



Tennessee Valley Authority Privacy Impact Assessment (PIA)

i-Sight

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

02/19/2020

Responsible TVA Business Unit

Ethics & Compliance

Name of System

i-Sight

System Owner Details

Reason for Completing PIA

Name

[Redacted]

New system

Title

[Redacted]

Significant modification to an existing system

Phone

[Redacted]

To update existing PIA for a security authorization

Email

[Redacted]

PRIVACY DETERMINATION

(To be completed by the TVA Privacy Program)

Privacy Office Comments

This PIA is being updated for security authorization. Due to current circumstances regarding COVID-19 the SO is unable to provide written signature.

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

	Name	Signature	Date
System Owner	[Redacted]	[Redacted]	04/06/2020
Senior Privacy Program Manager	Chris Marsalis	Chris Marsalis	04/06/2020



SYSTEM OVERVIEW

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

i-Sight is a case management system utilized by TVA to track ethics advice and counsel, ethics investigations, and union grievances.

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 checked="" type="checkbox"/> Home Phone | <input type="checkbox"/> Financial Information | <input type="checkbox"/> Biometric Information |
| <input checked="" type="checkbox"/> Home Address | <input type="checkbox"/> Clearance Information | <input type="checkbox"/> Citizenship |
| <input checked="" type="checkbox"/> Home Email | <input type="checkbox"/> Mother's Maiden Name | <input type="checkbox"/> Driver's License Number |
| <input checked="" type="checkbox"/> Employment Information | <input type="checkbox"/> Date of Birth | <input type="checkbox"/> Username/Password |
| <input checked="" type="checkbox"/> Work Address | <input type="checkbox"/> Place of Birth | <input type="checkbox"/> Passport Number |
| <input checked="" type="checkbox"/> Work Phone | <input type="checkbox"/> Criminal History | <input checked="" type="checkbox"/> Other: |
| <input checked="" type="checkbox"/> Work Email | <input type="checkbox"/> Social Security number (SSN) | <i>EIN, Gender, Compensation Rate</i> |
| <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:

TVA Act of 1933

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-2- Personnel Files*

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. The purpose of the system is to collect and maintain data regarding a case not individuals. PIA, SORNs.

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

There are no consent options. The information is not shared with any internal TVA systems or external organizations.

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?

Indefinitely

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: *Each Program Owner conducts their own assessment of case files.*

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

<Please describe processes and procedures to check for inaccurate information and how information is corrected, as necessary.>

The individual must contact their case manager in order to change update any information.



Access and Redress

13. 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 informaiton 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 sytem 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 27902-1499

Individuals with concerns about privacy may also email the TVA Privacy Office via the contact information provided in the privacy policy on the TVA's web site (<http://www.tva.gov/abouttva/privacy.htm>). This informaiton is provided in the Privacy Policy, posted visibly in the TVA Web site.

Internal and External Sharing

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

Limited employee demographic data is collected and maintained in associated with specific cases only.

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

Please describe and provide link:

i. Does the website or application allow individuals to submit comments, feedback or messages?

- Yes
 Yes, but the feature will be turned off
 No

ii. Does the website or application allow individuals to submit comments, feedback or messages?

- Yes, but TVA does not have access to any system information.
 Yes, TVA has access to the collected information, but only single-session technologies are used.
 Yes, TVA has access to the collected information, and multi-session technologies are used.
 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?

The vendor, Customer Expressions, monitors, records, and audits to prevent or detect unauthorized access. TVA i-Sight System Administrator(s) determines appropriate access levels and activates, modifies, and deactivates user credentials based on business need to know information. TVA Cybersecurity also does all monitoring, recording, and auditing to prevent or detect unauthorized access or inappropriate usage.

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