

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



Consolidated Financial System (CFS)

04/21/2023

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
Concur (bi-directional flow)	Concur processes travel vouchers and claims for authorized government travel.	Yes	GSA/GOVT-4, Contracted Travel Services Program (June 3, 2009).	29 U.S.C. §§ 1302, 31 U.S.C. § 3711(e) and 44 U.S.C. § 3101.	Yes
Secured Payment System (bi-directional flow)	Secure Payment System is an application that provides a mechanism which allows personnel at PBGC and Federal Program Agency locations to create payment schedules in a secure fashion	Yes	PBGC-2, Disbursements – PBGC 83 FR 6254 (February 13, 2018); PBGC-3, Payroll, Leave, and Attendance Records – PBGC 83 FR 6256 (February 13, 2018); PBGC-13, Debt Collection – PBGC 83 FR 6264 (February 13, 2018)	29 U.S.C. §§ 1302, 1306, 1307, 1341, 1343, 31 U.S.C. §§ 3711(e) and 44 U.S.C. §§ 3101.	Yes
Treasury Broker - DATA Act/ Data Act Schema/	The Data Act Schema combines information from CFS and the Federal Procurement Data System (FPDS), (PD and MEPD) that is uploaded to a Data Act broker maintained by the U.S. Department of the Treasury. The Data Act Schema contains the same PII in CFS or is made publicly available in FPDS.	No	Not applicable	Not applicable	Not applicable

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EFAST 2	EFAST2 electronically receives, processes, stores, publicly discloses, distributes, and archives approximately 1 million Form 5500 Series filings submitted annually by employers.	Yes	<p>The SORN for the legacy EFAST system is identified by</p> <p>DOL/PWBA-16, Form 5500EZ Filings</p> <p>Federal Register, Vol. 67, No. 67, Monday, April 8, 2002, Page 16936</p> <p>Two new SORNs addressing the change in data collection from paper and electronic filing to Web browser-based collection are currently in development.</p>	ERISA Act of 1974 and provisions of the Internal Revenue Code	Yes
Employee Express	Employee Express (EEX) is an automated system that Federal employees use to make their personnel and payroll transactions electronically. EEX serves as a front-end system for participating agencies' personnel and payroll systems. E	Yes	Some of the records in EEX are covered by Government-wide SORNs, such as OPM/GOVT 1 General Personnel Records, while others are covered by SORNs specific to each participating agency.	The information in EEX is collected by the participating agencies pursuant to the general authorities related to hiring and payroll in 5 U.S.C., Part III.	No

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FedDebt	The purpose of the FedDebt system is to maintain records about individuals who owe delinquent non tax debt(s) to the U.S. Government referred for collection by departmental and program agencies (Creditor Agencies). The information contained in the records is maintained for the purpose of taking action to facilitate the collection and resolution of the debt(s) using various collection methods, including, but not limited to, requesting repayment of the debt by telephone or in writing, offset, administrative wage garnishment, referral to collection agencies, to Department of Justice for litigation, and other collection or resolution methods authorized or required by law.	Yes	Bureau of the Fiscal Service, Department of the Treasury. 85 FR 11776 02/27/2020	The authorities for operating this system or performing this project are: Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701; 31 U.S.C. § 7701, 26 U.S.C. § 6109, 44 U.S.C. § 3101 and 31 U.S.C. chapter 31	Yes
Federal Personnel Payroll System	A comprehensive, mainframe-based, integrated online/real-time personnel and payroll system developed and operated by the Interior Business Center	Yes	Office of Personnel Management (OPM) government-wide system of records notices (SORNs) including OPM/GOVT-1, General Personnel Records, December 11, 2012 (77 FR 73694); modification	5 U.S.C. 5101, et seq., Government Organization and Employees; 31 U.S.C. 3512, et seq., Executive Agency Accounting and Other Financial	Yes

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			published November 30, 2015 (80 FR 74815); OPM/GOVT-7, Applicant Race, Sex, National Origin and Disability Status Records, June 19, 2006 (71 FR 35356); modification published. November 30, 2015 (80 FR 74815), and the DOI SORN, DOI-85 Payroll, Attendance, Retirement, and Leave Records, July 19, 2018 (83 FR 34156)	Management Reports and Plans; 31 U.S.C. 1101, et seq., the Budget and Fiscal, Budget, and Program Information; 5 CFR part 293, subpart B, Personnel Records Subject to the Privacy Act; 5 CFR part 297, Privacy Procedures for Personnel Records; Executive Order 9397 as amended by Executive Order 13478, relating to Federal agency use of Social Security numbers; and Public Law 101-576 (Nov. 15, 1990), the Chief Financial Officers (CFO) Act of 1990.	
Treasury Web Applications	Treasury Web Applications Infrastructure (TWAI) - a highly secure	Yes	Typically, Treasury bureaus and offices publish their own	In addition to those disclosures generally	Yes

