



Office of Information Technology

IT Investment Owner's Guide to
Total Cost of Ownership

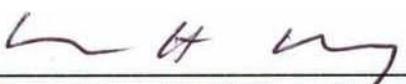
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Approval:



 Rich Macy, Acting Chief Information Officer

2/3/11

 Date

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1. Purpose of Document

The purpose of this document is to identify the high level responsibilities and resource requirements related to introducing and "owning" PBGC information technology investments. With this information, investment owners will be more informed about their investments' "total cost of ownership" and be better able to plan for required resources and time throughout the investment. Total cost of ownership of IT systems at PBGC includes the cradle to grave costs of planning, governing, developing, installing, supporting, maintaining and decommissioning any given technology used by PBGC, both PBGC Hosted and Non-PBGC Hosted. The CIO's programs that are required to be developed, implemented and maintained using policies, procedures, standards and guidelines are also included in the OIT baseline budget. In addition, the OIT's baseline budget also includes IT Project Managers (or vacancy slots) that are currently in place and the PPQA (Process and Product Quality Assurance) Program.

2. Project Background

Historically, technology has been implemented within PBGC without full understanding of the time, resources and ongoing infrastructure support required to start up and maintain an IT system. Additionally, security requirements and responsibilities have not been fully understood, assigned, or implemented, especially for "smaller" systems. In addition, technology has not been fully rationalized from a PBGC corporate perspective. Instead, individual departments have introduced technology to meet only their needs without regard to the additional work that is required for each system or opportunities to leverage existing technology and achieve economies of scale.

3. Terms and Definitions

This section defines and provides a common context for key terms.

TERM	Definition
Account Managers	Division Managers from Participant Services Division, Financial Management Services Division, and Corporate Services Division who manage IT Project Managers and support the business areas with IT Investment Management and understanding IT needs. They facilitate discussions with other OIT areas, as necessary.
COOP	Continuity of Operations, primarily led by the Facilities and Services Department as a program while the Office of Information Technology provides the technology COOP solution
Cost	For the purposes of the TCO document, "Cost" refers to contract costs as well as the internal time and labor for the various activities that are necessary to properly to stand up and maintain an information technology system.
EA	Enterprise Architecture, led by the Enterprise Architecture Division in the IT & Business Modernization Department
EISO	Enterprise Information Security Office, led by the Senior Agency Information System Officer
FASD	Facilities and Services Department
FIPS	Federal Information Processing Standards, published by the National Institutes of Standards and Technology

FOIA	Freedom of Information Act
FTE	Full Time Equivalent (may represent Federal or contractor staff)
Investment Owner	A PBGC senior leader who sponsors and is accountable for the Information Technology and all activities associated with it from cradle to grave costs of planning, governing, developing, installing, supporting, maintaining and decommissioning given technology.
IT&BMD	IT & Business Modernization Department, leads Enterprise Architecture, Capital Planning and Investment Control, ITSLCM, and IT Project Management for business applications.
ITIOD	IT Infrastructure Operations Department, leads the corporation's IT Infrastructure engineering and IT Operations.
ITIRB	IT Investment Review Board (Reference PBGC Directive GA-15-5)
ITSLCM	IT Solutions Life cycle Methodology (Reference PBGC Directive IM-05-7)
MOU	Memorandum of Understanding, typically between two agencies
OGC	Office of General Counsel
PO	Procurement Department
PIA	Privacy Impact Assessment
Privacy Steering Committee	Led by the Senior Agency Official for Privacy (Reference PBGC Directive IM-05-9)
SORN	System of Records Notice
TRB	Technical Review Board

4. PBGC Hosted vs. Non-PBGC Hosted Systems

The growth of the Internet and other advanced communications has enabled technology to be delivered in a multitude of ways. For the purpose of these guidelines, we will look at technology responsibilities in two different classes largely based on who manages the infrastructure related to the delivery of system functionality, as follows:

PBGC-Hosted Systems

These are systems that reside within PBGC's network and relies on OIT to provide the operations, infrastructure, security services (IT and non-IT controls), maintenance, backup and COOP management.

