



Pension Benefit Guaranty Corporation

PLUS Privacy Impact Assessment

Version 1.0

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Prepared by:

PBGC Office of Information Technology (OIT)
Enterprise Information Security Office (EISO)
1200 K Street NW
Washington, DC 20005

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 State Street Corporation's (SSC's) **Pension Lump Sum (PLUS)** system. A PIA is used to evaluate privacy vulnerabilities and risks and their implications on PLUS.

The PIA provides a number of benefits to Benefits Administration and Payment Department (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 PLUS. The PIA Questionnaire provides a framework by which PBGC 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 PLUS system. The PLUS system is a contractor owned and operated Commercial off the Shelf (COTS) package used as a pension payment system. The PLUS system is operated by State Street Corporation located in Quincy, MA, and is accessed by both PBGC and SSC users. The production requirements are in accordance with the paying agent contract and BPB's Payment Schedule. PLUS is a Major Application 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 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 PLUS application for their response. An Information Security Analyst from the TechGuard Security, LLC and the Enterprise Information Security Office (EISO)

staff met with the ISO and SME of the PLUS to discuss the questionnaire. Responses from the ISO and the SME of PLUS were obtained and used to fill in the final PIA and analysis.

IV. SYSTEM CHARACTERIZATION

The collection of resources is PLUS, a system that has been customized to work with PBGC. PLUS is a commercial of the shelf (COTS) package used as a pension payment system. Some PBGC's systems exchange data with PLUS via a secure FTP server. The business process and system uptime is guided by the BPB payment schedule and the nature of the transactions.

Types of Transactions –

- Pension – PBGC sends data files to SSC to process
- Lump Sum – PBGC sends data files to SSC to process
- Special – PBGC sends data files to SSC to process
- Notification of Change – SSC sends data files to PBGC to process
- Notification of Returns – SSC sends data files to PBGC to process
- Participant Payment Report – SSC sends data files to PBGC to process
- Acknowledgements – SSC sends data files to PBGC to process
- Ledgers – SSC sends data files to PBGC to process
- Trial Balance – SSC sends data files to PBGC to process
- Data Synchronization – SSC sends data files to PBGC to process

Types of Data – Name, Address, Phone, DOB, SSN, Financial

V. PIA RESULTS

The PIA evaluation revealed that the PLUS 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 PLUS, no discrepancies in the handling of PII have been discovered. Further information can be requested by contracting PBGC's Disclosure Officer.