

Legacy Record Search/Retrieval System

(LRSRS)

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 the Office of the General Counsel (OGC) Legacy Record Search/Retrieval System (LRSRS) system. A PIA is used to evaluate privacy vulnerabilities and risks and their implications on LRSRS. 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 LRSRS. 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 LRSRS as it is a system which contains PII. LRSRS is a stand-alone system, no contractors from non-legal departments will be provided access to the LRSRS System. LRSRS 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 PII.

The questionnaire was given to the Information System Owner (ISO) and Information System Security Officer (ISSO) for their response. An Information Security Analyst from PBGC's 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 eDiscovery were used to fill in the final PIA and analysis.

IV. SYSTEM CHARACTERIZATION

OGC's Legal Division's must respond to outside counsels' requests for electronic records in which the criteria vary from case to case, as well as conduct their own research and records review. LRSRS provides OGC the means in which such searches can be conducted. Generally records produced by a LRSRS search project are sensitive and may contain PII. The LRSRS is internal to OGC and is a stand-alone system and is not connected to the PBGC network.

V. PIA RESULTS

The PIA evaluation revealed that LRSRS contains PII due to its function as an in-house record retrieval system. Only those who authorized within the Office of the General Counsel are authorized to access the system 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 LRSRS. These controls are in accordance with those recommended by the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53 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.