

**U.S. Department of Commerce
BusinessUSA**



**Privacy Impact Assessment
for the Office of the Secretary
BusinessUSA Intellectual Hosting Service Application and
Satisfaction Survey Records System**

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Date approved: 6/24/14

**U.S. Department of Commerce Privacy Impact Assessment
BusinessUSA Intellectual Hosting Service Application and Satisfaction Survey
Records System**

Unique Project Identifier: OS-073 BusinessUSA Intellectual Hosting Service Application

Introduction: System Description

BusinessUSA (BUSA) is a gateway to business resources for U.S. small businesses and exporters. The BUSA's Intellectual Hosting Service Application and Satisfaction Survey Records System uses cloud-computing technology via a third-party vendor, that serves as a "Software as a Service" (SaaS) provider. BUSA conducted independent testing on this Cloud based system to ensure the it is FISMA compliant at a moderate security level. BUSA is accrediting the Intellectual Hosting Service Application and its boundaries as defined in its System Security Plan. The third-party vendor is not required to be FedRAMP (Federal Risk Management and Accreditation Program) certified, but they are in process of completing the certification to become FedRAMP certified and is in process of submitting their final authorization package to the FedRAMP Joint Authorization Board. The BUSA anticipates the vendor will be FedRAMP certified on or prior to June 1, 2015.

The SaaS provider has developed applications which provide BUSA and its customers with online tools that assist in the delivery of customer service activities. The activities are the mediums of communication including. These activities are provided by BUSA and contact center staff. The software is a service delivery mechanism that streamlines responses to customers via email, social media, frequently asked questions/knowledge base, and tickets. Customers access the system through Business.USA.gov (via portal).

The information is stored on a controlled electronic media and can be retrieved by an authorized user through a query based on an identifier such as an individual's name, business name or other identifier such as email address or telephone number. The authorized user will use this for customer identification, assistance and referral purposes only.

The information conducted by the system is shared with the following:

1. A record from this system of record will be disclosed to BUSA Federal agency and bureau partners including : the Department of Commerce (DOC), Small Business Administration (SBA), Department of Defense (DOD), Department of Veteran Affairs (VA), Environmental Protection Agency (EPA), U.S. Housing and Urban Development (USHUD), Department of Health and Human Services (HHS), General Services Administration (GSA), U. S. Department of Agriculture (USDA), Department of Energy (DOE), Office of Management and Budget (OMB), Department of State, Export/Import Bank, Overseas Private Investment Corporation (OPIC), Department of Transportation (DOT), Department of Treasury, Department of Justice (DOJ), National Science Foundation (NSF), U.S. Trade Development Agency (USTDA), Department of Education, Department of Labor (DOL), Department of Interior (DOI), Department of Homeland Security (DHS), and National Aeronautical and Space Administration (NASA) in connection with the assignment, based on customer need, and programs for the purpose of linking American businesses to available business resources.
2. A record from this system of record may be disclosed to Federal partners' sponsored organizations including Federal grantees and/or certified organizations involved in business development efforts and assistance, such as : DOC's National Institute of Standards and Technology (NIST) Hollings

Manufacturing Extension Partnership (MEP) Centers, DOC's NIST Manufacturing Technology Acceleration Centers (MTAC), DOC's Economic Development Administration (EDA) University Centers, DOC's Minority Business Development Agency (MBDA) Business Centers, Native American Business Enterprise Centers and Procurement Assistance Centers, DOC's International Trade Administration (ITA) Trade Promotion Coordinating Committee (TPCC), DOD's Procurement Technical Assistance Centers (PTAC), SBA's Small Business Development Centers (SBDC), Small Business and Technology Development Centers (SBTDC), Women Business Centers (WBC), Veteran Business Outreach Centers (VBOC), Service Corps of Retired Executives (SCORE), DOT's Small Business Transportation Resource Centers (SBTRC), Department of Treasury's Community Development Financial Institutions (CDFI), in connection with the assignment, based on customer need, and programs for the purpose of linking American businesses to available business resources.

