



Tennessee Valley Authority Third-Party Websites and Applications Privacy Impact Assessment (TPWA PIA)

Extreme Energy Makeover Data Entry Tool

This TPWA PIA is a tool used by the TVA Privacy Program to identify privacy risks at the planning/initiation phase of the use of a third-party website or application. The PIA should be reviewed and updated every three years or sooner, if the website or application undergoes a major change. For additional guidance on how to complete this TPWA PIA, please refer to the TVA Guide to Completing Required Privacy Documentation. 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 1.0
February 2015





PROGRAM MANAGEMENT

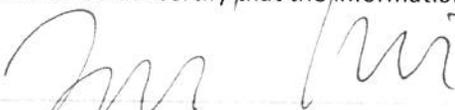
Name of PIA Author	Chris Marsalis	
Date of Submission	September 24, 2015	System Owner Details
Responsible TVA Business Unit	EnergyRight and Renewable Solutions	Name: Travis Reid Title: Analyst, Mkt& Program Analysis
Name of Website or Application	Extreme Energy Makeover Data Entry Tool	Phone: 615-232-6912 Email: tdreid@tva.gov
Configuration Item (if applicable)		
Reason for completing PIA	<input checked="" type="checkbox"/> New third-party website or application <input type="checkbox"/> Significant modification to an existing third-party website or application	

PRIVACY DETERMINATION

(To be completed by the TVA Privacy Program)

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

- 
 Travis Reid, System Owner 9/24/15
Date
- 
 Chris Marsalis, Senior Privacy Program Manager 9/28/15
Date



SYSTEM OVERVIEW

1. Please describe the purpose of the third-party website or application:

The Extreme Energy Makeover Online Tool will provide a means for Local Power Companies to implement energy savings measures in homes to achieve 25% energy savings of the home's total energy consumption. This project is part of the Smart Communities - EPA Environmental Mitigation project and impacts/progress must be reported in a timely manner to EPA to the TVA Executive Monthly Report.

2. What type(s) of information will be made available to TVA? Check all that apply:

- | | |
|--|--|
| <input checked="" type="checkbox"/> Name | <input type="checkbox"/> Mother's Maiden Name |
| <input checked="" type="checkbox"/> Home Phone | <input type="checkbox"/> Date of Birth |
| <input checked="" type="checkbox"/> Home Address | <input type="checkbox"/> Place of Birth |
| <input type="checkbox"/> Social Security number (SSN) | <input type="checkbox"/> Employment Information |
| <input type="checkbox"/> Medical or Health Information | <input type="checkbox"/> Criminal History |
| <input type="checkbox"/> Financial Information | <input type="checkbox"/> Biometric Information |
| <input type="checkbox"/> Clearance Information | <input type="checkbox"/> Other: <Please specify> |

3. What type(s) of information will TVA retain?

- | | |
|--|--|
| <input checked="" type="checkbox"/> Name | <input type="checkbox"/> Mother's Maiden Name |
| <input checked="" type="checkbox"/> Home Phone | <input type="checkbox"/> Date of Birth |
| <input checked="" type="checkbox"/> Home Address | <input type="checkbox"/> Place of Birth |
| <input type="checkbox"/> Social Security number (SSN) | <input type="checkbox"/> Employment Information |
| <input type="checkbox"/> Medical or Health Information | <input type="checkbox"/> Criminal History |
| <input type="checkbox"/> Financial Information | <input type="checkbox"/> Biometric Information |
| <input type="checkbox"/> Clearance Information | <input type="checkbox"/> Other: <Please specify> |
| <input type="checkbox"/> Log or Tracking Data | |



<p>4. Does the website or application allow individuals to submit comments, feedback, or messages?</p>	<p><input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> Yes, but the feature will be turned off</p>
<p>5. Does the website or application use tracking or customization technologies, such as cookies or web beacons?</p>	<p><input type="checkbox"/> No <input type="checkbox"/> Yes, but TVA does not have access to any collected information <input checked="" type="checkbox"/> Yes, TVA has access to the collected information, but only single-session technologies are used <input type="checkbox"/> Yes, TVA has access to the collected information, and multi-session technologies are used</p>
<p>6. Is identical information collected from 10 or more individuals or organizations? (excluding agencies, instrumentalities or employees of the federal government)</p>	<p><input type="checkbox"/> No <input checked="" type="checkbox"/> Yes</p>

