



Tennessee Valley Authority Privacy Impact Assessment (PIA)

tvasites.com

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	07/10/2023
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Responsible TVA Business Unit	Name of System
Economic Development	tvasites.com

System Owner Details		Reason for Completing PIA
Name		<input checked="" type="radio"/> New system
Title		<input type="radio"/> Significant modification to an existing system
Phone		<input type="radio"/> To update existing PIA for a security authorization
Email		

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

Privacy Office Comments

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

	Name	Signature	Date
System Owner			07/10/2023
Senior Privacy Program Manager	Chris Marsalis	Chris Marsalis (E-Signature)	07/03/2023

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.

Economic Development’s programs and services are designed to help improve the quality of life for the people of the Valley through job creation, investment and quality wages. TVAsites.com is ED’s primary marketing tool for these services offered. TVAsites.com is used by Valley communities and existing industries as a reference to resources available to them, and by consultants and prospective companies located around the world as a guide to locating in the Valley.

Resource pages include contact pages, community and business services, regional attributes, incentive information etc.

A typical transaction involves the visitor gathering knowledge from the page, with no information gathered by TVA. The only time information is gathered from tvasites.com is when a user requests to be contacted. In this instance the user fills out a form that includes their name, organization, phone number and email.

TVAsites.com is primarily managed by Mallory Lawson, Senior Consultant in Economic Development and our third-party marketing agency, Red Pepper and their contractor 40AU. Both RedPepper and 30AU have been vetted and are approved contractors for TVA. This website is monitored daily, making updates as needed, however the information on the page is primarily evergreen material, with most changes and updates being made if an ED position changes contact information.

The only connection to another website is tva.gov and the GURU tool which is our land and site database that is used by communities and administered by Diane Nunez and GIS WebTech.

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 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 checked="" type="checkbox"/> Username/Password |
| <input 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 type="checkbox"/> Other: |
| <input checked="" type="checkbox"/> Work Email | <input type="checkbox"/> Social Security number (SSN) | <input style="width: 150px; height: 20px;" type="text"/> |
| <input type="checkbox"/> Name | <input type="checkbox"/> Medical or Health Information | |

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 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?

After filling out a contact form, the user is directed to a "thank you" page informing them that someone will respond to their message soon.

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

Their information is not shared, only used to respond to their request for contact.

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--unless they request removal

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:

The form is a "contact us" page. That the user must submit themselves.

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?

tvasites.com is checked daily and updated when needed.

Access and Redress

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

The individual can access their information by contacting econdev@tva.gov.

Internal and External Sharing

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

The only time the information is used is to contact someone who has requested to be contacted.

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: [LinkedIn https://www.linkedin.com/showcase/tva-economic-development/](https://www.linkedin.com/showcase/tva-economic-development/)

- 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

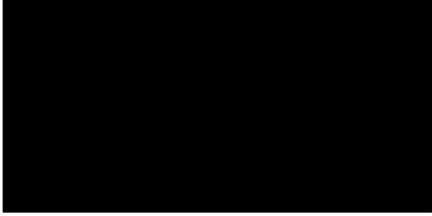
SECURITY

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

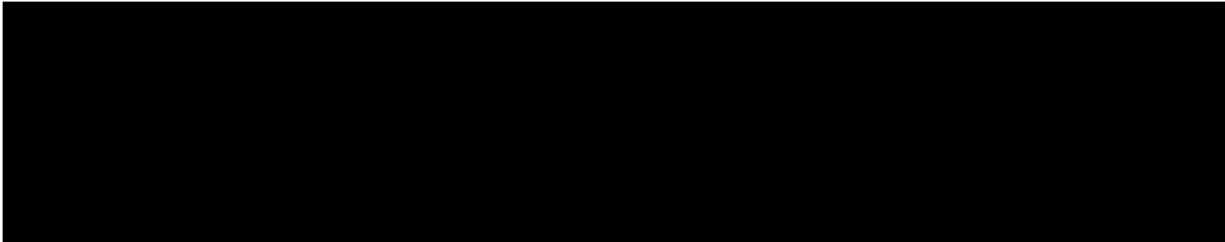
[Redacted]



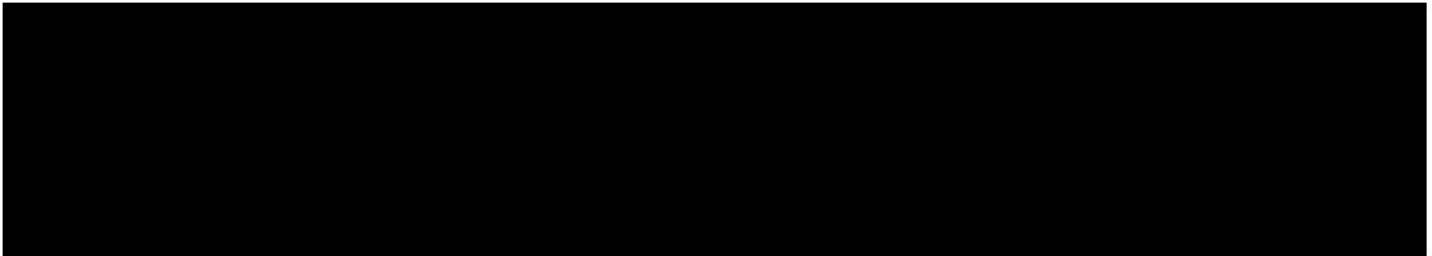
19. Has a FIPS 199 determination been made?



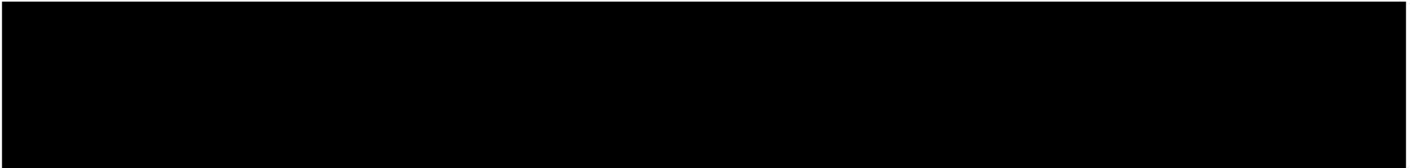
20. What is the FIPS 199 determination? Check one for each.



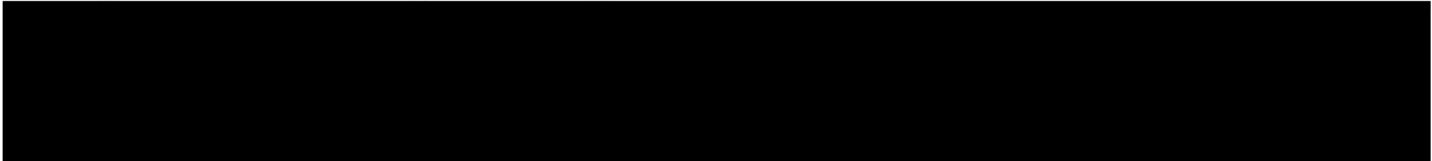
21. What types of technical safeguards are in place to protect the information?



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. Without approved login credentials from RedPepper and 40AU, access is denied. WordPress history logs are also available anytime a change is made.

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