



**Pension Benefit
Guaranty Corporation**

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

ServiceNow (SNow) (PIA)

Last Updated: 08/20/2025

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 (please detail in question 13)
User HiWAVE Support Portal	Secure login portal to manage ServiceNow instances, upgrades and HIWAVE user access. HiWAVE is used for 24/7 support to product documentation, knowledge base articles, customer support, and SNOW developer site resources.	No	N/A	N/A	No
Software as a Service (SaaS): User Interface, Platform, Plug-ins, Applications, APIs, Hosted ITIL	SaaS components provide a suite of applications focused primarily on automating processes and workflows. Personnel interact with SNOW service catalog, forms, and knowledge articles via an internally-branded user interface called "GetITail".	Yes	PBGC-(11, 16, 22, 28, OPM GOV'T-1)	29 U.S.C. 1302; 44 U.S.C. 3101; 5 U.S.C. 301; 5 U.S.C. 6120; 5 U.S.C. 552; Executive Order 12977; 6 CFR part 37 5 U.S.C. 1302, 2951, 3301, 3372, 4118, 8347	Yes
Software: MID Server (Java Application)	MID Server is a Java application that runs as a Windows service or UNIX daemon on a server in PBGC local network. It facilitates communication and data	Yes	PBGC-(11, 16, 22, 28, OPM GOV'T-1)	29 U.S.C. 1302; 44 U.S.C. 3101; 5 U.S.C. 301; 5 U.S.C. 6120;	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 (please detail in question 13)
	movement between ServiceNow instance and external applications, data sources and services.			5 U.S.C. 552; Executive Order 12977; 6 CFR part 37 5 U.S.C. 1302, 2951, 3301, 3372, 4118, 8347	

2.2 The System as a Whole

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

ServiceNow (Snow; SN) is a SaaS cloud offering from ServiceNow comprised of a suite of natively integrated applications designed to support IT service automation, resource management and shared support services. ServiceNow applications cover all Information Technology Infrastructure Library (ITIL) processes; PBGC has implemented IT Service Management (ITSM), Workplace Service Delivery (WPSD), and IT Operations Management (ITOM), which includes such features as Change Management, Incident Management, Knowledge Management, Problem Management, Service Desk, Facility Management, Configuration Management including automated discovery, and Asset Management services through SNow. ServiceNow is an existing system that requires annual recertification.

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 system and there are currently no changes.

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.)

Not applicable.

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 technical support teams use PII to provide support for PBGC IT systems, assets, and facilities. Service-oriented activities include managing facilities and IT service request tickets, retrieving incident information and troubleshooting issues. PII made available to ServiceNow is limited but visible only to authorized personnel for new hire processing; however, technical support teams and/or end users may incur improper data entry and/or attachments to a service ticket that may include their personal information or PII of other individuals. When PII is identified within or attached to a ticket, it is removed from the system as soon as possible after detection. Limiting collection of PII is controlled through personnel system data feeds to only provide limited information. When conducting training, the Privacy Office instructs individuals to not include PII of others (e.g., participants) when they open a service ticket. PII captured will be secured in compliance with the Federal Information Security Modernization Act (FISMA) and is not subject to unauthorized distribution. The limited use of PII that is in SNow is necessary for system performance, service tracking, and auditing purposes.

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.

ServiceNow does not retrieve records by using PII; rather information is retrieved by ticket or task numbers.

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

Approximately 2,300 active user records are in SNow

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 collection of personnel system data ingested into ServiceNow is mandatory for personnel and necessary for user lookup and service management within the system. Personal email address is also required within the New Employee Setup process as a method of contact for personnel security actions to initiate the onboarding process.

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?

ServiceNow does not collect SSN's but attachments to stored records may contain PII collected elsewhere and inadvertently uploaded as supporting artifacts. Due to the nature of information collected within ServiceNow for IT Service Management, it is unlikely SSNs would be entered but if such a situation were to occur, once identified, the PII would be removed and the incident reported.

