



Tennessee Valley Authority Privacy Impact Assessment (PIA)

People Lifecycle Unified System (PLUS)

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

Date of Submission

[Redacted]

07/02/2024

Responsible TVA Business Unit

Name of System

Human Resources

People Lifecycle Unified System

System Owner Details

Reason for Completing PIA

Name

Title

Phone

Email

[Redacted]

- 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]	07/02/2024
Senior Privacy Program Manager	Chris Marsalis	Chris Marsalis (E-Signature)	07/02/2024

SYSTEM OVERVIEW

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

<Please provide a detailed description of the purpose(s) for which information is collected, maintained, used, and/or disseminated. The section must tell a complete story, including system name and acronym, the Business Unit that owns the system, mission of the Business Unit, purpose of the system, description of a typical transaction, the subjects of the system, how information is collected (including any forms, third-party websites, applications, systems, etc.), how information is retrieved, and any connections to other internal or external systems or programs.

The People Lifecycle Unified System (PLUS) is a human capital management (HCM) system that integrates people from hire to retire. PLUS is an integrated solution consisting of PeopleSoft HCM/Oracle Business Intelligence and CRM. The PLUS system is the authoritative source of all people information for TVA. The PLUS system provides business functionality associated with the implementation of the following modules: Human Resources, TVA Payroll, Retirement, Payroll, HR Help Desk-Personnel Security, Recruiting, Employee and Retiree Benefits, Compensation, Manager and Employee Self Services. The PLUS solution provides source data to approximately 150 interfacing systems for TVA and supports many critical processes -from recruitment to retirement, as well as persons of interest (POI's).
 People Lifecycle Unified System (PLUS) provides a single portal for human resource, payroll, and retirement data. The system is managed by Human Resources and the CFO.
 The system tracks all people and payroll functions throughout the employee lifecycle from hiring to retirement, as well as operations, compliance and customer service.

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 checked="" type="checkbox"/> Financial Information | <input type="checkbox"/> Biometric Information |
| <input checked="" type="checkbox"/> Home Address | <input checked="" type="checkbox"/> Clearance Information | <input checked="" type="checkbox"/> Citizenship |
| <input checked="" type="checkbox"/> Home Email | <input type="checkbox"/> Mother's Maiden Name | <input checked="" type="checkbox"/> Driver's License Number |
| <input checked="" type="checkbox"/> Employment Information | <input checked="" type="checkbox"/> Date of Birth | <input checked="" type="checkbox"/> Username/Password |
| <input checked="" type="checkbox"/> Work Address | <input checked="" type="checkbox"/> Place of Birth | <input type="checkbox"/> Passport Number |
| <input checked="" type="checkbox"/> Work Phone | <input checked="" type="checkbox"/> Criminal History | <input type="checkbox"/> Other: |
| <input checked="" type="checkbox"/> Work Email | <input checked="" type="checkbox"/> Social Security number (SSN) | <input style="width: 150px; height: 15px;" type="text"/> |
| <input checked="" type="checkbox"/> Name | <input checked="" 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; National Apprenticeship Act of 1937, 50 Stat. 664.
 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.
 Tennessee Valley Authority Act of 1933, 16 U.S.C. 831-831ee; Internal Revenue Code; Fair Labor Standards Act, 29
 U.S.C. Chapter 8; 5 U.S.C. Chapter 63.
 Tennessee Valley Authority Act of 1933, 16 U.S.C. 831-831ee; 5 U.S.C. 310
 Tennessee Valley Authority Act of 1933, 16 U.S.C. 831-831ee; Executive Order 11478; Equal Employment
 Opportunity Act of 1972, Public Law 92-261, 86 Stat. 103; 5 U.S.C. 3101.
 Tennessee Valley Authority Act of 1933, 16 U.S.C. 831-831ee; Internal Revenue Code.
 Tennessee Valley Authority Act of 1933, 16 U.S.C. 831-831ee; 5 U.S.C. 552a; and 28 U.S.C. 534.

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-1- Apprentice Training Records
TVA-2-Personnel Files
TVA-11- Payroll Records
TVA-13- Employment Applicant Files
TVA-18- Employee Supplementary Vacancy Announcement Records
TVA-26- Retirement System Records
TVA-37- TVA Police Records

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

Individuals are notified as to how their information will be collected, maintained, used, and/or disseminated within the system but PIA's, SORN's, and Privacy Act statement.

