

eTALK

Privacy Impact Assessment (PIA) Executive Summary

I. BACKGROUND

Federal agencies are required 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 eTALK. A PIA is used to evaluate privacy vulnerabilities and risks and their implications on eTALK. The PIA provides a number of benefits to PBGC; 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 eTALK. 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 eTALK system. eTALK Qfiniti is a commercial off the shelf (COTS) application that enables an organization to record telephone calls and save them as .wav files for later retrieval, analysis and evaluation. The eTALK system is located at Kingstowne Village Pkwy, Kingstowne, Virginia and is accessed by both PBGC and its support contractors in the course of their jobs. eTALK 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, 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 Personally Identifiable Information (PII).

The questionnaire was given to the Information System Owner (ISO) and Information System Security Officer (ISSO) of eTALK 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 eTALK were used to fill in the final PIA and analysis.

IV. SYSTEM CHARACTERIZATION

eTALK Qfiniti system, utilizes 2 separate servers, is configured for PBGC to record all incoming telephone calls to the PBGC's 1-800 number at the Customer Contact Center in Kingstowne, Virginia and store a subset of the calls for further analysis. The analysis provides data for trending, quality assurance and training.

V. PIA RESULTS

The PIA evaluation revealed that eTALK contains PII. The primary privacy risk identified is disclosure of PII. The risk of a data breach is mitigated by physical and logical access controls, and the difficulty in accessing the data (must listen to each individual file in order to try to access PII). The safeguards and controls for this moderate system will adequately protect the information. It has been determined that it is collecting the minimum necessary information for the proper performance of a documented agency function.

These controls are in accordance with those recommended by the National Institute of Standards and Technology (NIST) Special Publication 800-53 revision 3 for a moderate risk system as has been determined in the eTALK Federal Information Processing Standard (FIPS) 199 evaluation. Based on the analysis performed here, no discrepancies have been discovered.