

SBA GOALOWNER PIA

SMALL BUSINESS ADMINISTRATION
PRIVACY IMPACT ASSESSMENT

Name of Project: GoalOwner

Program Office: Office of Human Capital Management (OHCM)

Project's Unique ID:

A. CONTACT INFORMATION:

1) Who is the person completing this document?

Margo Goggins
Program Analyst, OHCM
202-205-6213

2) Who is the System Owner?

Richard Brechbiel
Chief Human Capital Officer
202-205-6784

3) Who is the System Manager for this system or application?

D. Sharon Petrelle
Chief, Workforce Effectiveness Division, OHCM
202-205-7748

4) Who is the IT Security Manager who reviewed this document?

David McCauley
Chief Information Security Officer, OCIO
202-205-7103

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

Ethel Matthews
Senior Advisor to the Chief Privacy Officer, OCIO
202-205-7173

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
202-205-6708

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?'

No.

c. Is the information about employees?

Yes.

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

The system is as tool to monitor individual and organizational performance; to conduct employee performance progress reviews and employee performance appraisals; and to document performance award recommendations as required by 5 CFR, Part 430.

3) What: legal authority authorizes the purchase or development of this PIA Process?

15 U.S.C. § 634(b)(6), 44 U.S.C. § 3101.

Privacy Act of 1974, 5 USC 552a and related statutes (Electronic Communications Privacy Act of 1986; Computer Matching and Privacy Protection Act of 1988)

Paperwork Reduction Act of 1995; 44 USC 3501.

Government Paperwork Elimination Act of 1998.

Federal Records Act of 1950 and National Archives and Records Administration (NARA) implementing regulating at 36 CFR 1220 and 41 CSR 201-22.

The Office of Management and Budget (OMB) Circular A-130, "Management of Federal Information Resources," Appendix III, "Security of Federal

Automated Information Systems.” OMB Circular A-130 implements a number of Federal laws relating to information resources management (for example, the Paperwork Reduction Act, the Clinger-Cohen Act; and the Government Performance and Results Act).

The Federal Information Security Management Act of 2002 (FISMA).

Additional program definition is detailed in Title 13 of the Code of Federal Regulations (13 CFR), Part 123.

C. DATA in the PROCESS:

1) Generally describe the type of information to be used in the system and what categories of individuals are covered in the System?

The system will contain general employment information on SBA employees as well as specific information on employee performance, organizational performance, performance awards data, and competency development.

2) What are the sources of the information in the System?

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?

Performance information is collected from several sources: directly from the employee regarding work accomplishments; directly from the rating officials regarding the performance of their direct reports; directly from organizational unit leads regarding organizational performance; and directly from supervisors regarding competency development of their subordinates..

General employee information is collected from two sources: the NFC Payroll system and the Microsoft Exchange Outlook.

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

The National Finance Center (NFC) maintains SBA’s payroll system, which houses general employment information on all SBA employees. This system will provide that data to SBA HR System Admins who will upload the data into GoalOwner.

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?

The employee will provide performance feedback information on themselves and their individual performance and accomplishments.

3) Accuracy, Timeliness, and Reliability

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

Data from Federal Agency records is identified by name and email address, is subject to Privacy Act regulation and documented practices for accuracy. HR Systems Administrators will run periodic records checks to verify accuracy. Also, GoalOwner will generate error reports on information that seems inconsistent with previous data loads.

b. How will data be checked for completeness?

HR Systems Administrators will conduct periodic assessments of the information in the system to determine if the data is complete.

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)

Yes. General Employment Data and employee email address information is updated and uploaded into the system every two weeks by HR System Administrators. Data collected directly from employees/supervisors is updated as provided. GoalOwner Agency Database Hourly Transaction Logs and Daily incremental Backups help system administrators monitor the timeliness of data entries and give them the ability to determine whether data is inactive or out-of-date.

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

Yes, there is a data elements dictionary that is maintained by the database administrators that describes the data elements in the GoalOwner system. The name of the file is GoalOwner.pdf.

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. The information is necessary and based on the specific need to evaluate employee performance as required by 5 CFR, Part 430.

- 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?**

N/A

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

N/A

- 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?**

No data is being consolidated in this system.

- 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.**

No processes are being consolidated. Not applicable.

- 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.**

Data is accessed by authorized users with sufficient privileges by name and employee email address.