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

Not Applicable

- 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 ServiceNow system is used for IT service, asset, and configuration, IT business change and release, incident management, problem management. ServiceNow may contain PII (shared from other systems, such as PBGC-22) which pulls personnel data from Active Directory. The information contained in Active Directory is synced with ServiceNow.

Data containing PII may be inadvertently collected in the system due to Incident ticketing, such as an email or an attachment referencing a building visitor by name or by including other PII in the request. Emails sent to PBGC's IT Service Desk, Workplace Solutions or Physical Security route to and automatically generate an incident ticket in ServiceNow, thus contents or attachments of these emails are written into the incident record.

The New Employee Setup form is used to collect an individual's personal email address in order to initiate onboarding activities, including personnel security processing. This form of PII is collected electronically in the service catalog form, and is visible only to authorized personnel for new hire processing.

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 any external provider.

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.

1. ServiceNow creates a request for data from Active Roles Server (ARS)/ Lightweight Directory Access Protocol (LDAP).
2. The request is queued in the External Communication Channel (ECC) Queue.
3. A Management, Instrumentation, and Discovery (MID) Server sends out a request to the ServiceNow instance over a designated port , checking for any work in the ECC Queue.
4. Based on the configuration of the MID Server's capabilities in the SN instance, the SN instance replies with a request that the MID Server can perform.
5. In the case of an LDAP request, the MID Server connects to the PBGC LDAP instance within the PBGC network and collects the data.
6. Once the MID Server has completed the request, it contacts the ServiceNow instance over the designated port, stating the task is finished. The data is sent to the ServiceNow instance, and the data is stored in an Import table.
7. Once imported, the data in the Import Table is processed using a Transform Map. User records are either inserted or updated records in the User (sys_user) table as appropriate. Group tables are also imported in a similar manner.

Records imported in the Import Tables are cleared after one week.

PII in ServiceNow is not shared externally

14. For the user roles in the system:

GROUP NAME (Role Name)	*Member Count (as of 8/4/2025)	Application Owners (Approvers)	Access Level	Recertification Date
APPS_ServiceNow_ HiPortal_Admin	4	Joshua Kossoy (primary); Brittanie Thom; J	Access is based on Access Control Lists (ACLs) needed for PBGC personnel to perform duties as assigned within ServiceNow	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_ HiPortal_User	8	Joshua Kossoy (primary); Brittanie Thom	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_ AgileDev_Access	7	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants access to the ServiceNow Agile Development project management features.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_Approval_Man ager	4	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; This role allows federal members to approve any request.	5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_Approver	11	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Allows a Designated Approver to Approve Requests in ServiceNow	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_Asset_Admin	8	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Group to be used with ServiceNow is necessary to support access and separation of duties for Asset Management.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_Asset_Tech	17	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Group to be used with ServiceNow is necessary to support access and separation of duties for Asset Management.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_AzDOPProjectBI SD_Approver	3	Joshua Kossoy (primary);	Members of this group approve Microsoft Azure DevOps Project requests	Annually; New entitlement

GROUP NAME (Role Name)	*Member Count (as of 8/4/2025)	Application Owners (Approvers)	Access Level	Recertification Date
		Brittanie Thom; Joelle Thorpe	when the project is to be in the BISD collection.	
APPS_ServiceNow_I TSM_AzDOProjectCI DDIT_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Members of this group approve Microsoft Azure DevOps Project requests when the project is to be in the CIDDIT collection.	Annually; New entitlement
APPS_ServiceNow_I TSM_AzDOProjectITI OD_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Members of this group will approve Microsoft Azure DevOps Project requests when the project is to be in the ITIOD collection.	Annually; New entitlement
APPS_ServiceNow_I TSM_Azure_Approver	1	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Azure Approver Role in SNOW	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_BusinessService_Manager	0	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants the ability to add, edit, modify and administer the FISMA & Business Services table data in ServiceNow	Annually; New entitlement
APPS_ServiceNow_I TSM_CAB_Analyst	4	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants access to CAB Analyst functions in ServiceNow	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_Catalog_Admin	8	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Provides Admin access to Service Now / Service Catalog functions	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_Change_Manager	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants manager access to ServiceNow request for change (RFC) tickets	Annually; 5/5/2025 – 6/20/2025

