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

Consolidated Financial System (CFS)
04/09/2025

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. 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)*
Premium and Practitioner System (PPS)	PPS functionality is used for: processing annual filings; calculating premium, interest, and penalty owed; and creating accounting ledger entries for PBGC's Consolidated Financial Systems (CFS) accounting system.	Yes	PBGC-2 and 13.	29 U.S.C. 1302; 44 U.S.C. 3101; 5 U.S.C. 301; 31 U.S.C. 6101; 31 U.S.C. 9101, et seq.; 31 U.S.C. 3716. 29 U.S.C. 1302; 31 U.S.C. 3711(a) (1) (2) (3); 44 U.S.C. 3101; 5 U.S.C. 301; Executive Order 13019	Yes
ConcurGov (bi-directional flow)	ConcurGov processes travel vouchers and claims for authorized government travel.	Yes	GSA/GOVT-4, Contracted Travel Services Program 74 FR 26700 (June 3, 2009).	31 U.S.C. 3511, 3512 and 3523; 5 U.S.C. Chapter 57; and implementing Federal Travel Regulations (41 CFR 300-304)	Yes
Federal Personnel Payroll System (FPPS)- Employee Express/Leave	A comprehensive, mainframe-based, integrated.	Yes	Office of Personnel Management (OPM) government-wide	5 U.S.C. 5101, et seq., Government Organization and	Yes

and Earnings Statements/Quick Time	online/real-time personnel and payroll system developed and operated by the Interior Business Center		system of records notices (SORNs) including OPM/GOVT-1, General Personnel Records, December 11, 2012 (77 FR 73694); modification published November 30, 2015 (80 FR 74815); OPM/GOVT-7, Applicant Race, Sex, National Origin and Disability Status Records, June 19, 2006(71FR35356); 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	Employees; 31 U.S.C. 3512, et seq., Executive Agency Accounting and Other Financial 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.	

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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 Consolidated Financial System (CFS) is a major information system with Premium and Practitioner System (PPS) module and Concur Gov as subsystems.*
> *The Concur Gov is hosted on Concur Cloud for Public Sector (CSO) with the details of the connection and implemented and inherited privacy controls documented in CFS System Security and Privacy Plan and SAP Concur Gov FedRAMP documentation. The ISAs and MOUs are in place between General Services Agency (GSA), SAP Concur and PBGC.*
>
> *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) 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. 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.

> *CFS is an existing system. Although since last reviewed, CFS has undergone a series of maintenance updates aimed at improving the usability of the CFS and to ensuring security and compliance, none of these maintenance updates had an impact on the way CFS collects, process and maintain PII. All changes have been documented where applicable in the CFS baseline configuration. Security Testing and Evaluation (ST&E) report and Security Impact Assessments (SIA) are conducted as part of the development and maintenance process of CFS.*

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.

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 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. Each role has to be 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. 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.

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.

The CFS applications are authorized to use SSNs under Government Data Matching. SSNs are primary identifier as a primary means for transferring, matching, or checking information with Federal Personnel Payroll System (FPPS) Human Resource Management System, and Employee Express.

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

Approximately 927 individuals PII is maintained.

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.

> *The submission of PII by individuals (CFS users) is mandatory for the intended uses stated in section 6 of this PIA above.*

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?

> *CFS does not collect SSN. CFS subsystems connected to the DOI Federal Personnel Payroll System (FPPS) have SSNs related to QuickTime, Employee Express and Leave and Earnings Statements. The information collected within these applications are by DOI and other departments and used for federal employee benefits. The PBGC Concur Gov instance collects, use and dispose of PII to provide PBGC personnel with end-to-end commercial Travel and Expense product offering.*

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

> *The CFS applications are authorized to use SSNs under Government Data Matching. SSNs are primary identifier as a primary means for transferring, matching, or checking information with Federal Personnel Payroll System (FPPS) Human Resource Management System, and Employee Express.*

    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.
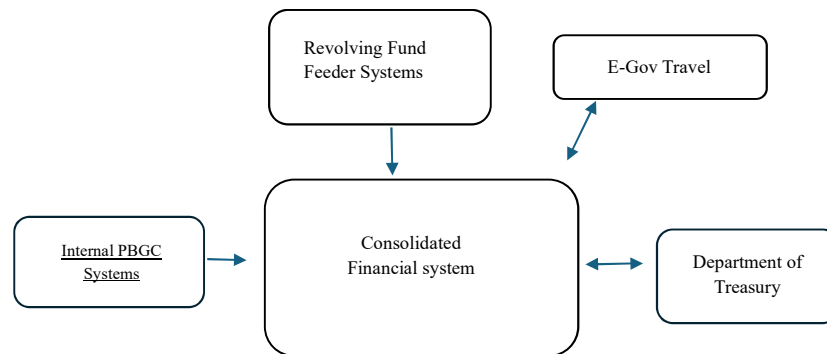
> *CFS uses PII that is collected by the following interconnected systems: My Plan Administration Account (My PAA), SAP Concur (Concur Gov), Federal Personnel Payroll System (FPPS), Premium and Practitioner System (PPS), QuickTime, Leave and Earning Statement (LES) and Employee Express. Collection of PII is via the GetIT Access application process. PBGC utilize the Participant Privacy Act Notice to notify personnel/users about why the information is being collected, how the information will be used, and under what circumstances the information may be disclosed.*

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.

