Information Technology Infrastructure Operations Department (ITIOD)

ServiceNow (SNow) Privacy Impact Assessment (PIA)

Last Updated: 9/13/2024

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 compone nt 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)*
User HiWAVE Support Portal	Secure login portal to manage ServiceNow instances, upgrades and HIWAVE user access. HiWAVE is used for 24/7 support to product documentation, knowledge base articles, customer support, and SNOW developer site resources.	No	N/A	N/A	No
Software as a Service (SaaS): User Interface, Platform, Plug-ins, Applications, APIs, Hosted ITIL	SaaS components provide a suite of applications focused primarily on automating processes and workflows. Personnel interact with SNOW service catalog, forms, and knowledge articles via an internally-branded user interface called "GetITAll".	Yes	PBGC-(11, 16, 22)	29 U.S.C. 1302; 44 U.S.C. 3101; 5 U.S.C. 301; 5 U.S.C. 6120	Yes
Software: MID Server (Java Application)	MID Server is a Java application that runs as a Windows service or UNIX daemon on a server in PBGC local network. It facilitates communication and data movement between ServiceNow instance and external applications, data sources and services.	Yes	PBGC-(11, 16, 22)	29 U.S.C. 1302; 44 U.S.C. 3101; 5 U.S.C. 301; 5 U.S.C. 6120	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).

> ***ServiceNow*** *(Snow; SN) is a SaaS cloud offering from ServiceNow comprised of a suite of natively integrated applications designed to support IT service automation, resource management and shared support services. ServiceNow applications cover all Information Technology Infrastructure Library (ITIL) processes; PBGC has implemented IT Service Management (ITSM), Workplace Service Delivery (WPSD), and IT Operations Management (ITOM), which includes such features as Change Management, Incident Management, Knowledge Management, Problem Management, Service Desk, Facility Management, Configuration Management including automated discovery, and Asset Management services through SNow. ServiceNow is an existing system that requires annual recertification.*

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.

> *The ServiceNow system is used for IT service, asset, and configuration, IT business change and release, incident management, problem management. ServiceNow may contain PII (shared from other systems, such as PBGC-22) which pulls personnel data from Active Directory. The information contained in Active Directory is synced with ServiceNow.*

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.

> *PBGC does not inherit privacy controls from any external providers.*

5. For the user roles in the system (*as of 6/7/2024):

GROUP NAME (Role Name)	*Member Count (as of 6/7/2024)	Application Owners (Approvers)	Access Level	Recertification Date
APPS_ServiceNow_ HiPortal_Admin	4	Joshua Kossoy (primary); Brittanie Thom; Anh Nguyen	Access is based on Access Control Lists (ACLs) needed for PBGC personnel to perform duties as assigned within ServiceNow	Annually; 5/9/2024 – 6/1/2024
APPS_ServiceNow_ HiPortal_User	12	Joshua Kossoy (primary); Brittanie Thom; Anh Nguyen	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow	Annually; 5/9/2024 – 6/1/2024
APPS_ServiceNow_ AgileDev_Access	9	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants access to the ServiceNow Agile Development project management features.	Annually; 5/2/2024 – 5/28/2024
APPS_ServiceNow_I TSM_Approver	12	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Allows a Designated Approver to Approve Requests in ServiceNow	Annually; 5/6/2024 – 5/28/2024
APPS_ServiceNow_I TSM_Asset_Admin	9	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Group to be used with ServiceNow is necessary to support access and separation of duties for Asset Management.	Annually; 5/7/2024 – 5/18/2024
APPS_ServiceNow_I TSM_Asset_Tech	16	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Group to be used with ServiceNow is necessary to support access and separation of duties for Asset Management.	Annually; 5/2/2024 – 5/18/2024
APPS_ServiceNow_I TSM_Azure_Approver	2	Joshua Kossoy (primary); Brittanie	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to	Annually; 5/15/2024 – 6/1/2024

