



Pension Benefit
Guaranty Corporation

Information Technology Infrastructure Operations
Department (ITIOD)

Pension Lump Sum (PLUS) Privacy Threshold Analysis (PTA)

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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 (please detail in question 13)
PLUS	Pension Lump Sum (PLUS) is the pension benefit payment system that maintains the PLUS database of account and pension participant data at the heart of the PLUS Program.	Yes	PBGC-2, Disbursements, PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. §§ 1302, 1322, 1341, 1342, and 1350; 29 U.S.C. §§ 1055 and 1056(d)(3); 26 U.S.C. § 6103; 44 U.S.C. § 3101.	Yes
PLUS Web	PLUS Web is a web portal used by PBGC staff that provides real-time, read-only access to participant payment data in PLUS, and allows a limited number of PBGC employees to make changes in PLUS.	Yes	PBGC-2, Disbursements, PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. §§ 1302, 1322, 1341, 1342, and 1350; 29 U.S.C. §§ 1055 and 1056(d)(3); 26	Yes

2.2 The System as a Whole

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

The Pension Lump Sum (PLUS) Program includes the following interrelated systems:

PLUS is the component of the pension benefit payment system that maintains the PLUS database. The PLUS database contains account and participant data to manage pension payments in accordance with participants' tax withholdings and tax reporting purposes. Each of the several thousand PBGC-trusted pension plans is represented in PLUS as a separate account.

PLUS Web is a web portal for PBGC staff that provides real-time read-only access to participant payment data and allows minimal PBGC staff to make read/write changes to information in PLUS. The PLUS Web application provides PBGC benefits administrators with access to the PLUS system data through a secure web interface. PBGC users, in accordance with defined roles, access the application to view plan payee information, update payee data, place stop payments, view check images, and view various tax forms and reports.

The PLUS Program systems run as a service outside the PBGC environment. PBGC contracts with State Street Bank and Trust (SSBT), the paying agent for PLUS.

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.

This is an existing information system. My Pen Pay was a component for the system but was removed from the PLUS Boundary.

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, PLUS 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.

PII in PLUS is used to verify identity and pay pension benefits to participants and beneficiaries. PLUS collects only the minimum PII required to interact with financial institutions. This minimum information collected allows PBGC employees the ability to view existing participants' payment information, payment history and tax forms, and to print tax forms. PBGC conducts a Privacy Threshold Analysis for PLUS annually to document the types of PII in the system.

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 PLUS system retrieves and manages personally identifiable information (PII) as part of its core function of administering pension benefits for PBGC participants. To accurately identify and retrieve participant records, PLUS relies on a set of unique identifiers that are required for establishing, maintaining, and processing benefit accounts.

The primary identifiers used to locate records within PLUS are:

- Social Security Number (SSN) – the principal unique identifier for participant records and the key field used to distinguish individuals within the system.

- Account ID / Plan Account Number – a system-generated identifier that links each participant to the specific PBGC-trusteed pension plan and associated payment records.

When PBGC or SSBT personnel initiate inquiries, updates, or payment transactions, the system uses SSN and Account ID as the authoritative keys to retrieve the correct participant record. These identifiers are mandatory for processing transactions and ensuring that benefit actions are applied to the correct payee.

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

PLUS maintains and processes PII from over 900,000 retirees or their beneficiaries.

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.

PLUS does not collect data directly from individuals. Data is collected by other PBGC systems, which is transmitted to SSBT to be used and processed by PLUS. The submission of the PII to those PBGC systems is voluntary, but without it, payments from PLUS cannot be processed.

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?

The use of SSNs is justified as they are integral identifiers within the Participant Data set used to disburse benefit payments and fulfill federal tax reporting requirements. SSNs appear in system transactions and tokens exchanged between PBGC, SSBT, and approved third-party service providers only as required to provide secure participant services such as payment history, tax form retrieval, and check image access.

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

Interactions with financial institutions and tax reporting

- 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.

Not Applicable

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.

*The PLUS system does **not** collect PII directly from individuals. Instead, all personally identifiable information used by PLUS is collected by PBGC through its established benefit*

administration processes and then transmitted to State Street Bank and Trust (SSBT) for processing within PLUS.

PII used by PLUS originates from the following PBGC and third-party sources:

PBGC's OBA Applications Suite (BAS/Spectrum)

*This is the **primary source** of participant and plan data.*

PBGC collects PII directly from individuals during benefit applications, eligibility determinations, and ongoing payee services.

BAS generates structured payment and participant files that are securely transmitted to SSBT for ingestion into PLUS.

PBGC Exception-Processing Tools (NFDE and eCARF)

These tools allow PBGC staff to submit corrections, stop-payment requests, and manual transactions.

*They do **not** collect new PII from individuals; they use PII already collected by PBGC.*

Resulting files are transmitted to SSBT via FIPS-compliant SFTP for loading into PLUS.

Third-Party Service Providers (e.g., Fiserv, Sovos, Voya)

These vendors provide check images, tax forms, and payment history information.

