



Tennessee Valley Authority Privacy Impact Assessment (PIA)

SAP Concur

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

08/09/2021

Responsible TVA Business Unit

Corporate Accounting

Name of System

SAP Concur

System Owner Details

Reason for Completing PIA

Name

[Redacted]

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)

Privacy Office Comments

SAP Concur replaced ERS and ICCS.

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

	Name	Signature	Date
System Owner	[Redacted]	[Redacted]	01/22/2024
Senior Privacy Program Manager	Chris Marsalis	Chris Marsalis (Signed Electronically)	01/22/2024



SYSTEM OVERVIEW

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

SAP Concur is designed to automate and streamline corporate travel booking and expense reimbursement processes, monitor operating costs, provide internal controls, and enable businesses to create reports and perform analysis related to corporate travel and expenses.

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 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 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 checked="" type="checkbox"/> Username/Password |
| <input checked="" type="checkbox"/> Work Address | <input type="checkbox"/> Place of Birth | <input checked="" 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) | EIN |
| <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; 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; 5 U.S.C. Chapter 55.
Tennessee Valley Authority Act of 1933, 16 U.S.C. 831-831ee; 5 U.S.C. 5701-5709, and related Federal travel regulations.

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
TVA-7- Employee Accounts Receivable
TVA-12- Travel History

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

TVA employees and contractors are not notified within SAP Concur. They are notified within PLUS when they provide their information before it is pulled into SAP Concur. External 3rd parties that are paid via convenience check are not notified by the TVA employee or contractor issuing the convenience check when 1099 information is gathered. There are PIA's and SORN's.

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

TVA employees and contractors are not provided a consent through SAP Concur, they give consent to their information being collected within PLUS. External 3rd parties that are paid via convenience check are not provided a consent through SAP Concur. Their consent is inferred via them providing their personal information for the 1099 to the TVA employee or contractor collecting it from them.

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 6yrs. 3 months

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?

Any inaccurate or outdated information is updated by PLUS. This is a daily feed that runs to keep all updates in SAP Concur.

Access and Redress

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

TVA employees and contractors would contact their admin in PLUS to have any information corrected, amended, or deleted. External 3rd parties would not have a means of correcting or asking for the deletion of the collected 1099 information.

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 is accessible by: Report owners, Report owner submission delegate(s), Approvers, Approver delegate(s), Expense Processor(s), System Support resources (anyone with Import/Export Monitor role), Report License Holders (up to 70 individuals).

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

PLUS, Oracle EBS, Treasury, Payroll, LMS, Maximo, Mulesoft.

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

World Travel, USBank, FirstHorizons, ComData (Banking)

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: <https://usg.concursolutions.com/>

- 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]

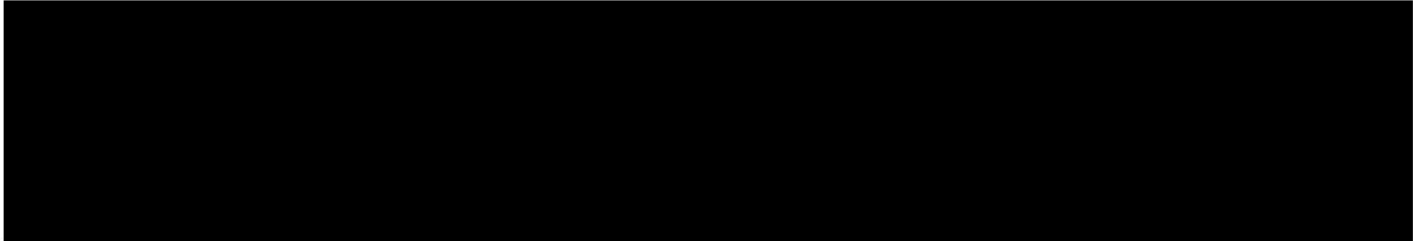
19. Has a FIPS 199 determination been made?

[REDACTED]

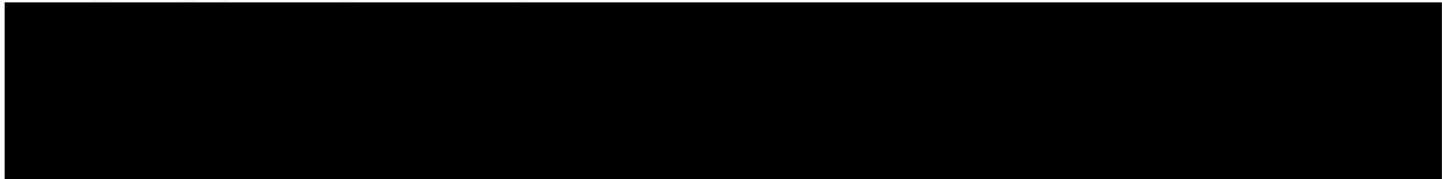
20. What is the FIPS 199 determination? Check one for each.



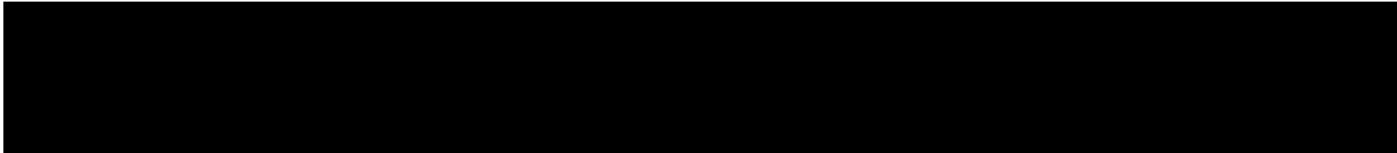
21. What types of technical safeguards are in place to protect the information?



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 by TVA Cybersecurity. SAP does have an audit trail that is part of the transaction to monitor.

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