Non-PBGC-Hosted Systems

These are systems that are externally hosted and do not reside on PBGC's network but rather whose functionality is delivered via the Internet or other communication vehicles. These systems can be provided through Software As A Service (SAASL Application System Providers (ASP), Federal Lines of Business, Federal Shared Services, Cloud and other arrangements. An Externally-Hosted System remains the overall responsibility of its Investment Owner. However, it reduces (but does not eliminate) the impact of a system on PBGC's network. OIT may still need to be engaged to setup connectivity, integrate Active Directory, manage bandwidth, etc. Additionally, to ensure consistency of management and ensure PBGC consistently and fully manages access through the full lifecycle of a user, OIT may need to determine impact on the Service Desk and the ELAN process. These additional costs and tasks need to be considered during planning.

5. Guidelines

The following items may require support, from either Federal or contract resources, from outside the investment owner's (or senior leader) business area. An Integrated Project Team that includes IT Project Manager, Business Project manager, EISO, ITIOD, and EA should be formed to assess the applicable tasks, the source of support for task completion and the related costs. The Investment Owner (or senior leader) will want to ensure that the IPT has either Federal or contract support with demonstrable expertise and experience with the technology being introduced or maintained.

The Account Managers (Division Managers from Participant Services Division, Financial Management Services Division, and Corporate Services Division) and the IT Project Managers from IT & Business Modernization Department (IT&BMD) will provide the coordination and IT Project Management in partnership with the Business Representatives and Business Project/Program Managers of the Investment. The Investment Owner is responsible for understanding, accounting for, and ensuring the below items are managed.

The below guidelines are broken down into the following three categories:

- Guidelines Applicable to **ALL IT Investments** (General)
- Guidelines Applicable to **PBGC-Hosted IT Investment**
- Guidelines Applicable to **Non-PBGC Hosted IT Investments**

Each category contains a table with the following columns:

- **ITEM** -the task, activity, product or services that may or may not be needed for a given IT Investment. **The IPT can work together to identify which of these items are applicable and how best to assess the cost estimate for each applicable item.**
- **Initial or One-Time setup cost or Effort (Average size of "ITEM")** - Costs that may be associated with one-time or initial setup for the Information Technology or Investment. Since each IT Investment may have its own characteristics and may influence the "ITEM", a range is provided for an average size of the "ITEM" (not the size of the IT Investment) for estimation guidance.
- **RECURRENCE** - After the initial setup, any recurring activities or costs that may be associated with the Information Technology or Investment while it is still operational, until it is decommissioned.
- **Other Guidelines and References** - Additional comments and references to consider as the IPT works through cost estimation.

Guidelines Applicable to ALL IT Investments

The following items and responsibilities apply to all technology investments. Given the number of items, it is in the best interest of the IT Investment Owner to collaborate with other IT Investment Owners where applications, systems and investments can be shared by multiple business areas.

ITEM (Investment owner has the Accountability)	INITIAL or ONE-TIME SETUP COST OR EFFORT (Average size of "ITEM")	RECURRENCE	OTHER GUIDELINES AND REFERENCES
Segment Architecture (by organizational functions regardless of organizational structure)	\$75K - \$400K	Every 3 years from last Segment Architecture	Reference Enterprise Architecture page

