

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



Office of Benefits Administration (OBA)
Applications Suite (BAS)

December 1, 2025

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.

TIP!

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

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

2.1 The Components of the System

Name of component	Describe the component (1 or 2 sentences)	Does this component contain PII	In what system of records (SORN) is this information stored	What is the Legal Authority for collection of this information	Does this system share PII internally (please detail in question 13)
Spectrum	The Spectrum application has four major functional areas—Data Load Management (DLM), Customer and Benefit Management, System Administration, and Payment Processing functions—that provide a framework for managing participant benefits and payments.	Yes.	PBGC-2, Disbursements; PBGC-6, Plan Participant and Beneficiary Data; PBGC-9, Unclaimed Retirement Funds	29 U.S.C. §§ 1055, 1056(d)(3), 1203, 1302, 1321, 1322, 1322a, 1341, 1342 & 1350; 44 U.S.C. § 3101; 5 U.S.C. § 301; 31 U.S.C. § 6101; 31 U.S.C. § 9101; 31 U.S.C. § 3716.	Yes.
Approval Worklist Application (AWA)	AWA allows users to view and approve pending transactions.	Yes.	PBGC-2, Disbursements; PBGC-6, Plan Participant and Beneficiary Data; PBGC-9,	29 U.S.C. §§ 1055, 1056(d)(3), 1203, 1302, 1321, 1322, 1322a, 1341, 1342 & 1350; 44 U.S.C. §	Yes.

			Unclaimed Retirement Funds	3101; 5 U.S.C. § 301; 31 U.S.C. § 6101; 31 U.S.C. § 9101; 31 U.S.C. § 3716.	
Case Management System (CMS)	CMS is a business application for the Office of Benefits Administration (OBA) and other departments that supports the workflow and milestone processing for the trustee case processing.	No.			No.
Customer Correspondence System (CCS)	CCS is a set of services that provides a dynamic, streamlined, and standardized method of letter generation functionalities to PBGC's users and enterprise applications.	No, CCS does not store any data that is considered a record. CCS is used as a transactional service to send outgoing correspondence.			No.
Image Processing System (IPS)	IPS is an online repository for document image	Yes.	PBGC-2, Disbursements, PBGC-6, Plan	29 U.S.C. §§ 1055, 1056(d)(3), 1203, 1302, 1321, 1322,	Yes,

	storage and catalog system.		Participant and Beneficiary Data, PBGC-9, Unclaimed Retirement Funds PBGC-10, Administrative Appeals File	1322a, 1341, 1342 & 1350; 26 U.S.C. § 6103; 5 U.S.C. § 301; 44 U.S.C. §§ 301 & 3101; 29 CFR 4003; 31 U.S.C. § 6101; 31 U.S.C. § 9101; 31 U.S.C. § 3716.	
Payment Adjustment Calculation System (PACS/Batch PACS)	This calculation tool evaluates whether PBGC must refund money to, or recoup money from, participants, beneficiaries, and alternate payees.	Yes.	PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. §§ 1055, 1056(d)(3), 1302, 1321, 1341, 1342 & 1350; 26 U.S.C. § 6103; 44 U.S.C. § 3101; 5 U.S.C. § 301.	Yes.
Integrated Present Value Future Benefits (IPVFB)	IPVFB determines the PBGC's Present Value of Future Benefits (PVFB) liability for financial reporting purposes.	Yes.	PBGC-6, Plan Participant and Beneficiary Data, PBGC-9, Unclaimed Retirement Funds	29 U.S.C. §§ 1055, 1056(d)(3), 1302, 1321, 1322, 1322a, 1341, 1342 & 1350; 26 U.S.C. § 6103; 29 U.S.C. § 1203; 44 U.S.C. § 3101; 5 U.S.C. § 301.	Yes.
Benefit Calculation and Valuation (BCV) Web Portal	The BCV web portal is a web application to perform authorized	Yes.	PBGC-6, Plan Participant and Beneficiary Data, PBGC-9, Unclaimed	29 U.S.C. §§ 1055, 1056(d)(3), 1302, 1321, 1322, 1322a, 1341, 1342 & 1350; 26 U.S.C. §	Yes.

	functions, which include performing valuation and calculation programming; producing benefit calculations and estimates; performing data entry, validation, reconciliation, and verification; performing system administration; and producing standard reports.		Retirement Funds, PBGC-10, Administrative Appeals File	6103; 29 U.S.C. § 1203; 44 U.S.C. § 3101; 5 U.S.C. § 301; 29 CFR 4003.	
Oracle Primavera (P6)	P6 is an enterprise project management application used to manage, schedule, and report OBA's case activities and resource capabilities/ assignments.	No.			No.
Client application component					
Archive Utility/Archive Access	Archive Access and Archive Utility are applications that store case-related files.	Yes.	PBGC-6, Plan Participant and Beneficiary Data, PBGC-9, Unclaimed	29 U.S.C. §§ 1055, 1056(d)(3), 1302, 1321, 1322, 1322a, 1341, 1342 & 1350; 26 U.S.C. §	Yes.