GROUP NAME (Role Name)	*Member Count (as of 8/4/2025)	Application Owners (Approvers)	Access Level	Recertification Date
			including approve, deny request.	
APPS_ServiceNow_I TSM_Chat_Admin	3	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants administrative access to control features of the ServiceNow service desk chat service.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_CMDB_Admin	8	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants administrative access to control the ServiceNow Configuration Management Database (CMDB) and Asset functions.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_EquipmentRelo cation_Approver	1	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Equipment Relocation Step 2 Approver Role in SNOW	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_FED- ChangeMgmt_Appro ver	5	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants approval group membership for Business Services review as part of mApplT "Request a New Service/Application". This is for Federal employees only.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_GetITAIL_Admin	4	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants administrative access to control the ServiceNow service portal.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_HRD_SCD	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants read-only access to the Position Description (PD)	Annually; New entitlement

GROUP NAME (Role Name)	*Member Count (as of 8/4/2025)	Application Owners (Approvers)	Access Level	Recertification Date
			Risk Table within ServiceNow for HRD Staffing and Classification Division (SCD) staff members	
APPS_ServiceNow_I TSM_Incident_Man ager	11	Joshua Kosoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants Manager access to declare Major Incident, exclude tickets from reporting, mark a ticket as a test ticket.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_International- ITServices_Approver	2	Joshua Kosoy (primary); Brittanie Thom; Joelle Thorpe	Grants access for approval of Service Catalog Item - Request for International IT Services (Mobile Phone and Laptop)	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_ITCOSMgr_ITI ODLead	1	Joshua Kosoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to ITCOS Manager ITIOD Lead Role in SNOW	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_ITDirector ITS pecialist	1	Joshua Kosoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to IT Director IT Specialist Role in SNOW	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_ITIL_Manager	9	Joshua Kosoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Limited administrative role for daily system management to address incidents, problems, and data modifications.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_ITIL_ProcessU ser	2,300	None (Default entitlement)	Access is default entitlement. Grants edit access to create and update interaction, incident, problem and change tickets within ServiceNow. Grants access to send Significant Occurrence Reports (SOR).	N/A
APPS_ServiceNow_I TSM_ITIOD-EIM- Approver	1	Joshua Kosoy (primary);	Access is based on ACLs needed for PBGC personnel to perform duties as assigned	Annually; 5/5/2025 – 6/20/2025

GROUP NAME (Role Name)	*Member Count (as of 8/4/2025)	Application Owners (Approvers)	Access Level	Recertification Date
		Brittanie Thom; Joelle Thorpe	within ServiceNow; Access to EIM Approver Role in SNOW	
APPS_ServiceNow_I TSM_ITIOSS_SLA_A ccess	18	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants permission to view survey results and service desk performance metrics.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_Knowledge_Ad min	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants permission to allow editing of all KB articles in the knowledge library	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_Knowledge_Edi t	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants edit access to create, edit, and review knowledge base articles in ServiceNow.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_Knowledge_Ma nagerALL	5	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants access for Knowledge Managers for all Knowledge bases in ServiceNow, provides permissions to approve articles and make recommendations for new Knowledge Bases to the Knowledge Admin.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_LegacyChange _1stCAB	3	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants Access to process and voting members of 1st Change Approval Board (CAB) for legacy change management. Provides the role change_manager.	Annually; 5/5/2025 – 6/20/2025

