



Privacy Impact Assessment for
Annuity Roll System (ARS)

October 29, 2025

Contact Point

Benjamin Gorog
Business Program Manager
Retirement Services

Reviewing Official

Becky Ronayne
Senior Agency Official for Privacy



Abstract

The United States Office of Personnel Management's (OPM) Annuity Roll System (ARS) is a centralized retirement and benefit system that supports the OPM's Retirement Services (RS) and interoperability with other RS systems under the Civil Service Retirement System (CSRS) and the Federal Employees Retirement System (FERS). This Privacy Impact Assessment is being updated and renewed because ARS continues to collect, maintain, and use personally identifiable information (PII) about federal annuitants, their dependents, and survivors.

Overview

The federal government's Annuity Roll, the active roster of individuals qualified to receive an annuity benefit, collects and maintains information related to eligibility for and the computation of federal retirement, health, and life insurance benefits. The information is used to determine qualification and pay benefits for retired federal employees and their survivors. The United States Office of Personnel Management's (OPM) Annuity Roll System (ARS), used to manage the Annuity Roll, is the OPM core retirement and benefit management system supporting the majority of retirement functions for OPM's Retirement Services (RS).

ARS's functions include processing the annuity roll in daily, monthly, and yearly cycles, court orders, voluntary allotments, health benefit/insurance providers' modifications, lump sum payouts, pay history, service history, and agency matching validations. In addition, ARS provides services attendant to financial management and debt collection in support of the Chief Financial Officer's responsibilities.

ARS helps RS serve millions of active federal annuitants and survivors. This system contains information on most retirement customer transactions for OPM and includes data from all federal agencies.

Specifically, it contains information on annuitants and their survivors and is



the backbone for maintaining accurate retirement records so retired federal employees and their survivors can receive the proper payments and benefits.

ARS interfaces with multiple systems such as the Federal Annuity Claims Expert System (FACES) and Janus, information technology tools that assist RS in calculating annuities based on former employees' records of federal service; Retirement Services Online (RSO), which provides federal retirees and survivor annuitants the ability to access their monthly annuity payment information online; and the Annuitant Health Benefit Online Support System (AHBOSS), an application that annuitants use to make health benefit enrollment changes and/or to request brochure information for plans participating in the Federal Employees Health Benefits Program (FEHBP). The Postal Services Health Benefits System is used by Postal annuitants to make health benefit enrollment changes and/or to request brochure information for plans participating in the Postal Service Health Benefits Program (PSHBP).

These interfaces use batch-file transfer technologies that are machine based in their authentication and authorization mechanisms as well as technology that encrypts sensitive information and ensures that it is communicated securely. Through the FACES/Janus interfaces, ARS obtains annuity calculations for further processing and adjudication. Through the RSO interface, ARS obtains annuitant and survivor change requests to modify personal information, such as federal and state tax withholdings, mailing address, direct deposit information, and allotment details. ARS plays an important role in accumulating and reporting of federal and state tax information which leads to the preparation of the annual 1099-R sent to each annuitant. Through the AHBOSS interface, ARS obtains annuitant and survivor change requests for health insurance providers during the annual FEHBP open season. Through the PSHBS interface, ARS obtains US Postal annuitant and survivor change requests for health insurance providers during the annual Postal Health Benefit open season.



Data from ARS is vital for conducting critical processes within Retirement Services. ARS informs specific customer surveys conducted by Retirement Services. These surveys include the disability earnings survey, the representative payee survey, verification of marital status, FERS annuity supplement, and the eligibility of child survivors and verification of educational status of students receiving benefits. Furthermore, ARS plays a role internal to retirement claims processing, by managing the Document Case and Control System, which tracks cases, related documents, and correspondence as they flow and are processed by the different retirement sections at both the Theodore Roosevelt Building (TRB) in Washington, DC and the United States Office of Personnel Management's Retirement Operations Center in Boyers, PA. ARS also receives data files for processing from systems at the Centers for Medicare & Medicaid Services (CMS), Social Security Administration (SSA) and the Department of Labor (DOL). ARS interacts with CMS to identify annuitants who have Medicare Part B and/or Part D coverage and to transact premiums owed back to CMS. It interfaces with systems at SSA for a series of individual matching validations including for the FEHBP, prescription drug subsidies under Medicare, cost of living adjustment impacts, disability benefits checks for annuitants and survivors, and death notifications of annuitants. ARS also interfaces with DOL's Office of Workers' Compensation Programs (OWCP) to identify individuals receiving prohibited concurrent benefits under CSRS and FERS.

