

SBA 7(a), 503 and 504 Loan Service Agent  
PIA R1

SMALL BUSINESS ADMINISTRATION  
PRIVACY IMPACT ASSESSMENT

**Name of Project: SBA System – 7(a), 503 and 504 Loan Service Agent**

**Project's Unique ID:**

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?**

Glenn Hannon  
Financial Analyst, Office of Financial Assistance  
202-205-7507  
[Glenn.Hannon@sba.gov](mailto:Glenn.Hannon@sba.gov)  
409 3<sup>rd</sup> Street S. W.  
Washington, DC 20416  
(202) 205-7122

**2) Who is the System Owner?**

Steve Kucharski  
Office of Financial Assistance  
[Stephen.Kucharski@sba.gov](mailto:Stephen.Kucharski@sba.gov)  
202-205-7551

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

Jihoon Kim  
Office of Financial Assistance  
[Jihoon.Kim@sba.gov](mailto:Jihoon.Kim@sba.gov)  
202-205-6024

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

Dave McCauley, Chief Information Security Officer

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

Ethel Matthews, Senior Advisor to the CPO

**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, SBA OCIO

**B. PIA PROCESS APPLICATION/GENERAL INFORMATION:**

**1) Does this system contain any information about individuals?**

Yes

**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?**

No

**2) What is the purpose of the System/Application?**

The system enables a third party contractor to collect payments, fees, and loan status information on SBA guaranteed loans and debentures and transfer the payments, fees and loan status information to the Agency.

**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.  
Public Law 85-536, 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 103-62 (Government Performance and Results Act).  
Public Law 85-699 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 the system?**

Borrowers, Principals of Borrowers, Guarantors of Borrowers, Financial, address, personal identifier (SSN) and demographic

Lending Partner, demographics

**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**

Lending Partners, SBAREF, Loan Application Tracking System, Electronic lending system

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

None

**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?**

Financial data, address, name, SSN

### 3) Accuracy, Timeliness, and Reliability

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

The data is matched against loan information developed when the SBA guaranty was originated, the loan numbers are matched and certain data verified.

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

The data is matched against loan information developed when the SBA guaranty was originated, the loan numbers are matched and data checked for completeness, if data is incomplete an error log is generated and SBA personnel contact the lender (source of data) to correct/verify information.

- 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)

SBA supplies a current data file of loan numbers and loan names to the contractor on a monthly basis.

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

SOP 20 03 3 – Accounting Structure

### 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, data is used to verify SBA program compliance and record specifics of loans.

- 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?**

Agency Security Access Procedures – 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.**

Agency Security Roles and Procedures/Controls – Agency Security Access Procedures – Access is limited by control assignment of a responsibility profile to all users. Each responsibility 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

**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 can be retrieved by Loan Number, business name, sole proprietor name or Employer Tax ID 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?**

None.

- 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.)**

NA

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?**

System operated on one site only

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

Contractor is not required to retain the data, the data is collected, transferred to SBA and SBA retains the data as delineated in the Privacy Act System of Records, SBA 21 and SOP 00 41 2.

- 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?**

As delineated in the Privacy Act System of Records, SBA 21 and SOP 00 41 2

- 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?**

NA

- 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.**

NA

- 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 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

- 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, SBA 21

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

NA

**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)

Contractors, users, managers, system administrators, developers

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

Criteria – 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 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.

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

Access is limited by controlled assignment of a responsibility profile to all users. Each responsibility 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.

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

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 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.

Education of Agency and contractor staff regarding the Privacy Act rules and prohibitions on the dissemination or use of non-public information is mandatory and ongoing. System audit trails can be used to document suspicious or irregular log-ons and navigation of the system. Agency network log-on procedures mandate a posted Privacy notice be viewed and acknowledged prior to entry. SBA Privacy Act Systems of Records SBA 20 and SBA 21 define routine uses of this information and serve as a control by defining acceptable uses. Limiting access to sensitive financial information to only those with a need to know remains the best and primary 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, contract clauses are inserted in their contracts and other regulatory measures addressed

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

Data is downloaded to other databases; however, there is no direct interface with other systems.



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

Office of the Chief Information Officer

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

NA

- 9) **How will the data be used by the other agency?**

NA

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

NA

**The Following Officials Have Approved this Document**

1) System Program/Project Manager

Signature:

Date:

Name: Glenn Hannon  
Title: Project Manager

2) System Owner

Signature:

Date:

Name: Stephen Kucharski  
Title: Modernization Program Manager

3) System IT Security Manager

Signature:

Date:

Name: David McCauley  
Title: Chief Information Security Officer

4) System Privacy Official

Signature:

Date:

Name: Christine Liu  
Title: Chief Privacy Officer