3. A record from this system of record may be disclosed to partner state governments, local governments, Non-Profit business development and assistance organizations, in connection with the assignment, based on customer need, and programs for the purpose of linking American businesses to available business resources.
4. A record in this system of record may be disclosed to a Member of Congress submitting a request involving an individual when the individual has requested assistance from the Member with respect to the subject matter of the record.
5. A record in this system of record may be disclosed to the DOJ in connection with determining whether disclosure thereof is required by the Freedom of Information Act (5 U.S.C. § 552).
6. A record in this system of record may be disclosed to a contractor of the DOC having need for the information in the performance of the contract, but not operating a system of records within the meaning of 5 U.S.C. 552a(m).
7. A record from this system may be disclosed to the Administrator of GSA or his/her designee, during an inspection of records conducted by GSA as part of that agency's responsibility to recommend improvements in records management practice and programs, under authority of 44 U.S.C. 2904 and 2906. Such disclosure shall be made in accordance with the GSA regulations governing inspection of records for this purpose, and any other relevant (i.e. GSA or Commerce) directive. Such disclosure shall not be used to make determinations about individuals.
8. A record from this system may be disclosed in the course of presenting evidence to a court, magistrate or administrative tribunal, including disclosures to opposing counsel in the course of settlement negotiations.
9. A record in this system of record may be disclosed, as a routine use, to appropriate agencies, entities and persons when (1) it is suspected or determined that the security or confidentiality of information in the system of record has been compromised; (2) the DOC has determined that as a result of the suspected or confirmed compromise there is a risk of harm to economic or property interests, identity theft or fraud, or harm to the security or integrity of this system or whether systems or programs (whether maintained by the DOC or another agency or entity) that rely upon the compromised information; and (3) the disclosure made to such agencies, entities, and persons is reasonably necessary to assist in connection with the DOC's efforts to respond to the suspected or confirmed compromise and to prevent, minimize, or remedy such harm.

Authorities supporting the DOC's use of websites and applications include:

- A. 5 U.S.C. § 301, the Federal Records Act;
- B. 5 U.S.C. § 552a, the Privacy Act of 1974;
- C. Section 208 of the E-Government Act of 2002;
- D. The President's Memorandum on Transparency and Open Government, January 21, 2009;
- E. The OMB Director's Open Government Directive Memorandum, December 8, 2009;
- F. OMB Memorandum M-10-23, Guidance for Agency Use of Third-Party Websites and Applications, June 25, 2010; and

G. OMB Memorandum for the Heads of Executive Departments and Agencies, and Independent Regulatory Agencies, Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act, April 7, 2010.

Section 1: Information in the System

1.1 Indicate what personally identifiable information (PII)/business identifiable information (BII) is collected, maintained, or disseminated. Check all that apply.

Identifying Numbers (IN)			
a. Social Security	<input type="checkbox"/>	e. Alien Registration	<input type="checkbox"/>
b. Taxpayer ID	<input type="checkbox"/>	f. Driver's License	<input type="checkbox"/>
c. Employee ID	<input type="checkbox"/>	g. Passport	<input type="checkbox"/>
d. File/Case ID	<input type="checkbox"/>	h. Credit Card	<input type="checkbox"/>
i. Financial Account			
j. Financial Transaction			
k. Vehicle Identifier			
l. Employer ID Number			
m. Other identifying numbers (specify):			

General Personal Data (GPD)			
a. Name	<input checked="" type="checkbox"/>	g. Date of Birth	<input type="checkbox"/>
b. Maiden Name	<input type="checkbox"/>	h. Place of Birth	<input type="checkbox"/>
c. Alias	<input type="checkbox"/>	i. Home Address	<input checked="" type="checkbox"/>
d. Gender	<input type="checkbox"/>	j. Telephone Number	<input checked="" type="checkbox"/>
e. Age	<input type="checkbox"/>	k. Email Address	<input checked="" type="checkbox"/>
f. Race/Ethnicity	<input type="checkbox"/>	l. Education	<input type="checkbox"/>
m. Religion			
n. Financial Information			
o. Medical Information			
p. Military Service			
q. Physical Characteristics			
r. Mother's Maiden Name			
s. Other general personal data (specify):			

