

## PRIVACY IMPACT ASSESSMENT

**Name of System/Application:** Customer Relationship Management (CRM)

**Program Office:** Office of the Chief Information Officer (CIO)

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?**

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

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

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

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

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

Paul Christy, Chief Information Officer, SBA 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, currently the CRM contains the names of business, their loan balances, postal addresses, EIN and SSN of the business owner

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

Yes.

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

No.

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

The Customer Relationship Management (CRM) program meets the basic need of providing centralized customer contact data across the entirety of the SBA with focus on business and lender interaction tracking and reporting. Beyond merely centralizing contact demographic data, CRM provides the ability to easily track major performance metrics vital to the SBA such as: number of new lenders established, number of contact efforts made to customers, number of loans issued, etc. These reports are quickly available to individual users and will be automated and standardized as a part of agency process to track performance for Field Operations.

The CRM system has been expanded to include a detailed correspondence management system replacing an aging custom-coded system, to pull additional data feeds for 8(a) businesses, and provide detailed mapping data to citizens for the HUBZone program.

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

Yes.

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

The CRM production system will transition from a Pilot environment to the SBA HQ infrastructure around the December 2010 timeframe.

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

- The American Recovery and Reinvestment Act of 2009 (PL 111-5).
- 15 U.S.C. § 634(b) (6), 44 U.S.C. § 3101.
- Privacy Act of 1974, 5 U.S.C. 552a and related statutes (Electronic Communications Privacy Act of 1986; Computer Matching and Privacy Protection Act of 1988).
- Paperwork Reduction Act of 1995; 44 U.S.C. 3501.
- Government Paperwork Elimination Act of 1998.
- Federal Records Act of 1950 and National Archives and Records Administration (NARA) implementing regulating at 36 C.F.R. 1220 and 41 C.S.R. 201-22.
- The Office of Management and Budget (OMB) Circular A-130, "Management of Federal Information Resources," Appendix III, "Security of Federal Automated Information Systems." OMB Circular A-130 implements a number of Federal laws relating to information resources ID (for example, the Paperwork Reduction Act, the Clinger-Cohen Act; and the Government Performance and Results Act).
- The Federal Information Security Management Act of 2002 (FISMA).

- Additional program definition is detailed in 13 C.F.R., Part 123.

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

CRM is primarily a presentation tool for SBA management and employees. Access to CRM data contained in the system is restricted by security roles. Security risks have been resolved via access controls inherited from SBA LAN/WAN. Privacy risks were also mitigated by masking or hiding SSN and or EIN fields from view.

**C. SYSTEM DATA**

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

Following categories of individual are covered in the CRM system: Lenders, Business Partners, Customers, Business owners, and Contacts.

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

Currently the CRM automated data sources are:

- Partner Information Sources (PIMS)
- Electronic Loan Information Systems (ELIPS)
- Electronic 8(a) Processing Systems (E8a)

The SBA user can enter administrative information (e.g. contacts, accounts, activity records and correspondence) into the CRM system.

**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?**

Currently the CRM automated Data Sources are:

- Partner Information Sources (PIMS)
- Electronic Loan Information Processing Systems (ELIPS)
- Electronic 8(a) Processing Systems (E8a)

The SBA user can enter administrative information (e.g. contacts, accounts, activity records and correspondence) into the CRM system.

**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?**

The SBA users may record and modify administrative information.

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

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

Currently the CRM system contains information that is migrated through Microsoft BizTalk adapter services from existing SBA data sources and SBA users may record administrative information from existing and or new customers.

Additionally, quality assurance processes will be executed to ensure data quality and to verify and validate the CRM system for accuracy, timeliness and reliability.

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

Quality assurance efforts will be executed to ensure data quality and to verify and validate the completeness of the CRM system.

**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 data is updated daily via automated updates from PIMS, E8a and ELIPS. A quality assurance effort will be implemented to ensure data quality and to verify and validate CRM.

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

Yes.

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

CRM privacy risks are limited due to security access controls inherited from the SBA LAN/WAN systems which authenticate the user at time of login for valid credentials. Privacy risks are further mitigated in that end-users are granted access to CRM on an individual basis, according to a pre-defined system security process.

**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.

**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 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.**

Data is retrieved by searching on key terms or unique identifiers such as name of lender, location/state, name of business, loan number and customer name.

The SSN and/or EIN information is stored as part of the data feed and used as a blind-key, but is never accessible or viewable in search results or displayed fields. The SSN and/or EIN information is always hidden from CRM users.

**9) What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

Reports can only be produced currently on loan, business, and lender information. Only internal SBA employees and contractors who have gone through the clearance process will have access to the CRM data. SBA program and field office end users will use the CRM tool to support outreach campaigns and provide service to SBA's customers.

**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.

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

Prior to accessing CRM, all users accept a "Rules of Behavior" contained in the security warning banner which states, in part, that they are prohibited from accessing or attempting to access system or information for which they are not authorized. The form stipulates that users may not read, store, or transfer information for which they are not authorized, and that disciplinary action may result from any unauthorized use of SBA systems and computer resources for non-work-related activities.

**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?**

All users will go through training on proper use of the system to ensure consistent use. Data is delivered from a centralized data store.

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

Retention of the information provided is indefinite. Since the average loan can be financed for at least 30 years, loan and lender data must remain for the life of the loan.

**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 this is an electronic system, no paper reports are produced, therefore no processes are needed for the disposal of hardcopy. Electronic records will be archived when a business no longer has a relationship with SBA or its lending partners. Archiving will be managed in accordance with SBA and NARA record scheduling and best practices

**4) Is the system using technologies in ways that the SBA has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?**

No. This data already resides in existing systems.

**5) How does the use of this technology affect public/employee privacy?**

Confidential SSN/EIN information on a citizen are and will continue to be masked from all CRM users.

**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?**

N/A.

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

N/A.

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

SBA Privacy Act System of Records Notice (SORN) SBA 21

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

N/A.

**F. DATA ACCESS**

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

Designated SBA employees and designated SBA contractors who have completed the background check and clearance process.

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

User Access to the system will be role based. Level of access will depend upon a designated role.

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

CRM users have access to views, reports, and data that correspond to their assigned system roles. System roles and user access will be controlled by a system administrator.

- 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)**

CRM user access is limited through the control of User IDs, password, along with the assignment of a User Role profile to all User IDs or Workgroups. Each user role comes with a pre-determined set of privileges, limiting data that may be accessible. A CRM user manual will detail the various roles within the system and explain the access associated with each User Role profile.

- 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 were involved in development, maintenance and delivery of the CRM production system. Privacy Act clauses have been included in the contract.

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

CRM will receive a daily unidirectional data feed from the existing PIMS, E8a and ELIPS systems.

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

All users of the system will be responsible for privacy and security of the data.

- 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.

**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.**

CRM is primarily a presentation tool for SBA management and employees. Access to CRM data contained in the system is restricted by security roles. Security risks have been resolved via access controls inherited from SBA LAN/WAN systems. Privacy risks were also mitigated by masking or hiding SSN and or EIN fields from view.

Privacy Impact Assessment PIA Approval Page

The Following Officials Have Approved this Document:

1) System Owner

 (Signature) 11/16/10 (Date)

MARK A. RUSSO, A/CIO

for

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Title: Chief Information Officer

2) System Owner Representative

 (Signature) 11/10/10 (Date)

Name: Kevin Adcock

Title: Senior Technical Advisor

3) IT Security Manager

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