PBGC Privacy Threshold Analysis

and

Privacy Impact Assessment

PBGC

Procurement Management Program (PMP)

11/21/2017

1. PRIVACY OVERVIEW AND POINT OF CONTACT (POC)

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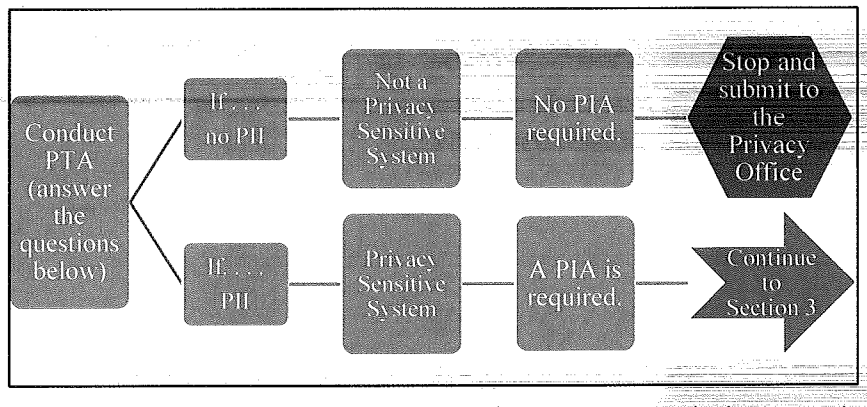
2. PRIVACY THRESHOLD ANALYSIS

A Privacy Threshold Analysis (PTA) is an analysis of how information is/will be handled by a system. More specifically, a PTA is used to determine whether a system (including any of its components/subsystems) collects or maintains PII. If the PTA reveals that the system (or at least one of its components/subsystems) does/will collect or maintain PII, then a Privacy Impact Assessment (PIA) must be conducted (*i.e.*, sections 3-5 of this document must be completed). If the outcome of the PTA is no, the system (nor any of its components/subsystems) does not/will not collect or maintain PII, no PIA is required and this document should be submitted for review as soon as this section is complete.



2.1. THE PTA

1) Why is this PTA being conducted?	☐ New system development ☐ Existing system being updated ☒ Annual review of an existing system ☐ Other: *Click here to enter other reason.*
2) Is this a pilot program?	No
If yes, what are the launch and end dates?	*Click here to enter launch and end dates.*
3) Does the information system contain any components/subsystems?	Yes
If yes, please list **each component/ subsystem.**	Comprizon Suite and FedSelect

4) Does the system (or any of its components/subsystems) collect, maintain, or share PII?	No

5) What types of PII will/does the system collect, maintain, use, or share? (Please consider all of the components/subsystems of the system when responding.)

Type of PII	Of whom? Check all that apply.	
☐ Name	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐ Social Security number	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐ Driver's license number	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐ Bank account number(s)	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐ Passport/alien registration number	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐ Other government ID number	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐ Postal address	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐ Email address	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐ Phone number	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐ Age, birthdate, or place of birth	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐ Sex/gender	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐ Race/ethnicity	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐ Citizenship status	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐ Marital status or marriage/divorce records	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐ Mother's maiden name	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐ Information about children	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐ Medical information	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐ Criminal records	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*

☐	Education information	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐	Employment history	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
		☐ PBGC vendors	☐ Other *Click here to enter text.*
☐	Tax documents	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐	Signature	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐	Fingerprints	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐	Voice recordings	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐	Physical movements (key entry)	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐	Unique device identifier	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐	Tracking data (*e.g.*, cookies, beacons)	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐	PBGC plan name	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐	PBGC participant number	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐	PBGC QDRO information	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐	PBGC alternate payee information	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐	PBGC beneficiary information	☐ PBGC employees/contractors ☐ PBGC vendors	☐ Participants, beneficiaries, etc. ☐ Other *Click here to enter text.*
☐	Other PII	*Click here to enter text.*	
☐	None		

2.2. PRIVACY OFFICE REVIEW

Name of Reviewer:	Margaret Drake
Date Reviewed:	*For Privacy Office use only* 12/21/17
Expiration Date:	*For Privacy Office use only* 12/21/18
PII Determination:	☒ No PII >> Not a privacy sensitive system. ☐ PII >> This is a privacy sensitive system.

