

SMALL BUSINESS ADMINISTRATION
PRIVACY IMPACT ASSESSMENT

Name of Project: Denver Finance Center System

Project's Unique ID: DFCS

Once the PIA is completed and the signature approval page is signed, please provide copies of the PIA to the following:

- SBA IT Security Manager
- SBA OCIO IT Portfolio Division
- SBA Privacy Act Officer

Do not email the approved PIA directly to the Office of Management and Budget email address identified on the Exhibit 300 form. One transmission will be sent by the OCIO Portfolio Management Division

Also refer to the signature approval page at the end of this document.

A. CONTACT INFORMATION:

1) Who is the person completing this document?

Jonathan Jones
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2) Who is the System Owner?

Jennifer Main
Chief Financial Officer
202-205-6449
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3) Who is the System Manager for this system or application?

Deepak Bhargava
Director, Office of Financial Systems
Office of Chief Financial Officer
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4) Who is the IT Security Manager who reviewed this document?

David L. McCauley
Chief Information Security Officer
Office of the Chief Information Officer
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David.McCauley@sba.gov

5) Who is the Bureau/Office Privacy Act Officer who reviewed this document?

Ethel Matthews
Office of the Chief Information Officer
(202) 205-7173
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6) Who is the Reviewing Official? (According to OMB, this the agency IO or other agency head designee who is other than the official procuring the system or the official who conducts the PIA).

Christine Liu
Chief Information Officer/Privacy Officer
(202) 205-6708
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B. PIA PROCESS APPLICATION/GENERAL INFORMATION:

1) Does this system contain any information about individuals?

a. Is this information identifiable to the individual!?

Yes

b. Is the information about individual members of the public?'

Yes

c. Is the information about employees?

Yes

2) What is the purpose of the system or application?

The Treasury Disbursements sub system of the DFCS maintains a register of all disbursements made, which includes employee, vendor, bank, and borrower information.

3) What legal authority authorizes the purchase or development of this system/application?

15 U.S.C. § 634(b)(6), 44 U.S.C. § 3101. Public Law 85536, 15 U.S.C. § 631 et seq. (Small Business Act, all provisions relating to loan programs); 44 U.S.C. § 3101 (Records Management by Federal Agencies); and Public Law 10362 (Government Performance and Results Act). Public Law 85699 as amended 15 U.S.C. §661 et seq. (Small Business Investment Act of 1958, all provisions relating to loan programs)

C. DATA in the PROCESS:

1) What categories of individuals are covered in this process?

Employees and borrowers.

2) What are the sources of the information in this process?

a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, source then what other source

The initial information is gathered from the individual, but for purposes of disbursement, the information is collected from various systems including JAAMS, PIMS, ELIPS, SBG and LAS.

b. What Federal agencies are providing data for use in the process?

The U.S. Department of Treasury is providing confirmation and payment collection information.

c. What State and local agencies are providing data for use in the process?

None

d. From what other third party sources will data be collected?

None

- e. **What information will be collected from the employee and the public?**

We do not collect information; we use what has been collected by Loan Offices, etc.

3) Accuracy, Timeliness, and Reliability

- a. **How will data collected from sources other than SBA records be verified for accuracy?**

The US Department of Treasury has controls in place to collect accurate data.

- b. **How will data be checked for completeness?**

We apply the payments and reconcile the information with Treasury.

- c. **Is the Data Current? What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models)**

This system processes the data passed to it from JAAMS, LAS, and PIMS. Those systems have procedures to validate information in them and provide opportunities for the information source to review and correct their information.

- d. **Are the data elements described in detail and documented? If Yes, What is the name of the document?**

No. However, the initial collection point (Loan Officers, etc) may have more detailed documentation.

D. ATTRIBUTES OF THE DATA

- 1) **Is the use of the data both relevant and necessary to the purpose for which the process is being designed?**

Yes

- 2) **Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**

No

- 3) **Will the new data be placed in the individual's record?**

No

- 4) **Can the system make determinations about employees/public that would not be possible without the new data?**

No

- 5) **How will the new data be verified for relevance and accuracy?**

N/A

- 6) **If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**

Sybase Access Controls as well as file level access controls. Agency Security Access Procedures are followed in granting access. Data access is limited to those individuals with authorized use and only for specific screens as they pertain to the user's role/need.

- 7) **If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access through the process? Explain.**

N/A

- 8) **How will the data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.**

Yes. Information can be retrieved by SSN, TIN, Name and Loan Number.

