

**SMALL BUSINESS ADMINISTRATION**  
**PRIVACY IMPACT ASSESSMENT**

**Name of Project:** eversity EEO Management System

**Program Office:** EEO&CRC

**Project's Unique ID:**

**A. CONTACT INFORMATION:**

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

Gaye Walker, EEO Specialist, EEO&CRC Office, (202) 205-6753

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

Delorice P. Ford, Acting AA, EEO&CRC Office, (202) 205-7340

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

Sandra L. Winston, Director EEO, EEO&CRC Office, (202) 205-7156

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

David McCauley, Chief Information Security Officer. OCIO, (202) 205-7103

**5. Did the Agency's Senior Office for Privacy review this document?**

Ethel M. Matthews, OCIO, (202) 205-7173

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

Christine Liu, Chief Information Officer/Chief Privacy Officer,  
(202) 205-6708

**B. SYSTEM APPLICATION/GENERAL INFORMATION:**

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

Yes, the information collected will include, but not limited to individuals' grade level, job series, race, color, national origin, gender, age, disabilities, and employment issues.

**(a) Is this information identifiable to the individual?**

Yes. Employee ID numbers are used to retrieve the data.

**(b) Is the information about individual members of the public?**

No

**(c) Is the information about employees?**

Yes, it pertains to their grade level, job series, race, color, national origin, gender, age, disabilities, and employment issues.

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

The purpose of the eversity Management System is to provide a statistical analysis of the workforce, which allows the Agency to identify barriers to employment by monitoring occupational categories and groupings, minority groupings, personnel actions, as well as applicant data. The system also provides the ability to generate, manage, and monitor EEO plans across the organization. It assists the EEO&CRC office in identifying issues impacting equal opportunity in the workplace.

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

Collection of this information is authorized by the Equal Employment Opportunity Act of 1972, 42 U.S.C. 2000e-16; Privacy Act of 1974, and Equal Employment Opportunity Commission (EEOC) regulation 29 CFR 1611.

**C. DATA in the SYSTEM:**

**1. Generally describe the type of information to be used in the system and what categories of individuals are covered in the system?**

The information to be used in the system will be statistical data regarding the employees' grade level, job series, race, color, national origin, gender, age, disabilities, and employment issues.

**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?**

The source of the information comes from the National Finance Center (NFC) in the Department of Agriculture (DOA), which collects information through the agency employment forms. This system is an Office of Personnel Management (OPM) approved personnel services provider that provides controlled data to the agency's Office of Human Capital Management (OCHM) and filtered down to the EEO&CRC office. OPM provides a summary of the Federal Work Force (FWF), and the Census Bureau provides a summary of the National Civilian Labor Force (NCLF).

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

The DOA-NFC, OPM, and the Census Bureau.

**(c) What State and local agencies are providing data for use in the system?**

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?**

Not Applicable, See D-10.

**3. Accuracy, Timeliness, and Reliability**

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

Statistical data will be verified by using the Agency's personnel roster.

**(b) How will data be checked for completeness?**

The system will provide error messages where data fields are incomplete.

**(c) Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date?**

The data is updated monthly through NFC.

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

Yes. EEOC MD 715 provides the Federal responsibilities under Section 717 of Title VII and Section 501 of the Rehabilitation Act.

**D. ATTRIBUTES OF THE DATA:**

**1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?**

Yes. The data is used to provide analysis on EEO plans and barriers to employment in a more efficient manner. The system (*eversity*) allows the Agency to perform extensive statistical analyses comparing information on its workforce with internal and external benchmarks.

**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. The data collected will provide a summary analysis about the categories and groupings of the Agency's workforce.

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

N/A

**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?**

The data is not being consolidated. However, according to the Agency Security Access Procedures – data access is limited to those individuals with authorized use and only for specific data as pertain to the user's role/need.

- 7. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access?**

According to Agency Security Roles and Procedures/Controls and Agency Security Access Procedures – access is limited by control assignment of a responsibility profile to all users. Each responsibility comes with a pre-determined set of privileges that provides limited data viewing according to the duties and needs of the user.