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

The performance plan report (Personal Business Commitment Plan-PBCP) can be run by the employee and their supervisor. HR System Administrators will be able to run reports on outstanding performance related documents such as progress reviews that have not been completed; employees who are overdue for a performance rating; organizational performance reports, ratings distribution reports, and performance cycle status reports. These reports will be used by HR Specialists to monitor the performance appraisal program and to ensure that SBA is in compliance with federal regulations that govern performance management.

Organizational performance reports are generated for individual offices. These reports will be used for the daily operation of the offices and other staff management purposes. These reports are restricted to specific office management and individuals involved with insuring accuracy of the data.

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?

The collected employee data is the same mandatory data required for employment consideration. The performance data and individual performance feedback data that is entered by the supervisor is required for conducting annual performance appraisals. The employee may (not required) enter their own performance progress information into the system. All performance data (whether provided by the employee or documented by the supervisor) will be maintained in accordance with the Privacy Act and will not be used for any other purpose than for which it was collected.

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS

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

The system operates from a single site with a separate site as a backup. Data is replicated to the backup site for disaster recovery purposes.

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

Data retention standards are consistent with SOP 34 30, which requires performance data to be maintained on employees for a period of three years.

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?

Data retention and reports retention standards are recorded in the System Security Plan. Performance appraisal records older than 3 years will be expunged from the system.

- 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?**

N/A

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

The system will contain general employee information such as name, email, grade, series, step, organizational unit. It will maintain and track this information throughout the employment tenure of each employee. If the employee changes grade, series, organizational component, etc., this information will be updated in the system. This will allow rating officials and HR Administrators to track employee general information and performance data. This information is also tracked through our payroll system which is the source from which the information in GoalOwner will be updated.

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

The system will contain the general employment information mentioned in E6 as well as specific information on employee performance, organizational performance, performance awards data, and competency development, work accomplishments, etc.

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

Access is limited by control of User ID's, password controls, and the assignment of a User Role profile to all User ID's. Each user role comes with a pre-determined set of privileges, limiting data that may be viewed to those screens and reports that are within the duties and needs of the user. A GoalOwner user manual details the various roles within the system and explains the access associated with each User Role profile. HR System Administrators have control over assigned user roles and will have access to audit logs that record the activities that occur within the system. Agency network log-on procedures mandate a posted Privacy notice be viewed and

acknowledged prior to entry. Additionally, all system users will be trained prior to initial system deployment and refresher training will occur every 2 years. This training will include Privacy Act rules and prohibitions on the dissemination or use of non-public information.

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

SMALL BUSINESS ADMINISTRATION Privacy Act System of Records
Employee Information Files

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

No revision is necessary. While the system is new, the types of data collected and the handling of privacy data remain the same as with the legacy system.

F. ACCESS TO DATA:

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

Access is open to all SBA employees; SBA supervisors/rating officials acting in their official capacity, with access to information on their direct reports only; and certified contractors under confidentiality agreements while actually engaged in system development, modification or maintenance.

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

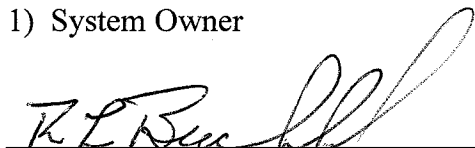
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- 3) **Will users have access to all data on the system or will the user's access be restricted? Explain**

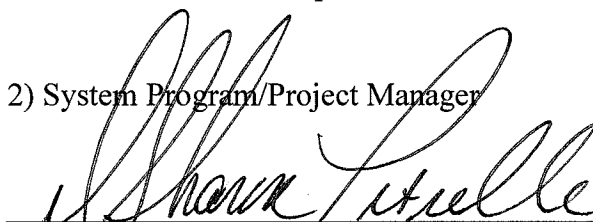
Users have access only to screens, reports and data corresponding to their assigned system user roles. HR System Administrators have control over assigned user roles and will have access to audit logs that record the activities that occur within the system.

The following officials have approved this document:

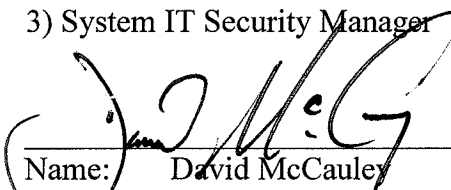
1) System Owner


Name: Richard L. Brechbiel
Title: Chief Human Capital Officer

2) System Program/Project Manager


Name: D. Sharon Petrelle
Title: Chief, Workforce Effectiveness Division, OHCM

3) System IT Security Manager


Name: David McCauley
Title: Chief Information Security Officer, OCIO

4) System Privacy Official

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For

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