

# Tennessee Valley Authority Privacy Impact Assessment (PIA)

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## *AvidFlow*

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 if the system undergoes a major change. Questions regarding this document should be directed to [privacy@tva.gov](mailto:privacy@tva.gov).

PIA should be submitted to:

TVA Privacy Office

[privacy@tva.gov](mailto:privacy@tva.gov)

Version 3.0  
September 2018

**PROGRAM MANAGEMENT**

Author Name

Date of Submission



Responsible TVA Business Unit

Name of System



**System Owner Details**

**Reason for Completing PIA**

Name

Title

Phone

Email

- 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

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

	Name	Signature	Date
System Owner	<input type="text"/>	<input type="text"/>	12/18/2025
Senior Privacy Program Manager	Chris Marsalis	Chris Marsalis (E-Signature)	12/18/2025

SYSTEM OVERVIEW

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

Incoming PaaS system from Avid to replace outgoing SaaS solution from AINS/Opexus. This system manages FOIA and Privacy Act requests and offers case management for these items.

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.)

- Home Phone, Home Address, Home Email, Employment Information, Work Address, Work Phone, Work Email, Name, Financial Information, Clearance Information, Mother's Maiden Name, Date of Birth, Place of Birth, Criminal History, Social Security number (SSN), Medical or Health Information, Biometric Information, Citizenship, Driver's License Number, Username/Password, Passport Number, Other:

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.

Number of people impacted?

- 1 - 999, 1,000 - 4,999, 5,000 - 19,999, 20,000 - 99,999, 100,000 or more

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): Personnel Files- TVA-2

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 Policy

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

Individuals must consent to sharing PII in order to make a PA Request. Additionally, Avid may maintain or process PII that was obtained from various TVA systems or programs. In those instances where PII is collected by other TVA systems or programs, the TVA ensures that its forms, whether paper-based or electronic, that collect PII display an appropriate Privacy Act Statement in accordance with the Privacy Act of 1974. The Privacy Act Statement provides formal notice to individuals of the authority to collect PII, the purpose for collection, intended uses of the information and the consequences of not providing.

### 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?

6 years Litigation can result in extended hold times.

### 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?

there is a document review process with the stakeholders as well as have the BU's verify information

### Access and Redress

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

They can submit a Privacy Act request to obtain this information and request it be amended, corrected, or deleted.

### 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 limited to the individual making the request and the admins of the system.

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

[Redacted]

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

Any organization can make a request for this information in the system.

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?

[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?



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.

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](mailto:privacy@tva.gov)