

1 EXECUTIVE SUMMARY REPORT

MyPBA Privacy Impact Assessment Executive Summary Report

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.

PBGC is responsible for ensuring the confidentiality, integrity, and availability of the information contained within its MyPBA system. A PIA is used to evaluate privacy vulnerabilities and risks to PII and their implications regarding the MyPBA system.

The PIA provides a number of benefits to Benefit Administration Payment Division (BAPD); 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 MyPBA. 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.

II. Purpose and Scope

Purpose: My Pension Benefit Account, also known as MyPBA, is a BAPD Major Information System (MIS). MyPBA is a web-based application that allows participants to make benefit inquiries with PBGC through secure web-based channels, providing an effective and efficient mechanism for transferring data from participants to PBGC's back office systems.

Scope: A Privacy Impact Assessment was conducted on the MyPBA system. MyPBA is cited on the PBGC Sensitive System List and reported on either the PBGC's Exhibit 53 or via capital asset plans and business cases (Exhibit 300s). It is also listed as a Major Application on the Information Systems Inventory Report.

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, The Privacy Act of 1974, 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 Personal Identifiable Information (PII).

The questionnaire was given to the Information System Owner (ISO) and Subject Matter Expert (SME) of the MyPBA application for their response. An Information Security Analyst from the TechGuard Security, LLC met with the ISO and SME of the MyPBA to discuss the questionnaire. Responses from the ISO and the SME of MyPBA were obtained and used to fill in the final PIA and analysis.

IV. System Characterization

The purpose of MyPBA web-based application is to: (1) better enable PBGC's ability to communicate plan-specific and benefit-specific information to individual participants in a secure and timely fashion; (2) allow participants to make benefit inquiries with PBGC through secure web-based channels; (3) provide participants with the ability to conduct benefit-related transactions with PBGC, that have historically been conducted through paper processes, through web-based channels; (4) provide an effective and efficient mechanism for transferring data from participants to PBGC's back office systems; and (5) potentially reduce the burden upon PBGC's Customer Call Center (CCC) or document management center staff and resources.

MyPBA application is an initiative of the PBGC E-Government project, under the direction of the PBGC E-Government Task Force. MyPBA is deployed to all PBGC plan participants.

MyPBA application allows participants the ability to view their personal account status, web-based transaction histories, as well as contact and bank account information on file with PBGC. Further, the application will allow participants to conduct business transactions online such as:

- Change contact information
- Apply for or edit electronic direct deposit information
- Apply for benefits
- Designate a beneficiary
- Request or generate a benefit estimate
- Update federal tax withholding options
- View 1099-R Tax Forms

The MyPBA application is a custom-built, distributed; *n*-tier web application designed utilizing Microsoft's .NET technologies ASP.NET, and VB.NET. MyPBA operates over PBGC's Internal Transmission Control Protocol/Internet Protocol (TCP/IP) network and transfers data securely. MyPBA has a customer-facing application used by PBGC's external customers and an administrative application that is used strictly by the Customer Contact Center (CCC).

V. PIA Results

The PIA evaluation revealed that the MyPBA system contains PII and only those who are authorized to use the application have access to it and the information contained therein. The users are utilizing the information for the sole purpose of performing their assigned duties. No discrepancies have been discovered.

VI. Summary

During the assessment of MyPBA no discrepancies in the handling of PII have been discovered.