



Pension Benefit Guaranty Corporation
BAA
Privacy Impact Assessment

Version 1.0

March 2007

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 its Benefit Administration Applications (BAA) system. A PIA is used to evaluate privacy vulnerabilities and risks and their implications on BAA. The PIA provides a number of benefits to Benefit Administration 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 BAA. 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 BAA. BAA is cited on the PBGC Sensitive System List and reported via capital asset plans and business cases (Exhibit 300s). It is also listed as a Major Application on the Information Systems Inventory Report. The system is a custom-developed application that is owned by PBGC.

Benefits Administration Applications (BAA) is a collection of IT systems and tools that provides uninterrupted services to 1.6 million participants in PBGC pension plans in a manner consistent with private sector financial services.

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 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 application to discuss the questionnaire. Responses from the ISO and the SME were obtained and used to fill in the final PIA and analysis.

IV. SYSTEM CHARACTERIZATION

Benefits Administration Applications (BAA) is a collection of IT systems and tools that provides uninterrupted services to 1.6 million participants in PBGC pension plans in a manner consistent with private sector financial services. This includes secure and accurate communication whenever the customer contacts the agency by phone, in person, or through the internet. Participant Services (PS) manages pension plan data, calculates pension benefits for participants, manages pension benefit accounts, delivers payments to participants, manages participant correspondence received by phone, mail, or internet, enables participant administration of their pension benefit account via the internet, and images plan and participant historical records. PBGC uses PS to process monthly payments for more than 650,000 participants.

There are several online databases within BAA, however the system of record which contains the primary participant data and the Personal Identifiable Information (PII), along with several schemas which serve different applications of BAA.

V. PIA RESULTS

The BAA contains PII and only those who are authorized to use the each application have access to the application and the information contained therein. The users are utilizing the information for the sole purpose of performing their assigned duties. A new policy, IM 10-3 Protecting Sensitive Information, has been established and disseminated which specifies how sensitive data to include PII data must be handled.

VI. SUMMARY

BAA contains PII in secure online databases. Security is consistent and the servers where the applications and data are stored are physically secured and password protected. Only staff 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.