



Office of Inspector General  
Pension Benefit Guaranty Corporation

March 8, 2019

**RISK ADVISORY**

TO: Tom Reeder  
Director

Robert Scherer  
Chief Information Officer

Judith Starr  
General Counsel

David Foley  
Chief of Benefits Administration

Alice Maroni  
Chief Management Officer

FROM: Robert A. Westbrooks  
Inspector General *Robert A. Westbrooks*

SUBJECT: Additional Safeguards are Needed to Protect Sensitive Participant Data from Insider Threats (SR 2019-001R/RA-19-001) (PUBLIC VERSION)

We are issuing this Risk Advisory to urge management to consider additional safeguards to protect sensitive participant data from insider threats based on recent OIG findings and long-standing concerns.

As you know, following a compromise of personally identifiable information on or about January 2018, our office conducted a criminal investigation to identify the person(s) responsible. In addition to our investigative response, we initiated an evaluation of *PBGC's Data Protection at Contractor-Operated Facilities* to ensure sensitive participant data is appropriately safeguarded (EVAL-2019-08/PA 18-125). We completed our evaluation and reported our findings and recommendations on January 31, 2019. During that project, we issued a separate Risk Advisory on September 11, 2018, on *Data Protection Considerations for the Field Office Support Services Procurement* (SR-2018-15). Please be advised that the criminal investigation is now concluding as well. We will notify management and report the outcome of the criminal investigation when the case is resolved in federal court.

We are providing management with a separate non-public version of this Risk Advisory to share the details regarding these additional safeguards. The suggestions contained in the restricted information Risk Advisory do not constitute formal audit recommendations; therefore, no

written management response is required. We will post this public version Risk Advisory on our website in accordance with our responsibilities under the Inspector General Act to keep the Board, Congress, and the public fully and currently informed about problems and deficiencies related to the Corporation's programs and operations.

cc: Frank Pace, Acting Director, CCRD  
Latrece Wade, Acting RMO  
Tim Hurr, CISO  
Margaret Drake, Chief Privacy Officer  
Phil Hertz, Senior Agency Official for Privacy