Small Business Administration
Privacy Impact Assessment

For

8a Small Disadvantaged Business Management Information System

August 2007

SMALL BUSINESS ADMINISTRATION
8(A) SMALL DISADVANTAGED BUSINESS MANAGEMENT INFORMATION
PRIVACY IMPACT ASSESSMENT

Name of Project: 8(a) Small Disadvantaged Business Management Information System

Program Office: Government Contracting & Business Development

Project's Unique ID: 0280001030130040301093

A. CONTACT INFORMATION:
1. Who is the person completing this document?
> Larry Gottlieb
> Project Manager
> Office of Busines Development
> 409 Third Street S. W.
> Washington, DC 20416
> (202) 205-6032

2. Who is the system owner?
Calvin Jenkins
Deputy Associate Deputy Administrator, GC/BD

3. Who is the system manager for this system or application?
Stan Fujii
Associate Administrator (Acting), Office of Program Review

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

6. Who is the Reviewing Official?
Christine Liu,
Chief Information Officer

B. SYSTEM APPLICATION/GENERAL INFORMATION:
1. Does this system contain any information about individuals? Yes

(a) Is this information identifiable to the individual? Yes
(If there is **NO** information collected, maintained, or used that is identifiable
to the individual in the system, the remainder of the Privacy Impact
Assessment does not have to be completed past this section. **Note:** Clearance
sheet must be signed and copies to IT Security and Chief FOI/PA must be
provided).

(b) Is the information about individual members of the public? Yes
The following information is collected from the public: name, address, social
security number, spouse name , address and social security number. Proof of
US Citizenship. Personal and corporate financial information, e.g., bank account
numbers and balances, assets, liabilities, lien holders, etc.

(c) Is the information about employees? No
(
2. What is the purpose of the system/application?

The 8a SDB Certification process and related federal statute(s) were established
by Congress to assist American citizens who own small businesses and belong
to certain designated groups considered socially and economically
disadvantaged. This assistance is intended to help these individuals overcome
deeply entrenched social and economic obstacles to their success by providing
limited preference in the federal procurement process. The 8a SDB Certification
process is the vehicle that allows individual small business owners to claim and
obtain eligibility for this preference. The eligibility lasts nine years, during which
time an Annual Review process is carred out by the SBA to ensure that the
applicant continues to meet the statutory and regulatory criteria for continued
participation in the program. This Annual Review process is intended for future
release in the system considered for review in this document. It involves the
same individuals, data and related security issues.

**3. What legal authority authorizes the purchase or development of this
system/application?**
§§7(j), 8(a) and 8(d) of the Small Business Act of 1953 (Public Law 85536)
as amended.

C. DATA in the SYSTEM:
**1. Generally describe the type of information to be used in the system and
what categories of individuals are covered in the system?**
*Individuals in specifically designated economically and socially disadvantaged groups.
These groups are defined by statute.*

The electronic 8aSDB MIS (8aSDB MIS) is an initiative undertaken pursuant
to the President's Management Agenda for E Government, under the auspices of
the Integrated Acquisition Environment (IAE). The 8aSDB MIS supports the 8(a)

Business Development Program and the Small Disadvantage Business certification program. It replaces three systems and consolidates their functionality on a single platform (Contractor TrackingSystem [CTS], SDBTS, and SACS/MEDCOR). This system automates key business processes that are currently manual and hard-copy based. The system provides online form creation and processing, content management, as well as automated alert and email capabilities. Small Business owners benefit from the 8aSDB MIS via reduced processing time and faster approval rates. The SBA benefits from labor productivity improvements which allow resources to be redeployed to areas requiring additional attention.

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, then what other source?

The initial information is loaded by the applicant into to the Central Contractor Registry (CCR) and uploaded within 72 hours to the 8a certification system. The applicant is then provided a Transaction Personal Identification Number (TPIN) which is utilized to enter the 8aSDB MIS. All subsequent information required for certification required by the 8a certification system is provided by the applicants with one exception. The applicants are required to sign and submit standard forms that request copies of the three years prior federal tax returns from the IRS. These copies are forwarded directly from the IRS to the Office of Business Development of the SBA.

(b) What Federal agencies are providing data for use in the system?
The initial data load by the applicant is to the Central Contractor Registry (CCR). This system is managed by GSA and a component of the Integrated Acquisition Environment that is controlled by the U.S. Department of Defense.
The Internal Revenue Service provides applicant tax return information.
(c) What State and local agencies are providing data for use in the system?
None
(d) From what other third party sources will data be collected?
Data is collected from the Central Contractor Registration (CCR).
This system is managed by the U.S. Department of Defense under the IAE.
Data also collected from private credit checking agencies, such as Experian.
(e) What information will be collected from the employee and the public?
Name, Birth Date, Address, Tax ID Number, SSN, EIN, Email Address, Primary North American Industry Classification Code (NAIC), Date the firm was established, Type of Business, 2 Years Tax information (Business & Personal), Ethnicity, Gender, Duns Number, Business Legal Structure, Ownership Percentage, Net Worth, Owners Net Compensation, Business Revenues, Business Liabilities, and Business Assets. Proof of US Citizenship is also required from the applicant.

