



**Pension Benefit Guaranty Corporation**  
1200 K Street, N.W., Washington, D.C. 20005-4026

## **PRIVACY STRATEGIC PLAN**

**Fiscal Years 2016-2017**

### **Vision**

The PBGC Privacy Office<sup>1</sup> functions as a government leader in protecting privacy and promoting transparency for customers, employees, and all stakeholders.

### **Mission**

The mission of the PBGC Privacy Office is to protect individuals by embedding privacy protections and promoting transparency in all PBGC Offices and Departments, and in their activities.

### **Values**

1. Accountability.
2. Transparency.
3. Efficiency.

### **Overview and Strategic Context**

PBGC is dedicated to protecting the pension benefits of millions of Americans. PBGC's three strategic goals are: (1) preserving plans and protecting pensioners; (2) paying pension benefits on time and accurately; and (3) maintaining high standards of stewardship and accountability. Privacy principles, policies, and practices are critical to PBGC's ability to achieve each of these strategic goals. Privacy and the PBGC mission goals should not be traded or balanced; rather, the two must be blended. The relationship can, and should be, mutually beneficial.

In addition, through training, outreach, and program development, the Privacy Office advances the two more fundamental ideas that personal information should be handled with care, and that to maximize effectiveness and efficiency, privacy must be "built-in" to projects, programs, and perhaps most importantly, into every PBGC employee and contractor's mindset.

To make these plans a reality, the Privacy Office herein establishes three goals, each supported by specific and measurable objectives.

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<sup>1</sup> The Privacy Office is located in the Office of the General Counsel. The term "Privacy Office" has been used for many years for ease of communication (internally and externally), and to underscore the significance of the work that the Privacy Office handles. This Strategic Plan envisions that the Privacy Office will be formally organized as a subdivision of the Office of the General Counsel in the near future.

## Goals and Objectives

### **Goal 1: Achieve and maintain compliance with privacy laws and guidance.**

Compliance with privacy laws and guidance is critical to the Privacy Office's success; all other measures of success must be secondary to basic compliance. The Privacy Office works tirelessly to achieve and maintain compliance, but compliance requires ongoing attention to constantly changing standards. The Privacy Office's first priority for Fiscal Years 2016-2017 is to increase agency-wide compliance with privacy laws and guidance.

- Objective 1.1 – Increase transparency and accountability by improving PBGC's foundational privacy documents: Systems of Records Notices, Privacy Threshold Analyses, and Privacy Impact Assessments.
- Objective 1.2 – Develop and maintain a robust record-keeping system for all privacy matters to ensure availability for internal use, audit responses, and public requests for information.
- Objective 1.3 – Ensure that complaints and incidents are recorded systematically, processed efficiently, and mitigated appropriately in accordance with federal and PBGC policies and procedures.
- Objective 1.4 – Review, assess, and provide guidance about PBGC programs, systems, projects, information sharing arrangements, and other initiatives to reduce privacy risks, including reducing PBGC's holdings of personally identifiable information (PII) when possible.
- Objective 1.5 – Evaluate PBGC programs and activities for compliance with privacy laws and guidance, including NIST SP 800-53, Revision 4, and OMB Circulars.

### **Goal 2: Foster a culture of “built-in” privacy agency-wide.**

When it comes to privacy, PBGC is only as strong as its weakest link. Often, the weakest link is a person, not a computer program or system. The Privacy Office ensures that PBGC's privacy policies and procedures are understood by every PBGC employee and contractor through education and training, but appreciates that there is a difference between employees understanding concepts when they are taught in a structured setting, and considering and applying those concepts to everyday situations. To bridge this gap, the Privacy Office will continue to enhance its training and outreach efforts agency-wide, while paying special attention to agency leadership and the Privacy Office's counterpart, the Office of Information Technology.

- Objective 2.1 – Provide outreach, education, and training to promote privacy and transparency as a way of thinking, rather than an afterthought.
- Objective 2.2 – Develop and deliver relevant and effective privacy training courses and materials to PBGC personnel and other stakeholders through onboarding training, refresher training, PBGC's Intranet and public-facing website, and targeted educational and outreach opportunities tailored to PBGC's needs.
- Objective 2.3 – Enhance engagement with leaders in every PBGC Department and Office so that the importance of privacy at every step of the information lifecycle is emphasized from “the top down” agency-wide.
- Objective 2.4 – Cultivate and sustain a collaborative partnership with PBGC's Office of Information Technology so that privacy can be optimally integrated throughout PBGC's activities.
- Objective 2.5 – When addressing an issue or developing a plan or procedure, develop a solution that addresses the root cause and will serve the agency long-term, even if there is a short-term alternative that would be technically compliant.

### **Goal 3: Develop and maintain top privacy professionals in the federal government.**

The PBGC's Chief Privacy Officer and the collateral duty staff that have supported her are hard-working, thorough, and passionate about privacy. Providing support, opportunities for professional growth and development, and a workplace environment in which they are valued is crucial to recruiting and retaining a high performing workforce. Ensuring that the Privacy Office is fully staffed is likewise of critical importance. With privacy issues in the news almost every day, and new laws, regulations, and guidance being published almost as frequently, the need for more privacy resources is constantly growing.

Currently, the Privacy Office consists of the Senior Agency Official for Privacy (SAOP) (who, as PBGC's Deputy General Counsel, has mostly non-privacy duties), the Chief Privacy Officer (who has no non-privacy duties) and one Privacy Specialist (who has mostly non-privacy duties). Recently, the Privacy Office has been able to call on the attorneys in PBGC's Office of General Counsel's General Law & Ethics group to assist with the ever-growing list of privacy tasks. However, with the increased attention on privacy controls (e.g., NIST SP 800-53, Rev. 4, Appendix J), and the additional responsibilities that revised OMB A-130 will place on the SAOP, the current state of affairs is not sustainable. The Privacy Office needs more dedicated personnel to establish and maintain a privacy program that is compliant with federal laws and guidance. Failure to address this risk could ultimately cost PBGC a significant amount of resources and reputational damage.

- Objective 3.1 – Acquire sufficient human capital to establish and maintain a fully operational Privacy Office, and formally establish the Privacy Office as a subdivision of the Office of the General Counsel.
- Objective 3.2 – Support employee development and emphasize the role of training and professional development in performance planning, including increasing the number of individuals with IAPP certifications each year.
- Objective 3.3 – Recognize individual and group contributions to advancing the Privacy Office's mission, informally and/or within PBGC's existing awards program.