ITEM (Investment owner has the Accountability)	INITIAL or ONE-TIME SETUP COST OR EFFORT (Average size of "ITEM")	RECURRENCE	OTHER GUIDELINES AND REFERENCES
NOTE: Segment Architecture is not necessarily done for a system but rather for a function that may be served by more than one system.		<u>OR</u> Major event such as change in business process, legal mandates etc.	on the Intranet For consistency, must use PBGC's Segment Architecture contract vehicle
Business case development (level of detail and formality varies depending on the investment and is ultimately captured in OMB 53 and 300 documents). Includes: Overview, alignment to strategic plan, Program Management Plan, Risk Management, Acquisition Strategy, Performance Gap to close, Milestones, Cost Estimation, etc. Excludes Alternatives Analysis, Cost-Benefit Analysis, and Return on Investment.	\$25K - \$400K	Updated annually during "Select" CPIC phase and Budget Formulation time in spring; could be handled by Federal or contractor effort (2-4 week effort)	CPIC guidelines and CPIC Calendar OMB Circular A-11 section 300
Architecture Analysis (Technical As-Is Analysis, Technical To-Be Analysis, Product Selection Analysis, Interface Analysis etc.)	\$35K - \$500K	As determined by IT or Business PM <u>OR</u> Recommended by EA for any major modernization or development	Leverage EA Contract Vehicle
Alternatives analysis (formal) conducted at least every 3 years to ensure that the solution is still the best fit for business needs, including Cost-Benefit Analysis, and Return on Investment (excludes product analysis that is covered under Architectural Analysis). Alternatives considered could be PBGC-Hosted, Externally-Hosted (cloud or shared services), status quo, COTS, COTS-Custom combination, etc.	\$50K - \$50K	Revisited every 3 years to ensure that the solution is still the best fit and is yielding a positive return on investment (tied to annual operational analysis)	Contract vehicle is best managed by the business
FIPS 199 Assessment (FIPS 199 assessment will determine depth of security requirements)	8-16 hours for each of 3-6 FTEs	Reviewed and updated annually and prior to any planned major changes to the system,	Effort to conduct annual review is included under "Continuous Monitoring" item.
PBGC System Registration	16-32 hours for each of 3-6 FTEs	Not applicable unless major change to system occurs.	
Privacy Impact Assessment (PIA)	8-16 hours for each	Reviewed annually	Consult OGC/Chief

ITEM (Investment owner has the Accountability)	INITIAL or ONE-TIME SETUP COST OR EFFORT (Average size of "ITEM")	RECURRENCE	OTHER GUIDELINES AND REFERENCES
	of 3-6 FTEs	(2-4 hours for each of 1-2 FTEs)	Privacy Officer for more guidance.
System of Records Notice (SORN) (if applicable)	16-32 hours for each of 1-2 FTEs	Reviewed annually (2-4 hours for each of 1-2 FTEs)	Consult OGC/Chief Privacy Officer for more guidance.
COOP Determination -Department Director to determine whether the system is required during COOP and timeframe of availability.	See FASD COOP Manager about Departmental COOP Plan	Updated annually and tested twice a year	
Records Management (Records and Document retention, archival, restoration, etc.) , eFOIA and eDiscovery	Define and manage the requirements	Ongoing	PBGC Directive IM-15-1 "PBGC Records Management Programs" Records Officer in FASD, eFOIA and eDiscovery points of contact in OGC
User Account Management (needs to be built in to ELAN process for all systems)	System Owner approval of all users (and sometimes the actual granting of access)	Ongoing approval/denial of all users (and sometimes the actual granting and removal of access)	Need to coordinate with Service Desk ELAN process
User Account Annual Re-certification	None	8-80 hours with approximately 2-6 FTEs annually	Business or system owners participate a great deal and are totally responsible for at times
Service Desk Coordination for Help	Determine workflow of Service Desk help requests	Ongoing adjustments as necessary	
Upgrade planning and funding to keep software and hardware current and avoid obsolescence and security risks		Ongoing	
Development, configuration and integration with other systems in compliance with PBGC's ITSLCM, including supporting PPQA audits. This includes changes or adjustments needed to be made by other integrated or impacted investments	Depends on the solution; Estimation primarily led by IT Project Manager	Depends on the solution for enhancement and maintenance release annually	Impact assessment meeting to identify and initiate integration/ impacts
Sharing of the solution across departments and divisions- support enterprise solutions (if applicable)	To be determined	To be determined	Consult with EA for common business applications and solutions