AUTHORITY AND PURPOSE

<p>7. Is the use of this third-party website or application consistent with all applicable laws, regulations, and policies?</p>	
<p>This tool is compliant with the President’s Transparency and Open Government Memorandum¹⁴ (January 21, 2009) and the OMB Director’s Open Government Directive Memorandum.</p>	
<p>8. For each box checked above in Question 3, please provide the business need for the collection:</p>	<p><i>This data will need to be collected to educate consumers and communities on the benefits of Energy upgrades. In addition to providing each homeowner with custom training on the specific improvements on their home, TVA and TVA partners would hold public education demonstrations in communities to provide education on the Smart Communities, Extreme Energy Makeovers Projects and available resources.</i></p>
<p>9. Can you retrieve data in the system by using one or more of the identifiers listed in Question 2? If yes, this system is subject to the Privacy Act and requires a <u>System of Records Notice (SORN)</u>.</p>	<p><input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> SORN already exists. TVA-29 Energy Program Files</p>



ACCOUNTABILITY, AUDIT, AND RISK MANAGEMENT

10. What TVA employees and business units are responsible for monitoring the privacy governance and administration of this third-party website or application?

Travis Reid, System Owner, Energy Right and Renewable Solutions

DATA MINIMIZATION AND RETENTION

11. Will TVA retain data and, if so, for how long?

Records will be retained for 10 years and then archived.

SECURITY

12. What types of physical safeguards exist to protect the information TVA retains?	<input type="checkbox"/> Guards <input type="checkbox"/> Identification Badges <input type="checkbox"/> Other: <i><Please specify></i>	<input type="checkbox"/> Biometrics <input type="checkbox"/> Closed Circuit TV (CCTV) <input checked="" type="checkbox"/> N/A
13. What types of access controls are in place to protect the information TVA retains?	<input checked="" type="checkbox"/> User Identification <input checked="" type="checkbox"/> Firewall <input type="checkbox"/> Virtual Private Network (VPN) <input type="checkbox"/> Smart Cards	<input checked="" type="checkbox"/> Passwords <input checked="" type="checkbox"/> Encryption <input type="checkbox"/> Public Key Infrastructure (PKI) <input checked="" type="checkbox"/> Other: Role based access. Information sent SFTP from the local power company <input checked="" type="checkbox"/> FedRamp certification in process
14. What types of administrative safeguards exist to protect the information TVA retains?	<input checked="" type="checkbox"/> Contingency Plan <input checked="" type="checkbox"/> Regular Back-up of files <input checked="" type="checkbox"/> Offsite storage of back up files <input checked="" type="checkbox"/> User training	<input checked="" type="checkbox"/> User manuals for the system <input checked="" type="checkbox"/> Rules of Behavior <input checked="" type="checkbox"/> Least privilege access <input type="checkbox"/> Other: <i><Please specify></i> <input type="checkbox"/> N/A, TVA does not retain information



<p>15. What monitoring, recording, and auditing safeguards are in place to prevent or detect unauthorized access or inappropriate usage of TVA's third-party website account or of the application?</p>	<p><i>TVA Standard monitoring within the corporate infrastructure on the database and connection to DSIMS. Mutual SSL and restricted IP ports.</i></p>
<p>16. Discuss any other potential privacy vulnerabilities and safeguards that are in place to mitigate those vulnerabilities.</p>	<p><i>None</i></p>

TRANSPARENCY

<p>17. What types of transparency mechanisms are in place to notify individuals as to how their information will be collected, used, and/or shared?</p>
<p><input type="checkbox"/> TVA Privacy Notice on the website or application (see OMB 10-23 for content requirements)</p> <p><input type="checkbox"/> An exit notice explaining to users moving from an official TVA site to the third-party website that they are being directed to a non-TVA website</p> <p><input type="checkbox"/> Third-Party's Privacy Policy (for example, Facebook, Google Analytics, or ForeSee's Privacy Policy)</p> <p><input checked="" type="checkbox"/> PIA</p> <p><input checked="" type="checkbox"/> Privacy Act Statements</p> <p><input checked="" type="checkbox"/> System of Records Notice (SORN)</p> <p><input checked="" type="checkbox"/> Other Residents must sign an agreement before work is performed.</p>

USE LIMITATION

<p>18. Explain how the information in the system is limited to the uses specified in the notices discussed above.</p>
<p><i>The information collected within this tool will solely be used to evaluate cost-effective, deep-energy retrofits, maximizing the use of the energy reduction measures and focusing on a whole house approach for energy savings.</i></p>
<p>19. With which (if any) internal TVA systems/organizations is the information shared?</p>



Information will be retained in Demand Side Information Management System when it's in a report ready state. Reports will be sent Semi-annually to the Environmental Protection Agency.

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

Environmental Protection Agency and the U.S. Energy Information Administration.

21. What methods (if any) are used to analyze the data?

Data is analyzed by logic built within the application/tool.

END FORM

Please submit completed form to:

**Christopher Marsalis
TVA Senior Privacy Program Manager
(865) 632-2467
camarsalis@tva.gov**