The Benefits Administration Applications
(BAA)
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 the Benefits Administration Applications (BAA). A PIA is used to evaluate privacy vulnerabilities and risks and their implications on BAA. 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 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 system. BAA is PBGC owned and contractor operated with oversight by Federal personnel. BAA is comprised of 5 major components and a number of small utility tools used in the course of data processing. The BAA systems are located at 1200 K Street NW, Washington, DC and Wilmington, DE, and are accessed by both PBGC and its support contractors in the course of their jobs. BAA 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 PII.

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

IV. SYSTEM CHARACTERIZATION

The Benefits Administration Applications (BAA) is an inter-related group of IT applications that support pension benefit administration, payment, and control. These applications manage pension plan data, calculate pension benefits for participants, manage pension benefit accounts, deliver payments to participants, manage participant correspondence received by phone, mail, or Internet, and store plan and participant historical records. A single database is the authoritative source of the customer information in Benefits Administration with many data stores receiving feeds from within the database.

Workflow is supported for case and sponsor information, milestone processing, case processing team assignment, and the corporate goal of stewardship by ensuring that PBGC's business processes are efficient and effective to facilitate timely and accurate reporting of auditable financial information.

An enterprise document management system allows PBGC users to scan, index, and commit documents to a repository for retrieval as necessary to support various business processes including customer service and relationship management.

A specific component of the BAA provides for a distributed, multi-tiered web based application available for the automatic generation of letters for correspondence with participants and their beneficiaries.

V. PIA RESULTS

The PIA evaluation revealed that BAA contains PII due to the collection, storage and processing of pension participants and their beneficiaries in order to meet the mission of PBGC in paying appropriate benefits. Only those who support and/or use the components that make up BAA are authorized to access these components and any data residing thereon.

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 BAA. 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.