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Infrastructure (TWA)I-Pay.gov/ Invoice Processing Platform (IPP) / Collections Information Repository (CIR)	<p>environment provided by the Federal Reserve Information Technology (FRIT) to support several enterprise-wide Treasury applications.</p> <p>Pay.gov is a website where you can fill out a government form or pay a bill to a United States government agency.</p> <p>IPP is a secure, web-based, centralized program through which federal agencies better manage the invoicing process for goods and services, from purchase order to payment notification.</p> <p>CIR - Federal Program Agencies (FPAs) use CIR to get detailed and summary-level information on revenue they receive.</p>		<p>SORNS for systems of records they maintain that are unique to a Treasury mission. At Treasury, some systems of records are not covered by a Government-wide SORN, but the records are of a type commonly maintained by all (or most) Treasury bureaus and offices. In these cases, Treasury publishes a single SORN to cover the maintenance of these systems of records by all Treasury bureaus and offices that maintain these records. These SORNS are referred to as "Treasury-wide SORNS." If a Treasury bureau or office maintains a system of records covered by a Treasury-wide SORN, they do not need to publish their own SORN to cover these records.</p>	<p>permitted under the Privacy Act of 1974, 5 U.S.C. 552a(b), records and/or information or portions thereof maintained as part of this system may be disclosed outside Treasury as a routine use pursuant to 5 U.S.C. 552a(b)(3) as follows to:</p>	

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
US Bank	The requirements for interconnection between Pension Benefit Guaranty Corporation (PBGC) and U.S. Bank are for the express purpose of exchanging data between Premium and Practitioner System (PPS), owned by Financial Operations Division (FOD), and U.S. Bank - Lockbox, owned by U.S. Bank. This interconnection will be utilized through the U.S. Treasury, Bureau of the Fiscal Services Financial Agent Selection Process for General Lockbox Network (GLN). U.S. Bank will process paper checks and other remittance documents (not related to taxes) that are received through the mail.	No	Not applicable	Not applicable	No

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 Consolidated Financial System (CFS) is a major information system within the PBGC FOD. The CFS addresses the PBGC's budgetary, fiscal, financial, management and reporting needs for the enterprise revolving fund, trust accounting, and consolidated financial operations. The FOD processes premium filings to prepare financial statements and administer the Corporation's financial and accounting programs. The FOD uses the Premium and Practitioner System (PPS) module of the CFS to automate the filing processes and facilitate premium filing, collection and enforcement services.

CFS is comprised of the following ledgers:

- The Consolidated Financial System Revolving Fund Ledger;
- The Consolidated Financial System Trust Accounting Ledger; and
- The Consolidated Financial System Consolidated Ledger.

CFS is a production system based on the Oracle Federal Financials (E-Business Suite 12.2.10) Commercial Off-the Shelf (COTS) application product. CFS also includes custom designed interfaces that integrate CFS with other PBGC and non-PBGC systems.

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

Confidentiality	Moderate
Integrity	Moderate
Availability	Low

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.

CFS uses PII that is collected by the following interconnected systems: My Plan Administration Account (My PAA), GSA (Concur), Case Management System (CMS), Federal Personnel Payroll System (FPPS), Secured Payment System (SPS), Comprizon, FedDebt, and US Bank.

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.

CFS does not inherit any controls from an external provider, and there are ISAs and MOUs in place between Treasury (SPS) and GSA (Concur). The privacy applicable portions of those documents pertain to the descriptions in Section 2.1 The Components of the System.

5. For the user roles in the system:

Role Name	Number of Users in that role	Approver/Sign off	Access Level (Read, Write, etc)	Recertification Date
Analyst CRM	16	Brad Porter	Read, Write and Edit	05/25/2022
CCD Analyst TCA	16	Brad Porter	Read, Write and Edit	05/25/2022
CCD Supervisor TCA	3	Brad Porter	Read, Write and Edit	05/25/2022
CCRD CRM	2	Brad Porter	Read, Write and Edit	05/25/2022
CFS User CRM	5	Brad Porter	Read, Write and Edit	05/25/2022
Contractor Supervisor CRM	3	Brad Porter	Read, Write and Edit	05/25/2022
Federal Accountant CRM	7	Brad Porter	Read, Write and Edit	05/25/2022
Federal Approval CRM	16	Brad Porter	Read, Write and Edit	05/25/2022
Federal CCD Manager CRM	4	Brad Porter	Read, Write and Edit	05/25/2022
Federal Lead Accountant CRM	1	Brad Porter	Read, Write and Edit	05/25/2022
Federal Senior Accountant CRM	5	Brad Porter	Read, Write and Edit	05/25/2022
OGC - BLT User CRM	1	Brad Porter	Read, Write and Edit	05/25/2022
PBGC CCD Analyst TCA	8	Brad Porter	Read, Write and Edit	05/25/2022
PBGC CCD Manager TCA	4	Brad Porter	Read, Write and Edit	05/25/2022

Role Name	Number of Users in that role	Approver/Sign off	Access Level (Read, Write, etc)	Recertification Date
STCD User CRM	1	Brad Porter	Read, Write and Edit	05/25/2022
Suspense Approver CRM	5	Brad Porter	Read, Write and Edit	05/25/2022
Suspense Federal Approver CRM	14	Brad Porter	Read, Write and Edit	05/25/2022
Grand Total	111	-		-

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.