GROUP NAME (Role Name)	*Member Count (as of 8/4/2025)	Application Owners (Approvers)	Access Level	Recertification Date
APPS_ServiceNow_I TSM_LegacyChange _2ndCAB	3	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants Access to process and voting members of 2nd Change Approval Board (CAB) for legacy change management. Provides the role change_manager.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_LegacyChange _eCAB	4	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants Access to process and voting members of Emergency Change Approval Board (CAB) for legacy change management. Provides the role change_manager.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_List_Updater	10	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants Access to Bulk Update/Close Tickets.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_Location_Mana ger	7	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants the ability to add, edit, modify and administer the Location table data in ServiceNow	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_ModernChange _CREB_Process	4	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; For members of Change Release Enablement Board (CREB) for Modern Change Mgmt	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_ModernChange _CREB_Voter	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; For voting members of CREB for Modern Change Mgmt.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_ModernChange _eCREB	7	Joshua Kossoy (primary);	Access is based on ACLs needed for PBGC personnel to perform duties as assigned	Annually; 5/5/2025 – 6/20/2025

GROUP NAME (Role Name)	*Member Count (as of 8/4/2025)	Application Owners (Approvers)	Access Level	Recertification Date
		Brittanie Thom; Joelle Thorpe	within ServiceNow; For members of emergency Change Release Enablement Board (eCREB) for Modern Change Mgmt	
APPS_ServiceNow_I TSM_ModernChange _SPMO	0	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; For members of SPMO for Modern Change Mgmt	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_New UNIXLINUXServiceA ccount_Approver	1	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to New UnixLinux Service Account Step 2 Approver Role in SNOW	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_NewMicrosoftT eamsPlanner_Approv er	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Step 3 Teams Approver Role in SNOW	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_NewMobileDevi ce_Approver	1	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to New Mobile Device Step 2 Approver Role in SNOW	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_NewOracleServ iceAccount_Approver	1	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to New Oracle Service Account Step 2 Approver Role in SNOW	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_NewWindowsS erviceAccount_Appro ver	3	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to New Windows Account Step 2 Approver Role in SNOW	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_ODBC_Access	5	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants members the Open Database Connectivity (ODBC) role	Annually; 5/5/2025 – 6/20/2025

GROUP NAME (Role Name)	*Member Count (as of 8/4/2025)	Application Owners (Approvers)	Access Level	Recertification Date
			which allows for read only ODBC connections to ServiceNow.	
APPS_ServiceNow_I TSM_Oracle_Admin	5	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants Oracle DBA's the ability to add, edit and create Database, Schema, Role and Approver records in ServiceNow/Service Catalog	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_OracleDatabas e_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Oracle Database Approver Role in SNOW	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_Outage_Editor	6	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants permissions for members to post outage and planned maintenance notices on the GetITAll portal page.	Annually - 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_PERSEC_Appr over	10	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Personnel Security (PERSEC) Approver Role in SNOW	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_Problem_Mana ger	7	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants manager access to resolve, close, and analyze problem tickets.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_Reporting_Acc ess	22	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants access to share reports to groups and to schedule reports for automated generation and delivery	Annually; 5/5/2025 – 6/20/2025

GROUP NAME (Role Name)	*Member Count (as of 8/4/2025)	Application Owners (Approvers)	Access Level	Recertification Date
APPS_ServiceNow_I TSM_Reporting_Adm in	6	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants administrative access to ServiceNow reporting. Permits viewing, adding, deleting reports.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_RSA_ProcessU ser	3	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to the ServiceNow Release Support Analyst function	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_ServiceCatalog NewCatalogItem_Ap prover	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Service Catalog New Catalog Item Approver Role in SNOW	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_SoftwarePacka ging_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Software Packaging Approver Role in SNOW	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_SQLServerNew Database_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to SQL Server, New Database Approver Role in SNOW	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_StorageAllocati on_Approver	1	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Storage Allocation Approver Role in SNOW	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_SurveyReadOn ly	3	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Grants members the ability to read Survey Instance and Survey Response records. Provides the role survey_reader.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_UnixNewServer	1	Joshua Kossoy (primary);	Access is based on ACLs needed for PBGC personnel to perform duties as assigned	Annually; 5/5/2025 – 6/20/2025

