

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



**Office of Benefits Administration (OBA)  
Applications Suite (BAS)  
April 1, 2021**

## 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 (SSN), 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.

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## 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 9)?
Server application components					
Spectrum	Spectrum is a web-based application that provides users with the ability to create, manage, edit, and review customer's information and their benefits data.	Yes.	PBGC-2, Disbursements, PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. § 1055 & 1056(d)(3), 1302, 1322, & 1350; 44 U.S.C. § 3101; 5 U.S.C. § 301.	Yes.
My Pension Benefit Account (MyPBA)	MyPBA is a web-based self-service application that allows participants in plans that have been trusted by PBGC to conduct business transactions electronically with PBGC.	Yes.	PBGC-2, Disbursements, PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. § 1055, 1302, & 1322; 44 U.S.C. § 3101; 5 U.S.C. § 301.	Yes.
Case Management System (CMS)	CMS is a business application for the Office of Benefits Administration (OBA) and other departments that supports the	No.	PBGC-2, Disbursements, PBGC-9, Unclaimed Retirement Funds	29 U.S.C. § 1302, 1321, 1341, & 1350; 44 U.S.C. § 3101.	No.

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	workflow and milestone processing for the trustee case processing.				
Customer Relationship Management System (CRM)	CRM is the central repository for all PBGC participant interactions.	Yes.	PBGC-6, Plan Participant and Beneficiary Data, PBGC-10, Administrative Appeals File	29 U.S.C. § 1302, 1322, & 1350; 29 U.S.C. §§ 1055 & 1056(d)(3); 44 U.S.C. § 3101.	Yes.
Customer Correspondence System (CCS)	CCS is a set of services that provides a dynamic, streamlined, and standardized method of letter generation functionalities to PBGC's users and enterprise applications.	No, CCS does not store any data that is considered a record. CCS is used as a transactional service to send outgoing correspondence.			Generated correspondence is archived to IPS for records management purposes.
Image Processing System (IPS)	IPS is an online repository for document image storage and catalog system.	Yes.	PBGC-2, Disbursements, PBGC-6, Plan Participant and Beneficiary Data, PBGC-9, Unclaimed	29 U.S.C. § 1055 & 1056(d)(3), 1302, 1321, 1322, 1341, 1342, & 1350; 26 U.S.C. § 6103; 44 U.S.C. § 3101; 5 U.S.C. § 301.	Yes.

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			Retirement Funds PBGC-10, Administrative Appeals File		
Payment Adjustment Calculation System (PACS/Batch PACS)	This calculation tool evaluates whether PBGC must refund money to, or recoup money from, participants, beneficiaries, and alternate payees.	Yes.	PBGC-2, Disbursements, PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. § 1055 & 1056(d)(3), & 1302; 44 U.S.C. § 3101; 5 U.S.C. § 301.	Yes.
Integrated Present Value Future Benefits (IPVFB)	IPVFB determines the PBGC's Present Value of Future Benefits (PVFB) liability for financial reporting purposes.	Yes.	PBGC-2, Disbursements, PBGC-6, Plan Participant and Beneficiary Data, PBGC-9, Unclaimed Retirement Funds	29 U.S.C. § 1055 & 1056(d)(3), 1302, 1322, & 1350; 44 U.S.C. § 3101; 5 U.S.C. § 301.	Yes.
mass Extract Transform Load (mETL)	mETL is a database scaling tool used by the Plan Asset and Data Management Department (PADMD) to extract, transform, and load data.	Yes.	PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. §§ 1055 & 1056(d)(3), & 1350; 44 U.S.C. § 3101; 5 U.S.C. § 301.	Yes.

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BCV Web Portal	The BCV web portal is a web application to perform authorized functions, which include performing valuation and calculation programming; producing benefit calculations and estimates; performing data entry, validation, reconciliation, and verification; performing system administration; and producing standard reports.	Yes.	PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. §1350, 1055 & 1056(d)(3); 44 U.S.C. § 3101.	Yes.
<b>Client application components</b>					
Actuarial Calculation Toolkit (ACT)	ACT is used by actuaries to define how a plan must be valued and how benefit statements for that plan should be generated.	Yes.	PBGC-2, Disbursements, PBGC-6, Plan Participant and Beneficiary Data, PBGC-9, Unclaimed Retirement Funds, PBGC-10,	29 U.S.C. § 1055 & 1056(d)(3), 1302, 1321, 1322, & 1350; 44 U.S.C. § 3101; 5 U.S.C. § 301.	Yes.