ITEM (Investment owner has the Accountability)	INITIAL or ONE-TIME SETUP COST OR EFFORT (Average size of "ITEM")	RECURRENCE	OTHER GUIDELINES AND REFERENCES
Data and document conversion costs are typically applicable when migrating from the current system to the new system.	IT Infrastructure and development team's cost: \$150K for a 12 month effort	Not applicable	
Training	Training to all users should be evaluated	Refresher training should be considered annually or major enhancements	Consult HRD Training Institute for training rooms, computers, availability, etc.
Contract Execution	IT Project Managers typically take on COTR responsibilities for the primary development, modernization, enhancement, and maintenance of the IT Investment.		

Guidelines Applicable to PBGC-Hosted IT Investment

The following items and responsibilities are applicable when the technology investment is hosted by PBGC.

ITEM (Investment owner has the Accountability)	INITIAL or ONE-TIME SETUP COST OR EFFORT (Average size of "ITEM")	RECURRENCE	OTHER GUIDELINES AND REFERENCES
Infrastructure Requirements Definition Consulting Services: Technical Advisors in target technology to team with Investment group on finalizing requirements and confirm total cost of release/project integration and implementation.	\$0 - \$150K	Not Applicable.	Calculate based on duration and hourly \$ rate of specific technology skills needed: Oracle DBA SME costs average \$175/hour; other SME's are \$120-150/hour
Release Management Services: costs associated with set-up, refresh and technical analysis service support during	\$3,600/release for each business	Factor in costs for at least one release per year at	Cost of \$3,600/release was calculated

ITEM (Investment owner has the Accountability)	INITIAL or ONE-TIME SETUP COST OR EFFORT (Average size of "ITEM")	RECURRENCE	OTHER GUIDELINES AND REFERENCES
Development, Testing (including functionality, UAT & performance testing) across each environment.	system or product	\$3,600/release for each business system or product.	based on FY2010 actual service cost of \$1.620M/451 releases.
Hardware: Confirm availability of storage to meet requirements; otherwise cost out all hardware components needed for each technical environment (Development, Test, Production & COOP). Skip this section if the target environment is not hosted at PBGC, is assessable via the Internet, and no specific equipment purchases are required on either end of the Internet.	Cost of server(s) or other devices, including the first year of maintenance. (15% of purchase price - unless a special arrangement is made with the vendor)	Initial purchase cost of server(s) divided by .15.	On-going maintenance costs are typically 15% of the initial cost of equipment.
Software: Confirm availability of software licenses and usage fee coverage under our existing inventory requirements; otherwise cost out all software components needed for each technical environment (Development, Test, Production and COOP). Skip this section if the target environment is not hosted at PBGC, is assessable via the Internet, and no specific software purchases are required on either end of the Internet.	Cost of Software based on # of users, including the first year of maintenance. (15% of purchase price - unless a special arrangement is made with the vendor)	Costs of additional licenses and the cost of on-going maintenance.	Use the calculation of Initial purchase cost of software(s) divided by .15. On-going maintenance costs are typically 15% of the initial cost of software.
Maintaining Business Application Environment: Regression Testing after regular maintenance: contractor development team costs associated with set-up and validating business system functionality after any one of the following: security patching or infrastructure hardware/software upgrades.	Not Applicable	Calculate based on duration and \$ rate of development team's costs. Plan on a minimum of two of these occurrences per year.	
Telecommunications: Connectivity from PBGC to another site -if planning on using above and beyond the current internet service, such as a direct connection or line.	Average new T1 line connection = \$1,000	\$1,000/month with an annual cost of \$12,000	Direct connection costs can be of various types (T1, T3, etc.). ITIOD should be consulted.
Assess and Authorize (A&A) process leading to an Authority To Operate, to include Systems Security Controls Selection, System Control documentation, Control Implementation, Assessment of Controls, Authorization and Monitoring of Controls.	4 - 6 Months for each of 3-6 FTEs	Annual recurring activities are captured under "Continuous Monitoring," below.	

