

PRIVACY STRATEGIC PLAN

Fiscal Years 2022-2023

Vision

The PBGC Privacy Office, located within the Office of the General Counsel, functions as a government leader in protecting privacy and promoting transparency for customers, employees, and all stakeholders.

Mission

The mission of the PBGC Privacy Office is to protect individuals by embedding privacy protections and promoting transparency in all PBGC Offices and Departments, and in their activities.

Values

1. Accountability.
2. Transparency.
3. Efficiency.

Overview and Strategic Context

PBGC is dedicated to protecting the pension benefits of millions of Americans. PBGC's three strategic goals are: (1) preserving plans and protecting pensioners; (2) paying pension benefits on time and accurately; and (3) maintaining high standards of stewardship and accountability. Privacy principles, policies, and practices are critical to PBGC's ability to achieve each of these strategic goals. Privacy and the PBGC mission goals should not be traded or balanced; rather, the two must be blended. The relationship can, and should be, mutually beneficial.

In addition, through training, outreach, and program development, the Privacy Office advances the two more fundamental ideas that personal information should be handled with care, and that to maximize effectiveness and efficiency, privacy must be "built-in" to projects, programs, and perhaps most importantly, into every PBGC employee's and contractor's mindset.

To make these plans a reality, the Privacy Office herein establishes three goals, each supported by specific and measurable objectives.

Goals and Objectives

Goal 1: Achieve and maintain compliance with privacy laws and guidance.

Compliance with privacy laws and guidance is critical to the Privacy Office's success; all other measures of success must be secondary to basic compliance. The Privacy Office works tirelessly to achieve and maintain compliance, but compliance requires ongoing attention to constantly changing standards. The Privacy Office's first priority for Fiscal Years 2022-2023 is to increase agency-wide compliance with privacy laws and guidance.

- Objective 1.1 – Increase transparency and accountability by improving PBGC's foundational privacy documents: Systems of Records Notices (SORN), Privacy Threshold Analyses (PTA), and Privacy Impact Assessments (PIA).
- Objective 1.2 – Develop and maintain a robust record-keeping system for all privacy matters to ensure availability for internal use, audit responses, and public requests for information.
- Objective 1.3 – Ensure that complaints and incidents are recorded systematically, processed efficiently, and mitigated appropriately in accordance with federal and PBGC policies and procedures.
- Objective 1.4 – Review, assess, and provide guidance about PBGC programs, systems, projects, information sharing arrangements, and other initiatives to reduce privacy risks, including reducing PBGC's holdings of personally identifiable information (PII) when possible.
- Objective 1.5 – Evaluate PBGC programs and activities for compliance with privacy laws and guidance, including NIST SP 800-53 and OMB Circulars.

Goal 2: Foster a culture of “built-in” privacy agency wide.

When it comes to privacy, PBGC is only as strong as its weakest link. Often, the weakest link is a person, not a computer program or system. The Privacy Office ensures that PBGC's privacy policies and procedures are understood by every PBGC employee and contractor through education and training but appreciates that there is a difference between employees understanding concepts when they are taught in a structured setting, and considering and applying those concepts to everyday situations. To bridge this gap, the Privacy Office will continue to enhance its training and outreach efforts agency-wide, while paying special attention to agency leadership and the Privacy Office's strategic partners within the Office of Information Technology and other departments.

- Objective 2.1 – Provide outreach, education, and training to promote privacy and transparency as a way of thinking, rather than an afterthought.
- Objective 2.2 – Develop and deliver relevant and effective privacy training courses and materials to PBGC personnel and other stakeholders through onboarding training, refresher training, PBGC's Intranet and public-facing website, and targeted educational and outreach opportunities tailored to PBGC's needs.
- Objective 2.3 – Enhance engagement with leaders in every PBGC Department and Office so that the importance of privacy at every step of the information lifecycle is emphasized from “the top down” agency-wide.
- Objective 2.4 – Cultivate and sustain a collaborative partnership with PBGC's Office of Information Technology so that privacy can be optimally integrated throughout PBGC's activities.
- Objective 2.5 – When addressing an issue or developing a plan or procedure, develop a solution that addresses the root cause and will serve the agency long-term, even if there is a short-term alternative that would be technically compliant.

Goal 3: Develop and maintain top privacy professionals in the federal government.

In Fiscal Year 2017, the PBGC established a formal Privacy Office. The Privacy Office federal employees and contractors are hard-working, thorough, and passionate about privacy. Providing support, opportunities for professional growth and development, and a workplace environment in which they are valued is crucial to recruiting and retaining a high performing workforce. Ensuring that the Privacy Office is fully staffed is likewise of critical importance. With privacy issues in the news almost every day, and new laws, regulations, and guidance being published almost as frequently, the need for more privacy resources is constantly growing.

Since its establishment in 2017, the Privacy Office has grown.

The Privacy Office is led by the Senior Agency Official for Privacy (SAOP) (who as PBGC's Deputy General Counsel for General Law and Operations has mostly non-privacy duties) and the Chief Privacy Officer. The remainder of the Privacy Office consists of a Deputy Chief Privacy Officer, who is an attorney, three Privacy Attorneys (who have no non-privacy duties), and an IT Specialist (who has no non-privacy duties).

As the demands on the Privacy Office increase, the Privacy Office will need to increase its resources to maintain a privacy program that is compliant with federal laws and guidance. Failure to address this risk could ultimately cost PBGC a significant amount of money and reputational damage.

- Objective 3.1 – Acquire additional human capital to maintain a fully operational Privacy Office to comply with, and exceed, the federal requirements.
- Objective 3.2 – Support employee development and emphasize the role of training and professional development in performance planning, including training required to obtain and maintain IAPP certifications.
- Objective 3.3 – Recognize individual and group contributions to advancing the Privacy Office's mission, informally and/or within PBGC's existing awards program.

In 2021, the Privacy Office conducted an independent assessment of the Privacy Program. A key assessment recommendation was to prioritize privacy-related performance metrics and technology-enabled strategies in the strategic plan. As a result, the SAOP/Chief Privacy Officer are working to enhance privacy integration across corporate operations by embedding privacy-related performance measures and encouraging the adoption of privacy-enabling technologies in PBGC's strategic plans.

Some privacy-related performance measures that the Privacy Office is contemplating are:

- 1) Establishing a reporting structure for System of Records Notice (SORN) phase timeliness, and incorporate tracking of delays into enterprise risk management processes
- 2) Establishing timeliness measures for phases of the SORN development processes – for various stakeholder reviews