



Privacy Impact Assessment
for the

**Services Online System
(SOL)**

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Contact Points

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Abstract

The Office of Personnel Management Retirement Services is responsible for the Government-wide administration of retirement benefits and services for Federal employees, retirees, and their survivors. Retirement Services operates Services Online (SOL), an on-demand, web-based system that allows for direct access by authorized federal Civil Service and Federal Employees (CSRS/FERS) retirees and survivor annuitants to their monthly annuity payment information. With this system, retirees and survivor annuitants can quickly and conveniently view and update specific monthly annuity payment options. A Privacy Impact Assessment is being conducted because SOL collects, uses, maintains, and disseminates personally identifiable information about retirees and their survivors.

Overview

OPM Retirement Services (RS) serves millions of CSRS/FERS retirees and their survivors (such as spouses and children of the retirees) by providing them with retirement benefit services. These benefits are specifically for the Civil Service Retirement System (CSRS), Federal Employees Retirement System (FERS), FERS Special, or the Organization Retirement and Disability System (ORDS) and were earned through Federal government employment.

The Services Online system (SOL) is used to support the mission of RS. SOL is a web-based system that was developed to provide CSRS/FERS retirees and survivor annuitants with self service capability to view their monthly annuity payment information and to make certain updates or changes to that information. When a retiree or a survivor is placed into an interim or an active payment status, their information is sent to SOL from the Annuity Roll System (ARS) to create an account within the system. Interim payment status is for those individuals awaiting final approval of their retirement benefits and. Individuals are in active payment status once their retirement benefits are approved and they begin to receive a regular monthly payment.

Individuals are provided with information about SOL upon their retirement and are able to access it at (<http://www.servicesonline.opm.gov>) initially with a temporary password and their assigned retirement claim number. Through the SOL website individuals can update their mailing address, direct deposit information, Federal or state income tax withholdings, view, print or

request a duplicate Form 1099-R (the IRS form with which an individual reports his or her distributions from annuities), or establish allotment to organizations. Also available is the ability to set up checking or savings allotments, view annuity statements, and request duplicate retirement booklets and cards. Individuals in an active payment status have access to all menu options applicable to their case and can typically see confirmation of any changes they make in SOL within 24 to 48 hours.

The information in SOL that the individual is able to view and provide updates to is obtained from daily and monthly data transfers from the Annuity Roll System (ARS). ARS is the OPM core retirement and benefit management system supporting the majority of retirement functions for RS. ARS is used for the computation of Federal retirement, health, and life insurance benefits, and to determine qualification regarding pay benefits.

Through the SOL interface, any changes made by the individual are collected and transmitted to ARS as a transaction. Once the transaction is processed through ARS, updated payment information is transmitted back to SOL for processing to ensure the synchronization of payment information.

Section 1. 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 and the Federal Employee Retirement System (FERS) is administered pursuant to 5 U.S.C. chapter 84. In addition, the following authorities are relevant to the information use in the Retirement Services Office: 5 U.S.C. § 3301 and chapters 87, 89 and 90; Pub. L. 83-598, 84-356, 86-724, 94-455, and 106-265; and Executive Order 9397, as amended by Executive Order 13478.

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

The records in SOL are covered by the OPM/CENTRAL 1 Civil Service Retirements and Insurance SORN.

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

A System Security Plan was completed as part of the Authority to Operate granted to Services Online in June 2018.

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

Yes. The records in this system are covered under NARA General Records Schedule 5.2, Disposition Authority DAA-GRS-2017-0003-0002.

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.

The forms that are directly used by SOL are FORM RI 38-128 (It's Time to Sign-up for Direct Deposit), OMB 3206-0226, and SOL Customer Satisfaction Survey, OMB 3206-0236.

Section 2. Characterization of the Information**2.1. Identify the information the project collects, uses, disseminates, or maintains.**

SOL collects, uses, disseminates, and maintains the following information: full name, claim number, date of birth, Social Security number, mailing and email addresses, state and federal tax withholdings, organizational allotments, and financial information. The financial information includes Federal and state income tax withholdings information, form 1099-R information, mailing addresses, checking or savings allotments information, and direct deposit information.

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

SOL obtains information from the Annuity Roll System (ARS) via an electronic process on a daily and monthly basis. The information in ARS primarily originates from the retiree's paper application for benefits and from employment records submitted by a respective retiree's former agency.

The information from ARS is then made available to SOL users for updates via the SOL website. Changes to an individual's information are obtained directly from the individual in SOL and then reconciled in ARS.

Since SOL provides federal retirees and survivor annuitants the ability to manage their monthly annuity payment information online, information is collected (updated) directly from the user.

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

SOL does not use information from commercial sources or publicly available data.

2.4. Discuss how accuracy of the data is ensured.

The information in ARS which is used to populate SOL is reviewed by RS personnel and verified against information in paper-based records. The changes that an individual enters in SOL are subject to validation checks. For example, financial institution routing numbers are validated against a list of approved financial institutions within the Federal Reserve System.

