



**Pension Benefit  
Guaranty Corporation**

**Information Technology Infrastructure Operations  
Department (ITIOD)**

**PBGC.gov**

# **Privacy Impact Assessment (PIA)**

**Last Updated: 07/02/2025**

## 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 ( <i>please detail in question 13</i> )?
Employers & Practitioners: Pending Proposed Rules	This page displays comments on the proposed regulations sent to PBGC Office of the General Counsel (OGC).	Yes – Rulemaking comments submitted by individuals may contain name, contact information, or other PII.	PBGC-25: Comment Management System	29 U.S.C. 1302; 44 U.S.C. 3101; 44 U.S.C. Ch 36; 5 U.S.C. 301.	No
General web content	Content provided on PBGC.gov about the mission of the agency, its operations, forms and instructions, data, and how to contact the agency.	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 trusted 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. PBGC's proposed rules include the following, "Comments received will be posted without change to PBGC's website, [www.pbgc.gov](http://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) emails comments collected from <https://www.reginfo.gov> or submitted directly to OGC on proposed regulations for display on [PBGC.gov](http://PBGC.gov). OGC reviews comments received before forwarding for posting to the website.

PII displayed on [PBGC.gov](http://PBGC.gov) in connection with comments made to proposed regulations is a convenience copy (the original submission is on [reginfo.gov](http://reginfo.gov)) for the user.

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 is voluntary. Users can also choose to remove or redact their PII when submitting comments on pending regulations.

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?

*N/A (PBGC.gov does not collect SSN) provided is insufficient to confirm the requester's identity, and the individual is requesting Privacy Act records.*

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

N/A

- 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.

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. Since PII is not collected from the individual within this boundary, the Privacy Act Statement is not applicable to PBGC.gov.

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.

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14. For the user roles in the system:

Role Name	Number of Users in that Role	Approver	Access Level (Read, Write, etc.)	Recertification Date
<b>Administrator</b>	3	Michael Rucki	Read/Write/Approve/Publish	5/8/2025
<b>Editor</b>	12	Michael Rucki	Read/Write/Approve	5/8/2025
<b>Author</b>	25	Michael Rucki	Read/Write	5/8/2025
<b>Reviewer</b>	3	Michael Rucki	Read	5/8/2025
<b>Site Manager</b>	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

<b>Name of Reviewer</b>	Duane Dodson
<b>Date Reviewed</b>	07/18/2025
<b>Expiration Date</b>	07/17/2026
<b>Result</b>	<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