



Pension Benefit
Guaranty Corporation

Information Technology Infrastructure Operations
Department (ITIOD)

Personnel Security Service (PSS)
Privacy Impact Assessment (PIA)

Last Updated: 11/05/2024

1 PRIVACY POINT OF CONTACT

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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.

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)
eDelivery	eDelivery is an electronic solution hosted by Defense Counterintelligence and Security Agency (DCSA). It provides PBGC's Information Technology Infrastructure Operations Department (ITIOD) with the ability to securely retrieve investigative files to process, adjudicate, and track the status of background investigation cases.	Yes	PBGC-12: Personnel Security Investigation Records	29 U.S.C. 1302 5 U.S.C. 3301 44 U.S.C. 3101 EO 10450 EO 10577 EO 12968 EO 13467 EO 13488 5 CFR 5.2 5 CFR 731, 732 and 736 5 CFR 1400 OMB Circular A-130, 61 FR 6428 FIPS 201 HSPD 12	Yes
USAccess	The USAccess Program offers a shared service to PBGC with all the components necessary to manage the full lifecycle of a Personal Identity Verification (PIV) credential. This service allows for a single system to sponsor, enroll, issue, and maintain a common identity credential for each participant, and includes built-in workflow processes at every stage of the credentialing process.	Yes	PBGC-12: Personnel Security Investigation Records	29 U.S.C. 1302 5 U.S.C. 3301 44 U.S.C. 3101 EO 10450 EO 10577 EO 12968 EO 13467 EO 13488 5 CFR 5.2 5 CFR 731, 732 and 736 5 CFR 1400 OMB Circular A-130, 61 FR 6428 FIPS 201 HSPD 12	Yes

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Personnel Security Investigation Solution (PSIS)	PSIS is a background investigation and security clearance request application. This application is a case management system that enables ITIOD to update and request relevant information about employees' and contractors' background investigations and security clearances. PSIS uses the separate eDelivery system to securely retrieve investigative files to process, adjudicate, and track the status of PBGC background investigation cases.	Yes	PBGC- 12 - Personnel Security Investigation Records	29 U.S.C. 1302 5 U.S.C. 3301 44 U.S.C. 3101 EO 10450 EO 10577 EO 12968 EO 13467 EO 13488 5 CFR 5.2 5 CFR 731, 732 and 736 5 CFR 1400 OMB Circular A-130, 61 FR 6428 FIPS 201 HSPD 12	Yes
ServiceNow (SNow) GetITAccess New Employee Setup Form	Personnel Security Specialist uses the to create the PSIS' Intake Portal case. The GetITAccess New Employee Setup Form allows the submitter to request account creation for a new employee or contractor.	Yes	PBGC- 12 - Personnel Security Investigation Records	29 U.S.C. 1302 5 U.S.C. 3301 44 U.S.C. 3101 EO 10450 EO 10577 EO 12968 EO 13467 EO 13488 5 CFR 5.2 5 CFR 731, 732, and 736 5 CFR 1400 OMB Circular A-130, 61 FR 6428 FIPS 201 HSPD 12	Yes

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).

PSS is a collection of solutions and processes supporting background investigations and security clearance case management. The system supports secure retrieval of investigative files to process, adjudicate, and track the status of background investigation cases and the resulting issuance of credentials. This subsystem is a FISMA child of the parent ITISGSS and is not FISMA reportable.

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 employees and contractors. The format for collecting PII includes forms submitted primarily via the PSIS' Intake Portal. Email communication will be used as a secondary option in the event there are problems with the Intake Portal. Emails from PBGC would contain attached .pdf forms that are encrypted when being sent to new employees or contractors. PBGC advises new employees or contractors that any returned forms should be encrypted. The Intake Portal contains the PBGC's Privacy Act statement. The OF-306 and Fair Credit Reporting Act forms used are not PBGC forms and the Privacy Act Statements are the responsibility of the federal agencies that own these forms.

