SMALL BUSINESS ADMINISTRATION
PRIVACY IMPACT ASSESSMENT

Name of Project: **SBA System** - Partner Identification and Management System
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
Glenn.Hannon@sba.gov
(202) 205-7122

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

Steve Kucharski
Office of Financial Assistance
stephen.kucharski@sba.gov
202-205-7551

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

Glenn Hannon
Financial Analyst, Office of Financial Assistance
202-205-7507
Glenn.Hannon@sba.gov

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?

NO

a. Is this information identifiable to the individual!?

NO

(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?'

NO

c. Is the information about employees?

NO

2) What is the purpose of the PIMS?

PIMS was designed to contain information on any organization that partners with SBA to provide services to the small business community. Currently that has been identified as:

· Commercial Lenders – Banks, Credit Unions, Savings & Loan, etc.

· SBA Specific Organizations – CDCs, Microlenders, SBICs

· Non-Depository Organizations – BIDCOs, SBLCs, Farm Credit, etc.

· Holding Companies – Parent Organizations, primarily for lending institutions

· Economic Development – BIC, TBIC, USEAC, SCORE, SBDCs, etc.

· Investors – Organizations or Persons purchasing SBA loans

As of 8/02 – the SBICs have not been loaded and only BIC, SBDC and WBC Economic Development Organizations have been loaded. Closed One Stop Capital Shops are also in the database.

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

N/A

C. DATA in the PROCESS:

1) What categories of individuals are covered in the system?

N/A

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

N/A

    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

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

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

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

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

3) Accuracy, Timeliness, and Reliability

N/A

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

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

   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)

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

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?

N/A

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?

N/A

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?

N/A

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.

N/A

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

N/A

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.)

N/A

E.   MAINTENANCE AND ADMINISTRATIVE CONTROLS

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

N/A

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

N/A

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

N/A

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)?

N/A

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

N/A

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

N/A

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?

N/A

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

N/A

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

N/A

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)

N/A

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

N/A

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

N/A

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

N/A

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?

N/A

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

N/A

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

N/A

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

N/A

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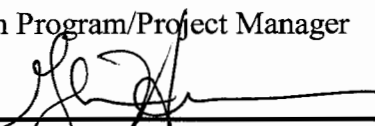
N/A

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

N/A

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The Following Officials Have Approved this Document
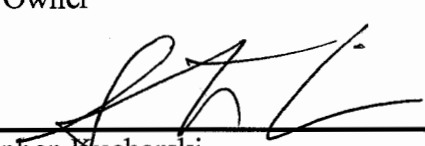
1) System Program/Project Manager

Signature: _____   Date: 08/22/2007
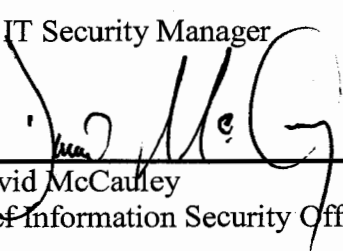Name: Glenn Hannon
Title: Project Manager

2) System Owner

Signature: _____   Date: 8/22/07
Name: Stephen Kucharski
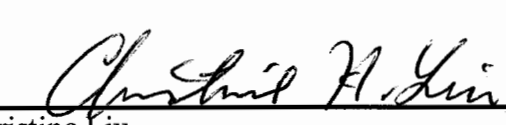Title: Modernization Program Manager

3) System IT Security Manager

Signature: _____   Date: 8/22/07
Name: David McCauley
Title: Chief Information Security Officer

4) System Privacy Official

Signature: _____   Date: 8/24/07
Name: Christine Liu
Title: Chief Privacy Officer