

U.S. Small Business Administration  
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# Office of Entrepreneurial Development Community Navigator Information Management System

## Privacy Impact Assessment December 15, 2021

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## **I. System Description/General Information**

The Community Navigator Information Management System (COMNAVS) is a new cloud based data collection and management application that several stakeholders including the Small Business Administration will rely on to report on the effectiveness of its counseling and training programs. COMNAVS will be a centralized web-based reporting system that embraces the Hub and Spoke “Navigator” Model. The “Hub” and “Spoke” approach features a lead organization – a “Hub” – at the center of a network of “Spoke” organizations that deploy trusted messengers to work with businesses in targeted communities. These networks leverage the business development expertise of the central Hub organization and the community credibility of spoke organizations to better connect business owners in targeted communities with critical services and assistance programs.

COMNAVS is a new system in production on January 7, 2022. The legal authority for this system is covered by: The Small Business Act of 1953, as amended; American Rescue Plan Act of 2021; Executive Order 9397; and Numbering Systems for Federal Accounts Relating to Individual Persons.

The purpose of COMNAVS is to provide a platform of resources in supporting Small Business Administration’s (SBA) mission with connecting business owners in targeted communities with critical services and assistance programs.

## **II. System Data**

The categories of individuals covered in the system are small business owners and their designated employees and applicable family members, such as a spouse of the business owner. Voluntary participation for collection is needed for full advantage of the COMNAVS program for Entrepreneurial Development. Users are provided a pop-up warning indicating they are providing information in accordance with the applicable laws as noted within this Privacy Impact Assessment (PIA), to execute inferred consent.

The SBA Form 3516 is utilized to report what information is collected. Hubs and spokes collect social security numbers, citizenship or immigration status, driver’s license or state identification number, medical information, passport numbers, ethnic or religious affiliation, alien registration number, sexual orientation, financial account number, account passwords, biometric identifiers, date of birth, criminal history, and mother’s maiden name. The information is primarily collected by the individual applicants or designees while other information is collected by SAM.gov and the United States General Service Administration provides business profile data for applicant firms. The accuracy of the data

collected from SAM.gov is verified daily and individual applicants are required to verify the information within their profiles and have the capability to ensure the information is accurate and current with annual reviews. An applicant is not permitted to submit information to COMNAVS if the minimum SAM.gov data imported is incomplete. The firm is required to return to SAM.gov to correct missing or out of date data. Documents uploaded to the system are reviewed individually by SBA employees assigned to process applications. No other third party sources or tribal, state, or local agencies provide information to this system.

### **III. Data Attributes**

The use of the data is both relevant and necessary for the purpose of the COMNAVS application for which the system is designed. The system is indexed and retrieved by DUNS or firm name. SAM.gov is discontinuing the usage of DUNS but the individual firm record will still be retrieval with the COMNAVS application. Reports generated from the system are in aggregate and not by individual.

The system will not derive any new data or create previously unavailable data about an individual. No new data will be placed in the individual's record and the system can't make determinations about employees or members of the public that would not be possible without new data.

### **IV. Maintenance and Administrative Controls**

The COMNAVS is operating under the Privacy Act systems of records notice SBA 11. The system is hosted in a FedRAMP approved cloud environment with replication in AWS East and West zones. The retention periods of data in this system are in compliance with SBA policy and the National Archives and Records Administration's General Schedule. The procedures for disposition of the records are applicable to the current Standards Operating Procedures of Records Management. Additional procedures for disposing data are executed in accordance with National Institute of Standards and Technology Special Publication 800-88, as amended

The system does not use any technologies in ways that SBA has not previously employed, for example, no monitoring software, caller -identification, etc. This system does not provide the capability to identify, locate, or monitor individuals in real time. designated for disposal.

### **V. Data Access**

Agency officials and contractor staff will have access to the data in the system

based on their specific role or responsibility. Contractor staff supporting application processing have access to only the cases assigned to them. Adjudicated Operation and Maintenance contractors have privilege user access. Access is limited to least privilege or need to know. Privacy Act clauses are in each respective contract for the contractors and regulatory measures for compliance.

Information is not shared with any external systems at this time. Access is limited and restricted by Role Based access. Agency staff are required to take SBA annual Cyber Security Awareness training which includes a Privacy module.

## **VI. Privacy Impact Analysis**

There are risks related to disclosure of individuals' privacy. Risks to the type of data, ensure information used as intended, safeguard unauthorized monitoring of privacy data, and protect information shared internal and external. The sensitivity of the COMNAVS data elements increases the risk for inadvertent disclosure which is susceptible to identity theft. Some data provides significant information which could also impact vulnerable populations.

Privacy risks are mitigated through access control, auditing, secure application design and monitoring, encryption, and authentication. Mitigation also includes ensuring collection is comparable to its' collection; ensuring collection follows statutory authority to collect, encryption of data in transit and at rest; incremental and full backups, data integrity checks, and data redundancy.

Regarding the relevance of data, time diminishes the risk slightly as much of the information is intended would no longer be current or potentially applicable.

Lastly, mitigation is also through education via annual Cybersecurity Awareness and Privacy Training.