GROUP NAME (Role Name)	*Member Count (as of 6/7/2024)	Application Owners (Approvers)	Access Level	Recertification Date
		Thom; Joelle Thorpe	Azure Approver Role in SNOW	
APPS_ServiceNow_ITSM_CAB_Analyst	5	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants access to CAB Analyst functions in ServiceNow	Annually; 5/2/2024 – 5/18/2024
APPS_ServiceNow_ITSM_Catalog_Admin	11	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Provides Admin access to Service Now / Service Catalog functions	Annually; 5/13/2024 – 6/1/2024
APPS_ServiceNow_ITSM_Change_Manager	4	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants manager access to ServiceNow request for change (RFC) tickets including approve, deny request.	Annually; 5/2/2024 – 5/18/2024
APPS_ServiceNow_ITSM_Chat_Admin	6	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants administrative access to control features of the ServiceNow service desk chat service.	Annually; 5/17/2024 – 6/1/2024
APPS_ServiceNow_ITSM_CMDB_Admin	8	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants administrative access to control the ServiceNow Configuration Management Database (CMDB) and Asset functions.	Annually; 5/17/2024 – 5/28/2024
APPS_ServiceNow_ITSM_EquipmentRelocation_Approver	1	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Equipment Relocation Step 2 Approver Role in SNOW	Annually; 5/15/2024

GROUP NAME (Role Name)	*Member Count (as of 6/7/2024)	Application Owners (Approvers)	Access Level	Recertification Date
APPS_ServiceNow_ITSM_FED-ChangeMgmt_Approver	5	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants approval group membership for Business Services review as part of mAppIT "Request a New Service/Application". This is for Federal employees only.	Annually; 5/18/2024 – 6/1/2024
APPS_ServiceNow_ITSM_GetITAll_Admin	8	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants administrative access to control the ServiceNow service portal.	Annually; 5/7/2024 – 6/1/2024
APPS_ServiceNow_ITSM_Incident_Manager	12	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants Manager access to declare Major Incident, exclude tickets from reporting, mark a ticket as a test ticket.	Annually; 5/15/2024 – 6/1/2024
APPS_ServiceNow_ITSM_ITCOSMgr_ITIODLead	1	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to ITCOS Manager ITIOD Lead Role in SNOW	Annually; 5/9/2024
APPS_ServiceNow_ITSM_ITDirector_ITSpecialist	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to IT Director IT Specialist Role in SNOW	Annually; 5/9/2024 – 5/18/2024
APPS_ServiceNow_ITSM_ITIOD-EIM-Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to EIM Approver Role in SNOW	Annually; 5/28/2024
APPS_ServiceNow_ITSM_ITIOSS_SLA_Access	23	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants permission to view survey	Annually; 5/7/2024 – 6/1/2024

GROUP NAME (Role Name)	*Member Count (as of 6/7/2024)	Application Owners (Approvers)	Access Level	Recertification Date
			results and service desk performance metrics.	
APPS_ServiceNow_ITSM_Knowledge_Admin	3	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants permission to allow editing of all KB articles in the knowledge library	Annually; 5/15/2024 – 6/1/2024
APPS_ServiceNow_ITSM_Knowledge_Edit	5	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants edit access to create, edit, and review knowledge base articles in ServiceNow.	Annually; 5/17/2024 – 6/1/2024
APPS_ServiceNow_ITSM_Knowledge_ManagerALL	7	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants access for Knowledge Managers for all Knowledge bases in ServiceNow, provides permissions to approve articles and make recommendations for new Knowledge Bases to the Knowledge Admin.	Annually; 5/9/2024 – 6/1/2024
APPS_ServiceNow_ITSM_LegacyChange_1stCAB	4	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants Access to process and voting members of 1st Change Approval Board (CAB) for legacy change management. Provides the role change_manager.	Annually; 5/2/2024 – 5/18/2024
APPS_ServiceNow_ITSM_LegacyChange_2ndCAB	4	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants Access to process and voting members of 2nd Change Approval Board (CAB) for legacy change management. Provides the role change_manager.	Annually; 5/2/2024 – 5/18/2024

GROUP NAME (Role Name)	*Member Count (as of 6/7/2024)	Application Owners (Approvers)	Access Level	Recertification Date
APPS_ServiceNow_ITSM_LegacyChange_eCAB	4	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants Access to process and voting members of Emergency Change Approval Board (CAB) for legacy change management. Provides the role change_manager.	Annually; 5/2/2024 – 5/18/2024
APPS_ServiceNow_ITSM_List_Updater	11	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants Access to Bulk Update/Close Tickets.	Annually; 5/8/2024 – 6/1/2024
APPS_ServiceNow_ITSM_Location_Manager	7	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants the ability to add, edit, modify and administer the Location table data in ServiceNow	Annually; 5/2/2024 – 6/1/2024
APPS_ServiceNow_ITSM_NewUNIXLINUXServiceAccount_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to New UnixLinux Service Account Step 2 Approver Role in SNOW	Annually; 5/15/2024
APPS_ServiceNow_ITSM_NewMicrosoftTeamsPlanner_Approver	3	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Step 3 Teams Approver Role in SNOW	Annually; 5/15/2024 – 6/1/2024
APPS_ServiceNow_ITSM_NewMobileDevice_Approver	1	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to New Mobile Device Step 2 Approver Role in SNOW	Annually; 5/15/2024
APPS_ServiceNow_ITSM_NewOracleServiceAccount_Approver	1	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to New Oracle Service Account Step 2 Approver Role in SNOW	Annually; 6/1/2024