All investigative case details, including PII, are retained in a secure IT system or safe with restricted access. Some information is pulled from other systems (General Services Administration (GSA) reports and Active Directory). Any DCSA mailed hard copy documents pertaining to PBGC applicant employee or contractor are scanned and uploaded into the PSIS application by PBGC Personnel Security unless the documents contain classified information, in which case, the hard copy documents are maintained in a PBGC safe as required by law.

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.

No privacy controls are inherited from any external providers. There is a valid ISA between PBGC and DCSA and a valid Inter Agency Agreement (IAA) between PBGC and GSA (IAA 20H0010). Both parties agree to work together to ensure the joint security of the connected systems and the data they store, process, and transmit, as specified in the ISA. Each party certifies that its respective system is designed, managed, and operated in compliance with all relevant federal laws, regulations, and policies. To comply with the provisions of the Privacy Act, Personally Identifiable Information (PII) captured will be secured in compliance with the Federal Information Security Modernization Act (FISMA) and not subject to unauthorized distribution.

5. For the user roles in the system:

Role Name	Number of Users in that Role (AD)	Approver	Access Level (Read, Write, etc.)	Recertification Date
PSIS – Adjudicator	7	Manager/COR and PSS Administrator Business Owner	Create, Read, Update, Delete, Search	6/4/2024
PSIS – Admin Read Only	2	Manager/COR and PSS Administrator Business Owner	Read, Search	6/4/2024
PSIS – Administrator	11	Manager/COR and PSS Administrator Business Owner	Create, Read, Update, Delete, Assign, Search	6/4/2024
PSIS – Data Entry	2	Manager/COR and PSS Administrator Business Owner	Read, Update, Search	6/4/2024
PSIS - Supervisor	2	Manager/COR and PSS Administrator Business Owner	Create, Read, Update, Delete, Assign, Search	6/4/2024
PSIS – Security Specialist	12	Manager/COR and PSS Administrator Business Owner	Create, Read, Write, Update, Delete, Search	6/4/2024
Intake Portal – Applicant User	N/A	Manager/COR and PSS Security Specialist	Read, Write, Update individual record (self)	10/31/2024
Intake Portal – Administrator	2	Manager/COR and PSS Business Owner	Create, Read, Update, Delete, Assign, Search	10/31/2024

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.

- **Physical Controls - Entrance to PBGC Headquarters (HQ) facilities employ armed guards and a PIV activated turnstile. Suites which include Data Centers require a PIV for physical access. Physical security controls employed to secure the PII in the system include:*

- Security guards
- Secured Facility
- Key Entry
- Identification Badges (PIV)
- Locked Offices
- Locked File Cabinets
- Locked Safe(s)

**Physical controls are provided by PBGC*

- **Technical Controls - All PBGC users are required to go through the PBGC GetITAccess service portal to request access to PSS components. The granting of privileges is based on least privilege and separation of duties. Technical controls employed to secure the PII in the system include:*

- Password protection
- Virtual Private Network (VPN)
- Firewalls
- Unique user identification names
- Encryption
- Intrusion Detection and Prevention Systems (IDPS)
- Personal Identity Verification (PIV) card access
- Public Key Infrastructure (PKI) Certificates
- Session Initiation Protocol (SIP)
- Data Loss Prevention (DLP)
- Access controls based on AD permissions

**Technical Controls are provided by PBGC*

- **Administrative Controls - All PBGC users are required to complete privacy training annually. Administrative controls employed to secure the PII in the system include:*

- Periodic Security Audits
- Regular Monitoring of User's Activities
- Annual Security, Privacy, and Records Management Refresher Training
- Backups Secured Offsite
- Encryption of Backups containing sensitive data
- Role-Based Training
- Least Privilege Access

- *Mandatory onboarding training for security, privacy, and Records management personnel*

**Administrative Controls are provided by PBGC*

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 collected is used to perform background investigations to support the suitability and eligibility determination process for federal employees and contractors. PBGC Personnel Security limits PII collection only to what is needed to accomplish the stated purpose for its collection. Also, PII collected is necessary for production of the PIV card, in accordance with federal standards.

