

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

**Name of Project: Contract Management System (CMS)**

**Project's Unique ID: CMS**

**A. CONTRACT 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 Manager for this system or application?**

- (1) Account Management/Privileges/ Administration:
  - i. Sharon Gurley - (202) 205-6622
- (2) Hosting/IT
  - i. Ron Whalen - (202) 205-6012

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

David McCauley  
Chief Information Security Officer

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

Ethel Matthews  
Senior Advisor to Chief Privacy Officer

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

Christine Liu  
Chief Information Officer and Chief Privacy Officer

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

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

- a. Is this information identifiable to the individual?  
YES
- b. Is the information about individual members of the public?  
NO
- c. Is the information about employees?  
YES

## SBA Contract Management System (CMS) PIA

### 2) What is the purpose of CMS?

The Small Business Administration (SBA) Office of Procurement and Grants Management (DPGM) has been using a manual process to create, track and archive its acquisition documents, including contracts and purchase orders. There are over 1500 contracts and 2000 purchase orders each year that are currently handled through manual processing using standard government forms. Tracking is done via manual data entry. In addition, there is no standardization of data and limited visibility into the acquisition and grants issued by the agency.

The Small Business Administration selected PRISM, a COTS end-to-end contract and grant management solution. PRISM will be known within SBA as the Contract Management System (CMS).

CMS will enable SBA to increase productivity through streamlined workflow, improved control, and automated collaboration of the end-to end procurement process. CMS will allow SBA to perform end-to-end electronic processing of contracts and grants and bring the agency into conformance with OMB e-Procurement guidance. CMS will be housed and hosted by SBA in an SBA data center and on the SBA network. CMS will provide the following functionality:

- End-to-End electronic handling of federal contracts and purchase orders during the entire lifecycle of these documents, including online creation, processing, approval, tracking and archiving;
- Functionality and technical standards that are compliant with OMB e-Procurement initiative;
- Compliant with FFSIO (formerly JFMIP);
- Interfaced with FedBizOpps, FPDS-NG, CCR and ORCA ;
- Support RFP and RFI documents in a manner compliant with FAR and Federal regulations;
- Provide standard maintenance updates to FAR database;
- Support the development and/or processing of requisition documents;
- Support the development and/or processing of invoice documents;
- Support the modeling, analysis and implementation of workflow management;
- Provide flexible grants application formatting; and
- Support the preparation, archiving and retrieval of Standard Form 424

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

Legislation and Presidential initiatives over the last decade, for example, Clinger Cohen Act (CCA), Federal Acquisition Streamlining Act (FASA), Presidential Management Agenda and eGovernment initiatives have effectively mandated that procurement functions be simplified and provide accurate data. The intent of these legislative initiatives is to improve the efficiency of the procurement process by facilitating the acquisition of commercial products and by transforming the acquisition process to accommodate electronic commerce.

**C. DATA IN TH PROCESS:**

**1) What categories of individuals are covered in CMS?**

Information will be maintained on individuals in CMS who are:

- Select Procurement, Grant, Financial and Management Employees who work at SBA ; and
- Select Employees of organizations doing business with SBA (employees at SBA vendors or grantees)

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

- 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? If not directly from the individual, source then what other source?

SBA employee information in CMS is derived mostly from the individual or their manager. Information regarding vendor companies and individual employee representatives at these companies is entered in CMS by SBA employees based on CMS privileges or for company information through integration to the GSA sponsored Central Contractor Registration (CCR). The General Services Administration (GSA) sponsors the Central Contractor Registration (CCR).

- b. What Federal agencies are providing data for use the process?

The General Services Administration (GSA) sponsors the Central Contractor Registration CCR for vendors who wish to do business with the United States Government. Vendor company information comes from CCR, including employee contacts at vendor organizations. CCR is sponsored by GSA, but technically managed within the Department of Defense (DOD).

- c. What State and local agencies are providing data for use in the process?

None

- d. From what other agencies are providing data for use in the process?

None

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

SBA will collect/maintain the following information on SBA employees:

- Name (Last, First, and middle initial);
- SBA contact information (Phone, Fax, Address, E-mail);
- Procurement and Grant information used to perform their job (COR Certification and Warrant Levels; and
- System Access and Privilege information (UN, PW, Privileges)

SBA will collect/maintain the following information on vendor companies and/or Grantees (note: vendors and grantees do not enter CMS, data is maintained by SBA personnel):

- Primary Vendor/Grantee information that can include: Name, Address, Web site, Dun and

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Bradstreet Number, CAGE Number, Tax Identification Number, Company financial information (size, ABA number), Business Type, Socio-Economic information (e.g. Small Business, 8a, etc.);

- Vendor/Grantee records contain a Vendor/Grantee Code, which in the case of some vendors is the Tax Identification Number (TIN) of companies. In some small businesses this TIN may be the Social Security Number (SSN) of the owner. In addition, for some Grantees this number may be a SSN.; and
- Vendor/Grantee Point of Contact (POC) and person authorized to sign that includes: name, company phone number, company email, company fax number. In some small businesses the POC may be the owner, whose SSN is used as the TIN for this company.

