

**STRATEGIC PLAN
for the Implementation of Executive Order 14019, Promoting Access to Voting**

FROM: Pension Benefit Guaranty Corporation
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TO: Susan Rice, Assistant to the President for Domestic Policy

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I. Flagship action:

A. Overview

The Pension Benefit Guaranty Corporation's (PBGC) Promoting Access to Voting Strategic Plan (Plan) outlines the implementation of the President's Executive Order (EO) 14019 on promoting access to voting. The Plan is designed to leverage PBGC's existing public website to expand access to resources for voter registration and election information for members of the general public who directly engage with PBGC activities or services. Accordingly, PBGC will establish a prominent link on PBGC's public website to the Vote.gov website. This Plan is based on PBGC's strong customer service culture and longstanding practice of providing tools and services to meet the needs of workers, retirees and beneficiaries in pension plans, as well as other visitors to PBGC's website.

B. Background

The Constitution and laws of the United States prohibit discrimination and protect the right to vote. The Voting Rights Act of 1965, the National Voter Registration Act of 1993 and other federal statutes implement those protections and assign key roles to the federal government. On March 10, 2021, the President issued EO 14019, "Promoting Access to Voting." This EO directed that within 200 days agencies develop and submit to the Assistant to the President for Domestic Policy a strategic plan outlining the ways the agency can promote voter registration and voter participation. As directed by EO 14019, PBGC has considered ways, appropriate and consistent with applicable law, to promote voter registration and voter participation. PBGC's analysis included considerations of ways to provide relevant information in the course of activities or services that directly engage with the public; ways to provide access to voter registration services and vote-by-mail ballot applications in the course of activities or services that directly engage with the public; and ways to facilitate seamless transition from agency websites to online voter registration systems or appropriate federal websites. PBGC's mission is

to protect the retirement security of over 34 million Americans in single-employer and multiemployer pension plans. Its activities and services directly engage with the segment of the general public concerned about retirement security involving single-employer and multiemployer pension plans. This Plan was developed in accordance with EO 14019.

C. Vision and mission statement

PBGC supports the right to vote for all Americans who are legally entitled to participate in elections. In this regard, PBGC plans to tailor its efforts in light of PBGC's unique mission and direct engagement with members of the public. Therefore, PBGC will establish a prominent link on PBGC's public website to the Vote.gov website.

Mission statement: PBGC will promote voter registration and voter participation among members of the public who directly engage with PBGC activities or services in a way that is consistent with our primary mission of protecting the retirement security of over 34 million Americans in single-employer or multiemployer pension plans.

Vision statement: PBGC will leverage information technology and existing federal resources to the maximum degree possible in order to most efficiently reach interested members of the public who directly engage with PBGC activities or services without detracting from PBGC's primary mission.

II. Providing information online:

A. Roles and responsibilities

The Chief Policy Officer, Office of Policy and External Affairs (OPEA) is the designated official responsible for promoting voter registration and voter participation among members of the public who directly engage with PBGC activities or services pertaining to single-employer or multiemployer pension plans. The Chief Policy Officer, OPEA carries out this responsibility in collaboration with the General Counsel, who provides legal advice and counsel for the Corporation on all legal issues, and the Chief Information Officer, who is responsible for the Corporation's information technology (IT) program and provides IT and electronic communications services and support to PBGC.

B. Goal: voter registration and voter participation

Goal: Promote voter registration and voter participation among members of the public who directly engage with PBGC activities or services pertaining to single-employer or multiemployer pension plans.

Priority: Establish a prominent link on PBGC’s public website (both the English language and Spanish language versions) to the Vote.gov website.

Actions:

1. Identify appropriate space in the PBGC public website (both the English language and the Spanish language versions) to place the link.
2. Create an appropriate message to accompany the link. This message should be staffed through Office of General Counsel (OGC) and OPEA.
3. Design the new space with the link and message in a way that is both prominent (i.e., noticeable) and in keeping with the overall design of the webpage. The webpage design should be staffed through OGC, OPEA and the Chief of Staff. Both the webpage design and message require approval from the Office of the Director prior to implementation.
4. Enable the link in a limited testcase environment.
5. Test the link and correct any issues identified.
6. Activate the redesigned webpage for use by the general public.

Practices:

1. Review the space identified upon the PBGC public website (both the English language and Spanish language versions) to place the link periodically to ensure it remains effective.
2. Consider periodically whether the message accompanying the link should be rewritten.
3. Consider periodically whether the space with the link should be redesigned.
4. Retest the link periodically (in accordance with best operating practices or SOP) to ensure that the link remains active and functional.

C. Definition of success and metrics

Definition of success: Establish a prominent link on PBGC’s public website to the Vote.gov website that is operational and effective for populations served by PBGC. The links to Vote.gov website on PBGC public website (both the English language and Spanish language versions) are operational and are used by members of the general public who directly engage with PBGC activities or services.

Metrics:

1. Number of Vote.gov link uses on the PBGC English language website to place the link.
2. Number of Vote.gov link uses on the PBGC Spanish language website.
3. Number of times PBGC Limited English Proficiency (LEP) program resources are used to refer persons to the Vote.gov website via a PBGC public website.

D. Timeline

PBGC anticipates taking all actions identified above in the “Actions” section by no later than December 31, 2021.

E. Budgetary impact

The budgetary impact of implementing PBGC’s Plan is negligible. The strategic plan uses personnel and technology that already exist at PBGC to leverage the resources and subject matter expertise at Vote.gov.

F. Statutory and regulatory compliance

Congress created PBGC by the Employee Retirement Income Security Act of 1974 to encourage the continuation and maintenance of private sector defined benefit pension plans, provide timely and uninterrupted payment of pension benefits, and keep pension insurance premiums at a minimum. 29 U.S. Code § 1302(b)(8), gives PBGC the power to “do any and all other acts and things as may be necessary or incidental to the conduct of its business and the exercise of all other rights and powers granted to the corporation” under the enabling legislation. PBGC has not reached a definitive legal opinion regarding implementation of its Plan promoting access to voting. An initial assessment indicates that, adding a link to Vote.gov to PBGC’s existing public website to expand access to resources for voter registration and election information for members of the general public who directly engage with PBGC activities or services is incidental to the conduct of its business and is in keeping with PBGC’s strong customer service culture and longstanding practice of providing tools and services to meet the needs of workers, retirees and beneficiaries in pension plans, as well as other visitors to PBGC’s website.

G. Languages

PBGC is committed to providing individuals with access to our programs and services, regardless of their ability to communicate in English. We do not require individuals who need language assistance to provide their own interpreters; rather, we provide telephone interpreter

services that allows on-call interpretation. There are interpreters available in 250 different languages free of charge to any individual requesting or otherwise requiring language assistance.

H. Advancing equity for underserved and disadvantaged communities

PBGC supports the right to vote for all Americans who are legally entitled to participate in elections. There are several discrete populations who are likely to directly engage with PBGC activities or services pertaining to single-employer or multiemployer pension plans. These include:

- Workers, retirees, and beneficiaries who are pension plan participants;
- Premium payers (PBGC-insured pension plans);
- Pension practitioners (attorneys, accountants, actuaries).

Members of underserved and disadvantaged communities may be found principally in the first of these three groups. PBGC's Plan is designed to leverage PBGC's existing public website to expand access to resources for voter registration and election information for all who access PBGC's public website. This Plan is based on PBGC's strong customer service culture and longstanding practice of providing tools and services to meet the needs of workers, retirees and beneficiaries in pension plans, as well as other visitors to PBGC's website.