They do not collect PII on behalf of PLUS; instead, they return data associated with participant records already maintained by PBGC and SSBT.

Format and Method of PII Transmission

*Because PLUS does not interact directly with individuals, all PII enters the system through **system-to-system transfers** in electronic formats.*

Privacy Act Notification and Opt-Out

*Because PLUS does **not** collect PII directly from individuals, it does **not** provide Privacy Act notices or offer opt-out options at the point of collection. These responsibilities rest with PBGC, which collects the information.*

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.

PLUS does not inherit any privacy controls from external providers. There is an ISA in place between PBGC and SSBT. The ISA establishes that PBGC and SSBT exchange Moderate-impact PII governed by the Privacy Act and federal privacy standards. The

agreement requires FIPS-validated encryption, strict access controls, role-based privacy training, multi-part auditing, and rapid incident reporting to protect participant data. SSBT, as a contractor processing PBGC PII, must maintain full PBGC-specified security and privacy authorization. These measures collectively ensure that participant PII is collected, transmitted, stored, and processed with appropriate privacy safeguards throughout the BAS-PLUS interconnection.

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 JSAM. Be sure to include any MOU, ISA, or Interagency Agreements.

Yes, there is PII shared with external organizations, which are listed under external connections. The PLUS Program centers on the PLUS system, which PBGC uses to pay pension benefits to pension plan participants through SSBT, the paying agent. An additional system in the PLUS Program is PLUS Web, a web portal that provides modern interfaces for a variety of PLUS users, including PBGC staff. Only the PLUS system stores data, whereas PLUS Web retrieves and processes data from PLUS. PBGC participant transactions are updated via an interface file from other PBGC systems and transmitted to SSBT directly. PBGC users do not update PLUS participant data records.

The PLUS Program consists of two interrelated systems:

- **PLUS** is the pension benefit payment system that maintains the PLUS database of account and pension participant data at the heart of the PLUS Program.
- **PLUS Web** is an SSBT system used by the Office of Operations. The system provides real-time access for PBGC plan administrators to retired participants' payment records and data. The PLUS Web application provides PBGC administrators with access to the PLUS system data through a secure web interface.

In addition to the PLUS components mentioned above, there are additional tools and services employed by PBGC to support the overall PLUS functionality.

- **Net Benefits Exchange Form Data Entry (NFDE)** – These are files that are sent weekly and monthly based on the Monthly Payment Schedule. The NFDE files are sent from PBGC to SSBT to update the PBGC data in PLUS. There are four types of NFDE files that can be sent: Lump Sum Add, Pension Add, Pension Special, and Pension Change. NFDE files are generated as a CRON/batch job through Integrator (a component in Spectrum). The files will be encrypted using a Federal Information Processing Standards (FIPS) 140-2 compliant version of Pretty Good Privacy (PGP), an electronic transfer protocol that allows for the private exchange of files. The .zip file is transferred from the Windows server on which it was created to a UNIX server within the SSBT DMZ. A CRON job will be executed from the UNIX server and the .zip file will be pushed to the

designated SSBT server at a predetermined time each week. The SSBT server will acknowledge the delivery of the file by sending a text file back to the UNIX server.

- **Electronic Check Action Request Form (eCARF)** – This tool is used to initiate Aftermath Transactions following check run processing. It is a homegrown PBGC tool that was migrated from the Plumtree Portal to SharePoint. It is used in concert with PLUS by both the Benefit Payment Division (BPD) Check Processing team (who have limited update rights in PLUS) and by SSBT personnel to satisfy whatever the request might be (i.e., Stop and Reissue a benefit check, Return a benefit check to Trust, etc.). eCARF is the system where requests are made and PLUS/SSBT is the system used by personnel to fulfill those requests.
- **My Pen Pay (MPP)** is a third-party service that provides data to the PBGC's My Pension Benefit Account (MyPBA) system, which is a web portal for pension plan participants that allows for limited transactions. PBGC pension plan recipients log on via MyPBA, which authenticates users and directs them to MPP. The MPP Service is used to retrieve customer payment history and tax withholding information. MyPBA consumes the MPP service for payment history and the most recent 1099 forms using the MPP common service. MyPBA may also obtain 1042-S via MPP.

Internal Connections

The PLUS Program exchanges encrypted data internally, as described below:

- **PLUS backup** is in the SSBT Somerset, NJ data center. The PLUS primary site in Grafton, MA performs daily data exchanges with the hot failover PLUS system located in Somerset, NJ. This connection provides the PLUS backup for the continuity of operations and redundancy requirements for PLUS.

Encryption: The connection is FIPS 140-2 compliant. It is doubly encrypted, with the SSBT hardware encryption and with the FIPS 140-2 encryption product Secure Shell (SSH) Tectia.

- **PLUS Web** relies on an internal data flow between PLUS and PLUS Web.

Remote access to the PLUS Program systems is managed via remote access VMware and/or VPN services. All SSBT systems' operations staff members access PLUS via the SSBT network or remotely via VMware or VPN.

