The Pension Lump Sum Program
(PLUS)
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 Pension Lump Sum Application (PLUS). A PIA is used to evaluate privacy vulnerabilities and risks and their implications on PLUS. 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 PLUS. 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 PIA was conducted on the PLUS system. The PLUS system is contractor-owned and operated by State Street Corporation (SSC) and ING, and it is a Commercial Off The Shelf (COTS) package used as a pension payment system. The PLUS system is contained within two data centers; a primary center located in Minneapolis, MN and a backup center located in Jacksonville, FL. PLUS is a Major Application on the PBGC Information Systems Inventory Report, with two minor applications iPayBenefits/PLUS Web (PW) and My Pen Pay (MPP). The PLUS system security requirements are consistent with the PBGC security requirements and standards.

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 Owner (IO) and Information System Security Officer (ISSO) of PLUS 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 IO and ISSO responses to the questionnaire. Responses from the IO and the ISSO of PLUS were used to complete the final PIA and analysis.

IV. SYSTEM CHARACTERIZATION

The Pension Lump Sum (PLUS) system is a base software package, customized by State Street Corporation (SSC) to provide annuity and lump sum payments to pension plan participants and their beneficiaries on PBGC's behalf as their paying agent. The system also performs recordkeeping and reporting functions of these payments and required federal taxes. Participant data within PLUS includes both identification information related to the participant as well as financial information on the payment amounts, deduction amounts and pay sources. PLUS system users include approximately a dozen authorized SSC and several hundred PBGC federal and contractor staff members. As noted previously, the PLUS system minor applications are iPayBenefits/PLUS Web (PW) and My Pen Pay (MPP).

The PW application is a web portal used to retrieve data from PLUS by PBGC authorized users. The PBGC authorized users are: PBGC pension plan administrators, Field Benefit Administrators (FBA), or PBGC Customer Call Center (CCC) personnel who update PLUS data through the Benefits Administration Applications (BAA) system. When the need arises to view the data in PLUS directly, these users can view the data in PLUS using the PW application and depending on their access rights, they may update participant data, place stop payments, view check images, and view various tax forms and reports.

As for the MPP application, this is a shared retiree web service that operates in conjunction with PBGC's My Pension Benefit Account (MyPBA) system (as a web portal for pension plan participants allowing them to view their pension payment information from the Internet which is a part of the PBGC's Benefit Application Administration System). MPP offers retirees the ability to view their payment history and details, check images, and tax forms online. MPP processes participants' data from the (PLUS) system, hence it is considered a minor application of PLUS.

V. PIA RESULTS

The PIA evaluation revealed that the PLUS system contains PII due to the collection, storage and processing of pension payments for participants and their beneficiaries in order to meet the mission of PBGC in paying appropriate benefits. Only those who are authorized to use the application have access to it and the information contained therein.

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 the Continuous Monitoring program for PLUS. 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.