



U.S. Small Business  
Administration

Small Business Administration  
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Washington, DC 20416

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# **Office of the Chief Information Officer**

## **Paycheck Protection Program**

### **Privacy Impact Assessment**

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**Document Information**

| <b>Template Owner Details</b> |                        |
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**Privacy Impact Assessment (PIA) Approval Page**

The following individuals have approved this document:

**1) System Owner**

\_\_\_\_\_ (Signature) \_\_\_\_\_ (Date)

Name: Nagesh Rao  
 Title: Director of BiTS  
 Office of the Chief Information Officer

**2) Senior Agency Official for Privacy**

\_\_\_\_\_ (Signature) \_\_\_\_\_ (Date)

Name: Maria Roat  
 Title: Chief Information Officer  
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**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 Reviewing Analyst?**

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**B. SYSTEM APPLICATION/GENERAL INFORMATION**

The Paycheck Protection Program (PPP) is an application hosted on SBA.gov (<https://www.sba.gov/>). SBA.gov is the primary website for the U.S. Small Business Administration (SBA). The PPP was created as a result of the COVID-19 crisis offering forgivable loans to small business. Users submit a PPP application form, SBA Form 2481, OMB Control number 3245.

The SBA.gov is hosted on Amazon Web Services (AWS) – US East. Public users can access SBA.gov through a web-browser from any remote location with Internet access

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

Yes, the PPP contains the following information:

- Name (last, first, middle)
- Tax Identification/Social Security Number or Employer Identification Number
- Email address
- Physical address
- Telephone number
- Citizenship status
- Alien Registration Number
- Race
- Ethnicity
- Gender
- Loan Agent information: (name, address, loan number, financial information, loan amount)
- Judicial information
- Signature

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

Yes.

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

Potentially yes

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

The SBA.gov is the primary website for the SBA. The SBA.gov incorporates online tools and features to deliver information and services to lenders, SBA partners, small business owners and prospective small business owners. SBA.gov enables small businesses to gain necessary access to the capital and tools they need to drive economic recovery and to create and retain jobs. SBA.gov is a public facing website.

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

No

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

No impact at this time.

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

- o Debt Collection Act of 1982, Deficit Reduction Act of 1984 (31 U.S.C. 3701
- o Right to Financial Privacy Act of 1978 (12 U.S.C. 3401)
- o Debarment and Suspension Executive Order 12549; (2 CFR Part 180 and Part 2700
- o 15 U.S.C. § 634(b)(6), 44 U.S.C. § 3101.
- o Section 7(b)(1) of the Small Business Act, as amended, authorizes the Agency's Physical Disaster Loan Program
- o Section 7(b)(2) of the Small Business Act, as amended, authorizes the Agency's Economic Injury Disaster Loan (EIDL) Program
- o Coronavirus Aid, Relief, and Economic Security (CARES) Act of 2020.

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

Office of Management and Budget (OMB) Memorandum 17-12 (M-17-12), identifies risks of disclosure of individuals' privacy data in five major areas. The table below identifies those risk areas and the mitigating strategies for each.

| Potential Risk               | Mitigating Strategies   |
|------------------------------|---|
| Sensitivity of Data Elements | Sensitivity of PPP data is mitigated using access controls, auditing, masking and monitoring. |
| Context of the Data          | PPP data about individuals is mitigated through   |

|                                   |  |
|-----------------------------------|--|
| Revelation of Private Information | The maximum extent to which private information could be disclosed address, race, and ethnicity of the participant, which is mitigated through access enforcement, auditing, and monitoring. |
| Impact on Vulnerable Populations  | Disclosure of PPP data may adversely affect specific vulnerable population.  |
| Relevance of the Data Over Time   | Relevance of PPP data would not be significantly affected over time.   |

**C. SYSTEM DATA**

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

The PPP gathers data about business owners, individuals, non-profits, tribal, that are looking for lenders to provide payroll protection program relative to COVID-19.

**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, then what other source?**

All information is obtained through participating individual.

**b. What Federal agencies are providing data for use in the system?**

None.

**c. What Tribal, State and local agencies are providing data for use in the system?**

Can be potential applicants.

**d. From what other third-party sources will data be collected?**

None

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

Please see section B, 1) above.

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

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

PPP relies on the participating individual for data validation. In addition there are validation checks via financial institution authorization code.

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

PPP relies on the participating individual for data validation and incomplete applications cannot be processed.