			Retirement Funds, PBCG-10, Administrative Appeals File	6103; 29 U.S.C. § 1203; 44 U.S.C. § 3101; 5 U.S.C. § 301; 29 CFR 4003.	
Tool components					
Service Administration Tool (SAT)	SAT is an independent tool that allows the Approval Administrator to manage Approvers, their approval rights, and the rules that govern approvals.	No.			No.
CLEAR	CLEAR is a web- based service from Thomson Reuters that helps PBGC locate participants.	Yes.	PBGC-9, Unclaimed Retirement Funds	29 U.S.C. §§ 1055, 1056(d)(3), 1302, 1321, 1322, 1322a, 1341, 1342 & 1350; 29 U.S.C. 1203; 44 U.S.C. § 3101; 5 U.S.C. § 301.	No.
FileNet Bulk Import Tool ¹	This tool is used to pull IPS documents based on the IPS Document IDs.	Yes.	PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. §§ 1055, 1056(d)(3), 1302, 1321, 1341, 1342, & 1350; 44 U.S.C. § 3101; 5 U.S.C. § 301.	Yes.

¹ Formerly referred to as the IPS Import Tool.

Plan Download Tool (PDT)	PDT pulls data for given cases, and outputs the information to mainly be used as a starting point for the creation of participant databases.	Yes.	PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. §§ 1055, 1056(d)(3), 1302, 1321, 1341, 1342, & 1350; 26 U.S.C. § 6103; 44 U.S.C. § 3101; 5 U.S.C. § 301.	Yes.
ATPBGC Add-Ins	ATPBGC Add-Ins includes custom functions that can be used in Excel.	No.			No.
Ares	Ares builds financial information.	Yes.	PBGC-13, Debt Collection	29 U.S.C. § 1302; 31 U.S.C. § 3711(a); 44 U.S.C. § 3101; 5 U.S.C. § 301; Executive Order 13019.	Yes.
Plan Closing	This tool is used to verify that valuation information stored for a given case plan is correct and complete at the time the Plan Completion Memo is submitted to ongoing administration.	Yes.	PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. § 1055 & 1056(d)(3), 1302, 1321, 1341, 1342 & 1350; 44 U.S.C. § 3101, 5 U.S.C. § 301.	Yes.
Recovery Collection Tool (RCT)	RCT is a tool to assist in reconciling and recording payment/	Yes.	PBGC-13, Debt Collection	29 U.S.C. § 1302; 31 U.S.C. § 3711(a); 44 U.S.C. § 3101; 5 U.S.C. §	Yes.

	collection data in Ares.			301; Executive Order 13019.	
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2.2 The System as a Whole

1. Please describe the purpose of the system when considered as a whole.

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

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

Confidentiality	Moderate
Integrity	Moderate
Availability	Moderate

3. Is this system owned and/or controlled by PBGC or an external party? If so, who owns and/or controls the system?

The OBA Applications Suite (BAS) is owned and controlled by PBGC and managed by the OBA Security Team, including the ISO within OBA.

4. Is this a new or existing information system? If this is an existing information system, please describe the changes.

For FY2026, LEO was decommissioned ~ November 2025.

5. Does your system collect, process, or maintain any records that describe how any individual exercises their First Amendment rights?

If so, please describe the information it collects and the purpose for the collection. Please describe whether: 1) an express legal authority authorizes the collection, 2) the collection is pertinent to and within scope of an authorized law enforcement activity, or 3) the individual(s) consents to the collection.

(The First Amendment guarantees an individual's right to the exercise of their religious beliefs, their petitioning the government, their exercise of free speech, their right to peaceably assemble, and the freedom of the press.)

The OBA Applications Suite (BAS) does not collect, process or maintain any records that describe how any individual exercises their First Amendment rights.

6. For the PII in the system, discuss the actual/intended uses of the PII; procedures taken to limit the PII collected to the minimum needed; reasons the PII is necessary and relevant; and procedures taken to periodically review the accuracy, relevance, timeliness, and completeness of PII throughout the information life cycle.

PII is used to manage pension plan data; value pension plans and associated liabilities for which PBGC is, or may be, obligated to pay; and calculate and provide pension benefits.

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

A Business Needs Justification Document (BNJ) is sent to the child system component teams to identify any changes in the PII process and/or information life cycle for that PII is collected from individuals, federal agencies, and other third-party sources.

7. Discuss how your system retrieves PII. Please describe the identifiers used to locate records within a system, such as name, identification number, date of birth, etc.

Records are retrieved using Social Security Number, Customer ID, and last name.

