Privacy Impact Assessment for

Online Retirement Application (ORA) (Pilot)

August 14, 2019

Contact Point

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OPM Form 5003

Abstract

The Office of Personnel Management (OPM) Retirement Services (RS) office in partnership with the OPM Office of the Chief Information Officer's Retirement Services Information technology Program Management Office (OCIO/RSITPMO) is developing an Online Retirement Application (ORA) to be used by current and former Federal government employees, Federal agencies' Human Resources offices, and payroll providers to complete and certify an immediate retirement application. In its pilot phase, ORA will only be used by current Federal employees applying for retirement. The certified retirement application and associated document(s) collected using ORA will be the primary and authoritative source of retirement data for the applicant and provide the personal data to initiate base entitlement and computation of Civil Service Retirement System (CSRS) and the Federal Employee Retirement System (FERS) benefits. This Privacy Impact Assessment (PIA) is being conducted because ORA will contain personally identifiable information (PII) about federal employees, retirees, and their families.

Overview

The Office of Personnel Management (OPM) Retirement Services (RS) is responsible for the administration of two primary Federal Retirement Programs covering millions of active employees who are eligible for retirement benefits and 2.4 million annuitants currently receiving benefits.

The Civil Service Retirement System (CSRS) is a defined benefit, contributory retirement system. Employees share in the expense of the annuities to which they become entitled. CSRS covered employees contribute a percentage of their pay to CSRS. The employing agency matches the employee's CSRS contributions. The Civil Service Retirement Act established the CSRS for certain Federal employees and it was replaced by Federal Employee Retirement System (FERS) for Federal employees who first entered covered service on and after January 1, 1987.

The FERS is a retirement plan that provides benefits from three different sources: a Basic Benefit Plan, Social Security, and the Thrift Savings Plan (TSP). Two of the three parts of FERS (Social Security and the TSP) can go with an employee to any job if they leave the Federal government before retirement. The Basic Benefit and Social Security parts of FERS requires employees to pay a share each pay period. The agency withholds the cost of the Basic Benefit and Social Security from the pay as payroll deductions. The agency pays its part, too. Then, after the employee retires, they receive annuity payments each month for the rest of their lives. The TSP part of FERS is an optional account that an agency automatically sets up for the employees. Each pay period the agency deposits into an account an amount equal to a percentage of the basic pay the employee earns for the pay period. Employees can also make their own contributions to the TSP account and the agency will also make a matching contribution. These contributions are tax-deferred.

In Fiscal Year 2019, RS identified ORA as a strategic initiative to standardize and automate retirement data collection using modern technology and to begin the process of moving the application from a paper-based form to an electronic data collection and submission. Today, the process of submitting an application for immediate retirement benefits occurs in the three stages described below.

Application Completed: The retirement application is completed by the federal employee and submitted to the employing agency human resource (HR) specialist. The employing agency completes the Agency Checklist of Immediate Retirement Procedures and the Certified Summary of Federal Service and forwards them to the employee for review and signature.

Application Submitted: Using the Agency Checklist the employing agency ensures all necessary data has been entered and submits the completed application and supporting documentation to OPM.

Application Received: Within a few days after receiving the application, OPM sends an acknowledgement of receipt to the applicant along with their assigned claim number that is used for all future reference with OPM.

ORA is being developed to transition these three stages from a paper-based method to one of electronic collection, to convert the paper retirement process to an electronic process. When a qualified federal employee is ready to retire, they will be sent an email request with instructions to complete an immediate retirement application using ORA. After successfully logging into ORA, the applicants will enter their retirement application information. They will then be required to complete a series of online retirement forms based on selections made during the application process. Applicants may save and return to the application until it is complete and submitted to the employing agency HR specialist for review. The HR specialist reviews the application and completes the Agency Checklist and other required forms and submits them back to the applicant for final review and certification. When the retirement application is complete and certified by the applicant, and by their agency's HR and payroll offices, the application is released to OPM. The applicant will then receive an email notification upon release and acceptance of the package by OPM. ORA is currently under development and will be piloted with a small number of agencies and applicants. Once the pilot is completed, the results analyzed, and any systems changes or additions are made, ORA will be rolled out to all agencies and this PIA will be updated.

