



Office of Information Technology (OIT)

Privacy Threshold Analysis

DFC-020 Request for SAM Assistance

March 4, 2026

1100 New York Ave NW
Washington, DC 20527

Introduction

This Privacy Threshold Analysis (PTA) is a questionnaire to assist with determining if a Privacy Impact Assessment (PIA) is necessary for this information system/program/project. Please answer all questions as completely as possible. Use the <Tab> key to move between fields. When finished, save the document and send it to the privacy office at privacy@dfc.gov.

General Information

Name of Information System/Program/Project: DFC-020 Request for SAM Assistance

Name of Submitter: Angela Linsbeck

Name of Program Office: Office of Financial Management

Name of System Owner/Program Manager¹: Sandip KarumathilVadakath

Email for System Owner/Program Manager: Sandip.KarumathilVadakath@dfc.gov

Name of Information Owner²: Angela Linsbeck

Email for Information Owner: angela.linsbeck@dfc.gov

Name of Authorizing Official³: Willie Williams

Email for Authorizing Official: willie.williams@dfc.gov

Date Submitted to Privacy Program for Review: 02/27/2006

Description of the IT System

Provide a general, non-technical description of the information technology (IT) system⁴ and its purpose so that its function and purpose are clear. The description of the IT system should contain the following elements:

- *The IT system or project name and the name of the program office that owns it.*
- *The business purpose of the IT system or project and how it relates to the program office and agency mission.*
- *A general description of the information in the IT system or project.*
- *A description of a typical transaction conducted in the IT system or project.*

¹ Person or organization having responsibility for the development, procurement, integration, modification, operation and maintenance, and/or final disposition of an information system.

² Official with statutory or operational authority for specified information and responsibility for establishing the controls for its generation, classification, collection, processing, dissemination, and disposal.

³ Official with the authority to formally assume responsibility for operating an information system at an acceptable level of risk to agency operations (including mission, functions, image, or reputation), agency assets, or individuals.

⁴ A discrete set of resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information. Examples of IT systems include IT applications, websites, projects, DFC forms, etc.

DFC-020 Request for SAM Assistance is a new OMB-approved form that will be housed on the DFC Forms Portal with the other OMB-approved forms. The U.S. government tracks each unique entity that is receiving federal financial assistance from any U.S. government agency. To do this, the U.S. government generates its own Unique Entity ID (UEI) through the System for Award Management (SAM.gov). In addition to the UEI, DFC clients must have an active SAM.gov registration that is required of recipients of U.S. federal financial assistance. This registration record is renewed annually. Borrowers/Guaranteed Parties/Insureds/Grantees are required to have a SAM Unique Entity ID (UEI). To assist clients with obtaining the SAM registration, DFC needs to obtain the required information and documentation from the client.

Individual submitters representing the client log in or create accounts in the DFC Forms System. They then complete the form and submit it with the applicable documentation. The DFC SAM Administrators will receive an email that the form has been submitted. The information will be saved in the Salesforce Forms application. The DFC SAM Administrators will utilize the information to assist contracted personnel with obtaining the SAM registration and annual renewals.

Questionnaire

1. **Is this a third-party subscription website used by the agency for research purposes only (i.e., to search for commercial data)?**
☐ Yes. Skip to question 4.
☒ No.
2. **Status of IT system:**
☒ This is a new IT system.

☐ This IT system has an existing PIA and as part of Assessment and Authorization (A&A) review, we certify that there are no changes.

☐ This is an existing IT system without a current PTA.

☐ This is an existing IT system that has been updated.
Date updated: MM/DD/YYYY
Please provide a general description of the update and what specifically has changed related to the application's handling or collection of information:
[Click here to enter text.](#)
3. **Indicate the stage of the IT system development life cycle the IT system is in.**
☐ Planning
☒ Development
☐ Production
4. **Is this IT system a cloud technology in which information is transferred over the Internet to a third-party server?**

- ☐ No. Skip to question 6.
☒ Yes.

5. Is this IT system approved by the Federal Risk and Authorization Management Program (FedRAMP)⁵ to store federal government data?

- ☐ No.
☒ Yes.
☐ This is a third-party subscription website used for research purposes only. It is not used by the agency to store federal government data, although user search queries and/or payment information may be remembered or stored by the website.