### 3) Accuracy, Timeliness, and Reliability

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

Vendor information will be verified against GSA Sponsored, CCR, through system-to-system integration.

- b. How will data be checked for completeness?

CMS includes validations against required data.

- c. Is the Data Current?

SBA employee privileges and access are maintained through an account management process managed by the system owner.

Vendor Company information is verified and updated based on a system-to-system interface with CCR.

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

Yes. They are described in the COTS PRISM Configuration Guide.

## 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. SBA is following Federal Acquisition Regulations (FAR) regarding what information is relevant and necessary.

- 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?**

CMS will derive data regarding an SBA employee's amount of work and provide reports on items such as: number of contracts awarded, number of contracts pending and associate this with a CMS user. No additional individual information will be created or derived.

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

Information regarding an SBA employee's workload will be maintained and associated with their user record for management reports.

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

Data regarding an employee's workload is available in manual form today.

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

Managers, based on privileges, will be able to view reports and compare to historical information.

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

SBA procurement data is consolidated, but not individual employee records. CMS is managed through the SBA hosting and network and only accessible to SBA employees or designates with proper privileges.

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

Individual data is not consolidated in CMS.

**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.**

Records are not maintained on individuals outside of their workload in CMS. Managers, with privileges, can retrieve a workload report based on name or office of assignment.

**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 on SBA employees can be the following:

- Workload (for management reports)
- System Log-In (for audit and security purposes)

System Administrators, as designated and granted privileges by the system owner, through the account management process can view these reports. In addition, managers can be provided access to reports on staff they are responsible for. CMS has privileges and an organizational hierarchy that designates what access a manager can see. For instance, the Director of the Office of Procurement and Grants Management may see reports for all of SBA and other managers may only see employees at offices under their supervision.

- 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.)**

Data in CMS is mandated by the Federal Acquisition Regulation (FAR), therefore employees to do their jobs need to enter certain required information. All employees, when entering the system agree to CMS terms and conditions. This consent/agreement is configurable in CMS to be accomplished at intervals required by SBA (e.g. each log-in, daily, monthly, and annually, etc.).

**E. MAINTENANCE AND ADMINISTRATIVE CONTROLS**

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

All CMS data is housed in one location

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

The FAR requires contract data to be retained for 6 years and 3 months.

- 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?**

CMS has a contract close-out process to delete contract information. Once a contract is closed out, data is maintained for 6 years and 3 months.

Reports are dynamically generated in CMS and not maintained as reports in CMS. Users, with proper privileges, can save reports (PDF, Excel, and Word) to their desk-top or other SBA system if they choose.

Vendor records are dynamically updated based on integration to CCR.

- 4) **Are the systems in the process using technologies in ways that the SBA has not previously employee (e.g., mOllitoring software, Smart Cards, Caller-ID)**

No

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

N/A

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

CMS cannot locate or monitor a physical location of an individual employee. CMS for auditing purposes will maintain a record of individual log-in to CMS. In addition, CMS will maintain

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information regarding work-load of a particular SBA employee. A user, with privileges granted, can search for a user within CMS for the purpose of including them in their workflow (e.g. select them to be an approver) or for management reports.

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

A time and date are entered with each log-in to CMS.

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

Access to CMS will be given, based on need to SBA employees. Each person granted access to the system will be trained and individually authorized to access the system, based on their privileges. All system users are required to follow established internal security protocols.

SBA has countermeasures in place to minimize the chance that a keystroke logger could be installed on a user's desktop machine. First, users do not have administrative rights on their machines. They are therefore limited in what software they can install, whether intentionally or unintentionally. Second, SBA runs spyware detection and elimination software on each user's machine. Keystroke loggers should be removed by this process.

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

SBA Privacy Act System of Record Number is 30

### 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 DATE:**

### 1) **Who will have access to the data in the System?** (e.g. contractors, users, managers, system administrators, developers, tribes, other).

The system will be accessed by personnel necessary for the creation of contracts and grants for SBA. Primarily, this includes members of the Office of Procurement and Grants Management. In addition, personnel from the Chief Information Officer's office, who are responsible for hosting CMS will have access to data in an Oracle database associated with CMS. Contract support may be granted, for CMS support, through SBA procedures and security to maintain aspects of CMS and its Oracle Database.

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

Are criteria, procedures, controls and responsibilities regarding access documented?

CMS has an account management procedure that governs user and system administration access. Through this process privileges are determined and granted.

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**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 information related to their particular role. Access controls following the principle of least privilege.

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

All users, when entering the system agree to CMS terms and conditions. This consent/agreement is configurable in CMS to be accomplished at intervals required by SBA (e.g. each log-in, daily, monthly, and annually, etc.). In addition, all users are trained on CMS.

**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. A Privacy Act clause is in the contract.

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

Yes. Contract information, including the Contracting Officer Name is sent through an interface from CMS to the GSA sponsored, Federal Procurement Data System Next Generation (FPDS-NG). SBA is updating an MOU with FPDS-NG for CMS.

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

The designated System Manager is responsible

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

No other agencies will have access to data in CMS. GSA, can consolidate data and reports based on information sent to FPDS-NG. Currently SBA enters information into FPDS, so this process will not change from current procedures.

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

GSA consolidates Federal procurement data from FPDS-NG

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

SBA system owner is responsible for the proper use of data.

**G. Privacy Impact Analysis**

**1) Discuss what privacy risks were identified and how they were mitigated for types of information collected.**

There is a potential for vendor and grantee records to contain an individual's Social Security Number (SSN), as passed from the Central Contractor Registry (CCR). This occurs because in some small businesses the POC may be the owner, whose SSN is used as the TIN for their company.

The Federal Acquisition Circular (FAC) 2001-16, October 1, 2003, subpart 4.11-Central Contractor Registration amends the Federal Acquisition Regulation (FAR) to require contractor registration in the Central Contractor Registration (CCR) database prior to award of any contract, basic agreement, basic ordering agreement, or blanket purchase agreement on or after October 1, 2003. Providing this information is a condition of doing business with the government.

Mitigation involves limiting access to this data to authorized users and providing this information only to those who need it to perform their job. CMS has an account management procedure to grant access to users and CMS is only accessible from within the SBA network. CMS enforces strong password authentication and has a set of parameters to configure permissions to activity or data once an individual is authenticated to the system.

Additionally, CMS has further mitigated this issue by installing a configuration switch that enables each agency to hide the TIN if they choose. It will not appear anywhere but in the profile that is transferred from CCR. The CMS System Administrators, a privileged user, are the only individuals who can view this in the profile.

**2) Describe any types of controls that may be in place to ensure that information is used as intent.**

All employees and contractors receive mandatory computer security awareness training. All contracting officers are trained in their position and additionally are required to complete ethics training with the legal office. In addition, CMS has in place system controls (i.e. denial of access) if an individual is found to be inappropriately using the information.

**3) Discuss what privacy risks were identified and how they were mitigated for information shared internal and external?**

SBA has a Memorandum of Understanding with GSA to use the Central Contractor Registry to receive vendor and grantee information for the acquisition process. Internally, information is accessed only with a need to know.

**4) What privacy risks were identified and describe how they were mitigated for security and access controls?**

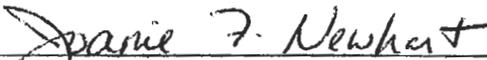
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CMS has a C&A package that outlines the security and access controls that protect CMS and the data it stores, processes, or transmits and also identifies any residual security risk. There were no additional privacy risks identified.

**See Attached Approval Page**

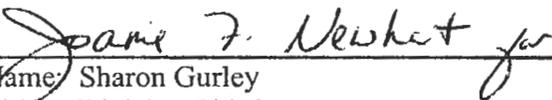
**The Following Officials Have Approved this Document**

**1. System Owner**

  
Name: Joanie F. Newhart  
Title: Director  
Office of Business Operations

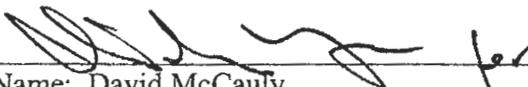
22 May 08  
Date

**2. System Project Manager**

  
Name: Sharon Gurley  
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Division of Procurement and Grants Management

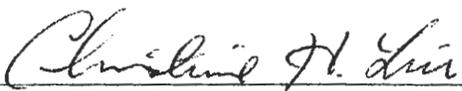
22 May 08  
Date

**3. System IT Security Manager**

  
Name: David McCaully  
Title: Chief Information Security Officer  
Office of the Chief Information Officer

22 May 08  
Date

**4. System Privacy Official**

  
Name: Christine Liu  
Title: Chief Information Officer  
Office of the Chief Information Officer

23 May 2008  
Date