

## PRIVACY IMPACT ASSESSMENT TEMPLATE

**Name of System/Application: E8(a)**

**Program Office: Government Contracting and Business Development**

Once the Privacy Impact Assessment is completed and the signature approval page is signed, please submit an electronic copy and hardcopy with original signatures of the PIA to the SBA Senior Advisor to the Chief Privacy Officer in the Information Privacy Office of the OCIO.

### **A. CONTACT INFORMATION**

**Guidance:** Each listing should include the full name, title, SBA Office and program, SBA phone number and SBA e-mail.

**1) Who is the person completing this document?**

Jacqueline B. West, Program Analyst, Office of Business Development, (202) 205 -7581, [jacqueline.west@sba.gov](mailto:jacqueline.west@sba.gov).

**2) Who is the system owner?**

Calvin Jenkins, Deputy Associate Administrator, GC/BD, (202) 205-6459, [calvin.jenkins@sba.gov](mailto:calvin.jenkins@sba.gov).

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

Darryl Hairston, Associate Administrator, Office of Business Development, (202) 205-5256, [darryl.hairston@sba.gov](mailto:darryl.hairston@sba.gov).

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

Lawrence Gottlieb, Acting Chief Information Security Officer, (202) 205-6032, [lawrence.gottlieb@sba.gov](mailto:lawrence.gottlieb@sba.gov).

**5) Who is the Senior Advisor who reviewed this document?**

Ethel Matthews, Senior Advisor to Chief Privacy Officer, (202) 205-7173, [ethel.matthews@sba.gov](mailto:ethel.matthews@sba.gov).

**6) Who is the Reviewing Official?**

Paul Christy, Chief Information Officer and Chief Privacy Officer, (202) 205-6756, [paul.christy@sba.gov](mailto:paul.christy@sba.gov).

### **B. SYSTEM APPLICATION/GENERAL INFORMATION**

**1) Does this system contain any information about individuals? If yes, explain.**

a. Is the information about individual members of the public?

Yes. The E8(a) Review System contains information relating to businesses that are approved for the 8(a) Business Development Program. This information

includes Social Security numbers on the firm's principal, Employer Identification Number, financials information on the firm, firm contact information, number of employees, address of the firm, status of the firm and all actions taken by SBA such as letters sent, annual updates, recommendations, and contract information regarding status of the firm.

**b. Is the information about employees? No**

**2) What is the purpose of the system/application?**

The purpose of the E8(a) System is to provide a database for firms that are approved for the 8(a) Business Development Program. It is housed and maintained within OCIO. The system utilizes an Oracle platform. It is an internal system used by only SBA employees that are approved for specific roles within the system.

**3) Is the system in the development process? No**

**4) How will the technology investment (new or updated) affect existing privacy processes?**

The E8(a) Review system is in primarily operations and maintenance phase of the system development lifecycle.

**5) 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 85-536) as Amended.

**6) Privacy Impact Analysis: What privacy risks were identified and describe how they were mitigated for security and access controls?**

All risks were identified in the Risk Mitigation/POAM which is included in the security authorization package. The information in the E8(a) System is populated upon approval by a direct feed from the BDMIS . This is an automatic process with security controls in place to protect the data. The system access is by program office approval only with each access having defined roles and only one role permitted per user.

**C. SYSTEM DATA**

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

8(a) Small Business Participants

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

All information is provided by individuals in the Business Development Management Information System (BDMIS). Upon approval it is then uploaded to the E8(a) System for viewing and updating by the SBA field staff.

**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?**

All information is provided by individuals (Alaskan Native Corporations, Community Development Corporations, and Tribal/owned firms) and authorized users.

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

None.

**c. What Tribal, 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 will be collected from the Central Contractor Registration (CCR). This system is managed by the U.S. Department of Defense under the IAE.

**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. The BDS inputs information into the E8(a) activity log that reflects actions and or correspondence with the firm.

**3) Accuracy, Timeliness, and Reliability**

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

Data received from CCR is subject to internal logic edits and error checks.

**b. How is data checked for completeness?**

Data received from CCR is subject to internal logic edits and error checks. A daily report also shows the data that failed to upload from BDMIS to E8a because of various errors.

**c. Is the data current?**

Data from CCR is received on a daily basis. The data feed from BDMIS is also transferred to E8a on a daily basis.

**d. Are the data elements described in detail and documented?**

Data elements are described in detail and documented in the E(a) Review System.

- 4) Privacy Impact Analysis:** Discuss what privacy risks were identified and how they were mitigated for the types of information collected?

The information in the E8(a) System is populated upon approval by a direct feed from the BDMIS . This is an automatic process with security controls in place to protect the data. The system access is by program office approval only with each access having defined roles and only 1 role permitted per user.

**D. DATA ATTRIBUTES**

- 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 85-536).

- 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 not derive new data or create previously unavailable data about an individual through aggregation from the information collected

- 3) Will the new data be placed in the individual's record?**

Not Applicable.