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, PSS leverages the eDelivery interface as outlined in the PBGC and DCSA ISA to securely retrieve investigative files. The ISA for eDelivery, was signed on February 9, 2024, consists of three distinct aspects: the content, packaging, and delivery of investigative case material.

Content

The investigative content of the eDelivery investigative case material file.

Packaging

eDelivery packages the contents of an investigative file in a 256-bit encrypted ZIP file, the Distributed Investigative File (DIF). The DIF serves as an electronic representation of the investigative file and provides both a graphic representation of a printed file and a data representation of certain documents.

Delivery

PBGC investigative case material is received from DCSA via Secure File Transfer Protocol (SFTP) via a nightly batch transmission and transferred into PSIS manually by PBGC upon receipt. The transmission will include a crosswalk listing all cases included in the transfer and all corresponding DIF files.

USAccess: *Data collected by PBGC's enrollment station (Personnel Security) is transmitted to the USAccess Integrated Data Management System (IDMS) over an encrypted channel. Data is transferred to a GSA-contracted commercial smart card printing/personalizing provider over a Secure File Transfer Protocol (SFTP) connection. Data is also transferred to the Office of Personnel Management/DCSA over a Secure Virtual Private Network connection.*

PSIS: *The Personnel Security Investigation Solution (PSIS) is built on Entellitrak Commercial Off the Shelf (COTS) application to enter and track information needed to support background investigations.*

PII data is collected from PSIS to Symantec Data Loss Prevention (DLP) for Exact Data Matching (EDM). The data values are updated during the collection and only the numeric values are stored in DLP.

ServiceNow (SNOW) GetITAccess New Employee Setup Form: *To initiate the pre-screening process for new applicants, employees, or contractors, a New Employee setup form is submitted in GetITAccess. The PBGC's Personnel Security team creates a new Intake Portal case. The automated email workflow will send an email to the individual to fill out the OF-306 and Fair Credit Reporting Act form, along with uploading a copy of their resume.*

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

- Yes
 No

11. If your system collects, Social Security Numbers:

a.

C

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

PII in the form of SSN is collected in support of background investigations and security clearance case management for PBGC employees and contractors.

b. Under which authorized uses, as described in the "Reduction of Use of Social Security Numbers (SSN) in PBGC" policy document?

Law enforcement, national security, credentialing. *Almost every law enforcement application must be able to report and track individuals using the SSN. This includes, but is not limited to, checks of the National Crime Information Center; state criminal histories; and FBI records checks.*

Security clearance investigation or verification. *The conduct or verification of background investigations and security checks requires the use of the SSN. The SSN is the single identifier that links all aspects of these investigations together. This use is also linked to other Federal agencies that continue to use the SSN as the primary identifier.*

Confirmation of employment eligibility. *Federal statute requires that all persons employed within the United States must provide an SSN or comparable identifier to prove that they are eligible to work for or with the government of the United States.*

Oversight work conducted by the OIG. *Pursuant to the statutory authority of the OIG to act as an independent oversight unit of the PBGC programs and operations, OIG is not required to obtain Agency approval to conduct its oversight work in the form of criminal and administrative investigations, audits, inspections, evaluations, contract reviews, and other reviews. This oversight may require obtaining or using SSN to conduct criminal and administrative investigations, audits, inspections, evaluations, contract reviews, and other reviews.*

- 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.

Not Applicable

2.3 Privacy Office Review

Name of Reviewer	Ashley Church
Date Reviewed	11/05/2024
Expiration Date	11/05/2025
Result	<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).

Enter description here.

Discuss any conditions on Approval

Enter description here.