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 Employee Retirement System (FERS) is administered pursuant to 5 U.S.C. chapter 84. In addition, the following authorities are relevant to the information in ARS: 5 U.S.C. chapters 87, 89, 89A, 89B and 90; Pub. L. 94-455; 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 ARS are covered by the OPM/CENTRAL-1 (Civil Service



Retirements and Benefits) SORN.

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

ARS currently has an approved ATO until February 28, 2027

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

These records are covered under the retirement case files records retention schedule with disposition authority DAA-0478-2017-0001-0001. DAA-0478-2017-0001-0001 pertains to retention of the retirement records for federal retirees and their heirs and dependents. DAA-0478-2017-0001-0002 pertains to the retention of retirement records for high profile retirees and their heirs and dependents.

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 information in ARS is obtained from a variety of forms, some of which are subject to the PRA and others that are not. Please see the forms listed below and, where applicable, the corresponding OMB control number. The source forms are added to the individual's paper case file, which is managed outside of ARS.

Note: Forms with an '*' besides indicates that they are not subject to the Paperwork Reduction Act.

Standard Forms:

- SF-2800, Application for Death Benefits (Civil Service Retirement System), OMB No. 3206-0156
- SF-2801, Application for Immediate Retirement (CSRS), *
- SF-2802, Application for Refund of Retirement Deductions (CSRS), OMB No. 3206-0128
- SF-2803, Application to Make Deposit or Redeposit, OMB No. 3206-0134
- SF-2804 and SF 2804-A, Application to Make Voluntary Contributions (CSRS),



*

- SF-2805, Request for Recovery of Debt due the United States, *
- SF-2806, Individual Retirement Record, *
- SF-2807, Register of Separations and Transfers (CSRS), *
- SF-2809, Employee Health Benefits Registration Form, OMB No. 3206-0160 SF-2810, Notice of Change in Health Benefits Enrollment, *
- SF-2817, Life Insurance Election: Federal Employees' Group Life Insurance Program, OMB No. 3206- 0230
- SF-2818, Continuation of Life Insurance Coverage as an Annuitant or Compensation, *
- SF-2821, Agency Certification of Insurance Status, *
- SF-3101, Notice of Correction of Individual Retirement Record, * SF- 3100, Individual Retirement Record (FERS), *
- SF-3104 and SF-3114, Application for Death Benefit (FERS), OMB No. 3206-0172
- SF-3106, Application for Refund of Retirement Deductions (Federal Employees Retirement System) (SF 3106A, Current/Fonner Spouse's Notification for Refund Retirement Deductions is included with this form.), OMB No.3206-0170
- SF-3107 and SF 31 13, Application for Immediate Retirement (Federal Employees Retirement System), *
- SF-3109, Election of Coverage (Federal Employees Retirement System)

OPM Forms:

- OPM 1482, Agency Certification of Status of Reemployed Annuitant - Federal Employees' Group Life Insurance Program, *
- OPM 1496A, Application for Deferred Retirement, Civil Service Retirement System (Separations on or after October 1, 1956), OMB No. 3206-0121
- OPM 1522 Request for Offset for Health Benefits Premiums from Monies Payable Under the Civil Service Retirement System or the Federal Employees Retirement System (in lieu of SF 2805), *

Retirement Forms:

- RI 10-125 Federal Employee Retirement Coverage Corrections Act (FERCCA) Election Form, * RI 16-28 Authorization for Direct Payments



- RI 20-7 Representative Payee Application - Read More at: RI 20-59, OMB No. 3206-0140 RI 20-64 Letter Reply to Request for Information, OMB No. 3206-0235
- RI 20-120 Request for Change to Unreduced Annuity - Read More at: RI 20-59, OMB No. 3206-0245 RI 20-122 Certification for Physicians Comparability Allowances (PCA), *
- RI 25-14 Self-Certification of Full-Time School Attendance for the School Year - Read More at: RI 25-27, RI 90-12, Get Instructions: RI 25-14A, OMB No. 3206-0032
- RI 25-15 Notice of Change in Student's Status - Read More at: RI 25-27, RI 90-12, OMB No. 3206-0042
- RI 25-41 Initial Certification of Full-Time School Attendance - Read More at: RI 25-27, RI 90-12, OMB No. 3206-0099
- RI 25-49 Verification of Full-Time School Attendance - Read More at: RI 25-27, RI 90-12, OMB No. 3206-0215
- RI 30-1 Request for Information - Read More at: RI 30-13, RI 90-8, OMB No. 3206-0143
- RI 30-10 Disabled Dependent Questionnaire - Read More at: RI 20-59, RI 90-8, RI 25-27, RI 90-12, OMB No. 3206-0179
- RI 38-45 We Need the Social Security Number of the Person Named Below, OMB No.3206-0144
- RI 38-107 URGENT - Reply Required Within 30 Days to Avoid Interruption of Your Payments, OMB No.3206-0197
- RI 38-122 Alternative Annuity and Rollover Election -Read More at: RI 38-123, RI 37-22, *
- RI 38-124 Voluntary Contributions Election -Read More at: RI 38-125, RI 37-22, *
- RI 38-128 It's Time to Sign-up for Direct Deposit, OMB 3206-0226
- RI 76-10 Assignment of Federal Employee's Group Life Insurance - Read More at: RI76-10, OMB No.3206-0270 *
- RI 79-9 Health Benefits Cancellation/Suspension Confirmation- Read More at: RI 79-2, *
- RI 92-19 Application for Deferred or Postponed Retirement - Federal Employees Retirement System (FERS) - Read More at: RI 92-19A, OMB No. 3206-0190



