



Pension Benefit
Guaranty Corporation

Information Technology Infrastructure Operations
Department (ITIOD)

PBGC.gov

Privacy Impact Assessment (PIA)

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1 PRIVACY POINT OF CONTACT

Name	Catherine Diamante
Title	Information System Security and Privacy Officer (ISSPO)
Phone	202-229-6039
Email	Diamante.Catherine@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.

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>)?
Acquia	Platform as a service that hosts pbgc.gov	Yes	PBGC-25: Comment Management System PBGC - 9: Unclaimed Retirement Funds	29 U.S.C. 1302; 44 U.S.C. 3101; 44 U.S.C. Ch 36; 5 U.S.C. 301. 29 U.S.C. 1055, 1056(d) (3), 1321, 1322, 1322a, 1341, 1342, and 1350; 29 U.S.C. 1203	Yes
Akamai Technologies	Manages developer access to pbgc.gov.	No	N/A	N/A	No
Google Analytics	Gathers non-user-specific analytics data (e.g., page hits).	No	N/A	N/A	No

2.2 The System as a Whole

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

PBGC.gov is an official government website that disseminates information to the public. PBGC's mission is to enhance retirement security by preserving and encouraging the continuation of private pension plans and by protecting the benefits of workers and retirees in traditional pension plans. PBGC.gov plays a vital role in accomplishing that mission. PBGC.gov's visitors include workers and retirees, employers and pension practitioners, policymakers, and the general public. The website contains information about PBGC's mission, pension benefits, and premium filings, along with press releases and a variety of other content. Visitors can access resources like PBGC's contact information, details about trustee pension plans, and lists of which pension plans PBGC insures.

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.

PBGC discourages submission of personally identifiable information in connection with the submission of comments to proposed regulations. PBGC's proposed rules include the following, "Comments received will be posted without change to PBGC's website, www.pbgc.gov, including any personal information provided. Do not submit comments that include any personally identifiable information or confidential business information."

The PBGC Office of the General Counsel (OGC) retrieves comments collected from <https://www.reginfo.gov> or submitted directly to OGC on proposed regulations for display on PBGC.gov. OGC reviews comments received before forwarding for posting to the website.

PBGC.gov also provides a tool for members of the public to submit an inquiry to determine whether PBGC may have a benefit due to them. The last name and last four digits of the SSN are used to perform an initial identity match against PBGC records to determine whether records exist for an individual who may be owed pension benefits.

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.

N/A

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

Several hundred.

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 to search for unclaimed retirement funds is voluntary, but failure to submit the requested PII will make it impossible for the individual to make an inquiry via the website.

When submitting a comment on a proposed regulation, users can choose to remove or redact their PII.

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?

PBGC.gov does collect partial SSN. The last name and last four digits of the SSN can be used to perform an initial identity match against PBGC records to determine whether records exist for an individual who may be owed pension benefits. This data is encrypted, and the search terms are not retained.

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

Compelling Business Need

- 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.

There is no plan to reduce SSNs; the last four digits are required to conduct a search for unclaimed retirement benefits.

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.

PBGC.gov may collect PII from the sources listed below:

1. Individuals
2. OGC

The PBGC Office of the General Counsel (OGC) provides comments collected from <https://www.reginfo.gov> or submitted directly to OGC on proposed regulations to the Communications, Outreach & Legislative affairs Department (COLAD) for display on PBGC.gov.

As PII is collected from the individual within this boundary, however transient, the Privacy Act Statement is applicable to PBGC.gov.

<https://www.pbgc.gov/workers-retirees/find-unclaimed-retirement-benefits/search-unclaimed>

The website collects a user’s last name and the last four digits of their SSN to search PBGC records and identify individuals who may be owed retirement benefits.

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 does not inherit privacy controls from Acquia, and no ISA is required since there is no dedicated or persistent connection between PBGC and Acquia.

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 PBGC Office of the General Counsel (OGC) emails comments collected from <https://www.reginfo.gov> or submitted directly to OGC on proposed regulations for display on PBGC.gov. OGC reviews comments received before forwarding for posting to the website. Once the information is posted on PBGC.gov, it is publicly available. When members public submit inquiries for unclaimed retirement funds, the data is shared with an internal database for a response.

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	3	Michael Rucki	Read/Write/Approve/Publish	5/8/2025
Editor	12	Michael Rucki	Read/Write/Approve	5/8/2025
Author	25	Michael Rucki	Read/Write	5/8/2025
Reviewer	3	Michael Rucki	Read	5/8/2025
Site Manager	11	Michael Rucki	Read/Write/Approve/Publish	5/8/2025

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

Physical security controls employed to secure the PII in the system included: security guards, key entry, secured facility, closed circuit television, identification badges and locked offices.

Technical controls employed to secure the PII in the system included: IP address restrictions, firewalls, unique user identification names, passwords, encryption, and intrusion detection system.

Administrative controls employed to secure the PII in the system include Periodic security audits, regular monitoring of user activities, annual refresher training for security, privacy and records management, backups secured offsite, role-based training, methods to ensure that only authorized personnel have access to PII, and mandatory on-boarding training for security, privacy, and records management.

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).

PBGC retains and destroys PII in accordance with 32 CFR 2002 to protect Controlled Unclassified Information. Non-CUI maintained on PBGC.gov does not meet the definition of a record according to NARA; therefore, no records schedule applies.

2.3 Privacy Office Review

Name of Reviewer	Duane Dodson
Date Reviewed	04/07/2026
Expiration Date	04/07/2027
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