Individuals' SOL transactions are validated within ARS before the transactions are updated to the SOL users' individual record. If the user's record is missing information needed by ARS to identify the user's ARS account, the record will be rejected, a report will be created, and the appropriate personnel will resolve the issue. Rejected records are reviewed by authorized staff for indications of inappropriate or unusual activity.

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

Privacy Risk: There is a risk that more PII that is necessary for the business purpose of SOL will be collected and maintained.

Mitigation: This risk is mitigated through the establishment of effective policies to avoid unnecessary collection of PII and to redact PII if it is collected inadvertently. In addition, the PII that is necessary for SOL to function, as well as any PII that may be collected inadvertently, is masked and transmitted via secure VPN connections so that its exposure is limited.

Privacy Risk: There is a risk that the information collected in SOL is not accurate.

Mitigation: This risk is mitigated by the procedures SOL has in place to validate the changes made by individual SOL through the use of field restrictions that permit applicants to enter data only within certain parameters, and through the use of user confirmation. SOL users are also given the ability to view and access to the information and can correct it when necessary.

Section 3. Uses of the Information

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

SOL provides CSRS/FERS retirees and survivor annuitants the ability to view and access their monthly annuity payment information online. Through direct access to the SOL website, individuals can make requests and update certain information in their record. Once changes are made by individuals in SOL, the SOL information is transmitted to ARS to update the individual's ARS record. Once that update happens, the individual's information is then sent back to SOL to confirm the update to the individual's record.

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.

SOL does not use technology to conduct electronic searches, queries, or analyses for the purpose of discovering or locating a predictive pattern or anomaly.

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

In addition to the individuals in RS who have a need to access the information in SOL in accordance with their business roles, OPM's Human Resource Services Program Management Office and the RS Information Technology Program Management Office in the Office of the Chief Information Office (OCIO) also have access to the system. OCIO provides the following system development functionality for SOL: System Development and Lifecycle Support, System Maintenance, Patch Management, and System Security.

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

Privacy Risk: There is a risk that an authorized user may access the information for an unauthorized purpose or that an unauthorized person may gain access to the system.

Mitigation: This risk is mitigated by requiring the CSRS/FERS retiree and survivor annuitant users of the system to log in using a unique identifier and complex password and to establish security questions and a valid email address in order to reset their password. This risk is further mitigated through OPM employees and contractors being subject to role-based access controls, which limit the information authorized users can access to that which they need to know. There is also a warning displayed on a splash screen when a user opens the website explaining that accessing the system without a need to know may subject them to criminal, civil, or administrative penalties.

Section 4. Notice

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

OPM provides retirees with a welcome letter upon their retirement. That letter informs them of the availability of SOL and notes that they will separately receive an initial password to access the system. Once they receive that password, retirees are able to log in to SOL, are prompted to create a new strong password known only to them, establish personal security questions and are able to access their records in SOL. They also are provided notice at that time about the operation of SOL through the Terms and Conditions and Privacy Act Statement.

In addition to the specific notices that individuals receive regarding SOL, they also receive information more generally about the collection and use of their retirement information through Privacy Act statements on each paper application for retirement benefits given to employees by their employing agency prior to the use of SOL. This PIA and the SORN referenced in Section 1.2 also provide notice.

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

SOL use is voluntary. If individuals opt not to use SOL, they have the option of contacting the Retirement Information call center and speaking with a Customer Services Representative to make any changes to their retirement account.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that individuals are not aware that SOL collects and uses their information, or that they will not receive adequate notice concerning why their information is being collected and how it will be used.

Mitigation: This risk is mitigated through the communication that retirees receive about SOL when they first retire and via information on the SOL web site. In addition, notice about SOL is provided through this PIA; and notice regarding retirement information more generally is provided through Privacy Act Statements on relevant retirement forms and through the OPM/CENTRAL 1 SORN.

Section 5. Data Retention by the project

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

SOL is populated with information from ARS and any updates that an individual makes in SOL are then sent back to ARS for reconciling. The changes are not made directly to the information stored in SOL. Every evening, ARS updates the information in SOL to reflect the changes that i have made and once each month ARS completely repopulates the information in SOL. This is consistent with the records schedule identified in Section 1.4, which requires the destruction of records of an intermediary nature upon verification of successful creation of the final document or file, in this case in ARS, or when no longer needed for business use, whichever is later.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that information will be kept for longer than is necessary or will be deleted before it is no longer needed.

Mitigation: This risk is mitigated by adhering to the applicable records schedule and having a process in place to reconcile records in SOL and ARS on a regular basis.

Section 6. 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.

SOL does not share information directly with any external entities. SOL is populated with information from ARS and any updates that an individual makes in SOL are then sent back to ARS. When information in SOL must be shared externally, primarily for a series of individual matching validations to ensure correctness and completeness of information and for retirement benefit distribution and fraud prevention, the dissemination is done from ARS.

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

SOL does not share information directly with any external entities. When information in SOL must be shared externally, the dissemination is done from ARS. External sharing of the information from ARS is done in accordance with the OPM/CENTRAL 1 SORN.

