

**Pension Benefit Guaranty Corporation (PBGC)  
Privacy Impact Assessment (PIA)**



**Office of Benefits Administration (OBA)**

**Applications Suite (BAS)**

**April 1, 2024**

# 1 Privacy Point of Contact

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*TIP!*  
This point of contact should be the person you want the Privacy Office to work with in completing this PIA. For some systems it might be the Information Owner (IO) or Information System Owner (ISO). Many business units identify this as the Information System Security Officer (ISSO). DO what makes sense for you!

# 2 Privacy Impact Assessment

A Privacy Impact Assessment (PIA) is an analysis of how information is/will be handled:

- i. To ensure handling conforms to applicable legal, regulatory, and policy requirements regarding privacy,
- ii. To determine risks and effects of collecting, maintaining, and disseminating information in an identifiable form in an electronic information system, and
- iii. To examine and evaluate protections and alternative processes for handling information to mitigate potential privacy risks.

Privacy concerns are highest for systems that contain Personally Identifiable Information (PII). PII is defined as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. Because there are many types of information that can be used to

distinguish or trace an individual's identity, the term PII is necessarily broad.

*TIP!*  
Information that either alone or when considered with other information that uniquely identifies a person is Personally Identifiable Information (PII). Combining pieces of information whether private or publicly available has powerful implications for uniquely identifying an individual.

For example, consider a person named Mary Jones. There are over 200 million results in an internet search for this name. But if we combine information such as a date of birth, the last four digits of a (or worse, an entire) Social Security Number, or a spouse's name, the number of persons to whom we could be referring begins to narrow quite rapidly. These types of information are considered identifiers. Identifiers that uniquely identify a person are the focus of privacy protection.

## 2.1 The Components of the System

Name of component	Describe the component (1 or 2 sentences)	Does this component contain PII	In what system of records (SORN) is this information stored	What is the Legal Authority for collection of this information	Does this system share PII internally (please detail in question 9)
Spectrum	Spectrum is a web-based application that provides users with the ability to create, manage, edit, and review customer's information and their benefits data.	Yes.	PBG-6, Plan Participant and Beneficiary Data; PBGC-9, Unclaimed Retirement Funds	29 U.S.C. §§ 1055, 1056(d)(3), 1203, 1302, 1321, 1322, 1322a, 1341, 1342 & 1350; 44 U.S.C. § 3101; 5 U.S.C. 301.	Yes.
Case Management System (CMS)	CMS is a business application for the Office of Benefits Administration (OBA) and other departments that supports the workflow and milestone processing for the trustee case processing.	No.		.	No.
Customer Correspondence System (CCS)	CCS is a set of services that provides a dynamic, streamlined, and standardized	No			No

	method of letter generation functionalities to PBGC's users and enterprise applications.				
Image Processing System (IPS)	IPS is an online repository for document image storage and catalog system.	Yes.	PBGC-6, Plan Participant and Beneficiary Data, PBGC-9, Unclaimed Retirement Funds PBGC-10, Administrative Appeals File	29 U.S.C. §§ 1055, 1056(d)(3), 1203, 1302, 1321, 1322, 1322a, 1341, 1342 & 1350; 26 U.S.C. § 6103; 5 U.S.C. § 301; 44 U.S.C. § 301 & 3101; 29 U.S.C. ch. 18; 29 CFR 4003.1; 29 CFR 4003.	Yes.
Payment Adjustment Calculation System (PACS/Batch PACS)	This calculation tool evaluates whether PBGC must refund money to, or recoup money from, participants, beneficiaries, and alternate payees.	Yes.	PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. §§ 1055, 1056(d)(3), 1302, 1321, 1341, 1342 & 1350;; 26 U.S.C. § 6103; 44 U.S.C. § 3101; 5 U.S.C. § 301.	Yes.
Integrated Present Value Future Benefits (IPVFB)	IPVFB determines the PBGC's Present Value of Future Benefits (PVFB) liability for financial reporting purposes.	Yes.	PBGC-6, Plan Participant and Beneficiary Data, PBGC-9, Unclaimed Retirement Funds	29 U.S.C. §§ 1055, 1056(d)(3), 1302, 1321, 1322, 1322a, 1341, 1342 & 1350; 26 U.S.C. § 6103; 29 U.S.C. § 1203; 44 U.S.C. §	Yes.