- 9) **What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

Automated queries are done to evaluate the disbursement history, track down missing payments, and to process cancellation transactions on disbursements that are not actually cleared by the payee. Access to reports is limited to those individuals with authorized use and only for specific reports as they pertain to the user's role/need.

10) What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent.)

We do not collect the information; we store what is passed to us.

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS

1) If the information in the process operated in more than one site, how will consistent use of the data be maintained in all sites?

It is operated one site only

2) What are the retention periods of data in the system?

As specified in SBA's Privacy Act Systems of Records, SBA 20 and SBA 21, In accordance with SBA Standard Operating Procedure 00 41 2 Records Management Program in appendices 17, 18 and 21.

3) What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented

Procedures for disposition stated in SBA SOP 00 41 2, appendices 17, 18, or 19, retention for financial records.

4) Are the systems in the process using technologies in ways that the SBA has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?

No

5) How does the use of this technology affect public/employee privacy?

Information is used only in the course of the disbursement/cancellation cycle

- 6) **Will this system in the process provided the capability to identify, locates, and monitor individuals? If yes, explain**

No

- 7) **What kinds of information are collected as a function of the monitoring of individuals?**

N/A

- 8) **What controls will be used to prevent unauthorized monitoring?**

Agency Security Roles and Procedures/Controls – Agency Security Access Procedures – Access is limited by controlled assignment of a responsibility profile to all users. Each responsibility comes with a predetermined set of privileges, limiting data that may be viewed to those screens and reports that are within the duties and needs of the user

- 9) **Under which Privacy Act systems of records notice does the system operate? Provide number and name**

SBA's Privacy Act Systems of Records, SBA 20 and SBA 21

- 10) **If the system is being modified, will the Privacy Act Systems of records notice require amendment or revision? Explain.**

It is not being modified.

F) ACCESS TO DATA:

- 1) **Who will have access to the data in the System? (e.g. contractors, users, managers, system administrators, developers, tribes, other)**

Users are within the Denver Finance Center.

For performing system maintenance activities, authorized personnel from Office of Financial Systems, CFO's office will have access to DFCS. This includes developers, system administrators and database administrators.

- 2) **How is access to the data by a user determined? Are criteria, procedures, controls and responsibilities regarding access documented?**

There are technical controls to ensure that only authorized users have access, as well as managerial controls to ensure that users are authorized access. Annual recertifications and reconciliations ensure the quality of the security program.

3) Will users have access to all data on the system or will the user's access be restricted? Explain

Users who have been duly authorized access to the system have full access. However, in place technical controls ensure that they have no ability to change any data.

4) What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?

Access is limited via userid and password controls, and rights are assigned to groups within the Operating System. In addition, education of agency personnel regarding privacy act rules and prohibitions is both mandatory and ongoing. Agency network login procedures mandate a posted privacy notice be viewed and acknowledged prior to entry. In addition, we follow the principal of least access as the most appropriate and significant control.

5) Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?

Yes, there is contract support to assist in the maintenance of the infrastructure. There is also contract support to provide system administration to the systems.

Yes. Privacy act contract clauses are in their contracts and other regulatory measures are addressed.

6) Do other systems share data or have access to the data in the system? If yes, explain.

The 1098 System for Cancellation of disbursements accesses these records to determine who a payment was made to, and how to cancel the disbursement.

7) Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?

The System Manager is responsible for protecting the privacy rights of the public and employees.

8) Will other agencies share data or have access to the data in this system?

No

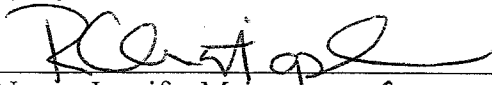
9) How will the data be used by the other agency? N/A

10) Who is responsible for assuring proper use of the data?


The system manager.

The following officials have approved this document:

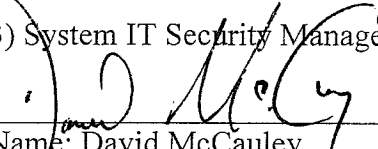
1) System Owner


Name: Jennifer Main
Title: Chief Financial Officer

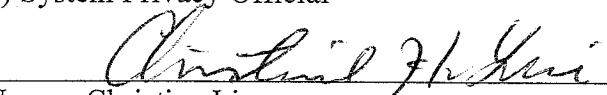
2) System Program/Project Manager


Name: Deepak Bhargava
Title: Director, Office of Financial Systems

3) System IT Security Manager


Name: David McCauley
Title: Chief Information Security Officer

4) System Privacy Official


Name: Christine Liu
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