

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



**Office of Management and Administration
Government to Government (OMAG2G)
Human Resources Management Systems (HRMS)
FPPS, OBIEE, eOPF, FPPS DataMart, WTTS/EODS,
FedTalent, ECOMP
March 2025**

1 Privacy Point of Contact

| | |
|-------|---------------------------|
| Name | Vincent McKinney |
| Title | Information System Owner |
| Phone | 202-229-3932 |
| Email | McKinney.Vincent@pbgc.gov |

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 <i>(please detail in question 13)</i> |
|--|---|---------------------------------|---|---|---|
| Federal Personnel/Payroll System (FPFS) | FPFS provides personnel and payroll support to numerous agencies. The system is customer-driven, creating and generating personnel transactions and enabling agencies to maintain records electronically. | Yes | OPM/GOVT-1-General Personnel Records | 5 U.S.C. 1302, 2951, 3301, 3372, 4118, 8347, and Executive Orders 9397, as amended by 13478, 9830, and 12107. | Yes |
| | | | OPM/Govt-2- employee Performance File System Record | 1104, 3321, 4305, and 5405 of title 5, U.S. Code, and Executive Order 12107. | |
| | | | PBGC-3- Employer Payroll Leave and Attendance Record | 29 U.S.C. 1302; 44 U.S.C. 3101; 5 U.S.C. 301; 5 U.S.C. 5501- 5584 | |
| | | | OPM/GOVT-5- Recruitment, Examining, and Placement Records | 5 U.S.C. 1302, 3109, 3301, 3302, 3304, 3305, 3306, 3307, 309, 3313, 3317, 3318, 3319, 3326, 4103, 4723, | |

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|--------------------------|---|----------------------------------|--|---|---|
| | | | | 5532, and 5533, and Executive Order 9397. | |
| 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)? |
| | | | OPM/GOVT-6- Personnel Research and Test Validation Records | 5 U.S.C. 1303, 3301, and 4702. | |
| | | | OPM/GOVT-7- Applicant Race, Sex, National Origin, and Disability Status Records | 5 U.S.C. 7201, sections 4A, 4B, 15A (1) and (2), 15B (11) and 15D (11); Uniform Guidelines on Employee Selection Procedures (1978); 43 FR 38297 et seq. (August 25, 1978); 29 CFR 720.301; and CFR 1613.301 | |
| | | | OPM/GOVT-9- File on Position | 5 U.S.C. 5103, 5112, and 5115 for | |

| 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) |
|----------------------|---|---------------------------------|--|--|--|
| | | | Classification Appeals, Job Grading Appeals, and Retained Grade or Pay Appeals, and Fair Labor Standard Act (FLSA) Claims and Complaints | classification appeals, 5346 for job grading appeals, and 5366 for retained grade or pay appeals; 29 U.S.C. 204(f) for FLSA claims and complaints; 31 U.S.C. 3702 for compensation and leave claims; and U.S.C. 5581, 5582, and 5583 and 38 U.S.C. 5122 for disputes concerning the settlement of the account for a deceased Federal civilian officer or employee. | |
| FPPS DataMart | FPPS DataMart is a tool used by HRD to generate business intelligence and analytics reports | Yes | OPM/GOVT-1-General Personnel Records | 5 U.S.C. 1302, 2951, 3301,3372, 4118, 8347, and Executive Orders 9397, as amended by 13478, 9830, and 12107. | Yes |

| 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 <i>(please detail in question 13)</i> |
|-------------------|---|---------------------------------|---|--|---|
| | from FPPS and WTTs | | | | |
| | | | OPM/Govt-2-Employee Performance File System Records | 1104, 3321, 4305, and 5405 of title 5, U.S. Code, and Executive Order 12107. | |
| | | | PBGC-3- Employer Payroll Leave and Attendance Records | 29 U.S.C. 1302; 44 U.S.C. 3101; 5 U.S.C 301; 5 U.S.C. 5501-5584 | |
| | | | OPM/GOVT-5-Recruitment, Examining, and Placement Records | 5 U.S.C. 1302, 3109, 3301, 3302, 3304, 3305, 3306, 3307, 309, 3313, 3317,3318, 3319, 3326, 4103, 4723, 5532, and 5533, and Executive Order 9397. | |
| | | | OPM/GOVT-6-Personnel Research and Test Validation Records | 5 U.S.C. 1303, 3301, and 4702. | |

