

Corporate Performance System (CPS)

Privacy Impact Assessment (PIA) Summary

I. BACKGROUND

Federal agencies are required 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 Corporate Performance System (CPS). A PIA is used to evaluate privacy vulnerabilities and risks and their implications on CPS. The PIA provides a number of benefits to PBGC; 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 CPS. 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 CPS system. The CPS system is PBGC owned and Contractor operated with oversight by Federal personnel. The CPS system is located at 1200 K Street NW, Washington, DC and is accessed by both PBGC and its support contractors in the course of their jobs. CPS is listed as a Major Application on the PBGC Federal Information Security Management Act (FISMA) Systems Inventory and its security needs are consistent with those of PBGC.

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, Section 208 of the E-Government Act of 2002, 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 Personally Identifiable Information (PII).

The questionnaire was given to the Information System Owner (ISO) and Information System Security Officer (ISSO) of CPS for their response. An Information Security Analyst from

PBGC's Enterprise Cybersecurity Division (ECD) along with a member of the PBGC Privacy Office reviewed the ISO and ISSO responses to the questionnaire. Responses from the ISO and the ISSO of CPS were obtained and used to fill in the final PIA and analysis.

IV. SYSTEM CHARACTERIZATION

The Corporate Performance System (CPS), is owned by PBGC's Quality Management Department (QMD), and is the accreditation boundary for both the Corporate Data Management System (CDMS) and the Corporate Performance Reporting System (CPRS). As the Pension Benefit Guaranty Corporation's data warehouse, CDMS stores data from major information systems for a variety of uses across the Corporation. CDMS provides access to pension plan participant data which includes personally identifiable information (PII). CPRS is a data mart and analytics business intelligence tool that supports corporate performance measurement and scorecard analysis and reporting.

V. PIA RESULTS

The PIA evaluation revealed that CPS contains PII due to its function as a data warehouse for PBGC. CPS does not collect PII, but is populated by other PBGC systems. Only those who support/or use CPS are authorized to access it and any data residing thereon.

The primary privacy risk identified is a potential data breach and subsequent loss or unauthorized disclosure of PII. The risk of a data breach is mitigated by security controls implemented and documented for the CPS. These controls are in accordance with those recommended by the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53 revision 3 for a moderate risk system in accordance with Federal Information Processing Standards (FIPS) 199 evaluation. Based on the analysis performed here, no discrepancies have been discovered.