

# **MY PEN PAY PRIVACY IMPACT ASSESSMENT EXECUTIVE SUMMARY**

## **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.

### **1.1 Purpose**

PBGC is responsible for ensuring the confidentiality, integrity, and availability of the information contained within the MyPenPay (MPP) system. A PIA is used to evaluate privacy vulnerabilities and risks and their implications for MPP.

The PIA provides a number of benefits to the Benefits Administration and Payment Department (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 MPP. 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 MPP.

### **1.2 Scope**

A PIA was conducted on the MPP system. The MPP system is contractor owned and operated by ING and State Street Corporation (SSC), and is used as a web interface to provide select information to PBGC retirees via MyPBA. The MPP system is located in the ING and SSC Jacksonville, FL datacenter, and has failover and disaster recovery capabilities. The production requirements for MPP are in accordance with those established for MyPBA. MPP is a contracted Major Application and its security needs are consistent with those of PBGC.

## **PIA APPROACH**

A questionnaire was developed in accordance with the FIPS publication 199 - Standards for Security Categorization of Federal Information and Information Systems, the OMB requirements, the Privacy 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 PII.

The MPP Information System Owner (ISO) referenced the PBGC Information Assurance Handbook, Volume 12, Section 3.4 for PIA Procedures and Appendix C: PIA Template Instructions and Outline for further guidance. The ISO followed the link in that section to the PIA Questionnaire and Executive Summary Template to get the template to complete the PIA. The MPP's ISO, ING and SSC Subject Matter Experts (SMEs) and an Information Security Analyst from TalaTek, LLC discussed the questionnaire. They developed an initial draft, solicited additional information, and reviewed and completed the final PIA as a team during a group meeting.

### **1.3 System Characterization**

MPP is a shared retiree web service application that uses the certified/accredited Pension Lump Sum (PLUS) benefit payment system as the backend and the certified/accredited MyPBA application as the front-end to provide PBGC retirees with access to pension payment information. MPP offers retirees the ability to view their payment history and details, check images, and tax forms online.

PBGC retirees access MPP via MyPBA. MyPBA is a PBGC web site that enables participants in PBGC-trusted plans to complete a number of transactions online. The data that is exchanged to process the transactions includes: Name, Address, Social Security Number, and Financial Account ID. MyPBA makes web service calls to MPP, which interfaces with internal SSC systems for benefit payment information and external systems to provide copies of checks and tax forms.

### **1.4 PIA Results**

The PIA evaluation revealed that the MPP system contains PII and only those who are authorized to use the application have access to it and the information contained therein.

### **1.5 Summary**

During the assessment of MPP, no discrepancies in the handling of PII have been discovered.