Pension Benefit Guaranty Corporation (PBGC)
Privacy Impact Assessment (PIA)

Financial Disclosure Online FDonline

08/13/2019

1 Privacy Point of Contact

Name	Harrison Enongene
Title	Information System Security and Privacy Officer (ISSPO)
Phone	202-304-9075
Email	Enongene.harrison@pbgc.gov

TIP!

This point of contact should be the person you want the Privacy Office to work with in completing this PIA. For some systems it might be the Information Owner (IO) or Information System Owner (ISO). Many business units identify this as the Information System Security Officer (ISSO). DO what makes sense for you!

2 Privacy Impact Assessment

A Privacy Impact Assessment (PIA) is an analysis of how information is/will be handled:

i. To ensure handling conforms to applicable legal, regulatory, and policy requirements regarding privacy,
ii. To determine risks and effects of collecting, maintaining, and disseminating information in an identifiable form in an electronic information system, and
iii. To examine and evaluate protections and alternative processes for handling information to mitigate potential privacy risks.

Privacy concerns are highest for systems that contain Personally Identifiable Information (PII). PII is defined as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. Because there are many types of information that can be used to distinguish or trace an individual's identity, the term PII is necessarily broad.

TIP!

Information that either alone or when considered with other information that uniquely identifies a person is Personally Identifiable Information (PII). Combining pieces of information whether private or publicly available has powerful implications for uniquely identifying an individual.

For example, consider a person named Mary Jones. There are over 200 million results in an internet search for this name. But if we combine information such as a date of birth, the last four digits of a (or worse, an entire) Social Security Number, or a spouse's name, the number of persons to whom we could be referring begins to narrow quite rapidly. These types of information are considered identifiers. Identifiers that uniquely identify a person are the focus of privacy protection.

2.1 The Components of the System

Name of component	Describe the component (1 or 2 sentences)	Does this component contain PII	In what system of records (SORN) is this information stored	What is the Legal Authority for collection of this information	Does this system share PII internally *(please detail in question 9)*
FDonline	FDonline is a solution for automating the annual financial disclosure process. FDonline facilitates the automation of the United States Office of Government Ethics (OGE) Form 450.	Yes	OGE/GOVT-2 Executive Branch Confidential Financial Disclosure Reports Privacy Act system of records notice.	Title I of the Ethics in Government Act of 1978 (5 U.S.C. App.), Executive Order 12674 (as modified by Executive Order 12731), and 5 CFR Part 2634, Subpart I, of the Office of Government Ethics regulations require the reporting of this information.	No

2.2 The System as a Whole

1. Please describe the purpose of the system when considered as a whole. Please include if this is an existing system

FDonline is a solution for automating the annual financial disclosure process. FDonline facilitates the automation of the United States Office of Government Ethics (OGE) Form 450. FDonline electronically notifies filers of the requirement to file and provides a link to a program that walks the filer through the entire form-filing process. The application automatically reminds filers of their need to file as due dates approach, allows for electronic filing, and automates management reports of non-filers. FDonline is an existing system that goes through annual recertification.

2. What are the Confidentiality, Availability, and Integrity ratings for the system as a whole?

Confidentiality	Moderate
Integrity	Moderate
Availability	Moderate

3. List and discuss the sources from which the system collects PII (for instance, from an individual, another federal agency, etc.), the format in which PII is collected (for instance, via a form, face-to-face, phone, etc.), the notification given at time of collection from an individual regarding the Privacy Act, and the ability to opt-out of collection (and the consequences of opting out). Include a copy of all forms and Privacy Act statements used to collect information.

FDonline does not ask for PII, however users can input wrong information within the system and inadvertently submit PII. If FDonline asks for work address, some users may put their home address instead of work address which now causes PII to reside within the system.

System users access the system via a Hypertext Transfer Protocol Secure (HTTPS) connection and complete the OGC form. PII is uploaded into the Intelliworx system via an online form.

4. Discuss any privacy controls that PBGC inherits from an external provider (cloud provider, third party provider, another government agency, etc.). If an

No ISA is required because there is no dedicated connection. To complete the online form, system users access the system via an HTTPS connection.

2.3 Privacy Office Review

Name of Reviewer	Gregory Armstrong
Date Reviewed	08/15/2019
Expiration Date	08/14/2020
Result	☒Approved without conditions ☐Approved with conditions (see below). ☐Denied

(For Privacy Office Use Only)

Discuss analysis of risks and compensating controls (or other mitigation steps.

Enter description here.

Discuss any conditions on Approval

Enter description here.

2.4 Signatures and Approval

Information System Owner/Information Owner
Name: Daniel Wheeler
Dept/Office: OGC
Phone: 202-229-6873
Email: wheeler.Daniel@pbgc.gov
I certify that this PIA is an accurate representation of the security and privacy controls in place to protect the PII that the system does/will collect or maintain.
Signature
Date signed 8/20/2019

Authorizing Official
Name: Paul Chalmers
Dept/Office: OGC
Phone: 202-229-3555
Email: Chalmers.Charles@pbgc.gov
I certify that this PIA is an accurate representation of the security and privacy controls in place to protect the PII that the system does/will collect or maintain.
Signature
Date signed 8/22/2019

Chief Privacy Officer
Name: Hartley Shawn
I certify that I have reviewed this PIA and have fully considered the privacy risks that this system creates.
Signature
Date signed 8/15/2019

This page is for internal routing purposes of documentation of approvals. Upon final approval, this page <u>must</u> be removed prior to publication of the PIA.