**c. Is the data current?**

PPP relies on the participating individual to provide current information. The participating individual can update their information at any time.

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

Yes, PPP has a database dictionary and spreadsheet with data variables defined.

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

Office of Management and Budget (OMB) Memorandum 17-12 (M-17-12), identifies risks of disclosure of individuals’ privacy data in five major areas. The table below identifies those risk areas and the mitigating strategies for each.

| <b>Potential Risk</b>             | <b>Mitigating Strategies</b>   |
|-----------------------------------|--|
| Sensitivity of Data Elements      | Sensitivity of PPP data is mitigated using access controls, masking, auditing, and monitoring.   |
| Context of the Data               | PPP data about individuals has levels of protection to safeguard information.  |
| Revelation of Private Information | The maximum extent to which private information could be disclosed address, race, and ethnicity of the participant, which is mitigated through access enforcement, auditing, and monitoring. |
| Impact on Vulnerable Populations  | Disclosure of PPP data would may adversely affect any specific vulnerable population.  |
| Relevance of the Data Over Time   | Relevance of PPP data would not be significantly affected over time.   |

**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, Same as B, 5) above.

**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?**

The PPP data is dependent on the user’s willingness to provide relevant, timely and accurate data. The user can update his or her information at any time.

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

PPP is not in the process of consolidating individuals’ data at this time. If information is used for aggregated purposes, all PII will be redacted.

- 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 being 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.**

N/A.

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

N/A.

- 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.**

Participation with PPP is voluntary and specific for this crisis, COVID-19.

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

Office of Management and Budget (OMB) Memorandum 17-12 (M-17-12), identifies risks of disclosure of individuals’ privacy data in five major areas. The table below identifies those risk areas and the mitigating strategies for each.

| Potential Risk               | Mitigating Strategies  |
|------------------------------|--|
| Sensitivity of Data Elements | Sensitivity of SBA.gov data is mitigated using access controls, masking, auditing, and monitoring. |
| Context of the Data          | PPP data about individuals only has context with regard to business demographic purposes.          |

|                                   |  |
|-----------------------------------|--|
| Revelation of Private Information | The maximum extent to which private information could be disclosed address, race, and ethnicity of the participant, which is mitigated through access enforcement, auditing, and monitoring. |
| Impact on Vulnerable Populations  | Disclosure of SBA.gov data may adversely affect any specific vulnerable population.  |
| Relevance of the Data Over Time   | Relevance of PPP data would not be significantly affected over time.   |

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

No data is retained on SBA.gov, the data is transferred from PPP to the Capital Access Financial System (CAFS) Etran. The FAR requires contract data to be retained for 6 years and 3 months.

**2) 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?**

Procedures for disposing data are executed in accordance with NIST SP 800-88 as amended.

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

No.

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

N/A.

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

No.

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

N/A.

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

Risks to unauthorized monitoring of privacy data were identified and broken into three major categories, with associated mitigating strategies identified in the table below.

| Potential Risk               | Mitigating Strategy   |
|------------------------------|---|
| Loss of data confidentiality | Role-based access control<br>Auditing on security-related events<br>Encryption of data in transit |
| Loss of data integrity       | Incremental and full backups<br>Data integrity checks   |
| Loss of data availability    | Data redundancy<br>Contingency Planning   |



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

N/A.

- 9) **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? (e.g., contractors, users, managers, system administrators, developers, tribes, other)**

PPP administrators, owners, and contractors working on behalf of SBA.

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

Request process via PPP system owner and adjudication.

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

No. Users will be restricted to their information only.

- 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)**

PPP is on the platform of SBA.gov which developed an Access Management Plan that addresses all Access Controls and enforces the appropriate controls for the appropriate security level of the system. Users who authorized to access the data will be controlled by the authorized role they are assigned with their account.

- 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 clauses are in the contract.

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

Yes, the data that is collected via PPP portal via SBA.gov and then sent over to Etran to be maintained.

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

System Owner, Information System Security Officer, and system administrators.

**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))?**

Yes, Preapproved Lenders that have lender agreements with SBA are matched with the user will have access to the data.

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

It will be used to provide loans to the users.

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

The Lenders are approved and have a lender agreement with SBA.

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

Office of Management and Budget (OMB) Memorandum 17-12 (M-17-12), identifies risks of disclosure of individuals’ privacy data in five major areas. The table below identifies those risk areas and the mitigating strategies for each.

| <b>Potential Risk</b>             | <b>Mitigating Strategies</b>   |
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