ORA will be launched as a cloud-based solution hosted in a Federal Risk and Authorization Management Program (FedRAMP)-certified public cloud environment.

Section 1.0. Authorities and Other Requirements

1.1. What specific legal authorities and/or agreements permit and define the collection of information by the project in question?

The Civil Service Retirement System (CSRS) is administered pursuant to 5 U.S.C. Chapter 83. The Federal Employee Retirement System (FERS) is administered pursuant to 5 U.S.C. Chapter 84. Related authorities include Code of Federal Regulations Parts 831, 841, 842, 844, 845, and 846.12. Executive Order 9397, as amended by 13478, allows for the collection of Social Security numbers for a Federal agency's mission.

Additional relevant authorities include: 5 U.S.C. Section 3301 and Chapters 83, 84, 87, 89, and 90; and P.L. 83-598, 84-356, 86-724, 94-455, and 106-265. 5 C.F.R. Part 850 further delineates OPM's authority to collect and use personally identifiable information (PII).

1.2. What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?

The applicable SORN is OPM Central-1, Civil Service Retirement and Insurance Records.

1.3. Has a system security plan been completed for the information system(s) supporting the project?

The system security plan for ORA is under development and will be completed as part of the Authorization to Operate package required before the system goes live.

1.4. Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?

Yes. The applicable NARA retention schedule is DAA-0478-2017-0001-0001.

1.5. If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.

In its initial development and pilot phase, ORA will only collect application information from current Federal employees who are applying for retirement and, therefore, the PRA is not applicable. As it develops, however, ORA will receive and process information from those who are no longer in Federal service and applying for their Federal retirement benefits, and from survivor annuitants or former spouses. The collection of their information will be subject to the PRA. As ORA develops, the online collection will mirror the questions asked on the manual paper forms listed in Appendix A, some of which are subject to the PRA. OPM will evaluate whether the relevant OMB control numbers apply to the online collection and will make any necessary updates and changes within the PRA process.

Section 2.0. Characterization of the Information

2.1. Identify the information the project collects, uses, disseminates, or maintains.

ORA collects, uses, disseminates, or maintains the following information: full name, claim number, date of birth, Social Security number, address, marital status, financial and banking information, health and life insurance benefits, email address, telephone number, service credit deposits, employee service history, retiring agency information, retirement plan (CSRS or FERS), retirement contributions, military service, military deposits.

Additionally, if a survivor's annuity is elected and/or there are former spouses payable, ORA collects: survivor/former spouse full name, survivor/former spouse date of birth, survivor/former spouse social security number, survivor/former spouse address, survivor/former spouse place of marriage, date of marriage and if applicable date of divorce.

2.2. What are the sources of the information and how is the information collected for the project?

The information for the immediate retirement applications populated and submitted in ORA are provided directly by the retiree and their agency's Human Resource office.

2.3. Does the project use information from commercial sources or publicly available data? If so, explain why and how this information is used.

No, ORA does not use information from commercial sources or publicly available data.

2.4. Discuss how accuracy of the data is ensured.

Accuracy of the data in ORA is confirmed by the review and certification of the retirement application data by the individual applicant, and by the agency Human Resources office and payroll provider prior to final submission of the data to OPM. OPM assumes, based on the source of the information and the opportunity to confirm accuracy prior to submission within the system that the information submitted is accurate. If errors are discovered at a later point, individuals can request corrections, as described in Section 7 of this PIA.

2.5. Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a risk that ORA will collect more information than is necessary to meet the business needs of the system or will not collect enough information to adequately process an individual's retirement application.

Mitigation: This risk is mitigated in the initial development and piloting of ORA by collecting the same information that is collected in the manual, paper application and asking for information that has been deemed pertinent to the retirement decision.

Privacy Risk: There is a risk that the information in ORA will not be accurate and OPM will be unable to correctly identify an individual and process their retirement benefits.

Mitigation: This risk is mitigated by requiring submission of data elements determined to be sufficient to distinguish each individual and by providing individuals and respective agency personnel with the ability to confirm the accuracy of the information prior to submitting it to OPM within ORA. OPM assumes that information regarding the Federal employees applying for retirement and that comes directly from the applicant or from the agencies is correct and has been validated by the employing agency. ORA's processes further mitigate the risk of inaccuracy by requiring the individual, HR office, and Payroll provider to certify the accuracy of the information submitted.