<p>mass Extract Transform Load (mETL)</p>	<p>mETL is a database creation application that allows a user the ability to record, analyze, track, and manage available data for each participant and links the data collected to its exact source.</p>	<p>Yes.</p>	<p>PBGC-6, Plan Participant and Beneficiary Data; PBGC-9, Unclaimed Retirement Funds</p>	<p>29 U.S.C. §§ 1055 &amp; 1056(d)(3), 1302, 1321, 1322, 1322a, 1341, 1342 &amp; 1350; 26 U.S.C. § 6103; 29 U.S.C. § 1203; 44 U.S.C. § 3101; 5 U.S.C. § 301.</p>	<p>Yes.</p>
<p>Benefit Calculation and Valuation (BCV) Web Portal</p>	<p>The BCV web portal is a web application to perform authorized functions, which include performing valuation and calculation programming; producing benefit calculations and estimates; performing data entry, validation, reconciliation, and verification; performing system administration; and producing standard reports.</p>	<p>Yes.</p>	<p>PBGC-6, Plan Participant and Beneficiary Data, PBGC-9, Unclaimed Retirement Funds, PBGC-10, Administrative Appeals File</p>	<p>29 U.S.C. §§ 1055 &amp; 1056(d)(3), 1302, 1321, 1322, 1322a, 1341, 1342 &amp; 1350; 26 U.S.C. § 6103; 29 U.S.C. § 1203; 44 U.S.C. § 3101; 5 U.S.C. § 301; 29 U.S.C. ch 18; 29 CFR 4003.1; 29 CFR 4003.</p>	<p>Yes.</p>

Oracle Primavera (P6)	P6 is an enterprise project management application used to manage, schedule, and report OBA's case activities and resource capabilities/ assignments.	No.			No.
<b>Client application components</b>					
Archive Utility/Archive Access	This utility serves as the repository for valuation and benefit recalculation files and databases.	Yes.	PBGC-6, Plan Participant and Beneficiary Data, PBGC-9, Unclaimed Retirement Funds, PBGC-10, Administrative Appeals File	29 U.S.C. §§ 1055 & 1056(d)(3), 1302, 1321, 1322, 1322a, 1341, 1342 & 1350; 26 U.S.C. § 6103; 29 U.S.C. § 1203; 44 U.S.C. § 3101; 5 U.S.C. § 301; 29 U.S.C. ch 18; 29 CFR 4003.1; 29 CFR 4003.	Yes.
Leo	Leo provides a framework for building participant databases.	Yes.	PBGC-6, Plan Participant and Beneficiary Data; PBGC-9, Unclaimed Retirement Funds	29 U.S.C. §§ 1055, 1056(d)(3), 1302, 1321, 1322, 1322a, 1341, 1342, & 1350; 29 U.S.C. § 3101; 44 U.S.C. § 3101; 5 U.S.C. § 301.	Yes.
<b>Tool components</b>					

CLEAR	CLEAR is a web-based service from Thomson Reuters that helps PBGC locate participants.	Yes.	PBGC-9, Unclaimed Retirement Funds	29 U.S.C. §§ 1055, 1056(d)(3) 1302, 1321, 1322, 1322a, 1341, 1342, & 1350; 29 U.S.C. § 1203; 44 U.S.C. § 3101; 5 U.S.C. § 301.	No.
FileNet Bulk Import Tool <sup>1</sup>	This tool is used to pull IPS documents based on the IPS Document IDs.	Yes.	PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. §§ 1055, 1056(d)(3), 1302, 1321, 1341, 1342, and 1350; 44 U.S.C. § 3101; 5 U.S.C. § 301.	Yes.
Plan Download Tool (PDT)	PDT pulls data for given cases, and outputs the information to mainly be used as a starting point for the creation of participant databases.	Yes.	PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. §§ 1055, 1056(d)(3), 1302, 1321, 1341, 1342, and 1350; 26 U.S.C. § 6103; 44 U.S.C. § 3101; 5 U.S.C. § 301.	Yes.
Aggregate Maximum (AggMax)	AggMax identifies customers subjected to the aggregate maximum limit.	Yes.	PBGC-6, Plan Participant and Beneficiary Data; PBGC-9, Unclaimed Retirement Funds	29 U.S.C. §§ 1055, 1056(d)(3), 1302, 1321, 1322, 1322a, 1341, 1342, & 1350; 26 U.S.C. § 6103; 29 U.S.C. § 1203; 44	Yes.

<sup>1</sup> Formerly referred to as the IPS Import Tool.

