




Office of Inspector General
Pension Benefit Guaranty Corporation

April 12, 2018

TO: Cathy Kronopolus
Chief of Benefits Administration

FROM: Brooke Holmes 
Assistant Inspector General for Audit

SUBJECT: Evaluation of Data Protection (Project No. PA-18-125)

In February 2018, the OIG initiated an evaluation of the Data Privacy Identification Process. During the survey, other OIG work identified issues with data protection at contractor managed facilities. Based on these concerns, we are redirecting this evaluation to determine if PBGC's controls relating to data protection are suitably designed and operating effectively at contractor managed facilities.

We would appreciate if appropriate staff are notified and if your office would provide the OIG a point of contact. If you have any questions or concerns, please contact me at ext. 3790 or Nick Novak, Deputy Inspector General, at ext. 6535.

cc: Marty Boehm, Director CCRD
Nicole Puri, Risk Management Officer
Judith Starr, General Counsel
Robert Scherer, Chief Information Officer



Office of Inspector General
Pension Benefit Guaranty Corporation

February 15, 2018

TO: Judith Starr
General Counsel

Robert Scherer
Chief Information Officer

FROM: Nick Novak
Deputy Inspector General

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NOVAK**

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Date: 2018.02.15 09:03:48
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SUBJECT: Evaluation of Data Privacy Identification Process (Project No. PA-18-125)

The Office of the Inspector General is initiating an evaluation of the Data Privacy Identification Process. The enclosure provides details of the evaluation and highlights some information we will request.

We would appreciate you notifying the appropriate staff of this work. The next step will be to set up an entrance conference, which we will coordinate with the Corporate Controls and Review Department. At that meeting, we will request a point of contact for the evaluation. Thank you in advance for your time and consideration.

cc: Marty Boehm, Director CCRD
Nicole Puri, Risk Management Officer
Margaret Drake, Chief Privacy Officer
Philip Hertz, Deputy General Counsel GLO

Information on New Evaluation

Evaluation Subject: Data Privacy Identification Process

Evaluation Code: PA-18-125

Source for the Work: Self-Initiated

Issue(s) under review/Objective(s)/Key question(s):

Entrance Questions

1. What department(s) is responsible for ensuring the privacy threshold analysis (PTA) are conducted for each system?
2. When the PTA is performed, what department verifies the information given by the information system owners?
3. What is the process for reviewing and ensuring the accuracy and completeness of the privacy impact assessments (PIA) and who performs the review?
4. What benefits have been received or identified in performing PIAs?

Document Request List

1. A list of all PTAs prepared in 2017
2. A list of all PIAs prepared in 2017
3. The most recent PIA Guide
4. The list of all Information Security System Owners and their respective systems

Systems Access Request

1. CSAM

Estimated start date for work: Immediately

Time frame for holding the entrance conference: Early March 2018

OIG Contacts:

Nick Novak, Deputy Inspector General, ext. 6535 and novak.nick@pbgc.gov

Brooke Holmes, Assistant Inspector General of Audit, ext. 3790 and holmes.brooke@pbgc.gov

Sharron Greene, Audit Manager, ext. 3419 and [greene.sharron@pbgc.gov](mailto:greenesharron@pbgc.gov)