

PRIVACY STRATEGIC PLAN

Fiscal Years 2024-2026

Vision

The PBGC Privacy Office, located within the Office of the General Counsel, functions as a government leader in protecting privacy and promoting transparency for customers, employees, and all stakeholders.

Mission

The mission of the PBGC Privacy Office is to protect individuals by embedding privacy protections and promoting transparency in all PBGC Offices and Departments, and in their activities.

Values

1. Accountability.
2. Transparency.
3. Efficiency.

Overview and Strategic Context

PBGC is dedicated to protecting the pension benefits of millions of Americans. PBGC's three strategic goals are: (1) preserving plans and protecting pensioners; (2) paying pension benefits on time and accurately; and (3) maintaining high standards of stewardship and accountability. Privacy principles, policies, and practices are critical to PBGC's ability to achieve each of these strategic goals. Privacy and the PBGC mission goals should not be traded or balanced; rather, the two must be blended. The relationship can, and should be, mutually beneficial.

In addition, through training, outreach, and program development, the Privacy Office advances two fundamental ideas that personal information should be handled with care, and that to maximize effectiveness and efficiency, privacy must be "built-in" to projects, programs, and perhaps most importantly, into every PBGC employee's and contractor's mindset.

To make these plans a reality, the Privacy Office herein establishes four goals, each supported by specific and measurable objectives.

Goals and Objectives

Goal 1: Improve compliance with privacy laws and guidance.

Compliance with privacy laws and guidance is critical to the Privacy Office's success; all other measures of success must be secondary to basic compliance. The Privacy Office works tirelessly to achieve and maintain compliance, but compliance requires ongoing attention to constantly changing standards. The Privacy Office's first priority for Fiscal Years 2024-2026 is to increase agency-wide compliance with privacy laws and guidance.

- Objective 1.1 – Increase transparency and accountability by improving PBGC's foundational privacy documents: Systems of Records Notices (SORN), Privacy Threshold Analyses (PTA), and Privacy Impact Assessments (PIA).
- Objective 1.2 – Develop and maintain a robust record-keeping system for all privacy matters to ensure availability for internal use, audit responses, and public requests for information.
- Objective 1.3 – Ensure that complaints and incidents are recorded systematically, processed efficiently, and mitigated appropriately in accordance with federal and PBGC policies and procedures.
- Objective 1.4 – Review, assess, and provide guidance about PBGC programs, systems, projects, information sharing arrangements, and other initiatives to reduce privacy risks, including reducing PBGC's holdings of personally identifiable information (PII) and specifically Social Security Numbers (SSN) when possible.
- Objective 1.5 – Evaluate PBGC programs and activities for compliance with privacy laws and guidance, including NIST SP 800-53 and OMB Circulars.

Goal 2: Foster a culture of privacy championship agency wide.

When it comes to privacy, PBGC's strength grows by improving weaknesses in workforce culture. Often, the weakest link in breach or incident is a person, not a computer program or system. The Privacy Office ensures that PBGC's privacy policies and procedures are understood by every PBGC employee and contractor through education and training but appreciates that there is a difference between employees understanding concepts when they are taught in a structured setting and considering and applying those concepts to everyday situations. To bridge this gap, the Privacy Office will continue to enhance its training and outreach efforts agency-wide, while paying special attention to agency leadership and the Privacy Office's strategic partners within the Office of Information Technology and other departments. The Privacy Office seeks to offer advanced privacy courses and other training opportunities.

- Objective 2.1 – Provide outreach, education, and training to promote privacy and transparency as a way of thinking, rather than an afterthought.
- Objective 2.2 – Develop and deliver relevant and effective privacy training courses and materials to PBGC personnel and other stakeholders through onboarding training, refresher training, PBGC's Intranet, and targeted educational and outreach opportunities tailored to PBGC's needs.
- Objective 2.3 – Enhance engagement with leaders in every PBGC Department and Office so that the importance of privacy at every step of the information lifecycle is emphasized from "the top down" agency-wide.
- Objective 2.4 – Cultivate and sustain a collaborative partnership with PBGC's Office of Information Technology so that privacy can be optimally integrated throughout PBGC's activities.
- Objective 2.5 – When addressing an issue or developing a plan or procedure, develop a solution that addresses the root cause and will serve the agency long-term, even if there is a short-term alternative that would be technically compliant.