- RI 92-22 Annuity Supplement Earnings Report -Read More at: RI 90-8, OMB No. 3206-0194

Section 2.0. Characterization of the Information

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

ARS collects, uses, disseminates, or maintains the following information for both annuitants and survivors: name, claim number, date of birth, SSN, address, marital status, financial and banking information and key values to compute an annuity, and health care insurance information (plan and carrier details).

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

Some of the information in ARS is obtained directly from the individual annuitant, who provides it via the various forms referenced in Section 1.5. Some of the data in ARS originates primarily from the annuitant's paper application for benefits and employment records submitted by that annuitant's former agency. ARS also receives some data from the internal OPM systems FACES/Janus, RSO, and AHBOS, and from SSA, CMS, and DOL via secure, encrypted connections.

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

Yes. ARS uses software for ZIP code verification prior to monthly annuity roll processing. The software validates, corrects, and standardizes customer address data, and is certified by the United States Postal Service. The address data solutions help provide accurate, on-time delivery of correspondence, goods, and services, while minimizing costs of undelivered mail.

2.4. Discuss how accuracy of the data is ensured.

A review of the annuity computation is conducted by Legal Administrative Specialists employed by OPM and checked against information in paper-based records. This review is conducted on a one-time basis upon the



initial annuity computation; spot checks (as part of the quality assurance process) may be conducted for certain computations as necessary in a given fiscal year. This review is conducted on a manual basis by inputting data points from paper forms into ARS; there is no direct digital scanning. In addition, OPM has matching agreements (as described in Section 6.1) with other benefits-paying federal agencies to ensure correctness of employment/employee information and benefit computations. Individuals are also afforded opportunities to review the accuracy of the data as described in Section 7.0.

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

Privacy Risk: There is a risk of collecting extraneous information.

Mitigation: This risk is mitigated through expert analysis of data elements required to determine the proper type of annuity. The forms listed in Section 1.5 are crafted to request only those data elements required to process a claim.

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

Mitigation: This risk is mitigated by the detailed procedures ARS has in place, described in Section 2.4, to ensure that the information is as accurate as possible. OPM also assumes that information regarding the federal employees that comes directly from other agencies is correct and has been validated by the employing agency before being submitted.

Section 3.0. Uses of the Information

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

The information in ARS is used for the computation of federal retirement, health, and life insurance benefits, and to determine qualification regarding pay benefits. ARS supports RS's management of retirement benefits for federal annuitants, and their survivors and dependents, across the government. The information in ARS is used for the computation of: CSRS and FERS benefits; CSRS and FERS survivors' benefits; FEHBP eligibility and



enrollments; Federal Employees' Group Life Insurance Program (FEGLI) benefits; and to withhold state income taxes from annuitant payments. The information may also be used to compute CSRS and FERS benefit estimates. ARS uses: first, last, and middle initial of name for employee identification; SSN for an alternate unique identifier if the claim number is not available; date of birth, in combination with other data elements, to search annuitants; claim number as a unique identifier for the annuitant case file; marital status to calculate any survivor benefits elected at retirement; and health insurance carrier information as part of the annuity benefit package and key values to compute annuity payments.

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. ARS does not use technology to conduct electronic searches, queries, or analyses for the purpose of discovering or locating a predictive pattern or anomaly. Only simple searches by claim number based on specific criteria manually input by the users are allowed.

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

Yes, there are other program offices within OPM with assigned roles and responsibilities within ARS. Healthcare and Insurance requires access to process healthcare enrollments, the Chief Financial Officer requires access to process financial statements and dispense benefits, and the Chief Information Officer requires access for IT system development and maintenance.

