Tennessee Valley Authority  
Privacy Impact Assessment (PIA)  

Economic Development Loans

This PIA is a tool used by the TVA Privacy Office to identify system privacy risks at the planning/initiation phase of the system development lifecycle (SDLC). The PIA should be reviewed and updated every three years in conjunction with the anniversary of the Authority to Operate (ATO) or sooner, if the system undergoes a major change. For additional guidance on how to complete this PIA, please refer to the TVA Privacy Documentation Completion Guide. Questions regarding this document should be directed to camarsalis@tva.gov.

PIA should be submitted to:
Christopher Marsalis  
TVA Senior Privacy Program Manager  
(865) 632-2467  
camarsalis@tva.gov

Version 2.0  
February 2016
Privacy Program

PROGRAM MANAGEMENT

Name of PIA Author: Chris Marsalis

Date of Submission: 07/10/2017

Responsible TVA Business Unit: Economic Development

Name of System/Collection: Economic Development Loans

System Owner Details:

Name: Alan Raymond
Title: Mgr, Economic Investments
Phone: 615-232-6083
Email: alraymond@tva.gov

Reason for Completing PIA:

☐ New system
☐ Significant modification to an existing system
☐ To update existing PIA for a triennial security reauthorization

PRIVACY DETERMINATION

(To be completed by the TVA Privacy Program)

Privacy Office Comments:

TVA Privacy Policy on landing page. Privacy statement on forms collecting personal information.

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

<table>
<thead>
<tr>
<th>Name</th>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>System Owner</td>
<td>Alan Raymond</td>
<td>07/10/2017</td>
</tr>
<tr>
<td>Senior Privacy Program Manager</td>
<td>Chris Marsalis</td>
<td>07/10/2017</td>
</tr>
<tr>
<td>Senior Agency Official for Privacy</td>
<td></td>
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</tbody>
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SYSTEM OVERVIEW

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

Economic Development offers loans to eligible companies and communities for economic development projects. As with most loan programs, the process includes extensive amounts of documentation provided by loan applicants and reviewed by TVA. The applicant answers questions on the application form to determine their eligibility for the program.

2. What type of information can be collected, maintained, used, and/or disseminated?

Check all that apply:
- ☒ Name
- ☒ Social Security number (SSN)
- ☐ Clearance Information
- ☐ Place of Birth
- ☐ Biometric Information
- ☒ Home Phone
- ☐ Medical or Health Information
- ☐ Mother's Maiden Name
- ☐ Employment Information
- ☒ Home Address
- ☐ Financial Information
- ☐ Date of Birth
- ☐ Criminal History
- ☐ Other: [ ]

AUTHORITY AND PURPOSE

3. Legal authority to collect, use, maintain, and share data in the system:


4. For each box checked above in Question 2, please provide the business need for the collection:

Economic Development Loans within the cloud version of CRM Dynamics, so that admin users can administer the ED Loans program via the CRM interface, and so applicants can submit and review their loan applications via the ED Loans CRM Portal.

5. Will the data in the system be retrieved using one or more of the identifiers listed in Question 2? ☐ Yes ☐ No

ACCOUNTABILITY, AUDIT, AND RISK MANAGEMENT

6. What TVA employees and business units are responsible for the privacy governance and administration of this system?

TVA’s Office of the Chief Information Officer is the responsible program owner for TVA’s Information Security and Privacy Programs, ensuring compliance with TVA-SPP-12.02, TVA Information Management Policy. TVA-SPP-12.02 implements the various privacy laws based on the Privacy Act of 1974 (the Privacy Act), the E-Government Act of 2002 (Public Law 107-347), the Federal Information Security Management Act (FISMA), Office of Management and Budget (OMB) mandates, and other applicable North American Electric Reliability Corporation (NERC) and TVA Records Management procedures and guidance. In addition to these practices, additional policies and procedures will be consistently applied, especially as they relate to protection, retention, and destruction of federal records. Federal and contract employees are given clear guidance in their duties as they relate to the collection, use, processing and security of privacy data. Guidance is provided in the form of mandatory annual security and privacy awareness training, including “TVA Information Security Training.” (See: TVA-SPP-12.01 §3.2.10.) The TVA Privacy Office will conduct periodic privacy compliance reviews of the Economic Development Loans in accordance with the requirements of the Office of Management and Budget (OMB) Circular A-130.
7. What privacy orientation or training is provided to authorized users of the system?

Privacy training is included in the Annual Cyber Security training is required for all TVA Employees and contractors.

DATA QUALITY AND INTEGRITY

8. How is data quality ensured throughout the data lifecycle and business processes associated with the use of the data? Check all that apply. Check all that apply:

☐ Cross referencing data entries with other systems  ☐ Character limits on text submissions

☐ Third party data verification  ☐ Numerical restrictions in text boxes

If collected via a form, please list form(s) name and number here: ❌

☐ Data taken directly from individuals

DATA MINIMIZATION AND RETENTION

9. What are the retention periods for the data in the system?

6 years.

INDIVIDUAL PARTICIPATION AND REDRESS

10. 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. TVA will review all Privacy Act requests on an individual basis and may 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. 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 Officer via the contact information provided in the privacy policy on the TVA’s web site (http://www.tva.gov/abouttva/privacy.htm).

This information is provided in the Privacy Policy, posted visibly on the TVA Web site.
11. Has a FIPS 199 determination been made?

☐ Not Applicable  ☐ No  ☐ Under Development  ☒ Yes

Expected date of completion: ______________ Date: 06/01/2017

Confidentiality  Integrity  Availability

☐ Low  ☐ Low  ☐ Low

☒ Moderate  ☒ Moderate  ☒ Moderate

☐ High  ☐ High  ☐ High

12. What types of physical safeguards exist to protect the information?

☒ Guards  ☐ Biometrics  ☒ Identification Badges  ☐ Closed Circuit TV (CCTV)

☐ Other: ________________________________

13. What types of access controls are in place to protect the information?

☒ User Identification  ☒ Passwords  ☒ Firewall

☒ Encryption  ☐ Virtual Private Network (VPN)  ☐ Public Key Infrastructure (PKI)

☐ Smart Cards  ☐ Other: B2B Azure authentication to get access to the portal and then we will be using role based security to prevent unauthorized access to data

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

☐ Contingency Plan  ☐ User manuals for the system  ☐ Regular Back-up of files

☐ Rules of Behavior  ☐ Offsite storage of back up files  ☒ Least privilege access

☐ User training  ☐ Other: ________________________________

15. What monitoring, recording, and auditing safeguards are in place to prevent or detect unauthorized access or inappropriate usage?

TVA-29 SORN, Privacy Impact Assessments, Audits and Virtual logs,

16. Discuss any other potential privacy vulnerabilities to the system and safeguards that are in place to mitigate those vulnerabilities:

N/A

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

We will develop a Specific ED Loans privacy statement on the application landing page (information regarding the data being collected and how it will be used and protected)
USE LIMITATION

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

   Information used to determined credit risk and eligibility for the ED Loan Program.

19. With which (if any) internal TVA systems/collections is the information shared?

   Treasury Office and the Office of General Counsel

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

   None

Please submit completed form to: Christopher Marsalis
TVA Senior Privacy Program Manager
(865) 632-2467
camarsalis@tva.gov