6. Does the agency use the IT system to collect, process, or retain information on (check all that apply):

- | | | |
|--|---|--|
| a. DFC employees? | ☐ Yes | ☒ No |
| b. Contractors working on behalf of DFC? | ☐ Yes | ☒ No |
| c. The general public? | ☐ Yes | ☒ No |
| d. Businesses/Organizations? | ☒ Yes | ☐ No |

7. Does the agency use the IT system to collect, process, or retain ANY of the following:

- | | | |
|---------------------------------------|------------------------------|--|
| a. Social Security number? | ☐ Yes | ☒ No |
| b. Driver's license or State ID? | ☐ Yes | ☒ No |
| c. Passport number? | ☐ Yes | ☒ No |
| d. Credit card number? | ☐ Yes | ☒ No |
| e. Alien registration number? | ☐ Yes | ☒ No |
| f. Personal financial account number? | ☐ Yes | ☒ No |
| g. Biometric identifiers? | ☐ Yes | ☒ No |

If you answered YES to any of the above, why does the agency collect the information?
Provide the function and the legal authority to do so.

[Click here to enter text.](#)

8. Does the agency use the IT system to collect, process, or retain ANY of the following about individuals:

- | | | |
|----------------------|---|-----------------------------|
| a. Full name? | ☒ Yes | ☐ No |
| b. Business address? | ☒ Yes | ☐ No |
| c. Business email? | ☒ Yes | ☐ No |

⁵ To see the listing of FedRAMP-approved Cloud Service Offerings, please visit the FedRAMP Marketplace at <https://marketplace.fedramp.gov/products>.

- d. Business phone number? ☒ Yes ☐ No

8.1 Does the agency use the IT system to collect, process, or retain ANY of the following:

- | | | |
|---------------------------------------|------------------------------|--|
| a. Home address? | ☐ Yes | ☒ No |
| b. Personal email? | ☐ Yes | ☒ No |
| c. Personal phone number? | ☐ Yes | ☒ No |
| d. Date of birth? | ☐ Yes | ☒ No |
| e. Mother's maiden name? | ☐ Yes | ☒ No |
| f. Medical information? | ☐ Yes | ☒ No |
| g. Account passwords? | ☐ Yes | ☒ No |
| h. Citizenship or immigration status? | ☐ Yes | ☒ No |
| i. Ethnic or religious affiliation? | ☐ Yes | ☒ No |
| j. Criminal history? | ☐ Yes | ☒ No |
| k. Last 4 digits of SSN? | ☐ Yes | ☒ No |
| l. Photograph of individual? | ☐ Yes | ☒ No |

If you answered YES to any of the information types in Question 8.1, why is this information collected?

BUILD Act of 2018 (22 U.S.C. § 9601 et seq.); Privacy Act of 1974 (5 U.S.C. § 552a); 5 U.S.C. § 301 (Departmental Regulations); 44 U.S.C. § 3101 (Records Management by Federal Agencies); Debt Collection Improvement Act of 1996 (31 U.S.C. § 3332); 26 U.S.C. § 6011 - U.S. Code - Unannotated Title 26. Internal Revenue Code § 6011. General requirement of return, statement.

9. What additional information (not limited to information about individuals) does the agency collect, process, or retain through its use of the IT system? Please be specific, to include data elements.

The collected information includes the Full name, email and telephone number of the employee of the entity that will be responsible for the SAM registration. Also collected are the Title, Full Name and email of the executive of the entity that will acknowledge the employee as being responsible for the SAM registration. The entity information collected includes the Legal Name, Legal Physical Address (Address, City, Region, County and Postal Code), Incorporation Date, Fiscal Year End Date, Country Registration Information (i.e., Registration Number, CIN, LEI, VAT or Swift). If the entity is a U.S. entity, DFC collects the Employer Identification Number (EIN), Checking ABA Routing Number, Checking Account Number and Bank ACH US Telephone. The client will be required to submit documentation to validate the above information.

10. Is this a third-party social media⁶ website or application that makes personally identifiable information (PII)⁷ available to the agency?

☒ No.

☐ Yes.

11. Is this a third-party email marketing tool⁸ or online survey platform⁹ used to engage with members of the public?

☒ No.

☐ Yes.

12. Does the agency use the IT system to measure or track a user's online activity?¹⁰

☒ No.

☐ Yes.

13. Does the agency or IT system collect, receive, or share PII, sensitive PII (SPII)¹¹, or ANY agency data with any other IT application or system?

☒ No.

☐ Yes. If so, please list any other IT applications or systems with which information is shared.

[Click here to enter text.](#)

14. Is the agency able to retrieve information from the IT system by an individual's name or by some identifying number, symbol, or other identifying particular assigned to the individual?

☐ No.

☒ Yes.

⁶ Digital technology that enables the sharing of ideas and information through virtual networks and communities.

⁷ PII is information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. Examples of PII typically found on social media platforms include usernames, profile photos, geographic information, work experience, education, etc.