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

Privacy Risk: There is a risk that the information in ARS could be used for a purpose other than that for which it was initially collected.

Mitigation: This risk is mitigated by user roles established by the ARS Administrator. Only those with a function related to managing the Annuity Roll will be granted access and only authorized users may access or modify



the data in ARS.

Privacy Risk: There is a risk that an unauthorized user might access the information in the system.

Mitigation: This risk is mitigated through role-based access control and following a strict IT access provisioning policy.

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.

Individuals will not typically have access to ARS; therefore, notice is not given by the system. However, a statement regarding a retiring employee's coverage and Privacy Act Statements are on each paper application for retirement benefits given to employees by their employing agency. The published SORN referenced in Section 1.2 also provides indirect notice to individuals.

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

Individuals may opt to exclude required information as requested on the paper application; however, it will impact the processing of their retirement application and subsequent annuity/benefit calculation and distribution. Federal employees cannot opt-out of the benefit since it is given as part of the employment.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that individuals are not aware that ARS contains their information.

Mitigation: Notice is provided that individual information may be shared outside of OPM through the Routine Use sections of the applicable SORN. In addition, retiring employees receive notice when they complete the retirement application.



Section 5.0. Data Retention by the Project

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

All Retirement Case Records are closed after all benefits have been applied for and paid to all eligible heirs. These records are retained in accordance with 5 U.S.C. 8345(i) and applicable record schedules. High profile retirement case records are transferred to the National Archives in 10-year blocks 30 years(s) after the retirement case file is closed.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that the length of the retention period will impact data quality due to media age.

Mitigation: This risk is mitigated by testing and verification of ARS backups.

Privacy Risk: There is a risk that information will be kept longer than is necessary to achieve the necessary business purpose.

Mitigation: Records are covered under the retirement case files records retention schedule with disposition authority DAA-0478-2017-0001-0001. DAA-0478-2017-0001-0001 pertains to retention of the retirement records for federal retirees and their heirs and dependents. DAA-0478-2017-0001-0002 pertains to the retention of retirement records for high profile retirees and their heirs and dependents.

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.

Information in ARS is shared externally primarily with other federal agencies in accordance with Computer Matching Agreements, memoranda of understanding, or information exchange agreements. The information is disclosed for a series of individual matching validations to ensure correctness and completeness of information and for retirement benefit distribution and fraud prevention. In addition, OPM contractors are provided with access to



ARS pursuant to contracts for the development and maintenance of ARS.

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

The information sharing described above is conducted in accordance primarily with the following routine uses 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.

l. To disclose, to the following recipients, information needed to adjudicate a claim for benefits under OPM's or the recipient's benefits program(s), or information needed to conduct an analytical study of benefits being paid under such programs: Office of Workers' Compensation Programs; Department of Veterans Affairs Pension Benefit Program; Social Security Administration's Old Age, Survivor and Disability Insurance and Medical Programs and Supplemental Security Income Program; Center for Medicare and Medicaid Services; Department of Defense; Railroad Retirement Board; military retired pay programs; Federal civilian employee retirement programs (other than the CSRS or FERS); or other national, State, county, municipal, or other publicly recognized charitable or social security administrative agencies.

m. To disclose to the Office of Federal Employees Group Life Insurance (OFEGLI) information necessary to verify the election, declination, or waiver of regular and/or optional life insurance coverage or eligibility for payment of a claim for life insurance.

n. To disclose to health insurance carriers contracting with OPM to provide a health benefits plan under the FEHBP, SSN, and other information necessary



to identify enrollment in a plan, to verify eligibility for payment of a claim for health benefits, or to carry out the coordination for benefits provisions of such contracts.

z. To disclose to an allottee, as defined in 5 CFR 831.1501, the name, address, and the amount withheld from an annuitant's benefits, pursuant to 5 CFR 831.1501 et seq. as an allotment to that allottee to implement the program of voluntary allotments authorized by 5 U.S.C. 8345(h) or 8465.

bb. To disclose to the Social Security Administration the SSN of civil service annuitants to determine:

(1) Their vital status as shown in the Social Security Master Records;

(2) Whether recipients of the minimum annuity are receiving at least the Special Primary Insurance Amount benefit from the Social Security Administration; and

(3) Whether civil service retirees with post-1956 military service credit are receiving benefits from the Social Security Administration.

cc. To disclose information contained in the Retirement Annuity Master File; including the name, SSN, date of birth, sex, OPM's claim number, health benefit enrollment code, retirement date, retirement code (type of retirement), annuity rate, pay status of case, correspondence address, and ZIP code, of all Federal retirees and their survivors to Federal agencies and requesting States to help eliminate fraud and abuse in the benefit programs administered by the Federal agencies and States (and those States to local governments) and to collect debts and overpayments owed to the Federal Government, and to State Governments and their components.

ee. To disclose information contained in the Retirement Annuity Master File, upon written request, to State tax administration agencies, for the express purpose of ensuring compliance with State tax obligations by persons receiving benefits under the CSRS or the FERS and to prevent fraud and abuse, but only the following data elements: Name, correspondence address, date of birth, sex, SSN, annuity rate, commencing date of benefits,



and retirement code (type of retirement).