- 8. How will the data be retrieved? Does a personal identifier retrieve the data? If yes, explain and list identifiers that will be used to retrieve the information on the individual.**

Data can be retrieved by categories or groupings based on the employees' grade level, job series, race, color, national origin, gender, age, disabilities, and employment issues.

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

\* EEOC MD 715 Report – Federal Agency Annual EEO Program Status Report. The report will provide the status of activities undertaken pursuant to its EEO program responsibilities under Section 717 of Title VII and Section 501 of the Rehabilitation Act. The report is prepared and submitted to EEOC.

- 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.)**

The information collected is not received directly from individuals. The information is collected through the DOA-NFC, OPM, and the Census Bureau.

**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?**

The system will be operated from one site. The data access will be limited to those individuals with authorized use and only for specific data as it pertain to the user roles/needs.

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

The retention periods are in accordance with the National Archives and Records Administration General Records Schedules 1.25, 1.26, and 2.

**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 the National Archives and Records Administration General Records Schedule 1.25, 1.26, and 2.

**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. This system will provide summary reports regarding different categories and groupings of the Agency workforce.

**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?**

Agency Security Roles and Procedures/Controls – Agency Security Access Procedures – Access is limited by control assignment of a responsibility profile to all users. Each responsibility comes with a pre-determined set of privileges that provides limited data viewing according to the duties and needs of the user.

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

Small Business Administration Privacy Act System of Records, EEO Pre-Complaint-SBA12, EEO Complaint Cases-SBA 13, and Payroll File-SBA 23.

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

No.

**F. ACCESS TO DATA:**

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

EEO Staff and selected MicroPact contractors with clearances.

**2. How is access to the data by a user determined?**

Access and use is limited to persons with official need to know. Agency Security Roles and Procedures/Controls & Agency Security Access Procedures are applicable – Access is limited to users with control responsibility assignments. Each responsibility comes with a pre-determined set of privileges that provides limited data viewing according to 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.**

No, users will not have access to the information in the system. Data access is limited to those individuals with authorized use and only for specific data as pertain to the user's role/need.

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

Password protected system, rules of behaviors, system audit trails to document suspicious or irregular logons and navigation of the system.

**5. Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system?**

Yes. MicroPact contractors are provided with a Privacy Act Statement regarding the use of the information collected and the security provisions required for the system. This information is included in the contract.

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

No. Data is not shared with other systems.

**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 (Federal, State, Local, Other)?**

Yes. EEOC require agencies to submit statistical and analytical reports regarding the data collected in the system.

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

EEOC analyzes the data in the reports to measure progress and identify issues affecting EEO in the government. This information is then consolidated with other Federal agencies' information and provided to Congress as an oversight measure to ensure compliance with established policies and standards under the EEO Statutes, Executive Orders, and regulations.

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

The EEO&CRC office.



The following officials have approved this document:

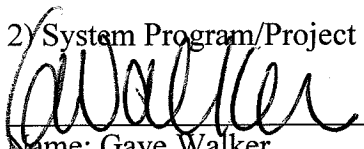
1) System Owner

  
Name: Deatrice P. Ford

6/19/07

Title: Acting Assistant Administrator,  
Equal Employment Opportunity and Civil Rights Compliance

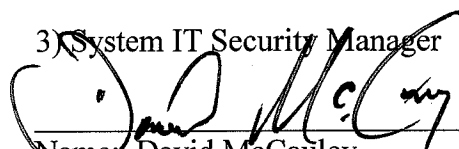
2) System Program/Project Manager

  
Name: Gaye Walker

6/16/07

Title: Equal Employment Opportunity Specialist

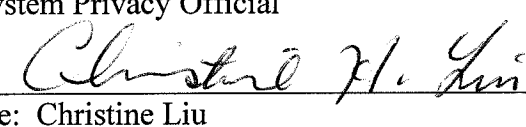
3) System IT Security Manager

  
Name: David McCauley

6/28/07

Title: Chief Information Security Officer

4) System Privacy Official

  
Name: Christine Liu

7/13/07

Title: Chief Privacy Officer