Work-Related Data (WRD)			
a. Occupation	<input type="checkbox"/>	d. Telephone Number	<input checked="" type="checkbox"/>
b. Job Title	<input type="checkbox"/>	e. Email Address	<input checked="" type="checkbox"/>
c. Work Address	<input checked="" type="checkbox"/>	f. Business Associates	<input type="checkbox"/>
g. Salary			
h. Work History			
i. Other work-related data (specify): Business name			

Distinguishing Features/Biometrics (DFB)			
a. Fingerprints	<input type="checkbox"/>	d. Photographs	<input type="checkbox"/>
b. Palm Prints	<input type="checkbox"/>	e. Scars, Marks, Tattoos	<input type="checkbox"/>
c. Voice Recording/Signatures	<input type="checkbox"/>	f. Vascular Scan	<input type="checkbox"/>
g. DNA Profiles			
h. Retina/Iris Scans			
i. Dental Profile			
j. Other distinguishing features/biometrics (specify):			

System Administration/Audit Data (SAAD)			
a. User ID	<input type="checkbox"/>	c. Date/Time of Access	<input type="checkbox"/>
b. IP Address	<input type="checkbox"/>	d. Queries Run	<input type="checkbox"/>
e. ID Files Accessed			
f. Contents of Files			
g. Other system administration/audit data (specify):			

Other Information (specify)
Industry

Contact type
Years in business
Size of firm
Company website
Ownership
Years in exporting
Counties exported to
Number of employees
Annual revenue
Service need
Customer request
Service resolution

1.2 Indicate sources of the PII/BII in the system. Check all that apply.

Directly from Individual about Whom the Information Pertains					
In Person		Hard Copy: Mail/Fax		Online	x
Telephone	x	Email	x		
Other (specify):					

Government Sources					
Within the Bureau	x	Other DOC Bureaus	x	Other Federal Agencies	x
State, Local, Tribal	x	Foreign			
Other (specify):					

Non-government Sources					
Public Organizations	x	Public Media, Internet	x	Private Sector	x
Commercial Data Brokers					
Other (specify):					

Section 2: Purpose of the System

2.1 Indicate why the PII/BII in the system is being collected, maintained, or disseminated. Check all that apply.

Purpose			
To determine eligibility		For administering human resources programs	
For administrative matters	x	To promote information sharing initiatives	x
For litigation		For criminal law enforcement activities	
For civil enforcement activities		For intelligence activities	
Other (specify): Business triage and resource referrals	x		

Section 3: Use of the System

- 3.1 Provide an explanation of how the bureau will use the PII/BII to accomplish the checked purpose(s), e.g., to verify existing data. Describe why the PII/BII that is collected, maintained, or disseminated is necessary to accomplish the checked purpose(s) and further the mission of the bureau and/or the Department. Indicate if the PII/BII identified in Section 1.1 of this document is in reference to a federal employee/contractor, member of public, foreign national, visitor or other (specify).

BUSA's mission is to serve America's businesses by providing easy access to government resources and opportunities, and by efficiently providing consistent, timely, relevant, accurate, complete, and trustworthy information to help them succeed. BUSA makes it easier for businesses to find the answers and assistance they need quickly through a multi-channel approach (including contact center, web site, email and social media) as facilitated by BUSA's Intellectual Hosting Service Application and Satisfaction Survey Records. BUSA serves as a central point of contact to exchange information among Federal, state, regional and local entities involved in the provision of business enterprise assistance. BUSA aims to provide a single customer experience for America's businesses when entering the Federal gateway by removing the redundancy of multiple contacts and access to difference Federal resource areas, while ensuring customers are properly referred to best suited resources in a timely manner.

This information will be used to make informed referrals to appropriate resource providers, business assistance organizations and programs. The PII/BII referenced pertains to the customer who voluntarily gives consent to BUSA for referrals to appropriate resource providers, business assistance organizations and programs.

Section 4: Information Sharing

- 4.1 Indicate with whom the bureau intends to share the PII/BII in the system and how the PII/BII will be shared.

