

MBDA Capital Readiness Program Salesforce System

System of Record Statement

Background

MBDA is developing an electronic, cloud-based platform in a custom Salesforce instance to monitor performance of Capital Readiness Program (CRP) award recipients. Awardees will record services that they provide to clients in this system. For example, when an awardee helps a business owner raise capital, the awardee will record information about the business owner and their business, details about the type and amount of capital raised, and other details associated with the provided service. This data will allow MBDA to assess the performance of grantees against their performance goals and assess the overall impact of CRP.

Purpose of System

Guidance for implementing the Privacy Act of 1974 indicates that a system of record notice is only required when records are retrieved by individual identifiers. “The ‘are retrieved by’ criterion implies that the grouping of records under the control of an agency is accessed by the agency by use of a personal identifier; not merely that a capability of potential for retrieval exists” (OMB Circular A-108).

The purpose of the system is to collect data on the performance of Capital Readiness programs rather than on individuals. While the capability in the Salesforce system exists to retrieve client records by name, **CRP has no routine business purpose for doing so**. Instead, the system’s primary use is to aggregate the service data to assess performance at the awardee level. For example, MBDA will assess the total amount of capital that each awardee has helped clients raise.

Individual records of service may be assessed by MBDA staff for quality assurance purposes, but these records are not retrieved by the unique identifiers of individuals. To mitigate any potential violations of the Privacy Act, MBDA staff who have access to the system will receive training on proper handling of data and be instructed that searching for or retrieving records by unique identifiers is not appropriate. If a business need for retrieval by unique identifier arises, MBDA will conduct appropriate reviews and issue a system of record notice at that time.