



Privacy Impact Assessment for

Annuitant Health Benefits Open Season System (AHBOSS)

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Abstract

The Office of Personnel Management's Retirement Services program manages the Annuitant Health Benefits Open Season System (AHBOSS) which is hosted by a third-party contractor. This system contains both a website and Interactive Voice Response (IVR) application used by annuitants to make health benefit enrollment changes and/or to request brochure information for plans participating in the Federal Employees Health Benefits (FEHB) Program during the annual Open Season enrollment period. This Privacy Impact Assessment is being prepared because AHBOSS processes and retains personally identifiable information about annuitants.

Overview

Annuitants use the AHBOSS to initiate their health enrollment change for the upcoming year to support the federal government's annuitant health benefits. AHBOSS uses Login.gov, which is a phishing-resistant multi-factor authentication service. Annuitants log in here first and then provide identifying information once to create a personal account with an annuitant-defined username and masked password. The username and password are also stored by the AHBOSS and are used to authenticate users for subsequent web access during the current Open Season. Information, including personally identifiable information (PII), collected by this system includes name, SSN, mailing address, current FEHB plan code, current FEHB code description, retirement claim number, date of birth, marital status, gender, carrier control number, and email address, for annuitants and their survivors.

The collected information is distributed to OPM's Annuity Roll System (ARS) through the OPM Federal Employee's Health Benefits (FEHB) Data Hub for dissemination. The FEHB Data Hub is a service through which FEHB Program information is collected and exchanged. The Hub's principal function is to share the information that passes through the Hub with the various health



insurance carriers that users select and, in some instances, from the carriers to other entities. The Hub also serves to share information with OPM's Retirement Services (RS) in order to document those transactions that involve the annuitant and their family members. This process assists RS in accurately documenting an annuitant's family members, who may be eligible to receive benefits based on their relationship to the annuitant.

During the annual FEHB Open Season, which generally runs from November to mid-December, the Open Season contractor is provided data extracted from the ARS, the OPM core retirement and benefits management system. Existing AHBOSS users are notified by mail or email of the upcoming season. The contractor loads this information into a database made available to annuitants via the Open Season website or Interactive Voice Response (IVR) system. Annuitants use the website to make Open Season changes and get health benefits on existing FEHB plans.

CSRs use an AHBOSS subsystem (COPS) designed for CSRs, OPM users, and contractor program staff to assist annuitants with enrollment requests. The IVR is hosted on a Platform as a Service designed for call centers. The IVR uses an Intelligent Agent to enhance the interaction between the annuitant and the IVR by listening and clarifying the caller's responses to the IVR. There is a continuous process improvement where Artificial Intelligence (AI) improves future automated responses based on "learning" caller preferences for the annuitant or the CSR. Once a transaction is completed, the electronic data is sent securely to OPM. The annuitant is sent an enrollment confirmation letter, and health benefits' carriers are notified.

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, and the Federal Employees Retirement System (FERS) is



administered pursuant to 5 U.S.C. chapter 84. The FEHB Open Season is administered pursuant to 48 C.F.R. chapter 16 and 5 C.F.R. part 890. In addition, the following authorities are relevant to the information in AHBOSS: 5 U.S.C. § 89; Pub. L., 86-382, 86-724, 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 SORN that applies to the information in AHBOSS 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?

Yes. The AHBOSS system security plan was completed on March 7, 2024.

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

Yes. The records that are provided to and used by the AHBOSS contractor are intermediary records covered by GRS 5.2, Item 020 and are to be destroyed upon verification of successful creation of the final document or file, or when no longer needed for business use, whichever is later.

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 following forms are used to collect the information in AHBOSS: SF-2809, Employee Health Benefits Registration Form, OMB No. 3206-0160; SF-2810, Notice of Change in Health Benefits Enrollment; RI 79-9, Health Benefits Cancellation/Suspension Confirmation; FEHB Open Season Express, IVR System, OMB No. 3206-0201.



Section 2.0. Characterization of the Information

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

Information (including PII) collected and used by this system includes name, SSN, mailing address, current FEHB plan code, current FEHB code description, retirement claim number, date of birth, marital status, gender, carrier control number, and email address, for annuitants and their survivors. Upon making an Open Season change, name, SSN, and date of birth are also collected and retained for annuitants and their survivors. Usernames and passwords are also collected and maintained for annuitant use during Open Season. This information is stored in AHBOSS, and annuitants must use it to authenticate to the system.

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

The information in the system is obtained via ARS file extracts and transmitted to the AHBOSS contractor at the beginning of Open Season. Additionally, information is submitted by annuitants and survivors, via the web and/or the IVR. OPM Retirement Services personnel and CSRs update Open Season changes into AHBOSS.