- 4) Can the system make determinations about employees or members of the public that would not be possible without the new data?**

Not applicable.

- 5) How is the new data verified for relevance, timeliness 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?**

NA. SBA maintains and operates internal security controls and authentication. These security controls ensure that data is fully secured against unauthorized access and prevent the loss of confidentiality and integrity, as well as, 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? If process are not be consolidated please state, "N/A".**

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.**

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 roles such as administrative, approval, legal, and field staff user.

**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.

Other ad hoc reports are available as requested combining any elements in the E8a Data Dictionary.

**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 do not have the opportunity to decline information. Consent for information is a criteria for acceptance and continuing eligibility in the SBA Business Development Program.

**11) Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is used as intended.**

The system security plan identifies roles and access for each SBA authorized user. It also identifies controls for a moderate system under NIST guidelines.

First layer is GLS, which provides general access control. Next layer is a the specific role assigned to each user, which is assigned by his/her manager and restricts access to certain data. All users also receive mandatory training on the disclosure and use of private information, as well as Computer Security Awareness Training. They also undergo a clearance process. Based on their clearance and job roles, their physical access is restricted to certain areas. All users are required to sign a rules of behavior document,...etc.

**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 system is operated from one site.

**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 indefinitely.

**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?**

Not Applicable

**4) Is the system 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?**

This system does not affect public/employee privacy due to the utilization of a secure web site and authentication controls.

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

No, the system will not provide the capability to identify, locate, or monitor individuals.

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

Not applicable

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

Not applicable

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

The E8(a) Review system operates under Privacy Act system of record notice 30 for the Servicing 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. DATA ACCESS**

**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:

- a.) Officials of SBA, Office of Government Contracting and Business Development, and SBA employees that are responsible for reviewing, and approving small businesses into 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 will be limited by User ID's, password controls, and the assignment of a responsibility profile to all User ID's. The system will have predetermined access roles and responsibilities for each user. Access will be granted to screens, functions and reports based on an individual's role and responsibility in application processing and approvals. Access will be provided by SBA Office of IT security upon receipt of a written authorization and approval of an SBA manager with specified authorization approval levels.

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

User access will be limited to screens, reports and data corresponding to the assigned system responsibility of the user. Managers have control over assigned responsibilities, through authorized system administrators.

**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)**

Assignment of responsibility profiles to all User ID's limits access by control of User ID/Password which effectively limits misuse or unauthorized browsing of data by those having access. Training on Privacy Act rules and prohibitions on the dissemination or use of non-public information is mandatory and ongoing for SBA staff and contractors. Agency network log-on procedures mandate a posted Privacy notice be viewed and acknowledged 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, were 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.**

Yes, CRM accesses the E8(a) Review System to create reports. CRM has the capability to create reports using the E8(a) Review System

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

Within the agency, the Office of Government Contracting and Business Development is responsible for assuring proper use of the data in the system. The Office of the Chief Information Office is responsible for the security of the system.

**8) Will other agencies share data or have access to the data in this system via transferred or transmitted (Federal, State, and Local, Other (e.g., Tribal))?**

Not Applicable.



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

Not Applicable.

**10) What procedures are in place for assuring proper use of the shared data?**

Within the agency, the Office of Government Contracting and Business Development is responsible for assuring proper use of the data in the system. The Chief Information Office is responsible for the security of the rSystem.

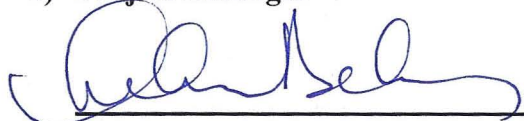
**11) Privacy Impact Analysis: Discuss what privacy risks were identified and how they were mitigated for information shared internal and external.**


The data in the E8(a) System is accessed by CRM to create reports and run data queries. All risks were identified in the Risk Mitigation/POAM which is included in the security authorization package. The information in the E8(a) System is populated upon approval by a direct feed from the BDMIS . This is an automatic process with security controls in place to protect the data. The system access is by program office approval only with each access having defined roles and only one role permitted per user.

**Privacy Impact Assessment PIA Approval Page**

**The Following Officials Have Approved this Document:**

**1) Project Manager**

  
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(Signature) 10/28/10 (Date)

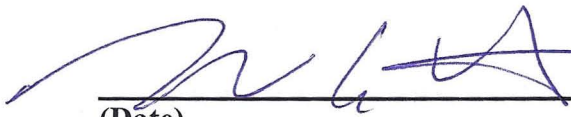
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**Project Manager**

**2) System Owner**

  
\_\_\_\_\_  
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**3) IT Security Manager**

  
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(Date) \_\_\_\_\_ (Signature) 10/27/10

**Lawrence Gottlieb**  
**Acting Chief Information Security Officer**

**4) Chief Privacy Officer**

  
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(Signature) 11/4/10 (Date)

**Paul T. Christy**  
**Chief Information Officer/Chief Privacy Officer**