3. Accuracy, Timeliness, and Reliability

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

Data received from CCR is subject to internal logic edits and error checks.
The certification and annual re-certification processes also require the applicant to provide a signed, sworn statement of data accuracy, under penalty of law if the information proves fraudulent.

(b) How will data be checked for completeness?

The data uploaded from CCR contains logical edits and error checks that ensure completeness of data. The SBA system also contains logical edits and error checks that prevent incomplete submission of data in the application or annual review processes. The data also is reviewed by a trained and qualified SBA/BD Business Opportunity Specialist for completeness and accuracy. A checklist is used to ensure completeness. If any data appears missing, the applicant is asked to supply the missing information.

(c) Is the data current?

Data from CCR is received on a daily basis.

(d) What steps or procedures are taken to ensure the data is current and not outofdate?

Name the document (e.g., data models).

The CCR system provides ongoing maintenance and logical edits to ensure that data is complete and correct.

On first applying for certification, the applicant must provide data for the last three calendar years. For the annual review process, the applicant must update the information on file to keep it current.

(e) Are the data elements described in detail and documented?

Data elements are described in detail and documented in the "8aSDB MIS Data Dictionary".

D. ATTRIBUTES OF THE DATA:

1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

Yes, the 8(a) Program Participation is based on eligibility and is included in the Small Business Act (Public Law 85536).

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?

The system does not derive new data or create previously unavailable data about an individual through aggregation from the information collected.

5

3. Will the new data be placed in the individual's record?
Not Applicable. (See 2a above).

4. Can the system make determinations about employees/public that would not
be possible without the new data?
Not applicable.

5. How will the new data be verified for relevance and accuracy?
Each year, program participants are required to submit current documentation for continuing eligibility in the 8(a) Program.

6. If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?
SBA maintains and operates internal security controls and authentication. These security controls ensure that data is fully secured against unauthorized access. They also prevent the loss of confidentiality and integrity, as well as unauthorized modification or destruction of data.

7. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access?
SBA maintains Internal Management Controls through periodic auditing from the Office of the Inspector General and the Office of Program Review. Certification and Accreditation of the system is provided by the Chief Information Office and includes a System Security Plan, Risk Assessment, and Security Test & Evaluation every three years for existing systems and each instance the system is upgraded or enhancement.

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, each participant is given a TPIN for access into the 8aSDB MIS. Each approved participant is also assigned an SBA case number as an internal identifier. SBA employees are given access and roles for access such as administrative, approval, legal, and field staff user.
Data is also retrieved by applicant Userid, applicant small business name, DUNS number, and case 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?
The following reports may be produced on individuals:
Congressional District
Location
NAIC Code
Contract Awards

Ethnicity
Gender
Revenues
Net Worth
This information is provided to Congress in the annual Report to Congress on Minority Capital Ownership Development as required by the Small Business Act Of 1988 [15 U.S.C. 636(j) 16(A) &(B)].
This information may also be requested under the Freedom of Information Act. However, distinct identifiers such as Name, EIN, SSN etc, are redacted to alleviate disclosure of private information.

The system can also produce reports on the numbers of applicants in each stage of the approval process, as well as their overall eligibility for certification by the 8a SDB program. The reports are used to track the rate of applicant throughput through the system, as well as the rate of declines versus approvals.

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.)
Individuals may decline to provide information or their consent for particular uses of the information, but both are conditions for initial acceptance and continuing eligibility in the SBA 8a and SDB Business Development Program.
All information is provided on a voluntary basis by individuals. The information is not used for any other purpose than to evaluate the applicant for eligibility for 8a SDB certification, so no consent for any other use is solicited.

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:
1. If the system is operated in more than one site, how will consistent use of the
system and data be maintained in all sites?
Information is processed in a single hosted site, not on the premises of the SBA. However, access is provided from numerous sites.

2. What are the retention periods of data in this system?
Retention of the information provided is indefinite. Upon completion of the nine year program participation term all data relating to the participant is archived in the system for an indefinite period.

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?
No data is deleted, so there is no retention period.

4. Is the system using technologies in ways that the SBA has not previously employed (e.g., monitoring software, Smart Cards, CallerID)?
No. The system uses the internet to capture information on small business owners. This system automates existing processes.