Section 3.0. Uses of the Information

3.1. Describe how and why the project uses the information.

The information collected in ORA Portal is used to determine eligibility and entitlement to retirement benefits. All information collected is necessary to establish the applicant's identity, history of federal government employment, and eligibility for the benefits sought. The information is entered into other OPM retirement systems to expedite the processing of the application and to ensure compliance with legislative mandates and adherence to OPM policies and regulations.

3.2. Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how OPM plans to use such results.

No, the project does not conduct electronic searches to discover or locate a predictive pattern or an anomaly.

3.3. Are there other programs or offices with assigned roles and responsibilities within the system?

In the initial development of ORA, only RS program staff and OCIO staff involved in developing and administering ORA will have access to the system with assigned roles and responsibilities. In addition, Federal agency Human Resource Specialists, to include those within OPM, and payroll service providers will have access to the system to provide information related to the retirement application and, in some instances, will have an administrative roll within ORA.

3.4. Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: There is a risk that authorized individuals may use information within the system for unauthorized purposes or that unauthorized individuals may gain access to the system.

Mitigation: This risk is mitigated through access controls that limit access to only those with a need to know and only with access appropriate to their roles and responsibilities. In addition, the system employs audit logs that will record anomalous behavior within the system. As ORA is developed and piloted, this risk will be evaluation and any necessary further steps taken to ensure it is mitigated.

Section 4.0. Notice

4.1. How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

When individuals access ORA to submit their retirement application information, they are provided with a Privacy Act Statement that explains why their information is being collected, how it will be used, and how it may be disclosed to others. In addition, OPM provides notice through the publication of this PIA.

4.2. What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?

Applying for retirement benefits through ORA is completely voluntary. However, if an applicant chooses to apply and are enrolled by their Agency, they cannot limit use or decline to provide mandatory information. Individuals may elect not to provide voluntary information; however, doing so may delay the processing of their retirement application. As ORA is developed and rolled out, those individuals who wish to apply for retirement using the manual, paper process will be able to do so. Once ORA is fully functioning, the intent is for ORA to replace the manual, paper process and applicants wishing to apply for retirement benefits will be required to do so through ORA.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that an individual may not know how information is used or that the system contains their information.

Mitigation: This risk is mitigated by proving individual applicants with a Privacy Act statement when they provide their information in ORA. In addition, this risk is mitigated through publication of this PIA.

Section 5.0. Data Retention by the Project

5.1. Explain how long and for what reason the information is retained.

The retirement records contained in ORA are covered by NARA schedule DAA-0478-2017-0001-0001. In general, retirement records are destroyed after all benefits have been applied for and paid to all eligible heirs, and 115 years from the date of the employee's birth, or 30 years after the date of employee's death, whichever is sooner (5 U.S.C. 8345(i)). The exact disposition of the records in ORA will be determined in the pilot process as the system develops and decisions are made concerning where the application information will be stored and whether the ORA records are transitory and will be kept only for the period of time necessary for a particular business need before they are moved to another system for processing and storage.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that information will be retained for longer than necessary.

Mitigation: This risk will OPM retains immediate retirement application records in accordance with DAA-0478-2017-0001, Retirement Case Files. The risk is mitigated by having the trained staff follow the established retention schedule and documented guidance from NARA, which clearly defines retention requirements by record type.

Section 6.0. Information Sharing

6.1. Is information shared outside of OPM as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.

Yes, the Federal agency Human Resource and Payroll Offices associated with a particular individual's retirement application in ORA will have access to the relevant information in ORA. The information is accessible to the respective agency personnel via the ORA and is used by them to submit and/or modify previously submitted applications as required. Once the applicant is certified as retired by RS, the applicant's former agency will have read only access to the records.

6.2. Describe how the external sharing noted in 6.1 is compatible with the SORN noted in 1.2.

The external sharing described in 6.1 is compatible with the purpose for which the information was collected, which is in part to determine retirement benefits, and the applicable SORN contains appropriate routine uses to permit this access.