| 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 <i>(please detail in question 13)</i> |
|-------------------|---|---------------------------------|--|--|---|
| | | | OPM/GOVT-7-Applicant Race, Sex, National Origin, and Disability Status Records | 5 U.S.C. 7201, sections 4A, 4B, 15A (1) and (2), 15B (11), and 15D (11); Uniform Guidelines on Employee Selection Procedures (1978); 43 FR 38297 Et seq (August 25, 1978); 29 CFR 720.301; and 29 CFR 1613.301. | |
| | | | OPM/GOVT-9-File on Position Classification Appeals, Job Grading Appeals, and Retained Grade or Pay Appeals, and Fair Labor Standard Act (FLSA) Claims and Complaints | 5 U.S.C. 5103, 5112, and 5115 for classification appeals, 5346 for job grading appeals, and 5366 for retained grade or pay appeals; 29 U.S.C. 204 (f) for FLSA claims and complaints; 31 U.S.C. 3702 for compensation and leave claims; and U.S.C. 5581, 5582, and 5583 and 38 | |

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|--|---|---------------------------------|---|--|--|
| | | | | U.S.C. 5122 for disputes concerning the settlement of the account for a deceased Federal civilian officer or employee. | |
| FedTalent | FedTalent is PBGC's Learning Management System used to support Computer-Based Training and collaborative learning for PBGC federal employees and contractors. It is a software tool used to store and manage online training. | No | N/A | N/A | No |
| Electronic Official Personnel Folder (eOPF) | eOPF is an automated system used by federal employees to manage their official personnel | Yes | OPM/GOVT-1-General Personnel Records | 5 U.S.C. 1302, 3301, 301, 2951, 3372, 5 U.S.C 293 et seq. and Executive Order 9830 and 12107 | Yes |

| 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 <i>(please detail in question 13)</i> |
|-------------------|--|---------------------------------|--|---|---|
| | files online. eOPF retains specific personal data such as payroll, performance records, awards, and attendance time. | | OPM/GOVT -2employee Performance File System Records | 1104, 3321, 4305, and 5405 of title 5, U.S. Code, and Executive Order 12107. | |
| | | | OPM/Govt – 3-Records of Adverse Actions, Performance Based Reduction in Grade Removal Action and Termination of Probationers | 5 U.S.C. 3321, 4303, 7504, 7514, and 7543. | |
| | | | OPM/GOVT-7-Applicant Race, Sex, National Origin and Disability Status Records | 5 U.S.C. 7201, sections 4A, 4B, 15A (1) and (2), 15B (11), and 15D (11); Uniform Guidelines on Employee Selection Procedures (1978); 43 FR 38297 et seq. (August 25, 1978); 29 CFR 720.301; and CFR 1613.301. | |
| | | | | | |
| | | | OPM/GOVT-10-Employee Medical File System Record | Executive Orders 12107, 12196, and 12564 and 5 U.S.C. | |

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|--|---|---------------------------------|--|--|--|
| | | | | chapters 11, 33, and 63. | |
| Workforce Tracking and Transformation System/Entry On duty System (WTTS/EODS) | Workforce data provided by the WTTS system assists in all phases of workforce planning and facilitates the personnel security management of onboarding and offboarding of personnel. EODS provides a library of online forms to be filled out by a federal new hire. The forms are prefilled with information entered by the selectee during his/her application process. | Yes | OPM/GOVT-1 – General Personnel Records | 5 U.S.C. 1302, 3301, 301, 2951 and Executive Order 9830. | Yes |
| | | | OPM/GOVT-5 – Recruitment, Examining, and Placement Records | 5 U.S.C. 1302, 3109, 3301, 3302, 3304, 3305, 3306, 3307, 309, 3313, 3317, 3318, 3319, 3326, 4103, 4723, 5532, and 5533, and Executive Order 9397. | |
| | | | OPM/GOVT-7- Applicant Race, Sex, National Origin and Disability Status Records | 5 U.S.C. 7201, sections 4A, 4B, 15A (1) and (2), 15B (11), and 15D (11); Uniform Guidelines on Employee Selection Procedures (1978); 43 FR 38297 et seq. | |

