

SBA Electronic Lending  
PIA R1

SMALL BUSINESS ADMINISTRATION  
PRIVACY IMPACT ASSESSMENT

**Name of Project:** SBA System - Electronic Lending

**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  
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409 3<sup>rd</sup> Street S. W.  
Washington, DC 20416  
(202) 205-7122

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

Steve Kucharski  
Office of Financial Assistance  
[stephen.kucharski@sba.gov](mailto:stephen.kucharski@sba.gov)  
202-205-7551

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

Steve Kucharski  
Office of Financial Assistance  
[stephen.kucharski@sba.gov](mailto:stephen.kucharski@sba.gov)  
202-205-7551

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

Dave McCauley, Chief Information Security Officer

**5) Who is the Bureau/Office Privacy Act Officer who reviewed this document?**

Ethel Matthews, Senior Privacy Official

**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 Electronic Lending System?**

The Electronic Lending System enables lending partners to submit a loan guaranty application to SBA in an electronic format, speeding up processing time, eliminating the significant cost of mailing paper applications, and further enabling the Agency's compliance with GPEA.

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

GPEA, 15 U.S.C. §636(a) et seq. and 15 U.S.C. §695 to 697f.

**C. DATA in the PROCESS:**

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

Borrowers, Principals of Borrowers, Guarantors of Borrowers, Financial, address, personal identifier (SSN) and demographic

Lending Partner, demographics

**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, source then what other source**

Lending Partners, SBAREF, Loan, LoanAcct, LoanApp

**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?**

Credit Reporting Agencies

**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?**

Credit Reporting Agencies provide only outside data, they are the original source.

**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)

Data is current according to Credit Reporting Agencies' records

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

ELEnd 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 loan 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?**

N/A

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

ELead System Security Roles – Agency Security Access Procedures – Access is limited to those individuals with 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 through the process? Explain.**

ELead System Security Roles – Agency Security Access Procedures – Access is limited to those individuals with user IDs 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 cannot be retrieved by personal identifier, it can be business name, sole proprietor name or Employer Tax ID 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 – Lending partner submits the information

**E. MAINTENANCE AND ADMINISTRATIVE CONTROLS**

- 1) **If the information in the process operated in more than one site, how will consistent use of the data be maintained in all sites?**

System operated on one site only

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

As delineated in SBA's Privacy Act Systems of Records, SBA 20 and SBA 21, In accordance with SBA Standard Operating Procedure 00 41 2, Item Nos. 50:04, 50:08, 50:09, 50:10, 50:11, 50:12, 50:13, 50:19, 50:22, 55:02, 70:09, 70:13, and appendices 17, 18 and 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 Systems of Records, SBA 20 and SBA 21, In accordance with SBA Standard Operating Procedure 00 41 2, Item Nos. 50:04, 50:08, 50:09, 50:10, 50:11, 50:12, 50:13, 50:19, 50:22, 55:02, 70:09, 70:13, and appendices 17, 18 and 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?**

ELend System Security Roles – Agency Security Access Procedures – Access is limited to those individuals with user IDs and passwords

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

SBA's Privacy Act Systems of Records, SBA 20 and 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, 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 – ELead 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?**

Agency Security Roles and Procedures/Controls – Agency Security Access Procedures – Access is limited by controlled assignment of a responsibility profile to all users. 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 ongoing. 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 Systems of Records SBA 20 and SBA 21 define routine uses of this information and serve 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 Loan 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?**

Office of the Chief Information Officer

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

No

- 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

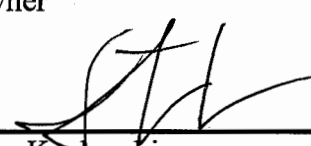
Signature: 

Date: 8/22/2007

Name: Glenn Hannon

Title: Project Manager

2) System Owner

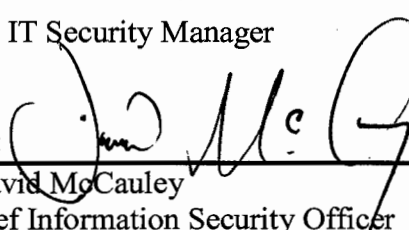
Signature: 

Date: 8/22/07

Name: Stephen Kucharski

Title: Modernization Program Manager

3) System IT Security Manager

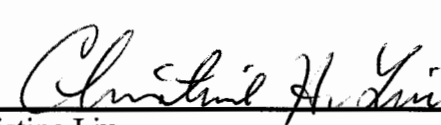
Signature: 

Date: 8/22/07

Name: David McCauley

Title: Chief Information Security Officer

4) System Privacy Official

Signature: 

Date: 8/23/07

Name: Christine Liu

Title: Chief Privacy Officer