ITEM (Investment owner has the Accountability)	INITIAL or ONE-TIME SETUP COST OR EFFORT (Average size of "ITEM")	RECURRENCE	OTHER GUIDELINES AND REFERENCES
Implement Continuous Monitoring and POAM management, which ensure required security is in place, a subset of controls is assessed annually, and security deficiencies are tracked and remediated.	Not Applicable	400-1600 hours for each of 3-6 FTEs	
Periodic Risk Assessment as environments and systems change.	Not Applicable	20-100 hours for each of 2-4 FTEs.	

Guidelines Applicable to Non-PBGC-Hosted IT Investment

The following items and responsibilities are applicable for technology investments that are not hosted within PBGC.

ITEM (Investment owner has the Accountability)	INITIAL or ONE-TIME SETUP COST OR EFFORT (Average size of "ITEM")	RECURRENCE	OTHER GUIDELINES AND REFERENCES
Required Interconnection Agreements/Memorandum of Understanding between PBGC and another federal entity	PD, OGC, EISO many need to work together to review and finalize the initial agreement 40-80 hours for each of 2-4 FTEs	Review annually and revise as necessary.	Effort for annual review included under "Continuous Monitoring" item.
Requirements definition, configuration, testing and roll-out of the solution via contracted service	Depends on the vendor	Depends on the vendor	Most shared services have a one-time setup cost and ongoing (Monthly or yearly) renewals. Charge models could vary (per user, per use, per participant, per filing, per transaction, etc.)
Documents required to be developed and maintained by PBGC in compliance with the ITSLCM and auditable	Depends on the vendor	Depends on the vendor	Contractor documentation services should be considered
Telecommunications: Connectivity from PBGC to another site - if planning on using above and beyond the current internet	Average new T1 line connection = \$1,000	\$1,000/month with an annual cost of \$12,000	Direct connection costs can be of various types (T1,

ITEM (Investment owner has the Accountability)	INITIAL or ONE-TIME SETUP COST OR EFFORT (Average size of "ITEM")	RECURRENCE	OTHER GUIDELINES AND REFERENCES
service, such as a direct connection or line.			T3, etc.). ITIOD should be consulted.
Oversee required security is in place and all supporting security documents (e.g. Authority to Operate [a Federal Responsibility], System Security Plans, Risk Assessments, POA&Ms) are available and provided as required from the service/system provider.	80-320 hours for each of 1-3 FTEs.	80-320 hours for each of 1-3 FTEs.	If a vendor has never completed activities leading to an ATO before, their cost to complete necessary activities could range from \$50,000-\$500,000 or more and should be considered as part of the contract requirements. Federal oversight may also be more extensive.

6. Additional Guidelines to Consider

The below are additional types of costs to consider that may or may not be directly related to Information Technology.

Risk-Adjusted Cost/Risk Management

All IT Investments and Information Technology come with inherent risks. Risk management is the identification, assessment, and prioritization of risks followed by coordinated and economical application of resources to minimize, monitor, and control the probability and/or impact of risks becoming issues. Risks can come from uncertainty in financial markets, project failures, legal liabilities, cost underestimation, personnel loss, change in schedules, natural causes and disasters, etc. For IT Investments, an average of 15-25% of the total or a subset of the total (where risks are most likely to occur) is recommended. The Office of Management and Budget provides 19 types of risks to be used as a starting point.

Federal Full Time Equivalent (FTE) Costs

All IT Investments are best managed by Federal IT Project Managers (who also assume COTR responsibilities) working in partnership with Business Project/Program Managers or Representatives. The Budget Department provides guidance for determining the cost of Federal FTEs. The IT Investment

Owner is encouraged to assess availability and staffing of Business Project/Program Managers and any other Federal resources that may be needed to participate in such activities as IT Security, Requirements Definition, Design Reviews, User Acceptance Testing, System Owner, Training, etc. in their areas. If new IT Investments are introduced, OIT should be consulted to assess capacity and workload of existing IT Project Managers and determining the need to request additional FTEs.