| 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) |
|-------------------|---|---------------------------------|---|---|--|
| | | | | (August 25, 1978); 29 CFR 720.301; CFR 1613.301 | |
| | | | OPM/GOVT-9-File on Position Classification Appeals, Job Grading Appeals | 5 U.S.C. 5103, 5112, and 5115 for classification appeals, 5346 for job grading appeals, and 5366 for retained grade or pay appeals; 29 U.S.C. 204 (f) for FLSA claims and complaints; 31 U.S.C. 3702 for compensation and leave claims; and U.S.C. 5581, 5582, and 5583 and 38 U.S.C. 5122 for disputes concerning the settlement of the account for a deceased Federal civilian officer or employee. | |

| 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) |
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|--|---|---------------------------------|---|--|--|
| Employees' Compensation Operations Management Portal (ECOMP) | ECOMP is a free, Web-based application hosted by the DOL Office of Workers' Compensation Programs (OWCP) that provides federal agencies with a comprehensive electronic system for recording workplace injuries and illnesses, and processing claims under the Federal Employees' | No | N/A | N/A | No |

| | | | | | | |
|--|----------------------------|--|--|--|--|--|
| | Compensation Act (FECA) | | | | | |
|--|----------------------------|--|--|--|--|--|

2.2 The System as a Whole

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

OMAG2G HRMS consists of a suite of federal shared systems, applications, and Web-based programs utilized by PBGC Human Resources Department. All OMAG2G subsystems are owned and hosted by third-party agencies/vendors — the Department of the Interior (DOI) and Office of Personnel Management (OPM).

DOI hosts the following systems:

- *Federal Personnel/Payroll System (FPPS)*
- *DataMart (Oracle Business Intelligence Enterprise Edition (OBIEE)*
- *FedTalent Learning Management System*
- *Workforce Tracking and Transformation System (WTTS)/Entrance on Duty System (EODS)*

OPM hosts the following systems:

Electronic Official Personnel Folder (eOPF)

DOL hosts the following systems:

- *Employees' Compensation Operations Management Portal (ECOMP)*

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 have been made to the system since its 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.

Intended use of the PII:

Collectively, these systems use PII to assist PBGC to accomplish the following business processes: hiring, on-boarding, processing personnel actions, processing benefits, off-boarding, creating reports, and managing employee records.

The PII in FPPS and eOPF is used to facilitate payroll, federal benefits, retirement and to ensure that personnel and payroll actions processed for individuals are properly reported to the appropriate financial entities and the Office of Personnel Management.

The purpose of PII in DataMart is to track the processing of personnel actions in FPPS and to meet agency reporting requirements.

eOPF is an electronic version of the paper OPF and a system for accessing the electronic folder online. The eOPF allows each employee to have an electronic

personnel folder instead of a paper folder which spans the lifecycle of a federal employee's job tenure, and thus PII exists on specific personnel forms, i.e., SF-50, S52, Benefit documents, etc.

The PII in WTTTS/EODS facilitates a centralized and standardized automated business capability for the on-boarding and off- secure boarding process of new federal employees and separations, provides system access for new hires to complete online forms, and transfer form data directly to FPPS and eOPF if applicable, and tracks SF-52 actions.

FedTalent contains no PII.

Steps to Limit PII:

To limit the collection of PII, HRD only utilizes the appropriate federal and agency-specific forms and authorized supporting documentation for the collection of PII. HRD personnel or the applicable PBGC Department regularly review PBGC-specific forms for appropriate collection of PII. Privacy and HRD collaborate to minimize the collection of PII necessary to perform agency functions.

Reasons the PII is necessary and relevant:

These collective systems use PII information to assist PBGC with hiring, onboarding, off-boarding, processing of personnel actions, benefits, and employee records management from all prospective and new employees within PBGC. WTTTS/EODS uses PII to facilitate the management of on and off-boarding of federal personnel.

DataMart collects PII for tracking the processing of personnel actions. The collection and use of SSNs are necessary to verify federal employment credentialing/eligibility and to allow employees to receive pay, pay taxes, obtain benefits, and enroll in federal financial and benefit programs to include direct deposit, beneficiary forms, etc.

