

## PRIVACY IMPACT ASSESSMENT

March 30, 2011

**Name of System/Application:** FOIA Tracking System

**Program Office:** FOI/PA Office

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

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

Lisa J. Babcock, Chief, FOI/PA Office, 202-401-8203, lisa.babcock@sba.gov

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

Delorice P. Ford, Assistant Administrator for Hearings and Appeals, EEOCC, Office of Hearings & Appeals, delorice.ford@sba.gov

**3. Who is the system owner representative for this system or application?**

Lisa J. Babcock, Chief, FOI/PA Office, 202-401-8203, lisa.babcock@sba.gov

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

Ja'nelle DeVore, Chief Information Security Officer, Office of the CIO, 202-205-7103, janelle.defore@sba.gov

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

Ethel Matthews, Senior Advisor to the Chief Information Officer, Office of the CIO, 202-205-7173, ethel.matthews@sba.gov

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

Paul Christy, Chief Information Officer, Office of the CIO, 202-205-6708, paul.christy@sba.gov

### B. SYSTEM APPLICATION/GENERAL INFORMATION

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

Yes. The system contains individual first, last name and address information.

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

Yes.

**b. Is the information about employees?**

Yes, but only if an SBA employee has submitted a FOI/PA inquiry.

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

The system is used by all SBA FOIA Public Liaisons and FOIA Requester Server Center Representatives to record and track all FOI/PA inquiries submitted to SBA. The Agency uses this system to provide efficient and accurate customer service and to comply with mandatory and ad hoc reporting requirements.

**3) Is the system in the development process?**

No. Privasoft AccessPro Redaction is a production ready Commercial-Off-The-Shelf (COTS) product.

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

The new system will not affect existing privacy processes.

**5) What legal authority authorizes the purchase or development of this system/application?**

Records Management by Federal Agencies, 44 U.S.C. § 3101, specifies the management of Federal records. The Small Business Act, 15 U.S.C. § 634(b)(6), authorizes the establishment and operation of the Agency. The Freedom of Information Act, 5 U.S.C. § 552, and the Privacy Act, 5 U.S.C. § 552a, establish the purpose, duties and role of the FOI/PA Office; and E.O. 13392 - Improving Agency Disclosure of Information, mandates practices, compliance activities and reports that all Federal agencies must implement.

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

Names, addresses, telephone numbers, and email addresses of individuals who submit FOI/PA inquiries to SBA and a brief description of the inquiry are identified. Access is limited to SBA employees who are designated as a FOIA Public Liaison or a FOIA Service Center Representative. Privacy risks are minimized since there is a two step authorization and access to the system is obtained through Active Directory.

**C. SYSTEM DATA**

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

Individuals who submit FOI/PA inquiries to SBA.

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

The sources of the information are individuals who submit a FOI/PA inquiry to SBA.

- 1) 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 source of the information is from the individual.

- 2) What Federal agencies are providing data for use in the system?**

None.

- 3) What Tribal, State and local agencies are providing data for use in the system?**

None.

- 4) From what other third party sources will data be collected?**

None.

- 5) What information will be collected from the employee and the public?**

No information is collected from the employee; information collected from the public includes name, address, telephone number and email address.

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

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

The individual is the only source of data.

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

N/A

- 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 information is provided directly by the submitter of the FOI/PA inquiry. Information is current as it is provided in real time.

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

Yes, the data elements are described in detail and documented in the Privasoft AccessPro FOIA Processing Guide.

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

Access is limited to SBA employees who are designated as a FOIA Public Liaison or a FOIA Service Center Representative. Privacy risks are minimized since access to the system is obtained through a two-step approval system shared with SBA's IT Security Office and the FOI/PA Office. Access is limited to employees with a need to know in compliance with SBA's Privacy Act System of Records 14.

**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 system contains set fields that only collect information which is sufficient to identify and track the course of each specific FOI/PA inquiry.

**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?**

N/A

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

N/A

**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?**

N/A

**7) If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? If processes 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, information can be retrieved by an individual's last name, the case number the system assigns, or subject matter.

- 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 FOI/PA Office has access to the entire system and can prepare reports by submitter's last name, SBA office code and type of request. This information is used to monitor all of the agency's FOI/PA activities and to prepare mandatory and ad hoc reports. The system has firewalls in place and Public Liaisons and FOIA Requester Service Center Representatives can prepare reports only for their office and office code.

- 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.**

Name and contact information are required in order to correspond with the individual.

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

Only SBA employees who have been granted access to the system via Active Directory will have access. Their access is limited to their own office and office code information. This is compliant with SBA Privacy Act Systems of Records 14.