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			Administrative Appeals File		
Archive Utility/Archive Access	This utility serves as the repository for valuation and benefit recalculation files and databases and functions as the delivery application for accessing plan-specific benefit recalculation programs.	Yes.	PBGC-2, Disbursements, PBGC-6, Plan Participant and Beneficiary Data, PBGC-9, Unclaimed Retirement Funds, PBGC-10, Administrative Appeals File	29 U.S.C. § 1055 & 1056(d)(3), 1302, 1321, 1322, & 1350; 26 U.S.C. § 6103; 44 U.S.C. § 3101; 5 U.S.C. § 301.	Yes.
Automated Data Transfer Utility (ADT)	ADT supports the software closeout process by validating data that is in the valuation database and loading benefit liabilities to the PBGC corporate database.	Yes.	PBGC-2, Disbursements, PBGC-6, Plan Participant and Beneficiary Data, PBGC-9, Unclaimed Retirement Funds, PBGC-10, Administrative Appeals File	29 U.S.C. § 1055 & 1056(d)(3), 1302, 1321, 1322 & 1350; 44 U.S.C. § 3101; 5 U.S.C. § 301.	Yes.
Leo	Leo provides a framework for building participant databases using the	Yes.	PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. §§ 1055 & 1056(d)(3), & 1350; 44 U.S.C. §	Yes.

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	same data model as ACT; data is validated and reconciled before delivery to ACT.			3101; 5 U.S.C. § 301.	
Tool components					
CLEAR	CLEAR is a web-based service from Thomson Reuters that helps PBGC locate participants.	No.	PBGC-6, Plan Participant and Beneficiary Data, PBGC-9, Unclaimed Retirement Funds	29 U.S.C. 1055, 1056(d)(3), 1302, 1321, 1322, 1322a, 1341, 1342, and 1350; 29 U.S.C. 1203; 44 U.S.C. 3101; 5 U.S.C. 301.	No.
IPS Import	The IPS Import tool is a JavaScript used to pull IPS documents based on the IPS Document IDs.	Yes.	PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. §§ 1055 & 1056(d)(3), & 1350; 44 U.S.C. § 3101; 5 U.S.C. § 301.	Yes.
Plan Download Tool (PDT)	PDT supports the Technology Risk Management Division (TRMD) by pulling participant census, valuation, payment, and address information from the enterprise databases,	Yes.	PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. §1350,1055 & 1056(d)(3).	Yes.



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	GENOWN/ SPECOWN, for given cases, and outputs the information into an Excel file, which is often used as a starting point for the creation of participant databases.				
Pre-Trusteeship Data Viewer (PDV)	PDV allows users to view and search customer data provided to PBGC in various formats for select cases.	Yes.	PBGC-6, Plan Participant and Beneficiary Data, PBGC-9, Unclaimed Retirement Funds, PBGC-10, Administrative Appeals File	29 U.S.C. §1350, 1055 & 1056(d)(3); 44 U.S.C. § 3101.	Yes.
Aggregate Maximum (AggMax)	AggMax allows TRMD Data Analysis Administrative Support (DAAS) personnel to query Genesis to identify customers subjected to the aggregate maximum limit.	Yes.	PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. §1350, 1055 & 1056(d)(3); 44 U.S.C. § 3101.	Yes.

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Conversion Tool for Optional Form of Annuity (OFA)	This tool compares ACT databases against Genesis to determine the scope of required ACT programming updates needed for a case.	Yes.	PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. §1350, 1055 & 1056(d)(3); 44 U.S.C. § 3101.	Yes.
ATPBGC Add-Ins	ATPBGC Add-Ins includes custom functions that can be used in Excel.	No.			No.
Benefit Calculation and Valuation (BCV) Migration Tool	The Case BCV Migration tool is a custom developed web application built on .NET technology using the C# language that will be used in production temporarily (from end of February 2020 to end of December 2020) for migrating Benefit Statement Retirement Statement / Benefit Estimation programs from the current Archive	No.			No.

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	platform to the new BCV platform.				
New Present Value Factor (NPVF) Calculator	This tool allows users to produce present value factors, early and late retirement factors, and form conversion factors.	No.			No.
OBA's Oracle Primavera P6 Project Management	OBA's Oracle Primavera P6 Project Management (OBA P6) is an enterprise project management application used to manage, schedule, and report OBA's case activities and resource capabilities/ assignments.	No.			No.
Ares	Ares is an MS Access application that builds a financial spreadsheet by pulling data from Genesis.	Yes.	PBGC-13, Debt Collection	29 U.S.C. 1302; 31 U.S.C. 3711(a); 44 U.S.C. 3101; 5 U.S.C. 301; <i>Executive Order 13019.</i>	Yes.
Plan Closing	This tool is used to verify that valuation information stored for	Yes.	PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. §1350, 1055 &	Yes.