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

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

2.4. Discuss how accuracy of the data is ensured.

The annuitant must authenticate with their credentials with AHBOSS in order to access the Open Season record. If this record is not available, the annuitant can use the IVR to speak to a CSR to complete or assist with any Open Season transaction. The IVR is hosted on a Platform as a Service designed specifically for call centers. There are validations set up on specific



data fields, as the data is entered, to ensure that correct data is entered. Additionally, AHBOSS makes sure that no mandatory data fields are left blank in the event they are required for OPM decision making.

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

Privacy Risk: There is a risk that the information provided and submitted is not accurate.

Mitigation: This risk is mitigated in part because it is primarily collected directly from the annuitants, who have an interest in providing accurate information. In addition, the information provided by the annuitant is validated through website field validations such as the ability to enter valid plan options. Annuitants are also able to change their data during Open Season as long as the website is online, which permits them to correct any inaccuracies. Corrections to annuitant information can also be made when the relevant carrier receives the information or when a CSR updates AHBOSS with the customer's information.

Privacy Risk: There is a risk that more information than is necessary to meet the business needs of the program office will be added.

Mitigation: This risk is mitigated by limiting the user to specific fields and preventing the user from being able to add more information than is specifically being requested.

Section 3.0. Uses of the Information

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

AHBOSS uses the information described in Section 2.1 to process Open Season changes. Executive Order 9397, as amended by Executive Order 13478, gives Retirement Services the authority to collect SSNs.



SSNs are collected for annuitants and their dependents. The SSN is necessary for collection because it is a unique identifier for dependents, who do not have an annuitant claim number. The full SSN is collected, but only the last four digits of the SSN will be displayed to the annuitant or dependent within AHBOSS. For annuitants, the claim number can function as an alternative identifier as necessary.

SSNs and other AHBOSS information are collected by the system and distributed to ARS through the OPM Federal Employee's Health Benefits (FEHB) Data Hub for dissemination. The FEHB Data Hub is a service through which FEHB Program information is collected and exchanged. The Hub's principal function is to share the information that passes through the Hub with the various health insurance carriers that users select and, in some instances, from the carriers to other entities. The Hub also serves to share information with OPM's Retirement Services (RS) in order to document those transactions that involve the annuitant and their family members. This process assists RS in accurately documenting an annuitant's family members, who may be eligible to receive benefits based on their relationship to the annuitant.

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.

Within the IVR, there is a continuous process improvement where AI improves future automated responses based on "learning" caller preferences for the annuitant or the CSR. This learning is based on the caller's responses to prompts within the IVR decision tree of possible responses on the call. Calls to the IVR are not recorded.

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

Within OPM, the following offices in the Office of the Chief Information Officer (OCIO), have assigned roles and responsibilities with AHBOSS. The



Retirement Services Information Technology Program Management Office (RS IT PMO) manages ARS, this office sends and receives the AHBOSS data with the AHBOSS stakeholders. Human Resources Solutions Management Offices (HRS IT PMO) manages the FEHB Data Hub - that collects the AHBOSS data from the AHBOSS vendor and the health benefits carriers. The Enterprise Information System (EIS) group manages the secure data exchange between the OCIO offices, the AHBOSS contractor and the Health Benefits carriers.

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

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

Mitigation: This risk is mitigated by requiring the annuitant and annuitant survivor users of the system to log in using a unique username and complex password designed by the user according to OPM's password standards. 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. Furthermore, AHBOSS is managed according to OPM's Information Technology Security guidance. This includes adherence to OPM's security and privacy policies, such as continuous monitoring, annual security assessments and authorizations, and vulnerability and penetration testing. Any identified vulnerabilities found in any of these areas are tracked for mitigation.



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.

AHBOSS includes a notice on the OPM website that is available to users prior to the system collecting their information. Users are also provided notice via a Privacy Act Statement, which informs them about why their information is being collected and how it will be used. If a caller does not want to provide their information when speaking to a CSR, but want to make an Open Season change, we offer to assist them with logging into AHBOSS, or send them a SF-2809 form via channels such as physical mail and downloading the form from the website.

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

Annuitants may decline to provide any and all information, but if they do so they will not be able to make changes to their coverage. The Privacy Act Statement informs annuitants that the requested information is necessary to process health benefit enrollment change requests. Annuitants can elect to keep their current health benefit carrier, preventing the need for existing data collection. Annuitants can also view and request health benefit plan brochures from the website or IVR without the need to provide any information. Additionally, annuitants can call the Open Season Call Center via the IVR and have a CSR assist them with an Open Season change. These calls are not recorded.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that individuals are not aware of how and why AHBOSS collects and uses their information and how it will be used.

Mitigation: This risk is mitigated by providing a Privacy Act Statement on AHBOSS at the point of collection and, indirectly, through publication of the applicable SORN. In addition, the full Terms and Conditions of Use and the Privacy Policy are also provided to the applicants on the home page of the



AHBOSS website. Annuitants also receive annual notifications by mail and email.