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 can be retrieved by using a unique case number assigned to each case or by an individual's name, which will display a list of all their cases in the system

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

954

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

The submission of PII is mandatory

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

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

HRMS utilizes the authority to solicit, collect, maintain and dispose SSN's provided by law, require interoperability with organizations beyond Pension Benefit Guaranty Corporation to include Interior Business Center, Dept of Treasury, Office of Personnel Management, Dept of Labor, Social Security Administration, Internal Revenue System, Law Enforcement Offices, other Federal, state and local entities.

The leveraged government systems to include FPPS, WTTS, DataMart, FedTalent, EOPF are used to process personnel and payroll for federal employees according to existing regulatory, statutory, and financial information requirements relating to federal pay, benefits, retirement, recruitment, onboarding, record maintenance entitlements, applicable policies, and procedures. This includes completion of federal forms and specific information shared across external agencies that accurately identifies information.

The FPPS system provides individual earnings notifications to the Department of Treasury for tax reporting purposes via the SSN. The SSN is also used to identify and match federal employee records internal to PBGC and external Federal, state, or local systems described above but not limited. Title 5, US Code section 1104 authorizes OPM to delegate personnel management functions to other Federal Agencies. Thus, the SSN is vital to properly identifying and maintaining records for complaint regulations and identification purposes to process payroll and personnel related matters. With lack of a universal identifier across external systems will delay and or prevent action of the application/request.

Upon reasonable alternative for collection of data other than the SSN, such as cross wide reference or employee identification number, system decommission or changes, or federal wide changes that eliminate the need for SSN use, HRD will require the indefinite use of SSN. HRMS internal standard operating procedures, communications, SSAE report, etc. will be reviewed annually to ensure data is afforded the highest protections practicable through use of appropriate administrative, technical and physical safeguards.

Cited Sources For Data, PII and SSN Collection

- *Public Law 104-134 (April 26, 1996) requires that any person doing business with the Federal Government furnish SSN or TIN, 2) E.O 9397 as amended by E.O. 13478 (November 18, 2008); 3) 5 U.S.C 301; 4) 31 USC Chapter 3511, 3512, 3513; 5) Federal Employee Retirement Law (Chapter 84, Title 5 US Code; 6) the Federal Retirement Group Life Insurance Law (Chapter 87, Title 5 US Code); 7) the Federal Health Benefits Law (Chapter 89, Title 5 US Code); 8) Civil Service Retirement Law (Chapter 83, subchapter iii, Title 5 US Code); 9) Veterans Preference Act 1944; 10) Internal Revenue Code sections 3402(f)(2) and 6109; 11) Privacy Act System of Records Notice (SORN), OPM/CENTRAL 1 Civil Service Retirement and Insurance; 12) Federal Employees Compensation Act 5 U.S.C. 8101; Debt Collection Act; 13) Section 6303 of 5 U.S.C., "Annual Leave Accrual," authorizes collection of information to determine and record service that may be creditable for accrual of annual leave. 14) Part*

351.503, 5 C.F.R., "Length of Service," authorizes collection of data to determine and record service that may be creditable for reduction-in-force retention purposes.

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

Based on the Reduction of Use of Social Security Numbers (SSN) in PBGC document there are numerous areas outlined in the "Authorized Uses of SSN". which justifies the collection, use, maintenance, and disposal of PII in the OMAG2G HRMS arena.

- b. Security clearance investigation or verification*
- c. Interactions with financial institutions*
- d. Confirmation of employment eligibility*
- f. Federal taxpayer identification*
- g. Government Data Matching*
- e. Administration of Federal Worker's Compensation*
- h. Oversight work conducted by the OIG*

- 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.

HRD collects PII directly from individuals via paper forms or online forms and the Privacy Act Statement is provided at the time of collection.

- *Paper forms: Privacy Act Statement is part of the paper forms. Most of the paper forms PBGC uses are Federal Forms created by other Federal agencies (e.g., OPM, DHS, IRS, etc.). Only one (the Address Form) of the 19 forms used by HRD are created by PBGC. The Address Form is owned by FOD/Payroll and Travel Department.*

- *Online forms: When individuals log onto the system to provide PII, the Privacy Act Statement is displayed on the screen. This system is a Software as a Service (SaaS) provided by another Federal Agency. Therefore, this portion of the control is inherited externally.*

Applicants are given the opportunity to decline to provide their own information by not submitting their information for the employment opportunity. Declining to provide their information simply means that the individual chooses not to participate in the hiring process for that employment opportunity. New hire employees are also given the opportunity to decline providing their own information or by opting to participate in only benefit programs of their choosing. Declining to provide their information will prevent the new hire employee from enrolling in that benefit program.

