SMALL BUSINESS ADMINISTRATION
PRIVACY IMPACT ASSESSMENT

Name of Project:
Surety Bond Guarantee/Preferred Surety Bond

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
    409 3rd Street S. W.
    Washington, DC 20416
    (202) 205-7122

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

    Frank Lalumiere, Associate Administrator for Surety Bond Program

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

    Frank Lalumiere, Associate Administrator for Surety Bond Program

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

Troy Thompson, IT Security Manager, SBA OCIO

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 Surety Bond System?

The Surety Bond Guarantee System enables the Agency to electronically track
underwriting application and claim data.

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

Small Business Act and Small Business Investment Act

C.   DATA in the PROCESS:

1)   What categories of individuals are covered in the system?
Principals of Businesses applying for and/or receiving SBA Bond Guarantees, Financial, address, personal identifier (SSN) and demographics

Surety Partner, demographics

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

Surety Partner, ProNet Databases, SBA Network and Web

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

Surety Partner/Agents and Claims Attorneys

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?

NA

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

Financial information, addresses, name and SSNs.

3)   Accuracy, Timeliness, and Reliability

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

NA

b.   How will data be checked for completeness?

Original Source

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)

Applicant Certification

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

SBG IRWIN data models

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 the surety bond being guaranteed.

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?

NA

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

SBGS Security Roles and Procedures/Controls – Agency Security Access - Access is limited by control of User ID's and passwords.

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.**

SBGS Security Roles and Procedures/Controls – Agency Security Access - Access is limited by control of User ID's and passwords.

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 Surety Bond Guarantee Number, business name, sole proprietor name, Employer Tax ID number or 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?**

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.)**

N/A – Surety partner submits the information

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?**

Only one site.

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

As delineated in SBA's Privacy Act System of Records, SBA 21.

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 SBA's Privacy Act System of Records, SBA 21.

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?**

Not applicable, per above.

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

SBA's 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 (Partners), 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 – SBG System Security Roles and Procedures/Controls – Agency Security Access Procedures – Access is limited by control of User ID's, password controls, and the assignment of a Responsibility profile to all User ID's. 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 control of User ID's, password controls, and the assignment of a responsibility profile to all User ID's. 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?

SBG System Security Roles and Procedures/Controls – Agency Security Access Procedures – Access is limited by control of User ID's, password controls, and the assignment of a Responsibility profile to all User ID's. 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 on going. 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 System of Records SBA 21 defines routine uses of this information and serves 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.**

Yes, Approved Surety Guarantees are uploaded to the SBA Mainframe for recording.

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

NA

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

NA

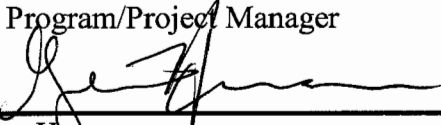**9)** **How will the data be used by the other agency?**

NA

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

NA

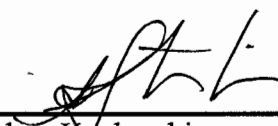# The Following Officials Have Approved this Document

1) System Program/Project Manager

Signature: _____ Date: 8/22/2007
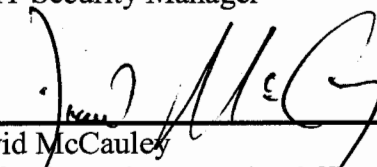
Name: Glenn Hannon
Title: Project Manager

2) System Owner

Signature: _____ Date: 8/22/07

Name: Stephen Kucharski
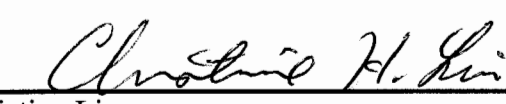Title: Modernization Program Manager

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