Pension Benefit Guaranty Corporation

Information Technology Infrastructure Operations Department (ITIOD)

Budget Department Management System (BDMS)

Last Updated: 06/11/2025

1   PRIVACY POINT OF CONTACT

Name	Les Hockman
Title	Information System Security and Privacy Officer (ISSPO)
Phone	202.229.3879
Email	hockman.lester@pbgc.gov

2 PRIVACY IMPACT ASSESSMENT

A Privacy Impact Assessment (PIA) is an analysis of how information is/will be handled:

   i.   To ensure handling conforms to applicable legal, regulatory, and policy requirements regarding privacy,
   ii. To determine risks and effects of collecting, maintaining, and disseminating information in an identifiable form in an electronic information system, and
   iii. To examine and evaluate protections and alternative processes for handling information to mitigate potential privacy risks.

Privacy concerns are highest for systems that contain Personally Identifiable Information (PII). PII is defined as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. Because there are many types of information that can be used to distinguish or trace an individual's identity, the term PII is necessarily broad.

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

2.1 The Components of the System

Name of component	Describe the component (1 or 2 sentences)	Does this component contain PII	In what system of records (SORN) is this information stored	What is the Legal Authority for collection of this information	Does this system share PII internally *(please detail in question 13)*
People Planner	People Planner (PLP) provides the ability to budget and project costs at an employee detail level within the application. This solution allows detailed planning with the ability to incorporate into a dimensional cube providing data transparency from the dimensional model to the individual detailed records.	Yes	OPM SORN GOVT-1 General Personnel Records -88 FR 56058 (8/17/2023)	5 U.S.C. 1302, 2951, 3301, 3372, 4118, 8347, and Executive Orders 9397, 9830, and 12107.	No
Microsoft Access Database	BDMS contains a legacy Access database to perform the position management function within the Budget Department.	Yes	See Above	See Above	No
Database extracts from Consolidated Financial System (CFS) and Human Resources Management System (HRMS	Extracts from CFS and HRMS contain data originating from the Department of Interior's Federal Personnel and Payroll System (FPPS)	Yes	DOI-85, Payroll, Attendance, Retirement, and Leave Records - 83 FR 34156 (July 19, 2018)	5 U.S.C. 5101, et seq., 31 U.S.C. 3512	No

2.2 The System as a Whole

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

> The Budget Department Management System (BDMS) supports a rolling 5-year strategic planning and budgeting process to align resources with PBGC's strategic goals and objectives. BDMS meets all the business requirements of Budget Formulation at PBGC with consideration of the following main goals:
> • Automate budget formulation
> • Improve data availability
> • Generate operating efficiencies
>
> BDMS provides a purpose-built Budget Formulation Solution that enables and automates the formulation and adjustment functions of budget management. It provides real-time budget figure updates across a collaborative, secure environment. It eliminates manual budgeting processes, improves communication and decision support, and increases transparency. All budget data is stored in a central repository with role-based access controls, following the principle of least privilege. The use of workflow automation is also available for all budgeting processes and workflows. Real-time budget status is also available via dashboards to all authorized users based on user roles. The Budget Formulation Solution will have reporting capabilities to help with budget report requirements.
>
> The addition of the People Planner module to BDMS introduces PII. Therefore, this addition was considered a major change when it was added to the authorization of BDMS in December 2022.
>
> BDMS is a Software as a Service (SaaS) solution by OneStream Software and a subsystem within the ITISGSS authorization boundary.

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

Confidentiality | Moderate
Integrity | Moderate
Availability | Moderate

3. Is this a contractor system?

☒Yes
☐No

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

> No changes since the last review

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.)

No, the system 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.

The People Planner module will replace the current Microsoft Access database that is used to facilitate the position management function within the Budget Department with a secure, role-based system. Certain employee-specific information which may be considered PII is either included in the current module or will be included in the future state People Planner module. This information is pertinent to the position management function performed by the Budget Department and is used in the formulation and execution of the Corporation's Personnel Compensation and Benefits budget to accurately forecast expected personnel costs. Only the information deemed necessary to carry out the position management, formulation, and execution functions will reside in the People Planning module. The data contained in People Planner is comprised of official Human Resources data and is updated on a biweekly basis to ensure data accuracy, relevance, timeliness, and completeness.

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.

PII is manually imported into the system via a CSV/Microsoft Excel file from OMAG2G Human Resources Management Systems (HRMS). Once the data has been imported into the system, Name and Employee Common ID are typically used to isolate records when review is needed at the employee level of detail.

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

Approximately 900 to 1000 individuals

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.

PII is not submitted by individuals. Any PII contained in BDMS is imported via a CSV/Microsoft Excel file from OMAG2G Human Resources Management Systems (HRMS).

10. 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?

BDMS does not collect, use or maintain SSN.

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

NA

    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.

NA

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 contained within BDMS is loaded manually via CSV and/or Microsoft Excel files from OMAG2G Human Resources Management Systems (HRMS).