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.

PBGC OMAG2G is responsible for all the applicable privacy controls while the Federal service providers are also responsible for implementing the privacy controls.

The only control PBGC fully inherited from the Federal service provider, Department of the Interior (DOI), is DI-02 Data Integrity And Data Integrity Board.

PBGC has a MOU with DOI. Below is the summary of the privacy portion of the MOU. "DOI and customer agency are responsible for compliance with the Privacy Act and related privacy laws, regulations, and policies, including publication of Privacy Act SORNs and requests for notification, access or amendment, for their respective records in this system where applicable. The collection, use, maintenance, sharing and disposal of PII must be consistent with the party's governing SORN(s) and agency privacy policy. The access use and sharing of PBGC data shall be governed by approved sharing agreements as established between DOI and PBGC. All requests for records or information, Privacy Act notification, access and amendment, Privacy Act complaints, and requests made under the Freedom of Information Act (FOIA) will be the responsibility of PBGC as the Client/Information owner."

PBGC has an Interagency Agreement (IAA) with OPM. The IAA included the standard privacy clause "PBGC's Privacy Clause for Inclusion in IAA's".

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.

Flow of Data in the system:

PII is shared with PBGC's HRD, Office of Information and Technology/Personnel Security Office, and PBGC's Payroll Travel Office. Data is shared internally through OMAG2G integration data feeds such as FPPS, WTTS, DataMart, EODS, eOPF, and QuickTime. The Interior Business Center (IBC) facilitates the electronic data feeds through daily, weekly, and/or biweekly uploads. Data feed is uploaded from PBGC to OMAG2G.

Flow of Data out of the system (other federal agencies):

- 1. To disclose information to the Department of Interior, IBC, as part of the payroll/personnel system to process payroll and benefit payroll deduction for employees via a secure trusted network. This information is shared via OMAG2G systems FPPS, fax, or email.*
- 2. Permanent records and specific disclosed data (SF-75/1150) contained in the eOPF and FPPS when an employee is transferring to the gaining Federal Agency upon written request or separates from PBGC to keep the official personnel file intact via a secure internet portal. This information is shared electronically via the eOPF secured system, US mail, email (password protected), or faxed per the gaining Agency's preference.*

Other third parties:

- 1. Disclose information to officials of labor organizations recognized under 5 USC Ch. 71 when relevant and necessary to their duties and representation concerning personnel policies, practices, and matters affecting working conditions.*
 - 2. Disclose information to health insurance carriers contracting with OPM for FEHB.*
 - 3. Disclose information to Office of Personnel Management for retirement or death in service information.*
 - 4. Disclose information necessary to the Office of Federal Group Life Insurance (FEGLI) to verify election of insurance or claim payment.*
 - 5. To disclose information to education institutions on appointment of recent graduates to a position in the federal service and to colleges, university officials, and student loan lenders regarding information about students in Pathways Program, volunteer service, and Student Loan Repayment Program.*
- PBGC has a MOU/ISA with DOI.*

14. For the user roles in the system:

Table 1: FPPS

| Role Name | Number of Users in that role | Approver | Access Level (Read, Write, etc.) | Recertification Date |
|----------------------|------------------------------|------------------|----------------------------------|----------------------|
| Administrator | 2 | Vincent McKinney | Write | 06/18/2024 |
| Concurren | 13 | Vincent McKinney | Read, Write | 06/18/2024 |
| Initiator | 40 | Vincent McKinney | Read, Write | 06/18/2024 |
| Requestor | 3 | Vincent McKinney | Read, Write | 06/18/2024 |
| Authorizer | 88 | Vincent McKinney | Read, Write | 06/18/2024 |
| SC1-SPO | 14 | Vincent McKinney | Write | 06/18/2024 |
| SC2-SPO LGAP | 35 | Vincent McKinney | Write | 06/18/2024 |
| SPO PROC | 40 | Vincent McKinney | Read, Write | 06/18/2024 |
| BlueZone | 17 | Vincent McKinney | Write, Execute | 06/18/2024 |

