

Benefit Calculation and Valuation (BCV)

Privacy Impact Assessment (PIA) Executive Summary

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.

II. PURPOSE AND SCOPE

- Purpose

PBGC is responsible for ensuring the confidentiality, integrity, and availability of the information contained within Benefit Calculation and Valuation (BCV). A PIA is used to evaluate privacy vulnerabilities and the associated risk implications with BCV. The PIA provides a number of benefits to PBGC; including enhancing policy 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 BCV. 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 BCV system. BCV is PBGC owned and contractor operated with oversight by Federal personnel. BCV is comprised of six components and a number of small utility tools used in the course of data processing. The BCV system is located at 1200 K Street NW, Washington, DC and Wilmington DE, and is accessed by both PBGC and its support contractors in the course of their jobs. BCV is listed as a Major Application on the PBGC FISMA Information Systems Inventory 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, Section 208 of the E-Government Act of 2002, as amended, 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 PII.

The questionnaire was given to the Information System Owner (ISO) and Information System Security Officer (ISSO) for BCV for their response. An Information Security Analyst from PBGC's Enterprise Information Security Office (EISO) along with a member of the PBGC Privacy Office reviewed the ISO and ISSO responses to the questionnaire. Responses from the ISO and the ISSO of BCV were used to fill in the final PIA and analysis.

IV. SYSTEM CHARACTERIZATION

BCV is a group of components used by the PBGC to determine benefits for participants, beneficiaries and alternate payees and is used by benefit administrators to calculate actual retirement benefits. BCV is also used to calculate corporate liabilities for the pension plans that PBGC trustees. BCV calculations are essential to determining eligibility and correct benefit amount for participants, beneficiaries, and alternate payees entering pay status and serves as liability data for corporate financial statements, and thus support the agency's mission of protecting the retirement incomes of American workers in defined benefit pension plans.

V. PIA RESULTS

The PIA evaluation revealed that BCV contains PII due to the storage and processing of data that is collected for calculating and valuing benefits and corporate liabilities. Only those who use 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.

The primary privacy risk identified is a potential data breach and subsequent loss or unauthorized disclosure of PII. The risk of a data breach is mitigated by security controls implemented and documented for. These controls are in accordance with those recommended by the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53 for a moderate risk system in accordance with Federal Information Processing Standards (FIPS) 199 evaluation. Based on the analysis performed here, no discrepancies have been discovered.