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	a given case plan is correct and complete at the time the Plan Completion Memo is submitted to ongoing administration.			1056(d)(3); 44 U.S.C. § 3101.	
Social Security Administration (SSA) Death Master File	This is a monthly process that updates the customer dates of death based on notifications from SSA.	Yes.	PBGC-6, Plan Participant and Beneficiary Data	29 U.S.C. §1350, 1055 & 1056(d)(3); 44 U.S.C. § 3101.	Yes.
Plan Customer Data Report	Customer Data Report is provided as a service by Tableau .	Yes.	PBGC 6, Plan Participant and Beneficiary Data	29 U.S.C. §1350, 1055 & 1056(d)(3); 44 U.S.C. § 3101.	No.
Cogniview's PDF2XL	Cogniview's PDF2XL is a COTS product that is used primarily by OBA auditors to convert PDF documents received from outside sources to Microsoft Excel for the purpose of valuing assets.	No.			No.
Recovery Collection Tool (RCT)	The RCT is an MS Access tool that uses imported weekly reports from the	Yes.	PBGC-13, Debt Collection	29 U.S.C. 1302; 31 U.S.C. 3711(a); 44 U.S.C. 3101; 5 U.S.C. 301;	Yes.

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	Centralized Receivables Service (CRS) and FedDebt to assist in reconciling and recording payment/ collection data in OBA/PAS/BPD's Recovery Tool Ares.			<i>Executive Order 13019.</i>	
MS Access-based utility tools	Access-based tools are used by TRMD to accomplish various tasks within the ACT, Archive, and IPVFB applications. Tools include: TyTrack, and Change Request.	Yes.	PBGC-6, Plan Participant and Beneficiary Data, PBGC-9, Unclaimed Retirement Funds, PBGC-10, Administrative Appeals File	29 U.S.C. §1302, 1350, 1055 & 1056(d)(3).	Yes.

## 2.2 The System as a Whole

1. Please describe the purpose of the system, when considered as a whole. Please include if this is an existing system (either an annual recertification update or a major change).

The OBA Applications Suite (BAS) is an existing system that supports the OBA mission, which is to ensure pension participants are paid their full benefit permitted by law, and to provide quality service through accurate, timely, and uninterrupted benefit payments and administration.

2. What are the Confidentiality, Availability, and Integrity ratings for the system as a whole?

Confidentiality	Moderate
Integrity	Moderate
Availability	Moderate

3. 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.

PII is collected from individuals, federal agencies, and other third-party sources. The format for collecting PII includes submitted forms, via email, phone, and/or via a website or agency database. Any data collection forms, surveys, or via email or website include a [Privacy Act Statement](#). The forms used to collect information can be found here: [CCS Correspondence Help Page](#).

Individuals can opt out of this collection of PII as participant response on a PBGC form is voluntary. However, failure to provide information to PBGC (e.g., SSN) may delay or prevent PBGC from calculating and paying the participant's pension benefits.

When participant and beneficiary information is provided by a third party (e.g., former plan administrator), the participant does not have the right to consent to a particular use of the information. After PBGC becomes the statutory trustee of a pension plan, a participant may contact the PBGC Customer Contact Center, or access MyPBA, to update or modify the information that is used by PBGC.

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4. 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.

N/A

5. For the user roles in the system:

Role Name	Number of Users in that role	Approver	Access Level (Read, Write, etc.)	Recertification Date

Due to the large number of roles and users, the BAS annual account recertification report is available for review.

6. Does the System leverage the Enterprise Access Controls?

- Yes  
 No

PBGC users that require access to BAS are required to go through PBGC's enterprise GetITAll process to obtain such access. Access is restricted based on the user's role whether he or she is a federal employee or a contractor.

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7. Discuss the physical, technical, and administrative controls that are employed to secure the PII in the system.

BAS adheres to the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53, Rev. 4, and has adopted appropriate administrative, technical, and physical controls to secure PII in accordance with PBGC's security program to protect the confidentiality, integrity, and availability of the information, and to ensure that 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 personnel. PIV badges are required to access secure office spaces as well as to access the PBGC local area network (LAN). Technical controls include access controls for password protection and least privilege access to the data. Virtual private network (VPN), firewalls, intrusion detection systems, 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.

8. For the PII in the system, discuss the actual/intended uses of the PII, the steps taken to limit the PII collected to the minimum needed, and the reasons the PII is necessary and relevant.

PII is used to manage pension plan data; value pension plans and associated liabilities for which PBGC is, or may be, obligated to pay; calculate and provide pension benefits; and report tax information to the Internal Revenue Service (IRS) and other tax authorities. PII is also used to correctly identify pension plan participants enabling them to review pertinent information through the MyPBA web portal.

9. 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 Cyber Security Assessment and Management (CSAM). Be sure to include any MOU, ISA, or Interagency Agreements.