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

Yes, re-dissemination of ARS information is subject to the terms stated in signed Computer Matching Agreements and information exchange agreements.

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

The ARS application captures information in audit records to establish what events occurred, the sources of the events, and the outcome of the events. Audit record content includes: (i) date and time of the event; (ii) the component of the information system where the event occurred; (iii) type of event; (iv) subject identity; and (v) outcome of the event (success or failure) of the event. Records disclosed outside of OPM are maintained through interface logs (e.g., batch files) upon distribution as outlined in section 6.1.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that information from ARS could be inappropriately disclosed for a purpose that is not consistent with the purpose for which it was collected.

Mitigation: This risk is mitigated by entering into agreements with information sharing partners that clearly define the purpose for the sharing, consistent with the purpose stated in the applicable SORN. In addition, OPM technical personnel review and analyze application audit records to ensure that information is accessed appropriately.

Privacy Risk: There is a risk that information, once shared appropriately, will be further shared or used in a manner that is inconsistent with the original purpose for which it was collected and/or shared.

Mitigation: This risk is mitigated by ensuring that the sharing is subject to written agreements that define the purposes for which information is shared,



prohibits additional uses, and appropriately limits any further sharing with third parties.

Section 7.0. Redress

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

Individuals do not have direct access to ARS. However, benefits information is provided to annuitants/survivors annually via mail or electronically and is also available for review on Retirement Services Online (RSO). A Summary of Benefits booklet is prepared upon benefit adjudication and is made available to the annuitant digitally through RSO. 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?

Individuals do not have direct access to ARS but can access and update their information through the web-based Retirement Services Online (RSO). Alternatively, 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 submit evidence to prove identity and/or the validity of change. In addition, individuals may request that their records be corrected 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?

Individuals are notified at the time of retirement and through subsequent notifications via mail or email about the availability of the RSO website as a mechanism for accessing and correcting their information. In addition, the OPM/CENTRAL-1 SORN provides detailed information 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 information that is contained in ARS or be afforded adequate opportunity to correct that information.

Mitigation: This risk is mitigated by providing individuals with access to their information via the RSO website, as well as through the procedures outlined in the OPM/CENTRAL-1 SORN.

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 mailings or by email. In addition, the OPM/CENTRAL-1 SORN provides indirect 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?

ARS maintains 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. ARS captures sufficient information in audit records to establish what events occurred, the sources of the events,



and the outcomes of the events. 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.

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

All OPM employees are required to complete annual IT Security and Privacy Awareness Training. In addition, end-users receive applicable ARS content training specific to their work responsibilities, which covers the appropriate use of the information in ARS and individual user responsibility.

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

ARS administrators grant access based on approval from the user's federal supervisor. Each user is assigned a unique user account and assigned a defined set of privileges based on the least privilege principle. The ARS administrator is responsible for ensuring the appropriate authorization has been granted for the access and the privileges requested, and for the removal of the user's privileges once that authorization has ceased.

Contractors serve as system developers and maintain the retirement systems at OPM. A contractor's access to ARS is based on the length of the contract and on the work the contractor is obligated to perform to support ARS and OPM. Before a contractor is granted access to ARS, the ARS administrator confirms that there is a valid contract in place, the contractor has a successfully adjudicated background investigation, and the contractor has completed IT Security and Privacy Awareness training.

ARS program staff receive a list of all users that have left OPM each month from OPM's Human Resources office. OPM network staff will terminate access of any contractor or OPM employee that no longer requires access. In addition, the OPM network administrators will suspend/remove access from



contract personnel when the contract has expired.

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?

ARS program managers coordinate with the Office of the Chief Information Officer and with the Chief Privacy Officer, as needed, to review and assess new uses of information contained in ARS. ARS program managers, the Senior Agency Official for Privacy, and Chief Information Officer also routinely 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.

Responsible Officials

Benjamin Gorog
Business Program Manager
Retirement Services

Approval Signature

Becky Ronayne
Senior Agency Official for Privacy