GROUP NAME (Role Name)	*Member Count (as of 8/4/2025)	Application Owners (Approvers)	Access Level	Recertification Date
AdditionalMemory_A pprover		Brittanie Thom; Joelle Thorpe	within ServiceNow; Access to UNIX Newserver, Additional Memory Approver Role in SNOW	
APPS_ServiceNow_I TSM_WindowsNewS erverAdditionalMemo ry_Approver	3	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Windows NewServer, Additional Memory Approver Role in SNOW	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_I TSM_WSDOfficeMov e_Approver	2	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Access to Workspace Solutions Department (WSD) Office Move Approver Role in SNOW	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_ WPSD_Manager	6	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Role-based permissions for WPSD components to configure maps and data types.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_ WPSD_MapEditor	5	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Role-based permissions for WPSD components to configure maps using Map Studio within SNOW.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_ WPSD_MapViewer	9	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Role-based permissions for access to Workplace Central workspace components.	Annually; 5/5/2025 – 6/20/2025
APPS_ServiceNow_ Zscaler_SASE_ OpsSupport	13	Joshua Kossoy (primary); Brittanie Thom; Joelle Thorpe	Access is based on ACLs needed for PBGC personnel to perform duties as assigned within ServiceNow; Provides permissions for users to access Zscaler-specific	Annually; 5/5/2025 – 6/20/2025

GROUP NAME (Role Name)	*Member Count (as of 8/4/2025)	Application Owners (Approvers)	Access Level	Recertification Date
			applications within ServiceNow	

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

Physical Controls - Physical security controls employed to secure the PII in the system include:*

- Physical Access Authorizations
- Physical Access Control
- Access Control for Transmission Mission
- Access Control for Output Devices
- Monitoring Physical Access
- Visitor Control
- Access Records
- Power Equipment and Power Cabling
- Emergency Shutoff
- Emergency Power
- Emergency Lighting
- Fire Protection
- Temperature and Humidity Controls
- Delivery and Removal
- Alternate Work Site
- Location of information Components
- Information Leakage

**Physical Controls are provided by both PBGC and the Cloud Service Provider (CSP)*

Technical Controls - Technical controls employed to secure the PII in the system include:*

- Account Management
- Access Enforcement
- Authenticator Management
- Cryptographic Module Authentication
- Information Flow Enforcement
- Separation of Duties
- Least Privilege
- Unsuccessful Login Attempts
- Remote Access

- *Wireless Access*
- *Audit Events*
- *Audit Review, Analysis, and Reporting*
- *Time Stamps*
- *Audit Record Retention*
- *Non-repudiation*
- *Session Audit*
- *Public Key Infrastructure Certificates*
- *Denial of Service*
- *Network Disconnect*
- *Session Authenticity*
- *Protection of Information at Rest*

*****Technical Controls are provided by both PBGC and the CSP***

Administrative Controls - All PBGC users are required to complete privacy training annually.

Administrative controls employed to secure the PII in the system include:

- *Periodic Security Audits*
- *Regular Monitoring of User's Activities*
- *Annual Security, Privacy, and Records Management Refresher Training*
- *Backups Secured Offsite*
- *Encryption of Backups containing sensitive data*
- *Role-Based Training*
- *Least Privilege Access*
- *Mandatory on-boarding training for security, privacy, and Records management personnel*

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

ITIOD has communicated to the enterprise the importance of not improperly inputting PII into user service tickets. Internally, ITIOD conducts incident management training and other educational opportunities for staff as end users and as catalog task and INC-management team members that manage tickets, to mitigate improper PII entry and to report such instances.

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).

General Technology Management Records - Information Systems/Technology
Destroy 3 years after agreement, control measures, procedures, project, activity, or transaction is obsolete, completed, terminated or superseded, but longer retention is authorized if required for business use. (GRS 3.1; Item 020)

General Technology Management Records - Configuration and change management records: *Destroy 5 years after system is superseded by a new iteration, or is terminated, defunded, or no longer needed for agency/IT administrative purposes, but longer retention is authorized if required for business use (GRS 3.4;Item 030)*

Data within ServiceNow is retained since inception (e.g., change records, incident ticketing etc.).

2.3 Privacy Office Review

Name of Reviewer	Duane Dodson
Date Reviewed	8/20/2025
Expiration Date	8/20/2026
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