Table 2: DataMart

| Role Name | Number of Users in that role | Approver | Access Level (Read, Write, etc.) | Recertification Date |
|------------------|------------------------------|-------------|----------------------------------|----------------------|
| Consumer | 14 | Doug Beaver | Read | 06/18/2024 |
| Author | 5 | Doug Beaver | Read, Write | 06/18/2024 |
| Scheduler | 2 | Doug Beaver | Read, Write | 06/18/2024 |

Table 3: FedTalent

| Role Name | Number of Users in that role | Approver | Access Level (Read, Write, etc.) | Recertification Date |
|---------------------|------------------------------|------------|----------------------------------|----------------------|
| Site Manager | 5 | Anh Nguyen | Read, Write, Execute | 03/19/2025 |
| General User | 2300 | Anh Nguyen | Read | 03/19/2025 |

| Role Name | Number of Users in that role | Approver | Access Level (Read, Write, etc.) | Recertification Date |
|-------------------------------|------------------------------|------------|----------------------------------|----------------------|
| Program Manager | 2 | Anh Nguyen | Read, Write | 03/19/2025 |
| Course Creator | 2 | Anh Nguyen | Read, Write, | 03/19/2025 |
| CSC Help Desk | 72 | Anh Nguyen | Read, Write | 03/19/2025 |
| Reports Runner | 30 | Anh Nguyen | Read, Write | 03/19/2025 |
| User Interface Manager | 20 | Anh Nguyen | Read, Write, | 03/19/2025 |
| Merge User Accounts | 3 | Anh Nguyen | Read, Write, | 03/19/2025 |

Table 4: eOPF

| Role Name | Number of Users in that role | Approver | Access Level (Read, Write, etc.) | Recertification Date |
|---------------------|------------------------------|------------------|----------------------------------|----------------------|
| Super User | 36 | Vincent McKinney | Read | 06/18/2024 |
| Investigator | 3 | Vincent McKinney | Read | 06/18/2024 |

Table 5: WTTS/EODS

| Role Name | Number of Users in that role | Approver | Access Level (Read, Write, etc.) | Recertification Date |
|-------------------------------|------------------------------|------------------|----------------------------------|----------------------|
| EEO | 3 | Vincent McKinney | Read, Write, Execute | 06/18/2024 |
| HR Representative | 66 | Vincent McKinney | Read, Write | 06/18/2024 |
| Manager | 0 | Vincent McKinney | Read, Write, Execute | 06/18/2024 |
| Security Administrator | 4 | Vincent McKinney | Read, Write | 06/18/2024 |
| Supervisor | 3 | Vincent McKinney | Read, Write | 06/18/2024 |

Table 6: ECOMP

| Role Name | Number of Users in that role | Approver | Access Level (Read, Write, etc.) | Recertification Date |
|---------------------------|------------------------------|------------------|----------------------------------|----------------------|
| Agency Reviewer | 1 | Vincent McKinney | Read, Write | 06/18/2024 |
| OSHA Record Keeper | 1 | Vincent McKinney | Read, Write | 06/18/2024 |

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

OMAG2G physical security controls:

OMAG2G leverages DOI physical security controls employed to secure the PII in the system. These controls include security guards, key entry, and secured facility, etc.

The Human Resources Department (HRD) is the main user of OMAG2G. Access to HRD office is restricted to authorized personnel only.

OMAG2G technical security controls:

OMAG2G leverages DOI technical security controls employed to secure the PII in the system. These controls include password protection, configuration management, contingency planning, audit logging, firewalls, unique user identification names, encryption, intrusion detection systems, and vulnerability scanning, etc.

PBGC is responsible for reviewing and approving PBGC user access requests and performing annual user account recertifications.

OMAG2G administrative security:

For Administrative security controls, OMAG2G fully leverages DOI's incident response controls to secure the PII in the system. Awareness and Training, Incident Response, Personnel Security, Planning, Security Assessment and Authorization (SA&A) controls are hybrid between OMA and DOI. For example, OMA conducts the annual SA&A process and reviews DOI's SA&A package onsite at least annually.

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 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 CLMS 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 | Shawn Hartley |
| Date Reviewed | 3/20/2025 |
| Expiration Date | 3/20/2026 |
| Result | <input checked="" type="checkbox"/> Approved without conditions <input type="checkbox"/> Approved with conditions (see below). <input type="checkbox"/> 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.