Conversion Tool for Optional Form of Annuity (OFA)	This tool helps determine updates needed for a case.	Yes.	PBGC-6, Plan Participant and Beneficiary Data	U.S.C. §3101; 5 U.S.C. §301. 29 U.S.C. 1055, 1056(d)(3), 1302, 1321, 1341, 1342, and 1350; 26 U.S.C. 6103; 44 U.S.C. 3101; 5 U.S.C. 301.	Yes.
ATPBGC Add-Ins	ATPBGC Add-Ins includes custom functions that can be used in Excel.	No.			No.
New Present Value Factor (NPVF) Calculator	This tool allows users to produce present value factors, early and late retirement factors, and form conversion factors.	No.			No.
Ares	Ares is used to manage collection actions for payees who received overpayments from PBGC that cannot otherwise be recovered through ACH Reclamation or Returning Checks To Trust	Yes.	PBGC-13, Debt Collection	29 U.S.C. § 1302; 31 U.S.C. § 3711(a); 44 U.S.C. § 3101; 5 U.S.C. § 301; Executive Order 13019.	Yes.



<p>Plan Customer Data Report</p>	<p>The Plan Customer Data Report is used to identify and detail all plan participant statuses so that it is easy to identify if there are participants that have not been located or have not received benefit determination letters due to lack of data on the participant/participant employment history.</p>	<p>Yes.</p>	<p>PBGC 6, Plan Participant and Beneficiary Data</p>	<p>29 U.S.C. §§ 1055, 1056(d)(3), 1302, 1321, 1341, 1342, &amp; 1350; 26 U.S.C. § 6103; 44 U.S.C. § 3101; 5 U.S.C. § 301.</p> <p>No.</p>
<p>Cogniview's PDF2XL<sup>2</sup></p>	<p>Cogniview's PDF2XL is a COTS product to convert PDF documents.</p>	<p>No.</p>		<p>No.</p>
<p>Recovery Collection Tool (RCT)</p>	<p>RCT is a tool to assist in reconciling and recording payment/collection data in Ares.</p>	<p>Yes.</p>	<p>PBGC-13, Debt Collection</p>	<p>Yes.</p> <p>29 U.S.C. § 1302; 31 U.S.C. § 3711(a); 44 U.S.C. § 3101; 5 U.S.C. § 301; Executive Order 13019.</p>

<sup>2</sup> Cogniview is in the process of decommissioning and is expected to be officially decommissioned this year (FY2024).

## 2.2 The System as a Whole

1. Please describe the purpose of the system, when considered as a whole, please include if this is an existing system (either an annual recertification update or a major change)

The OBA Applications Suite (BAS) is an existing collection of systems that supports the OBA mission, which is to ensure pension participants are paid their full benefit permitted by law, and to provide quality service through accurate, timely, and uninterrupted benefit payments and administration.

2. What are the Confidentiality, Availability, and Integrity ratings for the system as a whole?

Confidentiality	Moderate
Integrity	Moderate
Availability	Moderate

3. List and discuss the sources from which the system collects PII (for instance, from an individual, another federal agency, etc.); the format in which PII is collected (for instance, via a form, face-to-face, phone, etc.); the notification given at time of collection from an individual regarding the Privacy Act and the ability to opt-out of collection (and the consequences of opting out). Include a copy of all forms and Privacy Act statements used to collect information.

PII is collected from individuals, federal agencies, and other third-party sources. The format for collecting PII includes submitted forms, via email, phone, and/or via a website or agency database. Any data collection forms, surveys, or via email or website include a Privacy Act Statement. The forms used to collect information are sent from CCS.

Individuals can opt out of this collection of PII, as participant response on a PBGC form is voluntary. However, failure to provide information to PBGC (e.g., SSN) may delay or prevent PBGC from calculating and paying the participant's pension benefits.

When participant and beneficiary information is provided by a third party (e.g., former plan administrator), the participant does not have the right to consent to a particular use of the information. After PBGC becomes the statutory trustee of a pension plan, a participant may contact the PBGC Customer Contact Center where QuEST is accessed, or the participant can access MyPBA (which both are no longer in the BAS security boundary) to update or modify the information that is used by PBGC.

4. Discuss any privacy controls that PBGC inherits from an external provider (cloud provider, third-party provider, another government agency, etc.) If an Interconnection Security Agreement (ISA), Memorandum of Understanding (MOU), or similar document is in place, please summarize the privacy applicable portions of that document.

BAS does not inherit privacy controls from any external providers.

5. For the user roles in the system:

Role Name	Number of users in that role	Approver	Access Level (Read, Write, etc.)	Recertification Date

Due to the large number of roles and users, the BAS annual account recertification report is available for internal review only.