GROUP NAME (Role Name)	*Member Count (as of 6/7/2024)	Application Owners (Approvers)	Access Level	Recertification Date
APPS_ServiceNow_ITSM_NewWindowsServiceAccount_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to New Windows Account Step 2 Approver Role in SNOW	Annually; 5/17/2024 – 6/1/2024
APPS_ServiceNow_ITSM_ODBC_Access	6	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants members the Open Database Connectivity (ODBC) role which allows for read only ODBC connections to ServiceNow.	Annually; 5/2/2024 – 5/17/2024
APPS_ServiceNow_ITSM_Oracle_Admin	6	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants Oracle DBA's the ability to add, edit and create Database, Schema, Role and Approver records in ServiceNow/Service Catalog	Annually; 5/17/2024
APPS_ServiceNow_ITSM_Oracledatabase_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Oracle Database Approver Role in SNOW	Annually; 6/1/2024
APPS_ServiceNow_ITSM_Outage_Editor	6	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants permissions for members to post outage and planned maintenance notices on the GetITAll portal page.	Annually - new entitlement so N/A for 2024
APPS_ServiceNow_ITSM_PERSEC_Approver	11	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Personnel Security (PERSEC) Approver Role in SNOW	Annually; 5/7/2024 – 5/28/2024
APPS_ServiceNow_ITSM_Problem_Manager	8	Joshua Kossoy (primary); Brittanie	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants	Annually; 5/15/2024 – 5/18/2024

GROUP NAME (Role Name)	*Member Count (as of 6/7/2024)	Application Owners (Approvers)	Access Level	Recertification Date
		Thom; Joelle Thorpe	manager access to resolve, close, and analyze problem tickets.	
APPS_ServiceNow_ITSM_Reporting_Access	29	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants access to share reports to groups and to schedule reports for automated generation and delivery	Annually; 5/2/2024 – 6/1/2024
APPS_ServiceNow_ITSM_Reporting_Admin	8	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants administrative access to ServiceNow reporting. Permits viewing, adding, deleting reports.	Annually; 5/17/2024
APPS_ServiceNow_ITSM_RSA_ProcessUser	4	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to the ServiceNow Release Support Analyst function	Annually; 5/2/2024 – 5/18/2024
APPS_ServiceNow_ITSM_ServiceCatalogNewCatalogItem_Approver	3	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Service Catalog New Catalog Item Approver Role in SNOW	Annually; 5/15/2024 – 6/1/2024
APPS_ServiceNow_ITSM_SoftwarePackaging_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Software Packaging Approver Role in SNOW	Annually; 6/1/2024
APPS_ServiceNow_ITSM_SQLServerNewDatabase_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to SQL Server, New Database Approver Role in SNOW	Annually; 6/1/2024
APPS_ServiceNow_ITSM_StorageAllocation_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Storage Allocation Approver Role in SNOW	Annually; 5/15/2024 – 6/1/2024

GROUP NAME (Role Name)	*Member Count (as of 6/7/2024)	Application Owners (Approvers)	Access Level	Recertification Date
APPS_ServiceNow_ITSM_SurveyReadOnly	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants members the ability to read Survey Instance and Survey Response records. Provides the role survey_reader.	Annually; 5/17/2024 – 6/1/2024
APPS_ServiceNow_ITSM_UnixNewServerAdditionalMemory_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to UNIX Newserver, Additional Memory Approver Role in SNOW	Annually; 5/15/2024 – 6/1/2024
APPS_ServiceNow_ITSM_WindowsNewServerAdditionalMemory_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Windows NewServer, Additonal Memory Approver Role in SNOW	Annually; 5/17/2024 – 6/1/2024
APPS_ServiceNow_ITSM_WSDOfficeMove_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Workspace Solutions Department (WSD) Office Move Approver Role in SNOW	Annually - new entitlement so N/A for 2024
APPS_ServiceNow_ServiceNow_App_Admin	13	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants full administrative access to control ServiceNow.	Annually; 5/8/2024 – 5/18/2024
APPS_ServiceNow_ITSM_ITIL_**ProcessUser**	2,600	**None (Default entitlement)**	Access is default entitlement. Grants edit access to create and update interaction, incident, problem and change tickets within ServiceNow. Grants access to send Significant Occurrence Reports (SOR).	N/A
APPS_ServiceNow_WPSD_Manager	6	Joshua Kossoy (primary); Brittanie	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Role-based permissions for	Annually - new entitlement so N/A for 2024

