Small Business Administration

Privacy Impact Assessment

For

SBA Personnel/Payroll System at the National Finance Center

September 2005

Privacy Impact Assessment Authorization
Memorandum

I have carefully assessed the Privacy Impact Assessment for the SBA Personnel/Payroll System. This document has been completed in accordance with the requirements of the E-Government Act of 2002.

MANAGEMENT CERTIFICATION – Please check the appropriate statement.

_____ The document is accepted.

_____ The document is accepted pending the changes noted.

_____ The document is not accepted.

_____**We** fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

Judy Mitchell_____   _____
System Manager   DATE

David Sawyer_____   _____
OCIO/Project Representative   DATE

Richard L Brechbiel_____   _____
Program/Office Head   DATE

Ethel Matthews_____   _____
OCIO, Chief Information Security Officer   DATE

Lisa Babcock_____   _____
Chief FOI/PA   DATE

Delorice Price Ford_____   _____
Senior Official for Privacy   DATE

**Name of Project: SBA PERSONNEL/PAYROLL SYSTEM AT THE
                                   NATIONAL FINANCIAL CENTER**
Program Office: Office of Human Capital Management
Project's Unique ID:

A. CONTACT INFORMATION:

1. Who is the person completing this document?
William Turner
Personnel/Payroll Systems Analyst
Office of Human Capital Management
William.Turner@SBA.gov
(202) 619-0456

2. Who is the system owner?
Richard Brechbiel
Assistant Administrator for Human Capital Management
Office of Human Capital Management
Richard.Brechbiel@SBA.gov
(202) 205-6784

3. Who is the system manager for this system or application?
Judith Mitchell
Director, Personnel Services Division
Office of Human Capital Management
Judith.mitchell@sba.gov
(202) 619-0617

4. Who is the IT Security Manager who reviewed this document?
Ethel Matthews
Chief Information Security Officer
ethel.matthews@sba.gov
(202) 205-7173

5. Did the Chief FOI/PA review this document?
Lisa Babcock
Chief FOI/PA
lisa.babcock@sba.gov
(202) 401-8203

6. Did the Agency's Senior Office for Privacy review this document?
Delorice Ford
Agency Senior Privacy Official
delorice.ford@sba.gov
(202) 205-7340

7. Who is the Reviewing Official?
Delorice Ford
Agency Senior Privacy Official
delorice.ford@sba.gov
(202) 205-7340

B. SYSTEM APPLICATION/GENERAL INFORMATION:

1. Does this system contain any information about individuals? Yes.

(a) Is this information identifiable to the individual? Yes.

The SBA Personnel/Payroll System (PPS) contains information identifiable to individuals through name and social security number.

(b) Is the information about individual members of the public?

The SBA Personnel/Payroll System does not contain information about individual members of the public.

(c) Is the information about employees?

The SBA Personnel/Payroll System contains information about SBA employees and former employees.

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

The SBA Personnel/Payroll System is used to track the employment cycle of the employee and to pay the employee properly.

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

The Small Business Act, 5 U.S.C. ss634(a), and 31 U.S.C. ss1535(a), authorized purchase of the PPS.

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?**

    The SBA's Personnel/Payroll System (PPS) contains employee personnel and payroll data.

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 PPS uses information gathered directly from the individual as well as managers and time keepers.

    (b) **What Federal agencies are providing data for use in the system?**

    The Department of the Treasury, the Internal Revenue Service, General Services Administration, and the Office of Personnel Management provide tables for use by the PPS.

    (c) **What State and local agencies are providing data for use in the system?**

    State and municipal revenue services, state and municipal judicial systems also provide data for the PPS.

    (d) **From what other third party sources will data be collected?**

    ALLTAX, a program issued by Geac, a global tax software service provider.

    (e) **What information will be collected from the employee and the public?**

    The PPS will collect employee hours worked, leave taken, payroll payments, payroll collections, personnel documents, etc.