## **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?**

Access is limited to SBA employees designated as either FOIA Public Liaisons or FOIA Service Center Representatives. The designated employee submits an access request to SBA's IT security team who then submits the request to the FOI/PA Office for approval. Once approved employees can only access the system with their user identification and password. The system locks after three failed access attempts.

Criteria, procedures, controls and responsibilities are available from the system's user's manual and the online training provided from SBA's internal homepage, Employee Gateway/Yes page.

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

Records in the system are retained in accordance with NARA General Records Schedules 14 and 21 and SBA's Privacy Act System of Records 14, Freedom of Information and Privacy Act Case Files.

**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?**

Records will be deleted from the system by the FOI/PA Office in accordance with NARA General Records Schedules 14 and 21. Reports are maintained indefinitely.

**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?**

N/A

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

No.

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

Individuals are not monitored and therefore no information is collected.

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

Only SBA employees who have been granted access to the system via an issued user-id and password can access the information pertaining solely to their office and office code.

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

SBA Privacy Act System of Records 14, Freedom on Information/Privacy Act Records.

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

No.

## **F. DATA ACCESS**

### **1) Who will have access to the data in the system?**

Only the Agency's FOIA Public Liaisons, FOIA Service Center Representatives, OCIO employees and contractors with a need-to-know in order to maintain and oversee the system.

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

Access is limited to SBA employees designated as either FOIA Public Liaisons or FOIA Service Center Representatives. The designated employee submits an access request to SBA's IT security team who then submits the request to the FOI/PA Office for approval. Once approved employees can only access the system with their user identification and password. The system locks after three failed attempts.

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

Users in the FOI/PA Office have access to the entire system. All other users can only access information for their specific office codes.

### **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)**

The system has two levels of security. Security roles and access have been designed and assigned based on the roles of the user community. This is detailed in the user's manual and training video, both of which are available from SBA's Employee Gateway/Yes page. Guidance and training is provided by the Privacy Act and SBA's Privacy Act System of Records 14, SOP 40 03 - Disclosure of Information, and SOP 40 04 - Privacy Act Procedures.

### **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, Privacy Act contract clauses are inserted in the contract.

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

No.

**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 via transferred or transmitted (Federal, State, and Local, Other (e.g., Tribal))?**

No, the data is not shared with any other agency.

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

N/A

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

N/A

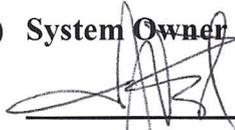
**11) Privacy Impact Analysis: Discuss what privacy risks were identified and how they were mitigated for information shared internal and external.**

Due to the system's limited distribution, two levels of security, minimal personal information and restricted user access, identified privacy risks are nominal. Access is limited to SBA employees designated as either FOIA Public Liaisons or FOIA Service Center Representatives. The designated employee submits an access request to SBA's IT security team who then submits the request to the FOI/PA Office for approval. Once approved, employees can only access the system with their user identification and password. The system locks after three failed attempts.

Privacy Impact Assessment PIA Approval Page

The Following Officials Have Approved this Document:

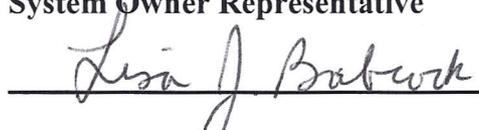
1) System Owner

 (Signature) 3/30/11 (Date)

Name: Delorice P. Ford

Title: Chief FOIA Officer

2) System Owner Representative

 (Signature) 3/30/2011 (Date)

Name: Lisa Babcock

Title: Chief, FOI/PA Office

3) IT Security Manager

 (Signature) 4-6-11 (Date)

Name: Ja'nelle DeVore

Title: Chief Information Security Officer

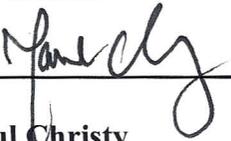
4) Senior Advisor to the Chief Privacy Officer

 (Signature) 4/8/2011 (Date)

Name: Ethel Matthews

Title: Senior Advisor to the Chief Privacy Officer

5) Reviewing Official

 (Signature) 4-13-11 (Date)

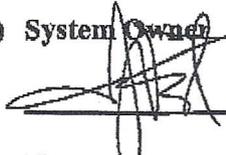
Name: Paul Christy

Title: Chief Information Officer

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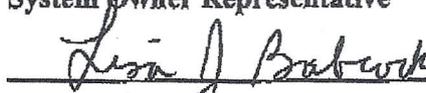
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