Section 5.0. Data Retention by the Project

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

All AHBOSS Health Benefit enrollment information processed during Open Season is updated to the ARS. The records in AHBOSS are intermediary records that are destroyed upon verification that ARS has been successfully updated or when no longer needed for business purposes. For ARS, all Retirement Case Records are closed after all benefits have been applied for and paid to all eligible heirs. These records are destroyed after cutoff, 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)). High-profile retirement case records are transferred to the National Archives in 10-year blocks 30 years after the retirement case file is closed. High-profile case files are for persons of historical significance such as former Presidents, Vice Presidents, Members of Congress, high-level appointments, survivors of high-profile individuals, and anyone who has or is receiving media attention or is historically of high importance.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that information may be kept longer than is necessary to meet the business need for which it was collected. This privacy risk includes the retention of PII which is no longer needed for processing or is retained longer than the approved schedule.

Mitigation: This risk is mitigated by OPM staff following the established retention schedule. OPM's staff receive annual Security and Privacy Awareness training and select personnel receive Records Management training as warranted.



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.

A third-party contractor and their subcontractors manage the data for AHBOSS. AHBOSS does not share records external to the AHBOSS contractor and their subcontractors unless OPM is directed to do so by court order. The AHBOSS contractor has no direct sharing connection with the FEHB carriers; all communications with the carriers, including PII records from AHBOSS, are managed via the FEHB Data Hub, which is discussed in a separate Privacy Impact Assessment (including details of information sharing and disclosures involving the carriers).

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

The information in the system is shared with the AHBOSS contractor and subcontractors pursuant to routine use "k" in the OPM/CENTRAL-1 SORN:

k. For Non-Federal Personnel--To disclose information to private organizations, contractors, grantees, volunteers, or other non-Federal personnel performing or working on a project, contract, service, grant, cooperative agreement, or job for, to the benefit of, or consistent with the interests of the Federal Government when OPM has determined that the use of that information is compatible with proper disclosure and will benefit Federal employees, annuitants or their dependents, survivors, and beneficiaries. To disclose information to contractors, grantees, or volunteers performing or working on a contract, service, grant, cooperative agreement, or job for the Federal Government.

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

The Open Season contractor and their subcontractors are bound contractually to protect AHBOSS data and to not further disseminate it.



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

AHBOSS does not share records external to the AHBOSS contractor unless OPM is directed to do so by court order.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that information in the system will be shared externally for a purpose that is inconsistent with the purpose for which it was collected.

Mitigation: This risk is mitigated because AHBOSS contractors and subcontractors are bound contractually to report any accidental disclosure of AHBOSS data. Additionally, AHBOSS has access controls that permit only those with a need to know and who have been trained on the proper use of the information in AHBOSS to access the system.

Section 7.0. Redress

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

Annuitants must first register with Login.gov, and then register with AHBOSS to use the website by creating a username and password; they can then make changes or request information. On subsequent visits, they enter their username and password (created when registering), then click on the submit button to make changes or request information. CSRs are also available to assist annuitants via the IVR. CSRs can process health benefit changes on behalf the annuitants by using COPS. 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; SSN; 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?

Depending on what the annuitant needs to update, there is text on the website informing them of the steps they need to take. Open Season CSRs are also available to assist with enrollment changes that are into Self Plus One or Self and Family through the website if annuitants are having difficulties. Qualifying life events occurring during Open Season are handled by Retirement Services staff. Additionally, changes needed outside of Open Season can be directed to the Retirement Services call center for action. 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; SSN; 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 procedures for correcting their information?

There is guidance posted on the website and instructions for all fields that require information to be input. Additionally, CSRs can provide information on correcting information during Open Season. The OPM/CENTRAL-1 SORN provides notification concerning correcting records.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals may not be able to access their information in AHBOSS nor be afforded adequate opportunity to correct that information.



Mitigation: This risk is mitigated by affording an opportunity to request modifications of records via the Open Season call center, by calling Retirement Services directly, or by sending an email to request changes at retire@opm.gov.

Privacy Risk: There is a risk that individuals will not be notified concerning their ability to access and amend their records.

Mitigation: This risk is mitigated through notification that is provided to individuals at the time of retirement, as well as through subsequent notifications by mail and email of the upcoming annual Open Season event. In addition, the OPM/CENTRAL-1 SORN provides notice regarding the procedures for accessing and correcting information.

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?

Contractor 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. Only personnel with security clearances are able to access the systems.

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

All AHBOSS personnel, including OPM and contractor personnel, are required to complete annual OPM IT Security and Privacy Awareness training and provide the certificate of successful completion before starting work on the Program. The CSRs and other individuals are trained in the usage of the OPM applications needed for Open Season and handling sensitive information.



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

The system has a role-based access matrix and a permission form that has to be signed by all approving authorities in order for an individual to obtain access to the system.

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?

All AHBOSS information sharing agreements are documented in the system security plan. New uses of information and new access to the system by organizations must be authorized by the AHBOSS system owner and other appropriate OPM officials.

Responsible Officials

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Approval Signature

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