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

SOL does not share information directly with any external entities. When information in SOL must be shared externally, the dissemination is done from ARS.

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

SOL captures transactional information in audit records to establish the time, date, and source of the transactions submitted, and the outcome of those audited events. However, there are no SOL logs of dissemination outside of OPM because SOL does not share information directly with any external entities. When information in SOL must be shared externally, the dissemination is done from ARS.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that the information will be disclosed or will be used outside of the scope of the purpose for which the initial collection was made.

Mitigation: This risk is mitigated by permitting access to only those OPM personnel who have a need to use the information in SOL in the course of their official business only and by permitting the retirees and survivor annuitants to access only their own information via the SOL website. Agency users have appropriate security clearances and are annually trained about the use of sensitive data. In addition, they are on notice that unauthorized user attempts or acts to accrue resources for unauthorized use, or otherwise misuse this system are strictly prohibited and may result in criminal, civil, or administrative penalties.

Section 7. Redress

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

OPM provides retirees and survivor annuitants with a welcome letter upon their retirement. That letter informs them of the availability of SOL and notes that they will separately receive an initial password to access the system. Once they receive that password, retirees are able to log in to SOL, are prompted to create a new strong password known only to them, and are able to access their records in SOL. They also are provided notice at that time about the operation of SOL through the Terms of Service and Privacy Act Statement. Within SOL, individuals are able to view their annuity information, form 1099R, and their payment history.

In addition, individuals may request access to their records by contacting the system owner identified in the OPM/CENTRAL 1 SORN and providing 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?

Once individuals gain access to SOL, they are given options and instructed to make changes to their own record(s). The system is designed to permit changes to income tax withholdings, mailing address, passwords, allotments, direct deposit payment options, opt-ins to receive information and to be able to print out associated notices, cards or statements. If they require correction to information that they cannot correct through SOL, they are provided with a phone number for the Retirement Information Office as well as an email address.

Individuals may also request that their information be corrected by following the instructions in the Contesting Record Procedure section of the OPM/CENTRAL 1 SORN. Individuals may request that their records be

corrected by contacting the system owner identified in the SORN and providing 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.

7.3. How does the project notify individuals about the

Individuals receive notice about SOL from the retiree welcome letter, the SOL website, this PIA, and the applicable SORN.

Individuals are also notified about the availability of SOL as a tool for accessing and correcting their information through various subsequent mailings after they have retired.

If a retiree or survivor has a question concerning any information associated with an account, they can contact OPM's Retirement Services at 1 (888) 767-6738 for further information. Customers using a Telephone Device for the Deaf (TDD) may call toll-free at 1 (855) 887-4957. Individuals may also send inquiries via email to retire@opm.gov.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals may not have adequate information concerning how to access information that is contained in SOL or to correct that information as needed.

Mitigation: This risk is mitigated by providing individuals with access to their information via the SOL website, this PIA, as well as through the procedures outlined in the OPM/CENTRAL 1 SORN. This risk is further mitigated through publishing clear instructions on other OPM websites and retirement brochures that inform individuals on how to access and request amendment to their records. Further assistance to gain access or make amendments is given on the SOL website with online FAQs and a specialized page called "Using Services Online" that can be found on the SOL main page.

Section 8. Auditing and Accountability

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

OPM personnel review and analyze application audit records for indications of inappropriate or unusual activity, investigate suspicious activity or suspected violations, report findings to appropriate officials, and take necessary actions.

SOL's system administrators also maintain access roles for OPM personnel and contractors that restrict and grant access to information and functionality based on the user's role in supporting the business process need. The system captures transaction and audit records to establish what events occurred, the sources of the events, and the outcomes of the events. SOL transactions are validated by programs within ARS before the transactions are updated to the SOL users' individual record.

Rejected records are reviewed by authorized staff for indications of inappropriate or unusual activity. The authorized OPM staff investigates suspicious activity or suspected violations, reports findings to appropriate officials, and takes necessary actions.

Additionally, access to the system is limited to those who have performed service subject to the CSRS and FERS and to those OPM employees and contractors who have a need to access the system in the course of their official duties. Individuals who access the system through the SOL website have access only to their own records when they log into SOL. official capacity.

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

OPM's internal system users are required to take the annual Information Technology Security and Privacy Awareness training. OPM's OCIO will terminate system access to the OPM network if the training is not taken within the required time. System users whose access is terminated will require supervisory intervention to regain system access.

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

Individual SOL web site users have unique identification credentials that grant full access to their respective payment information. SOL system support personnel within OPM such as System and Database Administrators and Development staff, must have security clearances and are required to take the annual OPM Information Technology Security and Privacy Awareness Training. System user access to SOL data is based on system users' role and functional business purpose.

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?

The information in SOL is not shared with external organizations as part of OPM RS operations and no new uses of the information are anticipated. However, any new uses, MOUs or ISAs regarding the program would be approved by the SOL System Owner and other appropriate OPM officials.

Responsible Officials

Nicholas Ashenden
Deputy Associate Director
Retirement Operations

Approval Signature

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