



Tennessee Valley Authority Privacy Impact Assessment (PIA)

eCash

This PIA is a tool used by the TVA Privacy Office to identify privacy risks at the planning/initiation phase of the system development lifecycle (SDLC) or early stages of project/program development. The PIA should be reviewed and updated on an annual basis, or sooner, if the system undergoes a major change. Questions regarding this document should be directed to privacy@tva.gov.

PIA should be submitted to:

TVA Privacy Office

privacy@tva.gov

Version 3.0
September 2018



PROGRAM MANAGEMENT

Author Name

[Redacted]

Date of Submission

09/08/2020

Responsible TVA Business Unit

Treasury

Name of System

eCash

System Owner Details

Reason for Completing PIA

Name

[Redacted]

Title

Phone

Email

- New system
- Significant modification to an existing system
- To update existing PIA for a security authorization

PRIVACY DETERMINATION

(To be completed by the TVA Privacy Program)

Privacy Office Comments

[Empty box for comments]

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

	Name	Signature	Date
System Owner	[Redacted]	[Redacted]	09/25/2020
Senior Privacy Program Manager	Chris Marsalis	<i>Chris Marsalis</i>	09/22/2020



SYSTEM OVERVIEW

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

eCash is a web based application used by TVA Treasury Management personnel and TVA Collection Agents valley-wide to record and account for all funds remitted to and disbursed by TVA. eCash stores all the data necessary to maintain the subsidiary ledger for TVA's Power Cash Account. The data contained in eCash is used to update TVA's General Ledger, for US Treasury Reporting, and for Cash Forecasting. The payment related data is used to create electronic payment files for handling payments determined to need "Special" handling. eCash provides the flexibility to record collection and payment data one time and have it available for use in three different Treasury Management functions.

2. About whom does the system collect, maintain, use and/or disseminate information? Check all that apply:

- TVA employees
- TVA contractor
- Members of the public

3. Is the information collected directly from the individual?

- Yes
- No

4. What type of personally identifiable information (PII) can be/is collected, maintained, used, and/or disseminated?

Check all that apply: (Per the Office of Management and Budget (OMB) Circular A-130, *Managing Information as a Strategic Resource*, personally identifiable information (PII) means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual.)

- | | | |
|---|---|--|
| <input type="checkbox"/> Home Phone | <input checked="" type="checkbox"/> Financial Information | <input type="checkbox"/> Biometric Information |
| <input type="checkbox"/> Home Address | <input type="checkbox"/> Clearance Information | <input type="checkbox"/> Citizenship |
| <input type="checkbox"/> Home Email | <input type="checkbox"/> Mother's Maiden Name | <input type="checkbox"/> Driver's License Number |
| <input type="checkbox"/> Employment Information | <input type="checkbox"/> Date of Birth | <input type="checkbox"/> Username/Password |
| <input type="checkbox"/> Work Address | <input type="checkbox"/> Place of Birth | <input type="checkbox"/> Passport Number |
| <input type="checkbox"/> Work Phone | <input type="checkbox"/> Criminal History | <input type="checkbox"/> Other: |
| <input type="checkbox"/> Work Email | <input type="checkbox"/> Social Security number (SSN) | <input style="width: 150px; height: 20px;" type="text"/> |
| <input checked="" type="checkbox"/> Name | <input type="checkbox"/> Medical or Health Information | |

If none of the above data elements are checked, stop and submit this PTA as-is to TVA Privacy Office at privacy@tva.gov. Otherwise, please continue completing the remaining questions in the document.

Privacy Notice and Transparency

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

Tennessee Valley Authority Act of 1933, 16 U.S.C. 831-831ee.

6. Does the system have a SORN? (If PII in the system is retrieved using one or more of the identifiers listed in Question 4, a System of Records Notice (SORN) is required.)

- Yes
- No

List name(s) of applicable SORN(s): TVA-29- Energy Program Participant Records

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

Individuals are not notified as to how their information will be collected, maintained, used, and/or disseminated with the system.

8. What consent options do individuals have regarding specific uses or sharing of their information?

There are no consent options as this is an internal TVA system.

DATA MINIMIZATION

9. Are only the minimum PII elements that are relevant and necessary to accomplish the legally authorized purpose collected, used and retained?

Yes No

10. What are the retention periods for the information in the system?

7 years

DATA QUALITY

11. How is data quality (i.e., accuracy, relevance, timeliness, and completeness) ensured throughout the data lifecycle and business processes associated with the use of the information? Check all that apply.

Information is collected directly from individuals (preferred method of collection, whenever possible)
 If collected via a form, please list form(s) name and number here:

Cross referencing information entries with other systems Third party information verification

Character limits on text submissions Numerical restrictions in text boxes

Other:

12. How is inaccurate or outdated information checked for and corrected?

If provided by user or upon notification/realization from another method/TVA address book.

Access and Redress

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

User would have to request a screenshot of their user profile setup to view their information.

Internal and External Sharing

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

Information in the system is used solely by the internal users of the system.

15. With which (if any) internal TVA systems is the information shared?

None.

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

None.

17. Does the system have any associated websites/applications including an external TVA website or third-party owned or managed website or application (e.g., Facebook, YouTube, Twitter, Flickr, etc.)?

Yes No

SECURITY

18. What privacy orientation or training is provided to authorized users of the system or individuals with access to the system?

[Redacted]

19. Has a FIPS 199 determination been made?

[Redacted]

20. What is the FIPS 199 determination? Check one for each.

[Redacted]

21. What types of technical safeguards are in place to protect the information?

[Redacted]

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

[Redacted]



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

[Redacted]

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

All monitoring, recording, and auditing safeguards are in place by TVA Cybersecurity.

25. Discuss any other potential privacy risks to the information within the system and safeguards that are in place to mitigate those risks.

None.

Please submit completed form to: **TVA Privacy Office**
privacy@tva.gov