




Office of Inspector General
Pension Benefit Guaranty Corporation

March 15, 2019

TO: Judith Starr
General Counsel

David Foley
Chief of Benefits Administration

FROM: Brooke Holmes 
Assistant Inspector General for Audits, Evaluations, and Reviews

SUBJECT: PBGC's Efforts to Reduce the Collection, Maintenance, and Use of Social Security Numbers (Project RV-19-136)

As required by OMB Circular No. A-130, agencies must take steps to eliminate unnecessary collection, maintenance, and use of Social Security Numbers (SSN). Accordingly, we are initiating an engagement to examine the extent to which PBGC has developed and executed plans to comply with this requirement.

We would appreciate your notifying the appropriate staff of this work. The next step will be to set up an entrance conference in March 2019, which we will coordinate with the Corporate Controls and Review Department. Please see the enclosure of this memorandum for issues under review that we plan to discuss at the entrance conference.

Thank you in advance for your time and consideration.

cc: Patricia Kelley, Chief Financial Officer
Karen Morris, Chief of Negotiations and Restructuring
Robert Scherer, Chief Information Officer
Frank Pace, Acting Director CCRD
Latrece Wade, Acting Risk Management Officer
Margaret Drake, Chief Privacy Officer

Information on New Project

Subject: PBGC's Efforts to Reduce the Collection, Maintenance, and Use of Social Security Numbers (SSN)

Source for the Work: Self-Initiated

Scope of Work: Limiting scope to SSN use related to pension plans only. We are not assessing PBGC's reduction of collection, maintenance, and use of SSNs related to federal employees or contractors.

Issue(s) under Review/Objective(s)/Key question(s) for Discussion at Entrance Conference:

1. For single-employer trustee and non-trustee plans, please provide an overview of when and where SSNs would be obtained, stored, and used. In addition, are there any written communications (soft or hardcopy) with plan participants or plan administrators that would include SSN information?
2. For multiemployer plans, insolvent, terminated or ongoing please provide an overview of when and where SSNs would be obtained, stored, and used within PBGC's systems. In addition, are there any written communications (soft or hardcopy) with plan participants or plan administrators that would include SSN information?
3. Please describe any other instances, where SSNs would be obtained, maintained, or used by PBGC.
4. To what extent has PBGC developed and executed plans to eliminate unnecessary collection, maintenance, and use of SSNs, particularly for pension plan participants (workers and retirees) and beneficiaries?

Documentation requested to be provided at the entrance conference

1. Corporation-wide plans, policies or studies pertaining to eliminating the unnecessary collection, maintenance, or use of SSNs; or including SSNs on mailed documents.
2. Plans, policies or studies specific to all Offices regarding eliminating the unnecessary collection, maintenance, or use of SSNs; or including SSNs on mailed documents.

Points of Contact Requested:

1. For each office that collects, maintains, or uses plan participants' or beneficiaries' SSNs.

Estimated start date for work: Immediately

Enclosure

PBGC's Efforts to Reduce the Collection, Maintenance, and Use of Social Security Numbers

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Time frame for holding the entrance conference: March 2019

OIG Contacts:

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