8. Approximately how many individuals' PII is maintained in the system?

BAS collects PII from over 1,215,000 retirees or their beneficiaries.

9. Is the submission of PII by individuals voluntary or mandatory? If the submission is voluntary, what is the outcome of an individual not submitting PII.

Individuals can opt out of the collection of PII, as participant response on a PBGC form is voluntary. However, failure to provide information to PBGC (e.g., SSN) may delay or prevent PBGC from calculating and paying the participant's pension benefits. When participant and beneficiary information is provided by a third party (e.g., former plan administrator), the participant does not have the right to consent to a particular use of the information. After PBGC becomes the statutory trustee of a pension plan, a participant may contact the PBGC Customer Contact Center where QuEST is accessed, or the participant can access MyPBA (which both are no longer in the BAS security boundary) to update or modify the information that is used by PBGC.

10. If your system collects, Social Security Numbers (SSNs):

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

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

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

Interactions with financial institutions, Federal Taxpayer Identification, and Government Data Matching.

- 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.

N/A

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

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

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

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

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

BAS does not inherit privacy controls from any external providers.

13. Is the PII shared with external (non-PBGC) organizations? If so, identify with whom the PII is shared and the purpose. 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 JCAM. Be sure to include any MOU, ISA, or Interagency Agreements.

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

1. *BAS to PBGC Data Distribution System (PDDS) – Interconnection is utilized to print and distribute letters to entities on behalf of PBGC. The security of information being passed on a one-way interconnection is protected using a Federal Information Processing Standard (FIPS) 140-2 approved encryption and hashing mechanisms.*
2. *BAS to Pension Lump Sum (PLUS) System – Interconnection is utilized for payee services to provide annuity and lump sum payments to pension plan participants and their beneficiaries on behalf of PBGC. The interconnection between PBGC's BAS and PLUS will utilize secure file transfer protocol (SFTP) over a secure Virtual Private Network (VPN).*
3. *BAS to Trust Accounting System (TAS) – Interconnection is utilized for the management and financial reporting of PBGC's Trust Fund. There is no direct connection between the TAS and BAS; data exchange will be facilitated via a Secure File Transfer Protocol (SFTP) solution managed by the PBGC IT Infrastructure Operations Department (ITIOD) and TAS.*
4. *BAS to Fiscal Services FedDebt – Interconnection is utilized for debt collections data from Treasury. The data exchange is over a virtual private network (VPN).*

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

14. For the user roles in the system:

Role Name	Number of Users	Approver	Access Level (Read, Write, etc)	Recertification Date
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	in that role			
Regular User – Read Only	1164	Service Owner(s)	Read only access is role-based for users who need to perform non-privileged duties	5/2025
Regular User – Write Access	792	Service Owner(s)	Write access is role-based for users who need to perform non-privileged duties.	5/2025
Advanced Privilege Users	55	Service Owner(s)	The access is role-based for users who need to perform privileged duties as assigned. This includes network, system, and database administrators.	5/2025

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

BAS adheres to the National Institute of Standards and Technology Special Publication 800-53, Rev. 5, and has adopted appropriate administrative, technical, and physical controls to secure PII in accordance with PBGC's security program to protect the confidentiality, integrity, and availability of the information, and to ensure that records are not disclosed to or accessed by unauthorized individuals. Physical controls include the use of secured facilities to protect the data center and work areas for PBGC personnel. PIV badges are required to access secure office spaces as well as to access the PBGC network. Technical controls include access controls for password protection and least privilege access to the data. A Zero Trust secure access service edge (SASE) platform provides access control, firewall services, intrusion detection, data protection and more, adding several layers of security around the PII data. Audit controls provide logging of network and system access to manage event monitoring. Administrative controls include periodic security audits, monitoring of user activity, mandatory background checks for any personnel who would have access to sensitive data, and annual security, privacy, and records management training. Backups are maintained off-site, and procedures are in place to ensure that only authorized personnel have access to PII.

16. Please discuss additional training for users, other than the PBGC mandatory annual training, for protecting information in the system.

There is no additional training for the BAS users, other than the PBGC mandatory annual training, for protecting information in the system.

17. Does the System leverage the Enterprise Access Controls?

- Yes
- No

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

- Yes
- No

19. Discuss the process in place for retention and destruction of PII. Cite the applicable retention schedule(s).

BAS follows the PBGC Directive IM 15-03, PBGC Records Management Program for retention and destruction of PII, and PBGC Record Disposition Schedule 2: Mission Schedule, ITEM 2.1: Plan, Participant, and Insurance Records for its retention.

2.3 Privacy Office Review

Name of Reviewer	SHANNON KRESHTOOL
Date Reviewed	
Expiration Date	November 30, 2026
Result	<input checked="" type="checkbox"/> Approved without conditions <input type="checkbox"/> Approved with conditions (see below). <input type="checkbox"/> Denied

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