> *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.*

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 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 PBGC Concur Gov instance provides PBGC personnel with end-to-end commercial Travel and Expense product offering. ConcurGov is a service for the GSA-led federal agency customer entity and its collection of customer-specific configurations of Concur Travel and Expense (CTE) with a few additional services such as GovPay within the Concur Cloud for Public Sector (CCPS) Cloud Service Offering (CSO). The following diagram depicts data flows.

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┌─────────────────┐                    ┌─────────────────┐
│ Revolving Fund  │                    │  E-Gov Travel   │
│ Feeder Systems  │                    │                 │
└────────┬────────┘                    └────────▲────────┘
         │                                      │
         ▼                                      ▼
┌──────────────┐   ┌─────────────────┐   ┌─────────────────┐
│ Internal PBGC│──▶│  Consolidated   │◀─▶│  Department of  │
│   Systems    │   │ Financial system│   │    Treasury     │
└──────────────┘   └─────────────────┘   └─────────────────┘
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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)*

14. For the user roles in the system:

CFS				
Role Name	Number of Users in that role	Approver	Access Level (Read, Write, etc)	Recertification Date
Analyst CRM	18	Brad Porter	Read, Write and Edit	05/02/2024
CCD Analyst TCA	17	Brad Porter	Read, Write and Edit	05/02/2024
CCD Supervisor TCA	3	Brad Porter	Read, Write and Edit	05/02/2024
CCRD CRM	1	Brad Porter	Read, Write and Edit	05/02/2024
CFS User CRM	5	Brad Porter	Read, Write and Edit	05/02/2024
Contractor Supervisor CRM	3	Brad Porter	Read, Write and Edit	05/02/2024
Federal Accountant CRM	5	Brad Porter	Read, Write and Edit	05/02/2024
Federal Approval CRM	15	Brad Porter	Read, Write and Edit	05/02/2024
Federal CCD Manager CRM	3	Brad Porter	Read, Write and Edit	05/02/2024
Federal Lead Accountant CRM	2	Brad Porter	Read, Write and Edit	05/02/2024
Federal Senior Accountant CRM	6	Brad Porter	Read, Write and Edit	05/02/2024
OGC - BLT User CRM	0	Brad Porter	Read, Write and Edit	05/02/2024
PBGC CCD Analyst TCA	7	Brad Porter	Read, Write and Edit	05/02/2024
PBGC CCD Manager TCA	5	Brad Porter	Read, Write and Edit	05/02/2024
STCD User CRM	2	Brad Porter	Read, Write and Edit	05/02/2024
Suspense Approver CRM	5	Brad Porter	Read, Write and Edit	05/02/2024
Suspense Federal Approver CRM	13	Brad Porter	Read, Write and Edit	05/02/2024
Grand Total	110	-	-	-

Concur Gov				
Role Name	Number of Users in that role	Approver	Access Level (Read, Write, etc)	Recertification Date
FT - Federal Traveler	611	David Guarnero	Read, Write and Edit	Weekly review by the Enterprise Identity Management (EIM) team and system administrator.
Traveler FTA - Federal Travel Arranger	52	David Guarnero	Read, Write and Edit	Weekly review by the Enterprise Identity Management (EIM) team and system administrator.
FSTA - Federal Supervisory Travel Approver	180	David Guarnero	Read	Weekly review by the Enterprise Identity Management (EIM) team and system administrator.

FATA Level 6 - Federal Agency Travel Administrator	7	David Guarnero	Read, Write and Edit	Weekly review by the Enterprise Identity Management (EIM) team and system administrator.
FATA Level 8 - Federal Agency Travel Administrator	6	David Guarnero	Read, Write and Edit	Weekly review by the Enterprise Identity Management (EIM) team and system administrator.
Grand Total	856			

15. 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.*

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

> *Besides PBGC mandatory training (Information Security & Privacy Awareness, Privacy Literacy, Insider Threat, and Rules of Behavior), CFS users are offered additional on the job training and other privacy refreshers by the Learning and Development Division via FedTalent Learning Management.*

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).

> *PBGC retains and destroys PII in accordance with National Archive and Records Administration (NARA) records and PBGC Simplified Records Schedules- Schedule. Refer to FOD File Plan Dashboard.*

2.3 Privacy Office Review

Name of Reviewer	Loretta Dennison
Date Reviewed	LORETTA DENNISON
Expiration Date	April 9, 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

> *Enter description here.*