Recipient	How Information will be Shared			
	Case-by-Case	Bulk Transfer	Direct Access	Other (specify)
Within the bureau	x			
DOC bureaus	x			
Federal agencies	x			
State, local, tribal gov't agencies	x			
Public				
Private sector	x			
Foreign governments				
Foreign entities				
Other (specify): - Non-profit business development and assistance organizations - Federal partner sponsored organizations (grantees &/or certified organizations involved in business development efforts and assistance)	x			

	The PII/BII in the system will not be shared.
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Section 5: Notice and Consent

5.1 Indicate whether individuals will be notified if their PII/BII is collected, maintained, or disseminated by the system. Check all that apply.

x	Yes, notice is provided pursuant to a system of records notice published in the Federal Register and discussed in Section 6.	
x	Yes, notice is provided by other means.	Specify how: A customer is provided notice when they are prompted for consent of PII/BII.
	No, notice is not provided.	Specify why not:

5.2 Indicate whether and how individuals have an opportunity to decline to provide PII/BII.

x	Yes, individuals have an opportunity to decline to provide PII/BII.	Specify how: All information collected by BusinessUSA is on the voluntary basis. Before the customer's prompted to provide PII/BII, they have an option to decline.
	No, individuals do not have an opportunity to decline to provide PII/BII.	Specify why not:

5.3 Indicate whether and how individuals have an opportunity to consent to particular uses of their PII/BII.

x	Yes, individuals have an opportunity to consent to particular uses of their PII/BII.	Specify how: The customer grants consent to use their information on the system. The process for granting consent is: (a) customer selects service request or communicates to BUSA; and, (b) Prior to customer providing PII/BII, the customer is given notice when prompted to provide consent to the particular use of their PII/BII.
	No, individuals do not have an opportunity to consent to particular uses of their PII/BII.	Specify why not:

5.4 Indicate whether and how individuals have an opportunity to review/update PII/BII pertaining to them.

x	Yes, individuals have an opportunity to review/update PII/BII pertaining to them.	When an individual requests a service action from BusinessUSA through the system, they enter PII/BII. It is at that point the system generates a ticket and automatically emails the individual a service confirmation, service ticket (number) and instructions. The instructions inform the individual to save their service ticket for future use including reviewing/updating their PII/BII.
	No, individuals do not have an opportunity to review/update PII/BII pertaining to them.	Specify why not:

Section 6: Administrative and Technological Controls

6.1 Indicate the administrative and technological controls for the system. Check all that apply.

	All users signed a confidentiality agreement.
	All users are subject to a Code of Conduct that includes the requirement for confidentiality.
x	Staff received training on privacy and confidentiality policies and practices.
x	Access to PII/BII is restricted to authorized personnel only.
x	The information is secured in accordance with FISMA requirements. Provide date of most recent Assessment and Authorization: December 13, 2013
x	The Federal Information Processing Standard (FIPS) 199 security impact category for this system is a moderate or higher.
x	NIST 800-122 recommended security controls for protecting PII/BII are in place and functioning as intended; or have an approved Plan of Action and Milestones (POAM). See Appendix A.
x	Contractors that have access to the system are subject to information security provisions in their contracts required by DOC policy.
	Other (specify):

Section 7: Privacy Act

7.1 Indicate whether a system of records is being created under the Privacy Act, 5 U.S.C. § 552a. (A new system of records notice (SORN) is required if the system is not covered by an existing SORN).

As per the Privacy Act of 1974, "the term 'system of records' means a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual."

x	Yes, this system is covered by an existing system of records notice. Provide the system name and number: COMMERCE/DEPARTMENT – 24 BusinessUSA Intellectual Hosting Service Application and Satisfaction Survey Records
	Yes, a system of records notice has been submitted to the Department for approval on
	No, a system of records is not being created.

Section 8: Retention of Information

8.1 Indicate whether these records are covered by an approved records control schedule and monitored for compliance. Check all that apply.

x	There is an approved record control schedule. Provide the name of the record control schedule: Records Schedule for U.S. Department of Commerce Office of the Secretary (N1-40-92-5) (Exec Sec) OGC Disposition Schedule for Department of Commerce Office of the Secretary (N1-040-03-2)
	No, there is not an approved record control schedule.

	Provide the stage in which the project is in developing and submitting a records control schedule:
x	Yes, retention is monitored for compliance to the schedule.
	No, retention is not monitored for compliance to the schedule. Provide explanation: