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Privacy Impact Assessment
Federal Business Opportunities
(FBO)

05/27/2015

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A. Data in the System

Question	Explanation/Instructions
1. Describe all information to be included in the system, including personal data.	<p>Government Users:</p> <ul style="list-style-type: none">- Full Name- Suffix- Title- Email Address (example given is .gov)- Phone- Agency- Contracting Office- User Role <p>Contractor Users:</p> <ul style="list-style-type: none">- DUNS- Legal Business Name- Doing Business AS- Cage- Division Name- Division Number- Physical Address- Mailing Address- Group Name- Full Name- Suffix- Title- Email Address- Phone Number <p>Citizen Users:</p> <ul style="list-style-type: none">- Does not enter Company information above and will not have access to controlled, unclassified data- Mailing Address- Group Name- Full Name- Suffix

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	<ul style="list-style-type: none"> - Title - Email Address - Phone Number <p>Non personal information collected:</p> <ul style="list-style-type: none"> - Agency Hierarchy - Notice Information
1.a. What stage of the life cycle is the system currently in?	Operations & Maintenance
2.a. What are the sources of the information in the system?	<p>Users input information themselves</p> <p>DUNS is provided (optional) it is checked against SAM – if found populates company information</p>
2.b. What GSA files and databases are used?	GSA/FAS/IAE Manages SAM
2.c. What Federal agencies are providing data for use in the system?	Agencies can connect contract writing systems to provide notice information (non-personal/user information)
2.d. What State and local agencies are providing data for use in the system?	Same as agency
2.e. What other third party sources will the data be collected from?	<p>Notice information is public & offered through API</p> <p>User information is only accessible to user, Symplicity and GSA</p>
2.f. What information will be collected from the individual whose record is in the system?	All user information is collected from the individual
3.a. How will the data collected from sources other than Federal	User information is not collected or shared

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agency records or the individual be verified for accuracy?	
3.b. How will data be checked for completeness?	For agency users, email confirmation of active account and validation is needed at administrator level.
3.c. Is the data current? How do you know?	90-day password reset has been implemented. There is no other check or validation past the initial approval.
4. Are the data elements described in detail and documented? If yes, what is the name of the document?	Yes – FBO data dictionary

B. Access to the Data

Question	Explanation/Instructions
1.a. Who will have access to the data in the system?	FBO System Contractor (Symplicity), IAE Contractor (Silo) and IAE who manages the system
1.b. Is any of the data subject to exclusion from disclosure under the Freedom of Information Act (FOIA)? If yes, explain the policy and rationale supporting this decision.	<p>Per Exemption 6: Information that, if disclosed, would invade another individual's personal privacy.</p> <p>Specific User Information is not given out.</p> <p>Government information included in notices such as POC can be included in FOIA.</p>
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	User information is limited to select and necessary members of the FBO System Contractor and IAE SuperUser Access.

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<p>3. Will users have access to all data in the system or will the user's access be restricted? Explain.</p>	<p>There are levels of access. A Super User can see all information. An Agency Administrator can only access information specific to their agency. A vendor/citizen can only see their information.</p>
<p>4. What controls are in place to prevent the misuse (e.g. browsing) of data by those having access?</p>	<p>Super Users are limited to necessary functions – IAE System Program Manager and contractor personnel</p> <p>Super Users approve new agency administrators with designation from the Head of the Contracting activity within that agency.</p> <p>All lower agency access is approved at the level above.</p>
<p>5.a. Do other systems share data or have access to data in this system? If yes, explain.</p>	<p>CFDA is also managed by the System Contractor and shares tables with FBO. User information is not shared between systems.</p>
<p>5.b. Who will be responsible for protecting the privacy rights of the clients and employees affected by the interface?</p>	<p>N/A - No interface.</p>
<p>6.a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?</p>	<p>Agencies have access to their own information and to office/locations under them. Agencies do not have access to other agency information.</p>
<p>6.b. How will the data be used by the agency?</p>	<p>The data is used to verify companies/citizen for access to controlled unclassified information, and to verify government user need to access the system</p>
<p>6.c. Who is responsible for assuring proper use of the data?</p>	<p>The IAE governing body – ACE board</p>
<p>6.d. How will the system ensure that agencies only get the information they are entitled</p>	<p>An agency hierarchy is established. Agencies only have access to information within their structure.</p>

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to?	
7. What is the life expectancy of the data?	Data maybe archived or disabled, but it is not destroyed.
8. How will the data be disposed of when it is no longer needed?	There is no plan to dispose of the data at this time.

C. Attributes of the Data

Question	Explanation/Instructions
1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?	Yes.
2.a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?	There is no plan to acquire new data.
2.b. Will the new data be placed in the individual's record (client or employee)?	There is no plan to acquire new data.
2.c. Can the system make determinations about individuals that would not be possible without the new data?	There is no plan to acquire new data.
2.d. How will the new data be verified for relevance and accuracy?	There is no plan to acquire new data.
3.a. If the data is being consolidated, what controls are in place to protect the data and prevent unauthorized access? Explain.	There is no plan to acquire new data.
3.b. If processes are being	There is no plan to acquire new data.

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consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.	
4. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	User data can be access by the individual secure log in.
4. What are the potential effects on the privacy rights of individuals of: <ul style="list-style-type: none"> a. Consolidation and linkage of files and systems; b. Derivation of data; c. Accelerated information processing and decision making; and d. Use of new technologies. <p>How are the effects to be mitigated?</p>	There is no plan to change, alter, or add any new data.

D. Maintenance of Administrative Controls

Question	Explanation/Instructions
1.a. Explain how the system and its use will ensure equitable treatment of individuals.	Information is only gathered to confirm access rights
1.b. If the system is operated in more than one site, how will consistent use of the system be maintained at all sites?	Only operated in one.
1.c. Explain any possibility of disparate treatment of individuals or groups.	
2.a. What are the retention periods of data in this system?	Indefinite
2.b. What are the procedures for eliminating the data at the end of	There are none currently in place

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the retention period? Where are the procedures documented?	
2.c. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	There is a 90 password reset for users, otherwise it is on the administrator to revoke rights, and upon the user themselves to update data.
3.a. Is the system using technologies in ways that Federal agencies have not previously employed (e.g. Caller-ID)?	No
3.b. How does the use of this technology affect individuals' privacy?	
4.a. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.	No.
4.b. Will this system provide the capability to identify, locate, and monitor groups of people? If yes, explain.	No.
4.c. What controls will be used to prevent unauthorized monitoring?	
5.a. Under which Privacy Act System of Records notice (SOR) does the system operate? Provide number and name.	GENERAL SERVICES ADMINISTRATION Privacy Act of 1974; Notice of Updated Systems of Records AGENCY: General Services Administration. ACTION: Notice. Federal Register / Vol. 73, No. 81 / Friday, April 25, 2008 / Notices #22386
5.b. If the system is being modified, will the SOR require amendment or revision? Explain.	The SORN is being reviewed for possible updating.