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BAS PII information is shared within the BAS components that maintain the data and produce the files for authorizing benefit payments. The BAS system boundary consists of a suite of applications that process data residing in a centralized enterprise Oracle database server. Each application within the suite processes customer benefit data and shares with other applications within the system boundary. Data reconciliation is also performed by some of the applications, providing data integrity and checking for accuracy and normalization of the data within the database.

The Genesis database, which is the data store for Spectrum, is the system of record that supports participant services and provides the data of record to other applications that view, manipulate, and store data in their own instances on Genesis.

BAS PII is provided to the following external entities and associated ISAs are stored in CSAM:

Government Publishing Office (GPO). The interconnection between PBGC's BAS and GPO's PBGC Data Distribution System (PDDS) utilizes site-to-site IPsec VPN and Secure File Transfer Protocol (SFTP) for a dedicated connection. This service is used for printing letters, benefit determinations and other participant correspondences.

- Participant Name
- Date of Birth
- SSN
- Last Known Address
- Plan Name
- Plan Employee Identification Number (EIN)/Plan Number (PN)
- Amount of Benefit
- Name of Plan Sponsor
- City/State of Plan Sponsor

Internal Revenue Service: Beneficiary information relevant to plan participant's qualification for the Healthcare Coverage Tax Credit (HCTC) is shared between BAS and IRS's HCTC. An automated SFTP transfer occurs on the 25th on each month.

- Taxpayer Identification Number (TIN)/SSN
- Full Name
- Date of Birth
- Street Address
- City
- State
- Zip Code
- Eligibility (Month/Year)
- Eligibility Adjustment Code

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Social Security Administration: The Spectrum Death Processing Subsystem provides relevant PII for deceased beneficiaries. Information is transferred through a two-way FIPS 140-2 tunnel utilizing IPSec IKE v1 and v2 with an AES 256 pre-shared key. Information Exchange Agreement (IEA) number 10014, effective 12/01/2016 through 11/30/2021.

Delphi: The data is exchanged via the Fidelity Plan Sponsor WebStation (PSW) portal. The link is secured via the HTTPS security protocol. This exchange is covered under SORN PBGC-6, Plan Participant and Beneficiary Data as noted in the Data Exchange Analysis (DEA) for Delphi GM, dated January 25, 2017.

- Customer Type (Participant, Beneficiary, Spouse, or Alternate Payee)
- Participant SSN
- Participant Name
- Payee's Benefit Commence Date
- Benefit Start Date
- Payee's Form of Benefit
- Current PBGC Basic Benefit Payable
- Current PBGC Supplement Payable
- PBGC Retirement Type
- Beneficiary Name
- Beneficiary Date of Birth
- Beneficiary's Relationship
- Reason for Benefit Change
- Benefit Change Effective Date
- Benefit Statement Provided (Yes or No)

State Street Bank: SFTP files are sent using FIPS 140-2 compliant Tectia Secure Shell (SSH) servers and encrypting the payload using Edge 3.7.3 encryption.

- Plan Data:
  - Pension Plan Name
  - Pension Plan Number (Case Number)
  - Date of Plan Termination
- Participant Data:
  - Participant Name
  - Participant Date of Birth
  - Participant SSN
  - Participant Mailing Address
  - Participant Destination (when payment is sent to an address other than the participant's)
  - Participant Financial Account Information and or Account Numbers
- Payment Data:

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- Payment Types (Lump Sum, Pension, Special)
- Payment Amounts
- Federal Withholding Amount
- Medical Deductions
- Transaction Data
  - Notification of Change
  - Notification of Returns
  - Acknowledgements
  - Trial Balance

The following externally provided service is supported by Shared Business Services:

U.S. Postal Service: The Address Validation Service (AVS) currently supports four applications owned by Office of Business Administration (OBA), which is the primary consumer of this service. The four applications are: Case Management System (CMS), Customer Relationship Manager (CRM), My Pension Benefit Administration (MyPBA), and Spectrum. Each application uses AVS to deliver on-demand transaction-based standardization and validation of addresses for real-time transactions. Spectrum is the only application that uses the bulk process to validate addresses. The AVS team generates files and transmits approx. 1.9 million customer addresses quarterly to GPO to be verified using WSFTP via LeapFile.

10. Does the system leverage the commonly offered control for Accounting of Disclosures?

- Yes
- No

### 2.3 Privacy Office Review

<b>Name of Reviewer</b>	Loretta Dennison
<b>Date Reviewed</b>	April 15, 2021
<b>Expiration Date</b>	April 15, 2022
<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.

<i>Enter description here.</i>
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Discuss any conditions on Approval

<i>Enter description here.</i>
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