



Tennessee Valley Authority Privacy Impact Assessment (PIA)

People Lifecycle Unified System (PLUS)

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 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
August 2013





PROGRAM MANAGEMENT

Name of PIA Author	Christopher Marsalis	
Date of Submission		System Owner Details
Responsible TVA Business Unit	Human Resources/CFO	Name: Shawn Ballard/Denise Jones Title: Mgr HRIS /SR Mgr Accounting Services Phone:865-632-7430/865-632-4511 Email: smballard@tva.gov/jdjones@tva.gov
Name of System/Collection	People Lifecycle Unified System (PLUS)	
Configuration Item		
Reason for completing PIA	<input checked="" type="checkbox"/> New system <input type="checkbox"/> Significant modification to an existing system <input type="checkbox"/> To update existing PIA for a triennial security reauthorization	

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:

1. Shawn Ballard 12/11/2013
 Shawn Ballard, System Owner Date

2. Christopher Marsalis 12/11/2013
 Christopher Marsalis, Senior Privacy Program Manager Date

SYSTEM OVERVIEW

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

<Develop a detailed description of the purpose(s) for which personally identifiable information (PII)¹ is collected, used, maintained, and shared. 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 collection, how information is collected (if not stated in the transaction), how information is retrieved, and any connections to other internal or external systems. If connections to other external systems exist, include information on relevant memorandum of understanding (MOU) allowing for the data sharing.>

The People Lifecycle Unified System (PLUS) is a human capital management (HCM) system that integrates people, payroll, and learning processes from beginning to end. PLUS is an integrated solution consisting of PeopleSoft HCM/Oracle Business Intelligence and Plateau/Success Factors Learning Management System. The PLUS system is the authoritative source of all people information for TVA. The PLUS system provides business functionality associated with the implementation of the following modules: Human Resources, TVA Payroll, Retirement Payroll, HR Help Desk – Personnel Security, HR Help Desk – Employee Service Center, Recruiting, Employee and Retiree Benefits, Manager and Employee Self Service, Portal, and Learning Management. The PLUS solution provides source data to more than 130 interfacing systems for TVA and supports many critical processes – from recruitment to retirement, as well as persons of interest (POI's).

People Lifecycle United System (PLUS) provides a single portal for human resource, training, payroll and retirement data. The system is managed by Human Resources and the CFO.

The system tracks all people and payroll functions throughout the employee lifecycle from hiring to retirement, as well as operations, compliance and customer service.

Employees can manage the following information:

- work and home addresses
- phone numbers
- email addresses
- Personal Information Summary
- emergency contacts
- I-9 Forms (complete and submit)
- Ethnic Groups
- Disability
- Severance Pay Calculator
- Personal Profile (view/modify)
- Benefits (enroll)
- Health Plan Summary
- Insurance Plan Summary
- Savings Plan Summary
- Flexible Spending Accounts

¹ OMB Memorandum 07-16, *Safeguarding Against and Responding to the Breach of Personally Identifiable Information*, defines PII as information which can be used to distinguish or trace an individual's identity such as their name, social security number, biometric records, etc., alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc.

- Dependent/Beneficiary Summary
- Life Event (birth, adoption, marriage, divorce)
- direct deposit
- view paycheck and historical pay statements
- voluntary deductions
- view W-2/W2-c forms and W-4
- compensation history
- recruiting (careers)

Managers can initiate the following transactions for their direct/indirect reports:

- supervisor change
- transfer
- termination
- extend temporary action or tenure
- reclassify job
- leave without pay
- location or official station change
- salary changes
- lump sum payments

Managers can view the following information for direct/indirect reports:

- status of all transactions initiated
- personal information such as employee ID, telephone number, location, birth day and month
- job and person profiles for skills, education, licenses and certifications request
- compensation history

