

# Procurement Management Program (PMP)

## Privacy Impact Assessment (PIA) Summary

### I. BACKGROUND

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 the Procurement Management Program (PMP). A PIA is used to evaluate privacy vulnerabilities and risks and their implications on PMP. The PIA provides a number of benefits to the Procurement Department (PD); 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 PMP. 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 PMP. PMP is PBGC owned and operated. PMP consists of two components, Comprizon Suite and FedSelect. The PMP system is located at 1200 K Street, NW, Washington, DC. PMP is listed as a Major Application on the PBGC FISMA Information 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) of Procurement Management Program (PMP) 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 PMP were used to fill in the final PIA and analysis.

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

Procurement Management Program is made up of two applications Comprizon Suite and FedSelect. Comprizon Suite is a contract writing system utilized for the procurement of goods and services. If a vendor is self-employed and does not have a Tax Identification Number (TINs), their social security number is utilized as their TINs. This information is retrieved and loaded into Comprizon from the System for Award Management (SAM).

FedSelect™, a proprietary Commercial-Off-The-Shelf (COTS) application, is an automated software tool used to support the competitive acquisition process.

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

The PIA evaluation revealed that PMP contains PII data due to information pulled from the System for Award Management (SAM) database. Only those who support the components that make up PMP are authorized to access these components and any data residing thereon, such as network and database administrators.

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 PMP. 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.