

# Administar

## 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 Administar. A PIA is used to evaluate privacy vulnerabilities and risks and their implications on Administar. 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 Administar. 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 Administar system. Administar is PBGC owned and contractor operated with oversight by Federal personnel. The Administar system is located at 1200 K Street NW, Washington, DC and Wilmington, DE, and is accessed by both PBGC and its support contractors in the course of their jobs. Administar 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 Administar for their response. An Information Security Analyst from PBGC's Enterprise Information Security Office (EISO) 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 Administar were used to fill in the final PIA and analysis.

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

Administar is a stand-alone major application used to manage the Page/Collins settlement at PBGC. As part of the Page/Collins Settlement, Administar performs settlement processing, including noticing, and benefit data. Administar also performs recalculations, payment processing, creates pension search spreadsheets and does calculating for PBGC quarterly liability reports.

Administar is a stand-alone system and is not connected to the PBGC network, nor does the system access the internet or any other internal PBGC systems, either directly or indirectly.

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

The PIA evaluation revealed that Administar contains PII due to its payments to participants who are eligible under the Page/Collins Settlement. Only those who support and/or use Administar 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 Administar. 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.