3. 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 the 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.

3.1. THE COMPONENTS OF THE SYSTEM

Procurement Management System (PMP)			
Name of component/ subsystem	**Briefly describe the component/ subsystem (1-2 sentences).**	**Does the component/ subsystem contain PII? (Yes/No)**	**Does the component/ subsystem share information externally?**
Click here to enter component/subsystem.	*Click here to enter text.*	*Select yes or no.*	*Select yes or no.*
Click here to enter component/subsystem.	*Click here to enter text.*	*Select yes or no.*	*Select yes or no.*

3.2. THE SYSTEM AS A WHOLE

PURPOSE	
1. What is the purpose of the system?	
Click here to enter text.	
AUTHORITIES & OTHER REQUIREMENTS	
2. What is the legal authority to collect, maintain, use, or share the PII contained in the system?	
Click here to enter text.	
3. What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information in the system?	
Click here to enter text.	
4. When was the Authority to Operate (ATO) granted for the system, or on what date is it expected to be awarded? (If the project does not trigger the Certification and Accreditation process, state why.)	
Click here to enter text.	
5. What is the UII number?	
Click here to enter text.	
6. Is there a FIPS 199 Determination?	
☐ Yes	Please provide the determinations for each of the following: Confidentiality: Choose High, Moderate, or Low. Integrity: Choose High, Moderate, or Low. Availability: Choose High, Moderate, or Low.
☐ No	*Click here to enter explanation.*

7.	Which records retention schedule(s) (approved by the National Archives and Records Administration (NARA)) applies to this system? (If none, describe the plans for addressing this.)
Click here to enter text.	
COLLECTION OF THE INFORMATION	
8.	What are the sources from which PII is collected? Check all that apply.
☐ Individual	☐ Federal agency ☐ Third party source
☐ Local/state agency	☐ Other *Click here to enter explanation.*
9.	How is the information collected? Check all that apply.
☐ Paper/written form	☐ Face-to-face ☐ Via email
☐ Via phone	☐ Via a website ☐ From another information system
☐ Other *Click here to enter explanation.*	
10.	Are any data collection forms or surveys used to collect information for the system?
☐ Yes	Attach a copy of all forms or the survey as an appendix of the PIA.
☐ No	
11.	If the answer to the previous question was "yes," is a Privacy Act Statement included on each form and survey?
☐ Yes	
☐ No	*Click here to enter explanation.*
☐ Not applicable	
MAINTENANCE OF THE SYSTEM	
12.	Does PBGC own the system?
☐ Yes	
☐ No	*Click here to enter explanation.*
13.	Does PBGC operate the system?
☐ Yes	
☐ No	*Click here to enter explanation.*
14.	Who has access to PII in the system? Check all that apply.
☐ PBGC employees	☐ PBGC contractor employees ☐ Federal employees at other agencies
☐ Third party contractor employees	☐ Other *Click here to enter explanation.*
15.	Which roles have access to PII in the system? Check all that apply.
☐ System users	☐ System administrators ☐ Developers
☐ Other *Click here to enter explanation.*	
16.	How is user access to data determined? Do all users have access to all data or is access restricted?
Click here to enter text.	
17.	How is the PII in the system secured? Check all that apply.
Physical Controls	
☐ Security guards	☐ Secured facility ☐ Identification badges

☐ Key entry	☐ Closed circuit television	☐ Locked offices
☐ Locked file cabinets	☐ Cipher locks	☐ Other *Click here to enter explanation.*
Technical controls		
☐ Password protection	☐ Unique user identification names	☐ Personal Identity Verification (PIV) card access
☐ Virtual Private Network	☐ Encryption	☐ Public Key Infrastructure (PKI) Certificates
☐ Firewalls	☐ Intrusion Detection System	☐ Other *Click here to enter explanation.*
Administrative Controls		
☐ Periodic security audits	☐ Backups secured off-site	☐ Methods to ensure that only authorized personnel have access to PII
☐ Regular monitoring of users' activity	☐ Encryption of backups containing sensitive data	☐ Mandatory on-boarding training for security, privacy, and records management
☐ Annual refresher training for security, privacy, and records management	☐ Role-based training	☐ Other *Click here to enter explanation.*

18. What are the procedures for disposition of the records at the end of the retention period? Where are the procedures documented?

