

**Pension Benefit Guaranty Corporation (PBGC)  
Privacy Impact Assessment (PIA)**



**Legacy Record Search/Retrieval System**

**(LRSRS)**

**11/16/2020**

# 1 Privacy Point of Contact

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## *TIP!*

*This point of contact should be the person you want the Privacy Office to work with in completing this PIA. For some systems it might be the Information Owner (IO) or Information System Owner (ISO). Many business units identify this as the Information System Security Officer (ISSO). DO what makes sense for you!*

# 2 Privacy Impact Assessment

A Privacy Impact Assessment (PIA) is an analysis of how information is/will be handled:

- i. To ensure handling conforms to applicable legal, regulatory, and policy requirements regarding privacy.
- ii. To determine risks and effects of collecting, maintaining, and disseminating information in an identifiable form in an electronic information system.
- iii. To examine and evaluate protections and alternative processes for handling information to mitigate potential privacy risks.

Privacy concerns are highest for systems that contain Personally Identifiable Information (PII). PII is defined as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. Because there are many types of information that can be used to distinguish or trace an individual's identity, the term PII is necessarily broad.

## *TIP!*

*Information that either alone or when considered with other information that uniquely identifies a person is Personally Identifiable Information (PII). Combining pieces of information whether private or publicly available has powerful implications for uniquely identifying an individual.*

For example, consider a person named Mary Jones. There are over 200 million results in an internet search for this name. But if we combine information such as a date of birth, the last four digits of a (or worse, an entire) Social Security Number, or a spouse's name, the number of persons to whom we could be referring begins to narrow quite rapidly. These types of information are considered identifiers. Identifiers that uniquely identify a person are the focus of privacy protection.

## 2.1 The Components of the System

Name of component	Describe the component (1 or 2 sentences)	Does this component contain PII?	In what system of records (SORN) is this information stored?	What is the Legal Authority for collection of this information?	Does this system share PII internally? <i>(please detail in question 9)</i>
LRSRS	LRSRS is a standalone system that allows OGC to search, identify, and retrieve agency records in support of resolving legal matters and other applicable laws. LRSRS is an existing system which goes through annual recertification as part of ongoing authorization.	Yes	None. LRSRS does not operate as a system of records, but does process information from other PBGC systems of records for which there are current SORNs.	29 CFR 4000 et seq. and the Federal Rules of Civil Procedure.	No

## 2.2 The System as a Whole

1. Please describe the purpose of the system when considered as a whole. Please include if this is an existing system (either an annual recertification update or a major change).

The Pension Benefit Guaranty Corporation's (PBGC) Office of the General Counsel (OGC) is responsible for the collection and production of agency records in support of processing and resolving PBGC legal matters/requests pursuant to litigation discovery, subpoenas, and other applicable laws. LRSRS is a standalone system that allows OGC to search, identify, and retrieve legacy emails and records from PBGC backup tapes. LRSRS search results may or may not contain PII, but the chance of PII being present is high.

2. What are the Confidentiality, Availability, and Integrity ratings for the system as a whole?

Confidentiality	Moderate
Integrity	Moderate
Availability	Low

3. List and discuss the sources from which the system collects PII (for instance, from an individual, another federal agency, etc.), the format in which PII is collected (for instance, via a form, face-to-face, phone, etc.), the notification given at time of collection from an individual regarding the Privacy Act, and the ability to opt-out of collection (and the consequences of opting out). Include a copy of all forms and Privacy Act statements used to collect information.

LRSRS collects PII from PBGC periodic backup tapes, which include information collected from the PBGC-wide email repository and other internal PBGC systems.

4. Discuss any privacy controls that PBGC inherits from an external provider (cloud provider, third party provider, another government agency, etc.). If an Interconnection Security Agreement (ISA), Memorandum of Understanding (MOU), or similar document is in place, please summarize the privacy applicable portions of that document.

Not Applicable. LRSRS is a standalone system with no internal or external interconnections.

5. For the user roles in the system:

Role Name	Number of Users in that role	Approver	Access Level (Read, Write, etc.)	Recertification Date
System Admin	2	Brian Cooper	Read and write	03/27/2021

6. Does the System leverage the Enterprise Access Controls?

- Yes  
 No

7. Discuss the Physical, Technical, and Administrative controls that are employed to secure the PII in the system.

LRSRS physical security controls employed to secure the PII in the system include security guards, identification badges, locked offices, key entry, locked file cabinets and cipher locks.

LRSRS technical controls employed to secure the PII in the system include password protection, unique user identification names, encryption and intrusion detection system, personal identity verification, and another VLAN Subnet.

Administrative security controls employed to secure the PII in the system include periodic security audits, annual refresher training for security, privacy and records management, encryption of backups containing sensitive data, mandatory on-boarding training for security, privacy, and records management, role-based training, and methods to ensure that only authorized personnel have access to PII.

8. For the PII in the system, discuss the actual/intended uses of the PII, the steps taken to limit the PII collected to the minimum needed, and the reasons the PII is necessary and relevant.

PII is stored in LRSRS in the form of emails and other electronic documents that are used to support the OGC regarding legal matters and requests

The PII maintained in LRSRS is both relevant and necessary for the purposes for which the system was designed, namely, to search emails and electronically stored documents for support of legal matters and other applicable laws.

9. Discuss the data flows within the system (include sources of data for data flowing into the system, destinations for data flowing out of the system, and any routine uses applicable to the system). For any information that is shared internally, be sure to discuss

whether these data interconnections are noted in CSAM. Be sure to include any MOU, ISA, or Interagency Agreements.

LRSRS is a tape reading system and the data flow within LRSRS comes from PBGC-backed up tapes which are manually loaded into LRSRS. The information stored in LRSRS is manually shared with Legal Divisions and other requestors approved by the General Counsel. The information is loaded into eDiscovery through its secure mechanism.

10. Does the system leverage the commonly offered control for Accounting of Disclosures?

- Yes
- No

### 2.3 Privacy Office Review

<b>Name of Reviewer</b>	Drew Kuchinski
<b>Date Reviewed</b>	01/02/2021
<b>Expiration Date</b>	01/02/2022
<b>Result</b>	<input checked="" type="checkbox"/> Approved without conditions <input type="checkbox"/> Approved with conditions (see below). <input type="checkbox"/> Denied

*(For Privacy Office Use Only)*

Discuss analysis of risks and compensating controls (or other mitigation steps).

<i>Enter description here.</i>
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Discuss any conditions on Approval.

<i>Enter description here.</i>
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