5. How does the use of this technology affect public/employee privacy?
This system poses a minimal threat to public/employee privacy via the use of a secure web site and the authentication controls described above.

6. Will this system provide the capability to identify, locate, and monitor individuals
Yes, as data is collected and updated over a period of several years, for purposes of original certification, then annual review.

7. What kinds of information are collected as a function of the monitoring of individuals?
Monitoring requires the applicant to provide annual financial and tax data for a period of nine years to ensure continuing eligibility in the program.

8. What controls will be used to prevent unauthorized monitoring?
Information is both role and userid protected. Only authorized SBA employees have access to the roles in the system that allow monitoring. These roles are granted by the System Administrator and the Sys Admin PO for GLS.

9. Under which Privacy Act systems of records notice does the system operate?
Provide number and name.
The BD Management Information System operates under Privacy Act 30 for the Serving and Contracting System/Minority Enterprise Development Central Repository.

10. If the system is being modified, will the Privacy Act system of records notice require amendment or revision?
No, the Privacy Act system of records notice will not require amendment or revision.

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 include the following:
Officials of SBA, Office of Government Contracting and Business Development, responsible for reviewing and approving small businesses for participation in the SBA Business Development Program.

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

Access is limited by User ID's, password controls, and the assignment of a responsibility profile to all User ID's. The system has predetermined access roles and responsibilities for each user. Access is granted to screens, functions and reports based on an individual's role and responsibility in the application processing and approval workflow. Access is provided by the SBA Office ofIT security upon receipt of a written authorization and approval of an SBA manager with specified authorization approval levels. Access is regulated formally via the GLS system.

3. Will users have access to all data on the system or will the user's access be restricted?
User access is limited to screens, reports and data corresponding to the assigned system role/authorization of the user. Only the System Administrator(s) is(are) authorized to assign and change roles.

Access to data is restricted by the role and office code of the user in the system Valid roles are the following:
- System Administrator (ADM)Assistant Administrator for Business Development (AA/BD): This user makes the final eligibility determination on 8(a) applicants.
- Assistant Administrator for Certification and Eligibility (AA/CE): This user has 2 roles:
  - Make the final eligibility recommendation on 8(a) applicants.
  - Make the final eligibility determination on SDB applicants.
- CODS Chief (CC):
- Office of Certification and Eligibility BOS (OCEBOS): This user reviews the 8(a) applicant's information to ensure completeness. If necessary, he procures fingerprint cards for criminal background checks, and other various forms from the applicant, before making an initial recommendation the application's eligibility.
- Business Opportunity Specialist (BOS): This is the SDB version of the OCEBOS role.
- Central Office Duty Station (CODS) General User (CG): The general user is responsible for assigning new applications to a BOS.
- Office of the General Counsel (OGC): This user examines the legality of any applications in question, and provides an additional recommendation on whether or not they qualify for certification.
- Office of Hearing and Appeals (OHA): This user reviews an applications which receive an initial decline and a reconsideration decline who request an appeal within the appropriate time frame.
- Field Office (8ASDBFieldOffice): This is a local office user who can see approved 8(a) applications located in their district, but nothing else and they have no workflow role.

4. What controls are in place to prevent the misuse (e.g., unauthorized

browsing) of data by those having access? (Please list processes and training materials)

The controls operate at two levels. First, access to the system is limited by userid and password, which keeps the mass of unauthorized individuals from entering the system. Second, an individual with authority to access the system has his/her access limited to the roles defined in a profile tied to his/her specific userid. Training on Privacy Act rules and prohibitions on the dissemination or use of nonpublic information is mandatory and ongoing for SBA staff and contractors. Agency network logon procedures mandate viewing and acknowledgement of a posted Privacy notice prior to entry. SBA Privacy Act System of Records defines routine uses of this information and serves as a control by defining acceptable uses.

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, are Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?

Yes, contractors are involved in the design, development, and maintenance of the system. Yes, clauses are inserted into contracts that protect privacy and other sensitive data.

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

No other systems have access to the data in the system.

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

The SBA IT Security Manager is responsible.

The Following Officials Have Approved This Document

1) System Manager

_____ (Signature) _____8/15/07_____ (Date)
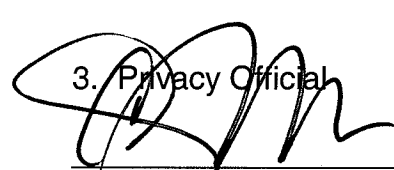
Name: Joseph Loddo,

Title: AA (Acting), Business Development

2. System Owner

_____ (Signature) _____8/15/07_____ (Date)

Name: Calvin Jenkins

Title: Deputy Associated, GC/BD

3. Privacy Official

_____ (Signature) _____8/16/07_____ (Date)

Name: Christine H. Liu

Title: Chief Privacy Officer