3. **Accuracy, Timeliness, and Reliability**

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

    The sources supply tables that are then tested according to the proscribed rules and regulations before being added to the NFC database.

    (b) **How will data be checked for completeness?**

The Tables are also tested for completeness through proscribed edits and procedures mandated by OPM.

(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).

The data and procedures are inspected regularly by the Department of Agriculture's Inspector General and reported to client agencies.

(d) Are the data elements described in detail and documented? If yes, what is the name of the document?

The data elements are described in various data dictionaries such as the Payroll/Personnel Data Dictionary and the Personnel History 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 data is both relevant and necessary for payroll and personnel operations.

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 will derive new data from the information collected such as amount earned, paid, and collected by an employee.

3. Will the new data be placed in the individual's record?

The new data will be placed in the employee's personnel or payroll record.

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

The PPS needs all the data collected to calculate payroll and meet regulatory requirements.

5. How will the new data be verified for relevance and accuracy?

The data is verified by personnel specialists, timekeepers, and managers prior to entry.

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

Data is protected from unauthorized access through security profiles, user-ids and passwords.

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

Management approval of access and limited permissions will protect data and prevent unauthorized access.

8. **How will the data be retrieved?**

The data will be retrieved electronically by computer monitors and through management reports. The data can be retrieved by name or by social security 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 PPS can produce a history of employment and payroll for each employee or groups of employee. The reports will be used by approved managers, organizations, and groups.

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 employee may self declare that information permitted. All other information is gathered by regulation and the necessity for properly processing payroll. The information is used only for official purposes.

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?**

The restricted access, security reporting, and enforcement of government regulations concerning the use and safeguarding of government personnel information will ensure consistent use by multiple sites.

2. **What are the retention periods of data in this system?**

The data is maintained in paper and electronic formats according to federal records management regulations.

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?**

Temporary employee payroll information is destroyed after 6 years while personnel information is maintained in the employee's Official Personnel Folder (OPF) until the employee leaves federal service and is then transferred to the Civilian Personnel Records Center. Where are the procedures documented? The procedures are documented in GSA's General Records Schedule and OPM's Guide to Personnel Record Keeping.

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

The system does not use technology new to the SBA.

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

The technology used provides up to date electronic security procedures to protect employee data privacy.

6. **Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.**

The system provides the capability to identify, locate, and monitor individuals as required by OPM.

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

The PPS will collect employee hours worked, leave taken, payroll payments, payroll collections, personnel documents, etc.

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

Security activity reports are prepared regularly that list, by individual, the type of access performed and any unauthorized attempts.

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

SBA Privacy Act SOR 23, Payroll files and NFC's Payroll/Personnel System. The

SOR representative is Gary Millet at 1-888-300-3399.

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

The system 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)

The data will be available to the personnel community, timekeepers, to system developers and through our reporting system to authorized management (i.e., Chief Financial Officer).

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

Access is controlled through the use of user-ids and passwords along with security profiles. Access to the data in the PPS is based upon the need of the personnel specialist and the scope of the employees he/she services.

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

Users will have limited access to the data based on the information they must process and for whom they must process the data.

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)

Security activity reports are prepared regularly that list, by individual, the type of access performed and any unauthorized attempts.

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?

The NFC follows official regulations, guidelines, and procedures when allowing contractors access to the system.

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

The SBA, the Office of Personnel Management's Central Personnel Data File, the IRS, the Social Security Administration, and the Department of the Treasury receive information from the PPS biweekly.

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

Personnel staff (users), agency security officers, and partner security staff (NFC) are responsible for protection of privacy rights.

8. **Will other agencies share data or have access to the data in this system (Federal, State, Local, Other)**

Other agencies will receive extracts of PPS data, such as the Department of Treasury with salary earned, the Internal Revenue Service, the Social Security Administration and the Office of Personnel Management

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

Other agencies will use the data in accordance with their authorized mission.

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

The system manager, agency security officers, and personnel staff are responsible for assuring proper use of the data.