

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



PBGC.gov

06/11/2019

1 Privacy Point of Contact

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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 <i>(please detail in question 9)</i>
PBGC.gov	PBGC.gov is an official, public-facing government website located within the Amazon East/West cloud, which contains (among other information) a searchable missing participants list.	Yes	PBGC-9: Unclaimed Pensions	29 U.S.C. 1055, 1056(d)(3), 1302, 1321, 1322, 1322a, 1341, 1342, and 1350; 44 U.S.C. 3101; 5 U.S.C. 301 (29 CFR 4902.3)	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 (either an annual recertification update or a major change)

PBGC.gov is an official government website that disseminates information to the public. PBGC's mission is to enhance retirement security by preserving and encouraging the continuation of private pension plans and by protecting the benefits of workers and retirees in traditional pension plans; PBGC.gov plays a vital role in accomplishing that mission. PBGC.gov's visitors include workers and retirees, employers and pension practitioners, policymakers, and the general public. The website contains information about PBGC's mission, pension benefits, and premium filings, along with press releases and a variety of other content. Visitors can access resources like PBGC's contact information, details about trusteed pension plans, and lists of which pension plans PBGC insures. Additionally, the site features an Unclaimed Pensions search that helps people find pensions owed to them.

This is the annual recertification of an existing system.

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.

PII Source: Individual

Form of Collection: An electronic form accessed through the website, PBGC.gov

Notification given at the time of collection: The Privacy Act of 1974, as amended, 5 U.S.C. § 552a (2006), requires PBGC to give notice when collecting information regarding the purposes for which it is collected, including how it may be used or disclosed. The Missing Participants List is a searchable repository maintained by PBGC of unclaimed pension benefits covered by the Employee Retirement Income Security Act of 1974, 29 U.S.C. chapter 18. PBGC collects the name, place and dates of employment, and contact information from individuals who believe they are a missing participant or beneficiary. It does so to determine whether the individual is, in fact, the missing participant or beneficiary. Providing personal information to PBGC is voluntary, but failure to do so may delay or prevent PBGC from determining whether you are, in fact, due a benefit.

PBGC may release information about you to other individuals and entities when necessary and appropriate under the Privacy Act, including: to a company that was responsible for the participant's pension plan or to entities related to that company to verify employment; to a labor organization that represents, or represented, the participant; to obtain the participant's or beneficiary's address from other sources when PBGC does not have a current or valid address; or to certain federal agencies to verify eligibility for a benefit.

4. Discuss any privacy controls that PBGC inherits from an external provider (cloud provider, third party provider, another government agency, etc.) If an Interconnection Security Agreement (ISA), Memorandum of Understanding (MOU), or similar document is in place, please summarize the privacy applicable portions of

PBGC does not inherit privacy control from Acquia and no ISA is required since there is no dedicated or persistent connection between PBGC and Acquia.

that document.

5. For the user roles in the system:

Role Name	Number of Users in that role	Approver	Access Level (Read, Write, etc)
Administrator	7	Mike Rucki	Read/Write/Approve/Publish
Editor	5	Mike Rucki	Read/Write/Approve
Author	11	Mike Rucki	Read/Write
Requester	1	Mike Rucki	Read

6. Does the System leverage the Enterprise Access Controls?

- Yes
 No

7. Discuss the Physical, Technical, and Administrative controls that are employed to secure the PII in the system.

PBGC.gov physical security controls employed to secure the PII in the system include security guards, key entry, secured facility, closed circuit television, identification badges and locked offices.

PBGC.gov technical controls employed to secure the PII in the system include: password protection, firewalls, unique user identification names, encryption, intrusion detection system and personal identification verification card access.

Administrative security controls employed to secure the PII in the system include: periodic security audit, regular monitoring of user's activities, annual refresher training for security, privacy and records management, backups secured offsite, role-based training, methods to ensure that only authorized personnel have access to PII, mandatory on-boarding training for security, privacy and records management.

8. For the PII in the system, discuss the actual/intended uses of the PII; the steps taken to limit the PII collected to the minimum needed; and the reasons the PII is necessary and relevant.

PBGC.gov collects limited information from participants and beneficiaries (names, postal address, email address, phone number, and employment history). The PII is necessary to confirm that an individual is due a benefit.

The Office of Benefits Administration (OBA) matches the PII that PBGC.gov collects to OBA records to verify the identities of individuals who may be eligible for benefits. Once a match is confirmed between the PII from PBGC.gov and the information in OBA records, OBA can determine whether that individual is eligible for a benefit and proceed accordingly.

9. Discuss the data flows within the system (include sources of data for data flowing into the system, destinations for data flowing out of the system, and any routine uses applicable to the system). For any information that is shared internally, be sure to discuss whether these data interconnections are noted in CSAM. Be sure to include any MOU, ISA, or Interagency Agreements.

Participants fill in the unclaimed pension form on PBGC.gov. Encrypted PII is sent via encrypted email to found@pbgc.gov for non-Collins participants and to pagecollins@pbgc.gov for Collins participants.

OBA may share this information with contractors, but that is not coordinated as part of the transfer of data from PBGC.gov to Office of Benefits Administration (OBA).

10. Does the system leverage the commonly offered control for Accounting of Disclosures?

- Yes
 No

2.3 Privacy Office Review

Name of Reviewer	Gregory Armstrong, IT Specialist
Date Reviewed	GREGORY ARMSTRONG Digitally signed by GREGORY ARMSTRONG Date: 2019.06.11 11:49:45 -04'00'
Expiration Date	
Result	<input checked="" type="checkbox"/> Approved without conditions <input type="checkbox"/> Approved with conditions (see below). <input type="checkbox"/> Denied

(For Privacy Office Use Only)

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

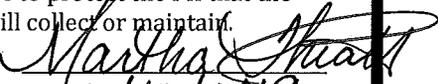
<i>Enter description here.</i>

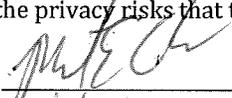
Discuss any conditions on Approval

<i>Enter description here.</i>

2.4 Signatures and Approval

Information System Owner/Information Owner	
Name:	Michael Rucki
Dept/Office:	COLAD
Phone:	Ext. 6342
Email:	Rucki.Michael@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	MICHAEL RUCKI <small>Digitally signed by MICHAEL RUCKI Date: 2019.06.12 11:34:49 -0400</small>
Date signed	06/12/2019

Authorizing Official	
Name:	Martha Threatt
Dept/Office:	COLAD
Phone:	Ext. 3727
Email:	Threatt.Martha@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	6/12/2019

Chief Privacy Officer	
Name:	Margaret Drake
I certify that I have reviewed this PIA and have fully considered the privacy risks that this system creates.	
Signature	
Date signed	6/12/19

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