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

Individuals are not provided consent for sharing their information, it is assumed as part of their employment they are allowing their information to be shared.

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?

TVA Records Disposition Schedule (RDS) published by the National Archives and Records Administration are applicable for this system.

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 enties 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?

Inaccurate or outdated information is checked for and corrected by the individual themselves.

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. Concurrent with the publication of the appropriate SORNS, exemptions from the access provisions of the Privacy Act may apply. TVA will review all Privacy Act requests on an individual basis and mas 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 document.

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 Office via the contact information provided in the privacy policy on the TVA's website.
(<http://www.tva.gov/abouttva/privacy.htm>).

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

The information in the system is limited to the employee and administrators of the system.

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

- Enterprise Financial Management System
- eWorkplace
- Enterprise Data Warehouse
- Expense Reimbursement System
- Integrated Credit Card Solution
- Planning Analytics
- PMDM (via EDW)
- iTWO – Project Management Reporting (via EDW)
- Identity IQ
- Supply Chain Data Mart (via EDW)
- Comprehensive Services Program (via EDW)
- Others

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

Federal Database with Federal Motor Carriers Safety Administration Alcohol & Drug Clearinghouse – Federal Reporting Requirement. Data is shared on an as needed basis with 3rd parties to support benefits, engagement surveys, salary surveys, and others.

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?

19. Has a FIPS 199 determination been made?

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



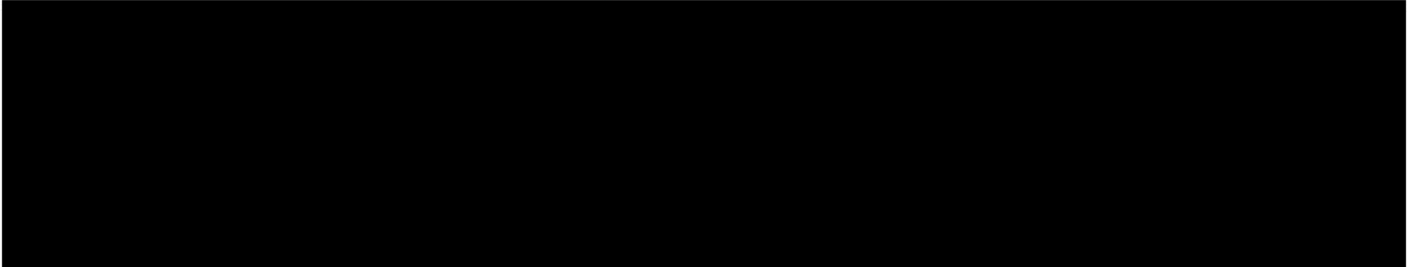
Confidentiality

Integrity

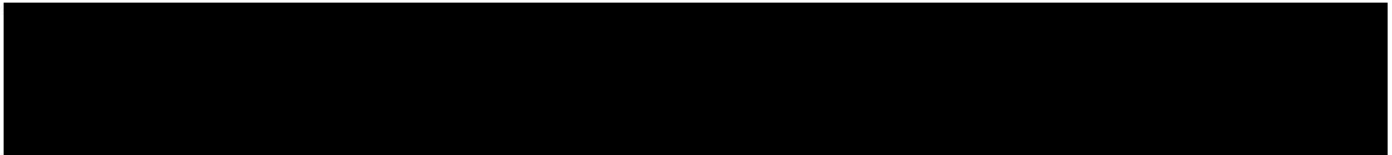
Availability



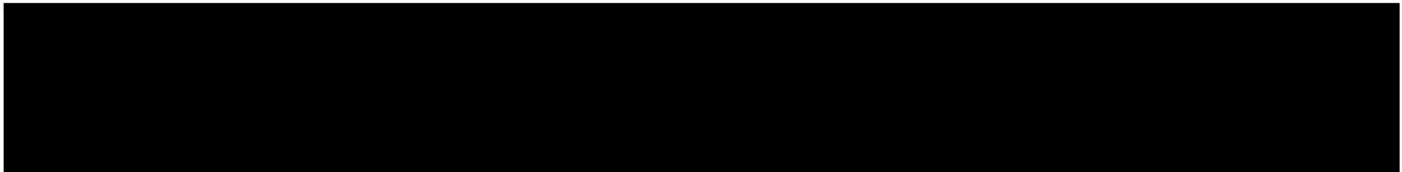
21. What types of technical safeguards are in place to protect the information?



22. What types of physical safeguards exist 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 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