Process and Product Quality Assurance

IT Investments are no longer required to budget for the PPQA (Process and Product Quality Assurance) program.

Budget Formulation and Budget Execution

The guidance set forth in this document should be used by the Investment Owners to ensure applicable costs are planned for and submitted as part of PBGC's Budget Formulation process (issued by the Budget & Organizational Performance Department), typically two years out, which includes ITIRB review of IT Synopses and the Budget Planning and Integration Team (BPIT) each year.

Once funding is **approved** during the Budget Execution year for the IT Investment to perform the planned work, the Budget Liaison Officers from the business departments can work with the appropriate CIO Leadership members and OIT Budget Liaison Officer to determine the best way to execute the funding.

7. Legislative and Regulatory Authorities for IT Investment Owner Guidelines

Below is a list of key legislation supporting the establishment of the IT Investment Owner Guidelines:

- Clinger-Cohen Act of 1996
- Paperwork Reduction Act of 1995
- Computer Security Act of 1987
- Presidential Decision Directive 63 of May 22, 1998, Critical Infrastructure Protection
- Government Paperwork elimination Act of 1998
- Rehabilitation Act, amended 1998
- Office of Management and Budget (OMB) Circular A-11, Part 7, Planning, Budgeting, Acquisition, and Management of Capital Assets, updated August 2009, and the Capital Planning Guide, issued 2006.
- Office of Management and Budget Circular A-130, Management of Federal Information Resources of November 30, 2000
- E-Government Act, 2002
- Government Accountability Office, Investment Management Executive Guide, GA0-04-394G
- Office of Management and Budget Circular A-130, Management of Federal Information Resources of November 30, 2000
- Federal Information Security Management Act (FISMA) of 2002
- Federal Enterprise Architecture- FEAC
- National Institute of Standards and Technology (NIST) Special Publications (SP), to include:

- NIST SP 800-18 Revision 1, "Guide for Developing Security Plans for Federal Information Systems"
- NIST SP 800-30, "Risk Management Guide for Information Technology Security Risk Assessment Procedures for Information Technology Systems"
- NIST SP 800-34, "Contingency Planning Guide for Information Technology Systems"
- NIST SP 800-37, Revision 1, "Guide for the Security Certification and Accreditation of Federal Information Systems"
- NIST SP 800-47, "Security Guide for Interconnecting Information Technology Systems"
- NIST SP 800-53, Revision 3, "Recommended Security Controls for Federal Information Systems"
- NIST SP 800-53A, "Guide for Assessing the Security Controls in Federal Information Systems"
- National Institute of Standards and Technology Federal Information Processing Standards (FIPS), to include:
 - FIPS 140-2, "Security Requirements for Cryptographic Modules"
 - FIPS 199, "Standards for Security Categorization of Federal Information and Information Systems"
 - FIPS 200, "Minimum Security Requirements for Federal Information and Information Systems"
- Privacy Act of 1974, 5 U.S.C. 552a
- ITMRA - Information Technology Management Reform Act
- OMB Circular A-11- Parts 2, 3, and 7
- OMB A-127- Financial Management Systems
- OMB- Office of E-Government and Information Technology - Improving Information Technology (IT) Project Planning and Execution
- Federal Acquisition Regulation (FAR)- Part 34-Major System Acquisition, subpart 4.2-Earned Value Management System
- OMB Guidance on Section 208 of the E-Government Act of 2002 (Public Law 107-347, 44 U.S.C. Ch 36) on implementing the privacy provisions of the E-Government Act.
- IM 05-8- Web and Intranet Governance
- IM 05-07- PBGC's Information Technology Solutions Life Cycle Methodology (ITSLCM)
- IM 05-2 - Information Technology Security Policies
- IM 05-4- Use of Information Technology Resources
- IM 10-3- Protecting Sensitive Information
- IM 15-1- PBGC's Records Management Programs
- GA 15-05- PBGC Corporate Planning Process