

SMALL BUSINESS ADMINISTRATION  
PRIVACY IMPACT ASSESSMENT

**Name of Project:** Financial Reporting Information System

**Project's Unique ID:** FRIS

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?**

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

Jennifer Main  
Chief Financial Officer  
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**3) Who is the System Manager for this system or application?**

Deepak Bhargava  
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Office of Chief Financial Officer  
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**4) Who is the IT Security Manager who reviewed this document?**

David L. McCauley  
Chief Information Security Officer  
Office of the Chief Information Officer  
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**5) Who is the Bureau/Office Privacy Act Officer who reviewed this document?**

Ethel Matthews  
Office of the Chief Information Officer  
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**6) Who is the Reviewing Official?** (According to OMB, this the agency CIO 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/Privacy Officer  
(202) 205-6708  
Christine.liu@sba.gov

**B. PIA PROCESS APPLICATION/GENERAL INFORMATION:**

**1) Does this system contain any information about individuals?**

a. Is this information identifiable to the individual?

No

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

No

c. Is the information about employees?

No

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

The Financial Reporting Information System (FRIS) allows for the consolidation of the agency's accounting information into a single system for effective and consistent reporting. FRIS primary functions are directed at the

consolidation of the general ledgers, the creation of budgetary information for the Loan Accounting transactions, the mappings of SBA accounts to Standard General Ledger (SGL) accounts, the generation of the financial statements, and the ability to extract and analyze data in whatever format the user chooses.

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

31 U.S.C., Part 285, Sections 112(a) and 113 of the Budget and Accounting Procedures Act of 1950 , 31USC Chapter 35 ,and 15 U.S.C. § 634(b)(6), 44 U.S.C. § 3101.

**C. DATA in the PROCESS:**

**1) What categories of individuals are covered in this process?**

None, this system only process accounting data.

**2) What are the sources of the information in this process?**

**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**

This system does not collect, create, maintain or disseminate any personal identifiable or privacy information.

**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?**

None

**e. What information will be collected from the employee and the public?**

None

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

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

All information is collected from internal SBA systems.

- b. **How will data be checked for completeness?**

Trail balances are created. Balances are checked before and after data is loaded into FRIS to make sure that the Consolidate General Ledger (CGL) data will remain in balance.

- 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)**

Yes, the data is current. Trail balances are created. Balances are checked before and after data is loaded into FRIS to make that the data CGL will remain in balance.

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

Yes, FRIS Table Documentation.

**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. The data that is collected is necessary for a consolidated general ledger for consistent reporting.

- 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?**

This system does not collect, create, maintain or disseminate any personal identifiable or privacy information.

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

This system does not collect, create, maintain or disseminate any personal identifiable or privacy information.

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

This system does not collect, create, maintain or disseminate any personal identifiable or privacy information.

**5) How will the new data be verified for relevance and accuracy?**

This system does not collect, create, maintain or disseminate any personal identifiable or privacy information.

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

The automated processes used for consolidation have a system login and password. Individuals are assigned to groups that restrict the access to only the necessary functions needed to perform their job/role.

**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.**

Processes are not being consolidated.

**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 can be retrieved through ad hoc queries and standard reports. The system does not contain any information on individuals therefore there are no personal identifiers.

**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, the system does not contain any information on individuals.

**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.)**

None, the system does not collect, create, maintain or disseminate any personal identifiable or privacy 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?**

Information is loaded into FRIS from 2 systems daily. Trail balances are created. Balances are checked before and after data is loaded into FRIS to make that the data CGL will remain in balance with the other systems.

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

In accordance with NARA standards, data is retained for 10 years.

- 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?**

At the end of the retention period, SBA follows NARA policy to archive data implemented by SBA SOP 00 41-2, Records Management

- 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)?**

The system is not using technologies in ways that the SBA has not previously employed.

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

There is no affect. SBA does not use this technology

- 6) Will this system in the process provided the capability to identify, locates, and monitor individuals? If yes, explain**

No, the system does not collect, create, maintain or disseminate any personal identifiable or privacy information.

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

The system does not use tracking technology to monitor individuals.

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

None, as no monitoring is done.

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

None, this system does not collect, create, maintain or disseminate any personal identifiable or privacy information.

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

N/A

**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)**

- SBA employees for viewing general ledger information, account balances and financial statements.
- SBA's Office of the Chief Financial Officer personnel related to administrative functions. This includes functional users as well as developers.
- SBA's Office of the Chief Information Officer personnel related

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

Yes, SBA has pre-determined responsibilities for users in the FRIS system which means that specific forms are made available to a user depending on their job function at the SBA. Access is provided by OCFO, Office of Financial Systems in Denver (OFS) upon receipt of the written authorization by the user's manager indicating specifically which responsibilities should be associated with the named user. These pre-determined responsibilities are associated with specific authorization, job functions, access to certain reports. OFS processes the access requests based on system policy.

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

A user's access is based on the responsibility assigned to the user. Therefore, users' access is restricted by responsibility. The pre-determined responsibilities as described in the question above assign different forms and types of data to a user. e.g. Inquiry only responsibilities do not allow data entry or modification.

**4) What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?**

A user's access is based on the responsibility assigned to the user. Therefore, users' access is restricted by responsibility.

OCFO conducts bi-annual security reviews of access to FRIS to validate that users are still performing the same job responsibilities within FRIS. The reviews require validation from managers to ensure that the access is appropriate and accurate. Additionally, database access is audited.

**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, there is contract support to assist in the maintenance of the infrastructure. There is also contract support to provide system administration to the systems.

Yes. Privacy act contract clauses are in their contracts and other regulatory measures are addressed.

**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?**

This system does not collect, create, maintain or disseminate any personal identifiable or privacy information.

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?**

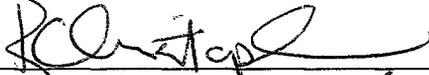
N/A

10) **Who is responsible for assuring proper use of the data?**

N/A

The following officials have approved this document:

1) System Owner



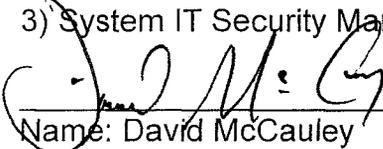
Name: Jennifer Main *for*  
Title: Chief Financial Officer

2) System Program/Project Manager



Name: Deepak Bhargava  
Title: Director, Office of Financial Systems

3) System IT Security Manager



Name: David McCauley  
Title: Chief Information Security Officer

4) System Privacy Official



Name: Christine Liu  
Title: Chief Privacy Officer