6.3. Does the project place limitations on re-dissemination?

The system does not explicitly limit the re-dissemination of retirement application information by the agencies. However, agencies with access to the information will be provided with instructions about appropriate use and re-dissemination of the information.

6.4. Describe how the project maintains a record of any disclosures outside of OPM.

ORA contains automated audit log capabilities that record all access and review of the data/folders. ORA also established manual processes that require documentation, justification and approval of all access, reviews and removal of data that occurs outside the automated audit log functionality.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that information may be inappropriately shared outside the agency or disclosed for a purpose that is not consistent with the purpose for which it was collected.

Mitigation: This risk is mitigated by limiting the access to ORA to only those external Federal agency personnel who have a need to know the information in order to submit and process an individual's retirement application. In addition, OPM will develop instructions in an appropriate form, e.g., MOU or Rules of Behavior, addressing the appropriate use and re-dissemination of the information.

Section 7.0. Redress

7.1. What are the procedures that allow individuals to access their information?

ORA is being designed so that applicants for Federal retirement can sign on to the system and populate and submit their retirement application. They will be provided with information about how the system works and how they access and update their information prior to being given access to ORA by their HR office and/or RS program staff. More generally, individual who want to request access to their records may contact the Retirement Services office at the Office of Personnel Management, 1900 E Street, N.W., Washington, D.C. 20415-0001. Individuals must provide the following information: name, including all former names; date of birth; Social Security number; the name and address of the office in which he or she is currently or was formerly employed in the Federal service; and annuity, service credit, or voluntary contributions account number, if assigned. Individuals requesting access must also follow OPM's Privacy Act regulations, 5 C.F.R. part 297, regarding verification of identity and access to records.

7.2. What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

ORA is being designed so that applicants for Federal retirement can sign on to the system and populate and submit their retirement application. They will be provided with information about how the system works and how they access and update their information prior to being given access to ORA by their HR office and/or RS program staff. More generally, individuals may contact Retirement Services directly to notify the agency of changes to personal information. Based on the type of change, RS may require the individual to submit evidence to prove identity and /or the validity of the change. Alternatively, individuals may contact the Retirement Services office at the Office of Personnel Management, 1900 E Street, N.W., Washington, D.C. 20415-0001 to request that their records be amended. Individuals must provide the following information: name, including all former names; date of birth; Social Security number; the name and address of the office in which he or she is currently or was formerly employed in the Federal service; and annuity, service credit, or voluntary contributions account number, if assigned. Individuals requesting amendment of records must also follow OPM's Privacy Act regulations, 5 C.F.R. part 297, regarding verification of identity and access to records. If the record did not originate with OPM, individuals must contact the agency that established the record and Agency Human Resource or payroll offices may make a correction by completing SF 2806-1 for CSRS and SF 3101 for FERS and forwarding to the Office of Personnel Management, Retirement Operations Center, Post Office Box 45, Boyers, PA 16017-0045.

7.3. How does the project notify individuals about the procedures for correcting their information?

With respect to ORS, individuals will receive information about how to correct information from their HR offices or from OPM RS program staff in the initial stand up and piloting of ORA. As the system develops, communication will be developed to best inform individuals about how the system operates, including how they may correct or request correction of erroneous information. More generally, individuals are notified by their agencies about the retirement process, and are provided with information about how to request correction and amendment of their records through the publication of the OPM Central 1 SORN and this PIA.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals may not understand how to access, correct, or amend their records maintained in this system.

Mitigation: This risk will be mitigated in the development/pilot stage of ORA by providing applicants with information about how they can access ORA to populate and submit their information. It is further mitigated more generally by providing notice in the applicable SORN concerning procedures for the access and amendment of records. As ORA and its processes are developed, RS will determine whether additional communication is necessary with individual applicants to provide information regarding access and amendment of the information contained in ORA.

Section 8.0. Auditing and Accountability

8.1. How does the project ensure that the information is used in accordance with stated practices in the PIA?

System administrators, security administrators, IT specialists, vetting operators, and analysts have access to the system in order to perform their duties in managing, upgrading, and using the system. Role-based access controls are employed to limit the access of information by different users and administrators based on the need to know the information for the performance of their official duties. OPM also employs processes to enforce separation of duties to prevent unauthorized disclosure or modification of information. No unauthorized users are permitted access to system resources. Strict adherence to access control policies is automatically enforced by the system in coordination with and through oversight by OPM security officers. As ORA is developed and modified, the information that the system collects, maintains, and disseminates will be reviewed and the privacy impact of any changes and updates will be evaluated and documented in an updated PIA.

