



Pension Benefit Guaranty Corporation

CIGSS Privacy Impact Assessment

Version 1.0

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Executive Summary Report

I. INTRODUCTION

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.

II. PURPOSE AND SCOPE

Purpose: PBGC is responsible for ensuring the confidentiality, integrity, and availability of the information contained within the Client Interface General Support System (CIGSS). A PIA is used to evaluate privacy vulnerabilities and risks and their implications on CIGSS.

The PIA provides a number of benefits to the Office of Information Technology (OIT); 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 CIGSS. 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 CIGSS system. The CIGSS system is a PBGC owned and Contractor operated. The CIGSS provides the platforms and infrastructure to support the interfaces between the end users and the major applications. CIGSS is listed as a General Support System on the Information Systems Inventory Report, 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, The Privacy Impact Act of 1975, 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 CIGSS application for their response. An Information Security Analyst from the TechGuard Security, LLC and the Enterprise Information Security Office (EISO) staff with the ISO and SME of the CIGSS to discuss the questionnaire. Responses from the ISO and the SME of CIGSS were obtained and used to fill in the final PIA and analysis.

IV. SYSTEM CHARACTERIZATION

The CIGSS is PBGC's enterprise network that provides connectivity between its headquarters at Washington DC and multiple field sites across the United States. CIGSS system is comprised of the following resources, Microsoft Active Directory, Novell's eDirectory and Microsoft operating platform. System also encompasses technologies for Internet/Intranet services, remote access capability, server virtualizations and central applications deployment to desktops. These systems allow the end users at PBGC to access multiple business systems as well as integrate custom applications and data sources.

V. PIA RESULTS

The PIA evaluation revealed that the CIGSS 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

CIGSS contains PII in secure online files. Security is consistent and the servers where the applications and data are stored are physically secured and password protected. Only staff who are authorized to use the application have access to it and the information contained therein. Staff utilizes the information for the sole purpose of performing their assigned duties. Further information can be requested by contracting PBGC's Disclosure Officer.