BDMS does not collect PII from individuals, therefore, providing Privacy Act Statements is not applicable for BDMS.

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.

BDMS does not inherit any privacy controls from OneStream. All privacy controls are implemented internally by ITISGSS, Common Control Provider (CCP) Privacy Office, or other PBGC CCP.

There is no applicable Service-Level Agreement (SLA), ISA, or MOU for BDMS.

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 (including 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 People Planner data is not shared externally (non-PBGC). BDMS receives data from Consolidated Financial System (CFS) (budget actuals from prior years, etc.) in the form of CSV files manually shared and imported. Similarly, BDMS will receive data from HRMS (for People Planning) as a manual CSV file-share as well. These are extracted from reports, with some manual processing before import into BDMS. An ISA/MOU is not needed because CFS and HRMS are PBGC-internal systems, and the interface is a non-dedicated connection.
>
> BDMS exports budget formulation data, which does not include PII, to external agencies (DOL, OMB, Congress) in the form of published reports, which are generated within BDMS and then subject to further review/revision by BD manually. These are submitted via the DEBS system via secure upload. An ISA/MOU is NOT needed because this data reporting/transfer is non-dedicated connection.
>
> The only other form of data interface is reports saved from BDMS for manual sharing within PBGC. In the current state, BDMS has no automated data interfaces with any other systems.
>
> All data interconnections are documented in control CA-3 within CSAM.

14. For the user roles in the system:

Role Name	Number of Users in that Role	Approver	Access Level (Read, Write, etc.)	Recertification Date
Administrator	2	Chuck Kelly	Read, Write	2/5/2025
Global User	12	Chuck Kelly	Read, Write	2/5/2025
Budget Liason Officer (BLO)	34	Chuck Kelly	Read, Write	2/5/2025
Department Directors	21	Chuck Kelly	Read, Write	2/5/2025
BPIT/EMC	7	Chuck Kelly	Read	2/5/2025
ITPD	2	Chuck Kelly	Read, Write	2/5/2025
People Planner Super User	2	Chuck Kelly	Read/Write	2/5/2025
People Planner Viewer	3	Chuck Kelly	Read	2/5/2025

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

Physical, technical, and administrative controls are implemented in accordance with the NIST SP 800-53 Moderate baseline to ensure the protection of data within BDMS.

Physical security controls employed to secure the PII in the system include:
- Security guards (PBGC)
- Key entry (PBGC)
- Locked file cabinets (PBGC)
- Secured facility (PBGC)
- Identification badges (PBGC)
- Locked offices (PBGC)
- Backups are secured off-site (PBGC)
- Physical access is only for authorized personnel (PBGC)

Technical security controls employed to secure the PII in the system include:
- Password protection (PBGC)
- Virtual Private Network (PBGC)
- Firewalls (PBGC and OneStream)
- Unique user identification names (PBGC and OneStream)
- Encryption (OneStream)
- Intrusion Detection Systems (OneStream)
- Personal Identity Verification (PIV) card access (PBGC)
- Public Key Infrastructure (PKI) Certificates (PBGC)
- System access is only for authorized personnel (PBGC and OneStream)
- CyberArk access for system upgrades and administrative duties (PBGC)
- OneStream Audit Logs of all data entry (OneStream)

Administrative security controls employed to secure the PII in the system include:
- Periodic security audits (PBGC)
- Regular monitoring of user's activity (PBGC)
- Annual refresher training for security, privacy, and records management (PBGC)
- Mandatory on-boarding training for security, privacy, and records management personnel (PBGC)
- Role-based training (PBGC)
- 90-Day inactivity deactivation (PBGC)
- Matrixed user security roles within the system, following the principle of least privilege (PBGC)

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

N/A

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).

Records containing personally identifiable information (PII) are maintained and destroyed in accordance with the National Archives and Records Administration's (NARA) Basic Laws and Authorities (44 U.S.C. 3301, et seq.) and with PBGC-specific records disposition schedules approved by NARA. These retention schedules ensure that records are kept for the minimum period necessary to satisfy business, legal, and historical requirements. The following PBGC and General Records Schedules (GRS) govern retention and destruction of BDMS records:

PBGC 1.7, PBGC 1.8, PBGC 2.2, PBGC 2.3, GRS 1.1 (Item 001), GRS 2.3 (Item 050),

GRS 2.8 (Items 010, 020, 050, 100, 101), GRS 3.2 (Item 010), GRS 4.2 (Items 001, 020, 160, 161), GRS 5.1 (Item 010), GRS 5.7 (Item 050)

Retention requirements within these schedules range from 1 year to 135 years, or are triggered by specific events, ensuring alignment with PBGC's operational and legal needs.

2.3 Privacy Office Review

Name of Reviewer	Corey Garlick
Date Reviewed	6/11/2025
Expiration Date	6/11/2026
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