External Connections

The PLUS Program interconnects with external systems to conduct core business functions:

- **PBGC Office of Benefits Administration Applications Suite (BAS) system connection to PLUS.** This connection allows SSBT and PBGC to exchange paying agent files. The primary Spectrum servers that process file transfers with the PLUS system are at the Lumen Colocation in Herndon, VA. The disaster recovery BAS system (including the Spectrum server application) data center is at 401 N. Broad St., Philadelphia, PA 19108.

The interconnection between the PBGC BAS system and the PLUS Program is documented in the ISA between PBGC and SSBT, which was signed in January 2024 and will be renewed in January 2027. This document is located in the PBGC system of record, JCAM, under the “Relationships” section.

Encryption: The connection between these two systems uses dedicated file transfer servers configured with the FIPS 140-2 compliant Tectia suite of products, Secure Shell (SSH) and Secure File Transfer Protocol (SFTP).

- **MyPenPay (MPP) and MyPBA.** PBGC participants access MPP via PBGC’s MyPBA website.

Encryption: The connection between MyPBA (PBGC) and MPP (Voya) is FIPS 140-2 compliant.

The following are third-party external service providers:

- **Sovos** – external service provider for tax information. This vendor provides tax information relevant to the beneficiary’s pension payments. The PLUS connection with this vendor is necessary to provide the PLUS participants with the information needed to calculate taxes. The service includes providing participants with the tax forms needed to file their federal income taxes and allows participants to view the forms online.

Encryption: Web calls to Sovos from MPP and PLUS Web are FIPS 140-2 compliant.

- **Broadridge** – external service provider for printing checks and tax returns. This vendor supports the production and mailing of paper checks to PBGC beneficiaries who do not participate in the electronic payment program, thereby providing them their monthly pension benefits.

Encryption: The primary PLUS connection to this vendor is FIPS 140-2 compliant.

14. For the user roles in the system:

Role Name	Number of Users in that Role	Approver	Access Level (Read, Write, etc.)	Recertification Date
APPS_SSB_Plus_RO	333	Manager/COR	Read	6/5/2025
APPS_SSB_Plus_RW	4	Manager/COR	Read\Write	6/5/2025
APPS_PBGC_NFDE	287	Manager/COR	Full Permission	6/5/2025
APPS_PBGC_NFDE_Admin	1	Manager/COR	System Administrator	6/5/2025
APPS_PBGC_eCARF_CCC	65	Manager/COR	Customer Contact Center Requestors	6/5/2025
APPS_PBGC_eCARF_CCC_Supervisor	6	Manager/COR	Customer Contact Center Supervisor	6/5/2025

Role Name	Number of Users in that Role	Approver	Access Level (Read, Write, etc.)	Recertification Date
APPS_PBGC_eCARF_Processor	301	Manager/COR	Field Benefit Administration Requestors	6/5/2025

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

PLUS is a third-party application managed and maintained by SSBT. The PBGC Office of Operations (OO) Security Control Assessment Team performs annual continuous monitoring activities to ensure PLUS adheres to the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53 Rev. 4/5 requirements and has adopted appropriate administrative, technical, and physical controls to secure PII in accordance with PBGC's security program.

These controls protect the confidentiality, integrity, and availability of information and help ensure records are not disclosed to or accessed by unauthorized individuals.

Physical controls include the use of secured facilities to protect the data center and work areas for PBGC and SSBT Personnel.

For PBGC users, personal identity verification (PIV) badges are required to access secure office spaces as well as to access the PBGC local area network (LAN). For SSBT users, multifactor authentication (MFA) is required to access both the physical facilities as well as the logical network.

Technical controls include access controls for password protection and least privilege access to the data. Virtual private network (VPN), firewalls, intrusion detection systems, and encryption of data in transit provide layers of security around the PII data. Audit controls provide logging of network and system access to manage event monitoring. Administrative controls include periodic security audits, monitoring of user activity, mandatory background checks for any personnel that would have access to sensitive data, as well as annual security, privacy, and records management training. Backups are maintained off-site, and procedures are in place to ensure that only authorized personnel have access to PII.

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

There is no additional training for the PLUS Program users, other than the PBGC mandatory annual training, for protecting information in the system.

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).

PLUS follows the PBGC Directive IM 15-03, PBGC Records Management Program for retention and destruction of PII, and PBGC Record Disposition Schedule 2: Mission Schedule, ITEM 2.1: Plan, Participant, and Insurance Records for its retention.

2.3 Privacy Office Review

Name of Reviewer	Shannon Kreshtool
Date Reviewed	June 9, 2026

Expiration Date	June 8, 2027
Result	<input checked="" type="checkbox"/> Approved without conditions <input type="checkbox"/> Approved with conditions (see below). <input type="checkbox"/> Denied

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Discuss analysis of risks and compensating controls (or other mitigation steps).

Enter description here.

Discuss any conditions on Approval