Click here to enter text.

USE OF THE INFORMATION

19. What are the intended uses of the PII in the system?

Click here to enter text.

20. Explain why the use of the PII is both relevant and necessary to achieve the purpose of the system.

Click here to enter text.

INFORMATION SHARING

21. With whom is the PII shared? Check all that apply.

☐ Within PBGC	Describe what PII will be shared internally and how:
☐ Other Federal agencies	Describe what PII will be shared with other agencies and how:
☐ Contractors	Describe what PII will be shared with contractors and how:
☐ Other third parties	Describe what PII will be shared with other third parties and how:

22. If PII is shared externally, is there an Information Sharing Agreement (ISA), Memorandum of Understanding (MOU), or other written agreement about the sharing?

☐ Yes	Attach copies of each MOU or ISA.

☐	No	Click here to enter text.
☐	Not applicable	
23.	If the answer to the previous question was "yes," are privacy requirements included in the ISA/MOU/agreement?	
☐	Yes	
☐	No	
☐	Not applicable	
24.	Per NIST SP 800-53 Rev. 4, Appendix J, does the system maintain an accounting of disclosures of PII to individuals who have requested access to their PII?	
☐	Yes	In what format is the accounting maintained?
☐	No	What steps will be taken to develop and maintain the accounting?
NOTICE TO THE INDIVIDUAL		
25.	What information is provided to an individual when he/she is asked to provide PII data? Check all that apply.	
☐	Privacy Act Statement	Please provide a copy of the Privacy Act Statement.
☐	Other	Describe: *Click here to enter explanation.*
☐	None	Describe: *Click here to enter explanation.*
26.	Can individuals "opt-out" by declining to provide PII or by consenting only to a particular use?	
☐	Yes	Explain how an individual can opt-out (either for specific data elements or specific uses of the data) and what, if any issues this presents for business. *Click here to enter explanation.*
☐	No	Explain why not. *Click here to enter explanation.*
AUDITING AND ACCOUNTABILITY		
27.	How is the information in the system verified as accurate, relevant, timely, and complete?	
28.	How is the system and user activity audited and/or monitored to ensure that the administrative, technical, and physical security safeguards used actually do guard against privacy risks?	
29.	In addition to the Senior Agency Official for Privacy (SAOP) and the Chief Privacy Officer, who is responsible for protecting the privacy rights of the public and employees?	
30.	Who is responsible for assuring proper use of the data and for reporting the loss, compromise, unauthorized disclosure, or unauthorized access of privacy sensitive information?	
Click here to enter explanation.		

4. PRIVACY OFFICE REVIEW

Name of Reviewer:	Margaret Drake	
Date Reviewed:	*For Privacy Office use only*	
Expiration Date:	*For Privacy Office use only*	
Privacy Impact Analysis (re: risks, sufficiency of safeguards, etc.):	*For Privacy Office use only*	
RESULT:	☐	Approved without conditions.
	☐	Approved with the following conditions: *For Privacy Office use only.*
	☐	Denied.

5. SIGNATURES

Information System Security Officer or System Owner/Information Owner	Authorizing Official
Name: Larry Grenier	Name: Steven Kvalevog
Department/Office: Procurement Department	Department/Office: Procurement Department
Phone: 202-326-4000, ext. 3473	Phone: 202-326-4000, ext. 6859
Email: Grenier.Larry@pbgc.gov	Email: Kvalevog.Steven@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: 1/16/18	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: 1/17/18

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: 12/21/17

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