6. Does the System leverage the Enterprise Access Controls?

- Yes  
 No

7. Discuss the Physical, Technical, and Administrative controls that are employed to secure the PII in the system.

BAS adheres to the National Institute of Standards and Technology Special Publication 800-53, and has adopted appropriate administrative, technical, and physical controls to secure PII in accordance with PBGC's security program to protect the confidentiality, integrity, and availability of the information, and to ensure that records are not disclosed to or accessed by unauthorized individuals. Physical controls include the use of secured facilities to protect the data center and work areas for PBGC personnel. PIV badges are required to access secure office spaces as well as to access the PBGC network. Technical controls include access controls for password protection and least privilege access to the data. A virtual private network (VPN), firewalls, intrusion detection systems, and encryption of data in transit provide layers of security around the PII data. Audit controls provide logging of network and system access to manage event monitoring. Administrative controls include periodic security audits, monitoring of user activity, mandatory background checks for any personnel who would have access to sensitive data, and annual security, privacy, and records management training. Backups are maintained off-site, and procedures are in place to ensure that only authorized personnel have access to PII.

8. For the PII in the system, discuss the actual/intended uses of the PII; the steps taken to limit the PII collected to the minimum needed; and the reasons the PII is necessary and relevant.

PII is used to manage pension plan data; value pension plans and associated liabilities for which PBGC is, or may be, obligated to pay; calculate and provide pension benefits; and report tax information to the Internal Revenue Service (IRS) and other tax authorities.

9. Discuss the data flows within the system (include sources of data for data flowing into the system, destinations for data flowing out of the system, and any routine uses applicable to the system). For any information that is shared internally, be sure to discuss whether these data interconnections are noted in CSAM. Be sure to include any MOU, ISA, or Interagency Agreements.

Currently, there are five external connections for the BAS system:

1. BAS to Health Care Tax Credit (HCTC)
2. BAS to PBGC Data Distribution System (PDDS)
3. BAS to Pension Lump Sum (PLUS) System
4. BAS to Trust Accounting System (TAS)
5. BAS to Fiscal Services FedDebt

These ISAs/connections are documented under the "Relationships" tab in CSAM, which is utilized as the PBGC system of record. In addition, BAS applications also connect to information systems that are inside the PBGC infrastructure, which are documented in CSAM as well.

10. Does the system leverage the commonly offered control for Accounting of Disclosures?

- Yes  
 No

11. If your system collects Social Security Numbers:

- a. Please provide a justification for the collection, use, maintenance, and disposal of PII in the form of SSN.

BAS uses SSN to report certain financial information to other Federal agencies who use SSNs as a primary identifier. BAS also uses SSN as a primary identifier prior to the assignment of a PBGC Customer ID, and in any necessary research where SSN is the only means used to verify identity.

- b. Under which authorized use, as described in the "Reduction of Use of Social Security Numbers (SSN) in PBGC" policy document?
- c. If the answer to b., above is "Compelling Business Need," please provide a plan to reduce the use of SSNs, highlighting activities that can be completed in the next 12 months.

b. (ARES) Interactions with financial institutions, (BCV, AWA, Spectrum, and IPS) Federal Taxpayer Identification, Government Data Matching, and Compelling Business Need.

c. Spectrum (AWA and SAT) - Cust IDs are used to the extent feasible and the last 4 of an SSN is restricted to read-only access and does not store or export copies of the SSN information.

Benefit Calculation and Valuation (BCV) Web Portal (Includes PACS, Archive, LEO and PDT) - It is highly unlikely that use/storage of SSN can be completely removed from the BCV system due to the financial aspect of the system and the need to identify and share data with other Government systems. The implementation of BCV\_REC\_ID (BCV system unique identifier), PBGC's Customer ID and Customer Plan Role ID are ways to identify a record and match/share data with other PBGC systems. These three IDs will be used to the extent possible to replace SSNs. In areas where the SSN can't be replaced it will be masked.

IPS - Currently there is no plan to reduce the usage as SSN will be used for its intended purposes only.

### 2.3 Privacy Office Review

<b>Name of Reviewer</b>	Shannon Kreshtool
<b>Date Reviewed</b>	May 15, 2024
<b>Expiration Date</b>	May 14, 2025
<b>Result</b>	<input checked="" type="checkbox"/> Approved without conditions <input type="checkbox"/> Approved with conditions (see below). <input type="checkbox"/> Denied

*(For Privacy Office Use Only)*

Discuss analysis of risks and compensating controls (or other mitigation steps.

<i>Enter description here.</i>
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Discuss any conditions on Approval

<i>Enter description here.</i>
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