GROUP NAME (Role Name)	*Member Count (as of 6/7/2024)	Application Owners (Approvers)	Access Level	Recertification Date
		Thom; Joelle Thorpe	WPSD components to configure maps and data types.	
APPS_ServiceNow_ WPSD_MapEditor	4	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Role-based permissions for WPSD components to configure maps using Map Studio within SNOW.	Annually - new entitlement so N/A for 2024
APPS_ServiceNow_ WPSD_MapViewer	8	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Role-based permissions for access to Workplace Central workspace components.	Annually - new entitlement so N/A for 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 – Physical controls provided by the Cloud Service Provider (CSP) include:*
  - *Physical Access Authorizations*
  - *Physical Access Control*
  - *Access Control for Transmission Medium*
  - *Access Control Output Devices*
  - *Monitoring Physical Access*
  - *Visitor Access Records*
  - *Power Equipment and Cabling*
  - *Emergency Shutoff*
  - *Emergency Power*
  - *Emergency Lighting*
  - *Fire Protection*
  - *Temperature and Humidity Controls*
  - *Water Damage Protection*
  - *Delivery and Removal*
  - *Alternate Work Site*
  - *Location of Information System Components*

- *Technical Controls* - Technical controls employed to secure the PII in the system include:*
  - *Password protection*
  - *Sensitive Data Detection (This functionality helps identify, manage, and protect sensitive information, including PII within SNow)*
  - *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*
  - *Time Stamps*
  - *Audit Events*
  - *Remote Access*
  - *Wireless Access*
  - *Audit Storage capacity*
  - *Authentication Management*
  - *Cryptographic Key establishment and management*

*Technical Controls are provided by both PBGC and the Cloud Service Provider (CSP)

- *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 on-boarding training for security, privacy, and Records management personnel*
  - *User Account Management*

*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.

PBGC technical support teams use PII to provide support for PBGC IT systems, assets, and facilities. Service-oriented activities include managing facilities and IT service request tickets, retrieving incident information and troubleshooting issues. PII made available to ServiceNow is limited but visible only to authorized personnel for new hire processing; however, technical support teams and/or end users may incur improper data entry and/or attachments to a service ticket that may include their personal information or PII of other individuals. When PII

> *is identified within or attached to a ticket, it is removed from the system as soon as possible after detection. Limiting collection of PII is controlled through personnel system data feeds to only provide limited information. When conducting training, the Privacy Office instructs individuals to not include PII of others (e.g., participants) when they open a service ticket. PII captured will be secured in compliance with the Federal Information Security Modernization Act (FISMA) and is not subject to unauthorized distribution. The limited use of PII that is in SNow is necessary for system performance, service tracking, and auditing purposes.*

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.

> 1. *ServiceNow creates a request for data from Active Roles Server (ARS)/ Lightweight Directory Access Protocol (LDAP).*
> 2. *The request is queued in the External Communication Channel (ECC) Queue.*
> 3. *A Management, Instrumentation, and Discovery (MID) Server sends out a request to the ServiceNow instance over a designated port , checking for any work in the ECC Queue.*
> 4. *Based on the configuration of the MID Server's capabilities in the SN instance, the SN instance replies with a request that the MID Server can perform.*
> 5. *In the case of an LDAP request, the MID Server connects to the PBGC LDAP instance within the PBGC network and collects the data.*
> 6. *Once the MID Server has completed the request, it contacts the ServiceNow instance over the designated port, stating the task is finished. The data is sent to the ServiceNow instance, and the data is stored in an Import table.*
> 7. *Once imported, the data in the Import Table is processed using a Transform Map. User records are either inserted or updated records in the User (sys_user) table as appropriate. Group tables are also imported in a similar manner.*
> 8. *Records imported in the Import Tables are cleared after one week.*

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?

> *ServiceNow does not collect SSN's but attachments to stored records may contain PII collected elsewhere and inadvertently uploaded as supporting artifacts. Due to the nature of information collected within ServiceNow for IT Service Management, it is unlikely SSNs would*

be entered but if such a situation were to occur, once identified, the PII would be removed and the incident reported.

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

Not Applicable

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	9/13/2024
Expiration Date	9/13/2025
Result	☒ Approved without conditions ☐ Approved with conditions (see below). ☐ 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.