibility, security clearance adjudication, and to determine special credentials and clearances for working at other TVA locations.
19. With which (if any) internal TVA systems/organizations is the information shared?
Investigative Information will be sent to the PLUS CRM portal
20. With which (if any) organizations external to TVA is information shared?
Information is only shared with EBI.
21. What methods (if any) are used to analyze the data?
Analysis is performed by human elements. There is no automated analysis or new data generated by the analysis conducted.

END FORM

Please submit completed form to:

Christopher Marsalis
TVA Senior Privacy Program Manager
(865) 632-2467
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