The CFS has the following Physical, Technical, and Administrative controls in place.

- (1) Physical controls – Security guards, key entry, locked file cabinets, secured facility, closed circuit television, cipher locks, identification badges, and locked offices.*
- (2) Technical controls– Password protection, virtual private network, firewalls, unique user identification names, encryption, intrusion detection, and personal identity verification.*
- (3) Administrative controls – security audits, monitoring of user activity, refresher security, privacy, records management, and role-based training, backups secured off-site, encryption of backups, least privilege to restrict access to PII and Personal Identity Verification.*
- (4) Access and least privilege controls-The Financial Operations Department documents its access procedures in the 6.0 System Access and Production Support document.*

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.

The PII records are maintained for:

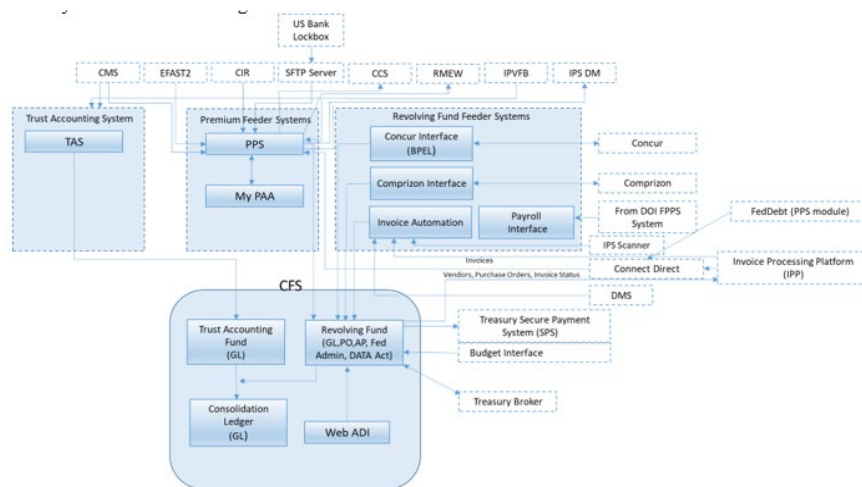
- Determining amounts to be paid and in effecting payments by the Department of the Treasury on behalf of PBGC.
- Collecting debts owed to PBGC by various individuals, including, but not limited to, pension plans and/or sponsors owing insurance premiums, interest and penalties; PBGC employees and former employees; consultants and vendors; participants, alternate payees, and beneficiaries in terminating and terminated pension plans covered by ERISA; and individuals who received payments from PBGC to which they are not entitled.
- Facilitating PBGC's compliance with the Debt Collection Improvement Act of 1996.

Users are granted access via GetIT, the PBGC network process. Requests are approved by the user's supervisor and the primary or alternate Information System Owner. The user's supervisor determines system responsibility, as approved by the primary or alternate Information System Owner. Quarterly, a review is performed to verify that users still have an active Local Area Network account. Annually, a recertification of all active users and their roles is conducted by the Financial Operations Department, Policies Procedures and Control Division, as per the 2.0 User Recertification document (using ITIOD SailPoint tool).

The Financial Operations Department also separates duties of individuals as necessary. Unique roles and responsibilities are established to promote separation of duties and to prevent one user from having access that would allow them to violate internal control. Roles and responsibilities that may pose a conflict have been identified. Any new roles and responsibilities are reviewed to ensure that the Financial Operations Department retains separation of duties. When users request access via GetIT, the user's supervisor and the information system owner are required to review and approve the request before the access is granted. The Financial Operations Department, Financial Systems Branch also reviews each request to ensure that separation of duties is maintained for each user, and the requested access does not violate the conflicts that have already been identified. In those cases where conflicts are identified, the Financial Systems Branch will not grant the access until the conflict has been resolved.

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.

The Consolidated Financial System (CFS) is a major information system within the Financial Operations Department (FOD). The CFS addresses the Pension Benefit Guaranty Corporation's budgetary, fiscal, financial, management, and reporting needs for the enterprise revolving fund, trust accounting, and consolidated financial operations. The following diagram depicts data flows.



Information is transmitted via electronic connections occurring within the boundaries of the PBGC internal network infrastructure as well as hard and soft copy reports with the following offices:

- *Office of the General Counsel (OGC)*
- *Corporate Finance & Restructuring Department (CFRD)*
- *Policy, Research and Analysis Department (PRAD)*
- *Office of Benefits Administration (OBA)*
- *Multiemployer Program Division (MEPD)*
- *Procurement Department (PD)*

PII is shared with Contractors for Operations and Maintenance (O&M) of the system. These are not interconnections and are not identified in the CSAM, SSP.

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

- ☒ Yes
- ☐ No