⁸ An IT application used to deliver and optimize the sending of email campaigns to a target audience, including emailing newsletters, press releases, and/or other agency notifications to subscribers.

⁹ A web-based platform used to create and/or store electronic surveys. Surveys can feature a variety of question types, including multiple choice, ranking, open ended, etc.

¹⁰ This question refers to the agency's use of web measurement and customization technologies. Examples include using cookies to remember a user's online search activity, tracking click or open rates of emails and hyperlinks, generating heatmap reports to determine where users are most interacting on a website, etc.

¹¹ SPII is PII that if lost, compromised, or inappropriately disclosed, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. SPII includes any data present in questions 7 and 8.1.

15. Does the agency routinely retrieve information from the IT system by an individual's name or by some identifying number, symbol, or other identifying particular assigned to the individual?

☐ No.

☒ Yes. If so, please list the personal identifier(s) used to retrieve the information.

The forms are assigned a SAM request number and is linked to the client's account. DFC can conduct searches by SAM request number.

16. If YES to questions 14 and 15, does a System of Records Notice (SORN) apply to the IT system?¹²

☐ No.

☒ Yes. If so, please list the relevant SORN(s).

DFC-02 Salesforce Customer Relationship Management System ("Insight") 85 FR 43210

☐ Unsure.

☐ N/A.

17. Has DFC conducted Assessment & Authorization (A&A)¹³ on the IT system?

☐ No.

☒ Yes.

☐ Unsure.

☐ This is a third-party subscription website used for research purposes only or a DFC form and is not required to go through the formal A&A process.

18. To which A&A system boundary will this IT system belong?

☐ DFCNet

☒ Insight

☐ Oracle E-Business Suite (EBS)

☐ Credit Management System (CMS)

☐ This is an external IT system.¹⁴

¹² See www.dfc.gov/privacy for a list of Government-wide and DFC SORNs.

¹³ A&A refers to steps 4 (Assess) and 5 (Authorize) of the Risk Management Framework. The purpose of the "Assess" step is to determine if information security and privacy controls are in place, operating as intended, and producing the desired results. In the "Authorize" step, a senior official makes a risk-based decision to authorize the system to operate.

¹⁴ An information system or component of an information system that is outside of the authorization boundary established by the organization and for which the organization typically has no direct control over the application of required security controls or the assessment of security control effectiveness.

Privacy Threshold Review

(To be completed by the DFC Privacy Program)

Date reviewed by the DFC Privacy Program Manager: 03/04/2026

Name of Reviewer: Donia A Harper-Chapman

DFC Privacy Program Manager Review Comments

The information collected includes the entity Full name, email and telephone number of the employee and Full Name and email of the executive, the Title, the Legal Name and Physical Address (Address, City, Region, County and Postal Code), the Incorporation Date, Fiscal Year End Date, Country Registration Information (i.e., Registration Number, CIN, LEI, VAT or Swift). The DFC collects the Employer Identification Number (EIN), Checking ABA Routing Number, Checking Account Number and Bank ACH US Telephone, If the entity is a U.S. entity.

Risk Level:

The privacy risk rating level is considered as “High”, due to the collection of the ABA banking routing and checking numbers, along with the entity’s full legal name and address if from the U.S. Although the form resides within the DFC Form Portal that is located on the Salesforce (Insight) system, the Data Loss Prevention (DLP) security tool will prevent the sensitive informational data from being exposed. The detection, prevention and protection DLP solution will also aid in unauthorized access while keeping the data properly secured while in transit and at rest.

Recommendation:

Therefore, the form should inherit the DFC-02 Salesforce Customer Relationship Management System (“Insight”) SORN, and to be included within the system’s Privacy Impact Assessment (PIA) document and Privacy Act Statment for collection of the sensitive data.

Designation

☐ **This is NOT a privacy-sensitive IT system.** The IT system contains no sensitive personally identifiable information (PII) and does not collect, maintain, or disseminate PII from or about members of the public.

☐ PTA is sufficient at this time.

☒ **This IS a privacy-sensitive IT system.** The IT system contains sensitive PII or collects, maintains, or disseminates PII from or about members of the public. *NOTE: IF the user answered YES to ANY option in question 7 OR question 8.1, this box must be checked.*

☒ PTA is sufficient at this time.

☐ PIA is required.

☐ Adapted PIA is required.

- ☐ SORN is required.
- ☒ Privacy Act Statement is required.
- ☐ Privacy Notice is recommended.

X _____
System Owner or Program Manager

Date _____

X _____
☐ SAOP or ☐ Designated Rep

Date _____