

Comprizon Suite

Privacy Impact Assessment (PIA) Executive Summary

I. BACKGROUND

Federal agencies are required by law 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 Comprizon Suite. A PIA is used to evaluate privacy vulnerabilities and risks and their implications on Comprizon Suite.

The PIA provides a number of benefits to the Procurement Department (PD); 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 Comprizon Suite. 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 Comprizon Suite. Comprizon Suite is PBGC owned and Contractor operated with oversight by Federal personnel. Comprizon Suite is a contract writing system utilized for the procurement of goods and services. If a vendor is self-employed and does not have a Tax Identification Number (TINs), their social security number is utilized as their TINs. This information is retrieved and loaded into Comprizon from the Department of Defense's Central Contractor Registration (CCR) database. PII data is not shared internally or externally with any other PBGC system.

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 Comprizon Suite 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 Comprizon Suite were used to fill in the final PIA and analysis.

IV. SYSTEM CHARACTERIZATION

Comprizon Suite is physically located at 1200 K St. NW Washington, DC 20005. Comprizon Suite is supported through the Data Center in PBGC Headquarters. The facility is not open to the public. Comprizon Suite is comprised of an application server and Oracle database server. Comprizon Suite is a contract writing system utilized for the procurement of goods and services.

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V. PIA RESULTS

The PIA evaluation revealed that Comprizon Suite contains PII data due to information pulled from the Central Contractor Registration (CCR) database. Only those who support the components that make up Comprizon Suite are authorized to access these components and any data residing thereon, such as network and database administrators.

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 Comprizon Suite. These controls are in accordance with those recommended by the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53 revision 3 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.