



**Pension Benefit Guaranty Corporation**  
**MyPBA**  
**Privacy Impact Assessment**

**Version 1.0**

**March 2007**

Prepared by:

PBGC Office of Information Technology (OIT)  
Enterprise Information Security Office (EISO)  
1200 K Street NW  
Washington, DC 20005

## Executive Summary Report

### I. INTRODUCTION

Federal agencies are required by law to ensure the protection of the personally identifiable information (PII) they collect, store, and transmit. The Pension Benefit Guaranty Corporation (PBGC) is responsible for ensuring proper protections of the information contained within its information systems, including PII. To that end, PBGC developed a Privacy Impact Assessment (PIA) to evaluate whether a system that contains PII meets legal privacy requirements.

### II. PURPOSE AND SCOPE

*Purpose:* PBGC is responsible for ensuring the confidentiality, integrity, and availability of the information contained within its My Pension Benefit Account (MyPBA) system. A PIA is used to evaluate privacy vulnerabilities and risks and their implications on MyPBA.

The PIA provides a number of benefits to Benefit Administration Payment Division (BAPD); including enhancing policy decision-making and system design, anticipating the public's possible privacy concerns, and generating confidence that privacy objectives are addressed in the development and implementation of MyPBA. The PIA Questionnaire provides a framework by which agencies can ensure that they have complied with all relevant privacy policies, regulations, and guidance, both internal and external to PBGC.

*Scope:* A Privacy Impact Assessment was conducted on the MyPBA application. MyPBA is cited on the PBGC Sensitive System List and reported on either the PBGC's Exhibit 53 or via capital asset plans and business cases (Exhibit 300s). It is also listed as a Major Application on the Information Systems Inventory Report. The system is a distributed-tiered web major application that is owned by PBGC.

MyPBA application allows participants the ability to view their personal account status, web-based transaction histories, as well as contact and bank account information on file with PBGC. MyPBA Back Office Server hosts two different pieces of the application, the MyPBA Admin Site and the Web Services back office application. MyPBA Hardware Configuration is supported by servers; the system that hosts MyPBA is physically located at PBGC 1200 K Street NW, Washington, DC 20005.

### III. PIA APPROACH

A questionnaire was developed in accordance with the FIPS 199- Standards for Security Categorization of Federal Information and Information Systems, Office of Management and Budget (OMB) requirements, The Privacy Impact Act of 1975, The National Institute of Standard and Technology (NIST) recommendations, and the Federal Enterprise Architecture Business Reference Model (BRM). The questionnaire was developed in order to identify any Personal Identifiable Information (PII).

The questionnaire was given to the Information System Owner (ISO) and Subject Matter Expert (SME) of the MyPBA application for their response. An Information Security Analyst from the TechGuard Security, LLC and the Enterprise Information Security Office (EISO) staff met

with the ISO and SME of the MyPBA to discuss the questionnaire. Responses from the ISO and the SME of MyPBA were obtained and used to fill in the final PIA and analysis.

#### **IV. SYSTEM CHARACTERIZATION**

MyPBA application is a distributed-tiered web application. Each tier is broken into layers, with each layer responsible for providing a set of necessary services for the entire system. The different layers are implemented in various fashions: as web sites, as executables, as dynamic libraries, and as windows applications and services. These layers are distributed across a number of different computer systems.

The Customer's web browser is responsible for displaying the interfaces returned by the MyPBA public web server's internet service layer. It is also responsible for determining which requests to send to the server based on user action and for sending any user entered data in these requests.

#### **V. PIA RESULTS**

The PIA evaluation revealed that the MyPBA application contains a PII and only those who are authorized to use the application have access to it and the information contained therein. The users are utilizing the information for the sole purpose of performing their assigned duties. No discrepancies have been discovered.

#### **VI. SUMMARY**

MyPBA contains PII in secure online databases. Security is consistent and the servers where the applications and data are stored are physically secured and password protected. Only staff authorized to use the application have access to it and the information contained therein. Staff utilizes the information for the sole purpose of performing their assigned duties. Further information can be requested by contracting PBGC's Disclosure Officer.