8.2. Describe what privacy training is provided to users either generally or specifically relevant to the project.

All OPM employees and contractors must take the annual Security and Privacy Awareness Training. All ORA users are required to take their agency's Security and Privacy Awareness Training. Their supervisor, Agency Benefit's officer and the RS Benefits Officer Development & Outreach representative must certify the training. If an agency does not have such a training, their users can take the OPM training to fulfill this requirement.

8.3. What procedures are in place to determine which users may access the information and how does the project determine who has access?

Access to ORA is approved and granted based on user roles, as outlined below. Access to any part of the system is approved specifically for, and limited only to, users who have an official need for the information in the performance of their duties.

OPM RS Account Administrator: authorization will follow the OPM process of completing and submitting Form 1665. Accounts will be created by the RSITPMO ORA Account Administration.

OPM RS Users: authorization will follow the OPM process of completing and submitting Form 1665. Accounts will be created by the RSITPMO ORA Account Administration.

Other Agency HR/Payroll Specialist: account authorization is approved and created by RS Account Administrators based on user role and required access.

Applicant: account authorization is approved and created by the applicant's Agency HR Specialist

8.4. How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within OPM and outside?

Any information sharing agreements, new uses of the information, or new access by additional individuals or organizations are evaluated by the RS program managers. The program managers coordinate with the Office of General Counsel, Office of the Chief Information Officer and with the Chief Privacy Officer, as appropriate, to review information sharing agreements, including Memoranda of Understanding (MOUs), computer matching agreements and information exchange agreements to ensure that appropriate privacy and security provisions are included to safeguard PII. As ORA is developed and piloted, any relevant uses of the information, access to the system, and necessary information sharing agreements will be evaluated for compliance with the Privacy Act and this PIA and will be appropriately reviewed and documented.

Responsible Officials

Rosemarie Lawler

Program Manager

Retirement Services

Systems Support Retirement Services

Approval Signatures

Signed Copy on File with the Chief Privacy Officer
Kellie Cosgrove Riley
Chief Privacy Officer

Appendix A

(*PRA not applicable)

Form	Title
SF 2801	Application for Immediate Retirement (CSRS)*
SF 2801-1	Certified Summary of Federal Service (CSRS)*
SF 2801-2	Spouse's Consent to Survivor Election (CSRS)*
SF 2802	Application for Refund of Retirement Deductions
SF 2802A	Current/Former Spouse's Notification of Application for Refund of Retirement Deductions Under the Civil Service Retirement System*
SF 2809	Employee Health Benefits Election Form, OMB No. 3206-0160
SF 2810	Notice of Change in Health Benefits Enrollment *
SF 176, SF 176T, SF 2817	Life Insurance Election, OMB No. 3206-0230
SF2818	Continuation of Life Insurance Coverage As an Annuitant or Compensationer *
SF 2821	Agency Certification of Insurance Status *
SF 54 & SF 2823	Life Insurance Designation of Beneficiary, OMB No. 3206-0136
SF 3102	FERS Designation of Beneficiary, OMB No. 3206-0173
SF 3103	Register of Separations and Transfers *
SF 3106	Application for Refund of Retirement Deductions, OMB No.3206-0170
SF 3106A	Current/Former Spouse's Notification of Application for Refund of Retirement Deductions Under the Federal Employees Retirement System*
SF 3107	Application for Immediate Retirement (FERS) *

Form	Title
SF 3107-1	Certified Summary of Federal Service (FERS)*
SF 3107-2	Spouse's Consent to Survivor Election (FERS)*
SF 3112	Documentation in Support of Disability Retirement, OMB No. 3206-0228
OPM Form 1510	Cert of Agency Offer of Position and Required Doc.*
OPM Form 1515	Military Service Deposit Election*
RI 76-10	Assignment FEGLI Program*
RI-20-124	LEO CERT*
DD 214	Certificate of Release or Discharge from Active Duty
W-4	Employee's Withholding Allowance Certificate