

Tennessee Valley Authority Privacy Impact Assessment (PIA)

OnGuard

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 <u>privacy@tva.gov</u>

> Version 3.0 September 2018



Privacy Impact Assessment

PROGRAM MANAGEMENT

Author Name	Date of Submission
	02/02/2022
Responsible TVA Business Unit	Name of System
TVAP & Emergency Management	OnGuard
System Owner Deta	ils Reason for Completing PIA
Name	○ New system
Title	 Significant modification to an existing system
Phone	 To update existing PIA for a security authorization
Email	

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

acy Office Comme	nts	 	 	

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

	Name	Signature	Date
System Owner			
Senior Privacy Program Manager	Chris Marsalis	Chris Marsalis (E-signature)	02/02/2022



SYSTEM OVERVIEW

1.	Please	describe	the	purpose	of the	system	/colle	ection
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OnGuard is the TVA Physical Access Control System (PACS) which provides TVA's assets protection against unauthorized observation, removal, or manipulation and ensures that TVA Police & Emergency Management (TVAP&EM) meets regulatory requirements related to physical access controls. OnGuard helps minimize the risk and harm to assets by enhancing the level of security at TVA facilities while providing assurance that individuals who are granted authorized access to TVA facilities are trustworthy and reliable and do not pose an unreasonable risk to the health and safety of others.

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

🔀 TVA employees	X TVA contractor	Members of the public	
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- 3. Is the information collected directly from the individual?
 - Yes O 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.)

🔀 Home Phone	Financial Information	Biometric Information
Home Address	Clearance Information	Citizenship
🔀 Home Email	Mother's Maiden Name	🔀 Driver's License Number
Employment Information	Date of Birth	Username/Password
Work Address	Place of Birth	Passport Number
Work Phone	Criminal History	🔀 Other:
Work Email	🔀 Social Security number (SSN)	All information is required from
🖂 Name	Medical or Health Information	Employee Gateway.

If none of the above data elements are checked, stop and submit this PTA as-is to TVA Privacy Office at <u>privacy@tva.gov</u>. 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; Executive Order 10577; Executive Order 10450; Executive Order 11478; Executive Order 11222; Equal Employment Opportunity Act of 1972, Public Law 92-261, 86 Stat. 103; Veterans' Preference Act of 1944, 58 Stat. 387, as amended; various sections of title 5 of the United States Code related to employment by TVA.

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 O 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?

PIA's, SORN's, Privacy Act Statement

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

Individuals may object verbally with consequences being no access to facility granted.

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 O No

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

3 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:

- 1			
Cross referencing information enties with other systems		Third party information verification	
Character limits on text submissions		Numerical restrictions in text boxes	
\boxtimes	Other: Bimonthly review of applications with Lenel.		

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

If an employee has inaccurate or outdated information they would need to contact Employee Gateway to make those changes.

Access and Redress

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

The individual can have their information corrected, amended, or deleted through Employee Gateway.

Internal and External Sharing

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

The system is limited to physical access and visitor management program.



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

Employee Gateway, Avigilon, Area Access Manager.

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, Flicker, etc.)?

SECURITY

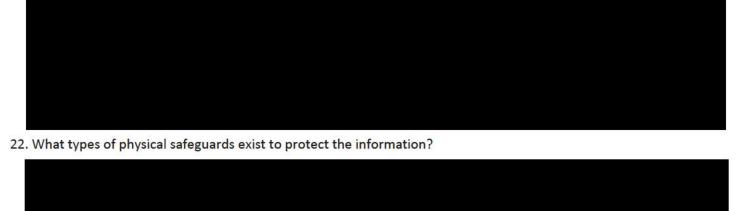
- 18. What privacy orientation or training is provided to authorized users of the system or individuals with access to the system?
- 19. Has a FIPS 199 determination been made?



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



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





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

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. TVAP also does their own audits on who has access as well as what they have access to.

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