2. What type of information can be collected, maintained, used, and/or disseminated? Check all that apply:

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

AUTHORITY AND PURPOSE

3. 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, Pub. L. 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; Internal Revenue Code; Fair Labor Standards Act, 29 U.S.C. Chapter 8; 5 U.S.C. Chapter 63.	
4. For each box checked above in Question 2, please provide the business need for the collection:	Information categories identified in Question 2 are necessary to be collected, maintained and used for Human Resources, Training, Payroll, Retirement and other critical business operations.
5. Will this information be retained in a Privacy Act System of Records Notice (SORN) ? If data in the system can be retrieved using one or more of the identifiers listed in Question 2, this system is subject to the Privacy Act and requires a SORN.	<input type="checkbox"/> No <input checked="" type="checkbox"/> TVA – 1: Apprentice Training Records; TVA – 2: Personnel Files; TVA-11: Payroll records; TVA-13: Employment Applicant files; TVA-18: Employee Supplementary Vacancy Announcement Records; TVA-26: Retirement System Records; TVA-37: TVA Police Records

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 At 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 period privacy compliance reviews of the [People Lifecycle United System (PLUS) 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 authorize users of the system?
In 2014, Privacy Training will become merged into the Annual Cyber Security Awareness training which will require all employees to complete an online training module to increase awareness of privacy requirements and to ensure all TVA personnel understand their responsibilities in safeguarding personal information in the workplace. The training module will cover the procedures and best practices for Protecting Personally Identifiable Information (PII) and Restricted Personally Identifiable Information (RPPII). These procedures and best practices correspond to applicable laws and regulations for protecting the confidentiality, integrity, and availability of PII and RPPII.

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.

- | | |
|--|--|
| <input checked="" type="checkbox"/> Cross referencing data entries with other systems | <input checked="" type="checkbox"/> Character limits on text submissions |
| <input type="checkbox"/> Third party data verification | <input checked="" type="checkbox"/> Numerical restrictions in text boxes |
| <input type="checkbox"/> Data taken directly from individuals via a form(s). Please list form(s) name and number here: | <input type="checkbox"/> Other: <Please specify> |

DATA MINIMIZATION AND RETENTION

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

TVA records disposition schedules (RDS) published by National Archives and Records Administration, are applicable for this system.

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. Concurrent with the publication of the appropriate SORNS, exemptions from the access provisions of the Privacy Act may apply. 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

<p>16. Discuss any other potential privacy vulnerabilities to the system and safeguards that are in place to mitigate those vulnerabilities:</p>	<p>Patches are not up to date. IT Architecture and Engineering has POAMs in place to ensure a regular patch cycle.</p>
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TRANSPARENCY

<p>17. How are individuals notified as to how their information will be collected, used, and/or shared within this system?</p>
<p>Privacy Impact Assessments, Privacy Act Statements, System of Records Notices (SORNs).</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>To request from any pertinent source directly or through a TVA contractor engaged at TVA's direction, information relevant to a TVA decision concerning the hiring, retention, or promotion of an employee, the issuance of a security clearance, or other decision within the purposes of this system of records. To provide information or disclose to a Federal agency, in response to its request, in connection with the hiring or retention of an employee, the letting of a contract or issuance of a license, grant, or other benefit by the requesting agency to the extent that the information is relevant and necessary to the requesting agency's decision on that matter. To provide the following information, To report earnings and other required information to Federal, State, and local taxing authorities as required by law To report earnings to the Civil Service Retirement System for members of that system. To transmit payroll deduction information to financial institutions and employee organizations To report earnings to courts when garnishments are served or in bankruptcy or wage earner proceedings</p>
<p>19. With which (if any) internal TVA systems/collections is the information shared?</p>
<p>See attached</p>
<p>20. With which (if any) organizations external to TVA is information shared?</p>
<p>Federal Agencies, State Government, Health care providers, Financial Institutions.</p>



21. What methods are used to analyze the data?

This will be addressed by POAMS.

END FORM

Please submit completed form to:

**Christopher Marsalis
TVA Senior Privacy Program Manager
(865) 632-2467
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