

**My Pension Benefit Access  
(MyPBA)  
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 My Pension Benefit Access (MyPBA). A PIA is used to evaluate privacy vulnerabilities and risks and their implications on MyPBA. 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 MyPBA. 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 MyPBA system. MyPBA is PBGC owned and contractor operated with oversight by Federal personnel. MyPBA is comprised of two modules, customer and administrative, and is supported by two PBGC databases. The MyPBA 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. MyPBA 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 MyPBA 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 MyPBA were used to fill in the final PIA and analysis.

#### **IV. SYSTEM CHARACTERIZATION**

The purpose of the MyPBA, a web-based application, is to: (1) enable PBGC to communicate plan-specific and benefit-specific information to individual participants in a secure and timely fashion; (2) allow participants to make benefit inquiries with PBGC through secure web-based channels; (3) allow participants the ability to conduct benefit-related transactions with PBGC, which have historically been conducted through paper processes, through web-based channels; (4) provide an effective and efficient mechanism for transferring data from participants to PBGC's back office systems; and (5) potentially reduce the burden upon PBGC's Customer Call Center (CCC) or document management center staff and resources.

Additionally, the MyPBA application connects to the MyPenPay application, an externally hosted system that provides a shared web service application that uses the Pension Lump Sum (PLUS) Benefit Payment System as the backend to provide users' access to pension payment information.

#### **V. PIA RESULTS**

The PIA evaluation revealed that MyPBA contains PII due to the collection, storage and processing of pension participants and their beneficiaries information in order to meet the mission of PBGC in paying appropriate benefits. Only those who support and/or use the components that make up MyPBA 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 MyPBA. 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.