Goal 3: Develop and maintain top privacy professionals in the federal government.

In Fiscal Year 2017, the PBGC established a formal Privacy Office. The Privacy Office is a group of individuals who are hard-working, thorough, and passionate about privacy. Providing support, opportunities for professional growth and development, and a workplace environment in which they are valued is crucial to recruiting and retaining a highly performing workforce. Ensuring that the Privacy Office is fully staffed is likewise of critical importance. With privacy issues in the news almost every day, and new laws, regulations, and guidance being published almost as frequently, the need for more privacy resources is constantly growing.

Since its establishment in 2017, the Privacy Office has grown tremendously. The Privacy Office is led by the Senior Agency Official for Privacy (SAOP) (who as PBGC's Deputy General Counsel for General Law and Operations has mostly non-privacy duties) and the Chief Privacy Officer. The remainder of the Privacy Office consists of a Deputy Chief Privacy Officer, who is an attorney, three Privacy Attorneys (who have no non-privacy duties), and two IT Specialists (who have no non-privacy duties).

If the demands on the Privacy Office increase, the Privacy Office may need to increase its resources to maintain a privacy program that is compliant with federal laws and guidance. Currently, the Privacy Office is right-sized, but failure to address this risk (if it materializes) could ultimately cost PBGC a significant amount of money and cause reputational damage.

- Objective 3.1 – Acquire additional human capital to maintain a fully operational Privacy Office to comply with, and exceed, the federal requirements.
- Objective 3.2 – Support employee development and emphasize the role of training and professional development in performance planning, including training required to obtain and maintain IAPP certifications.
- Objective 3.3 – Recognize individual and group contributions to advancing the Privacy Office's mission, informally and/or within PBGC's existing awards program.

Goal 4: Integrate privacy enhancing technologies and implement metrics program.

The Privacy Office continues to conduct independent assessments of the Privacy Program, an initiative the office began in 2022. A key assessment recommendation was to prioritize privacy-related performance measures and technology-enabled strategies in the strategic plan with more specific metrics and performance measures. A key assessment recommendation was to prioritize privacy-related performance metrics and technology-enabled strategies in the strategic plan. As a result, the SAOP/Chief Privacy Officer are working to enhance privacy integration across corporate operations by embedding privacy-related performance measures and encouraging the adoption of privacy-enabling technologies in PBGC's strategic plans.

- Objective 4.1 – Implement a fully operational Privacy Office metrics program.
- Objective 4.2 – Support data driven decisions for mitigating privacy risk.
- Objective 4.3 – Leverage technology solutions to enhance Privacy Office performance measures.

The Privacy Office monitors key performance metrics and shares them with PBGC leadership to encourage the reduction of risk. These metrics fall into three categories. The first category is breach reporting. Breaches of PII and, specifically, SSNs are monitored along with the systems where these leaks may have occurred. These privacy breaches are analyzed for both detection method and nature of

the threat. The event is monitored even after it is reported, specifically how the event is resolved and the level of impact.

The second category contains privacy risk related to FISMA systems and PII/SSN inventories for all FISMA systems. In addition to maintaining inventories of which systems process PII/SSN, privacy-related Plans of Action & Milestones for FISMA systems are monitored as they are remediated.

The third category is the progress of SORN publication in the Federal Register. The Privacy Office will track all SORNs that have not been revised or rescinded within a biennial period since their most recent publication. Metrics will include the date(s) of the most recent publication of all existing SORNs, the number of existing SORNs which have been revised and republished within a biennial period since their last publication, number of existing SORNs which have not been revised and republished within six months after their biennial period, number of existing SORNs which have not been revised and republished within one year after their biennial period, and number of new draft SORNs which have not been published since the expiration of the thirty calendar drafting period. With visibility into where these SORNs are backlogged efficiency can continue to improve in the future.

After aggregation, these metrics are visualized using PowerBI. The resulting dashboards are shared with PBGC leadership to demonstrate where improvements need to be made and provide insight into how those improvements are possible.

These improvements will allow the Privacy Office to track important metrics by utilizing technology. Overall, these changes will make it easier to analyze and track important privacy events, improving the privacy practices of the agency.

This Privacy Strategic Plan document is considered approved and ready for use at PBGC according to the undersigned.

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