



Privacy Impact Assessment for Digital File System (DFS)

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Abstract

The OPM Retirement Services (RS) program office in partnership with the OPM Office of the Chief Information Officer's Retirement Services Information Technology Program Management Office (OCIO/RSITPMO) developed The Digital File System (DFS) to help OPM RS employees manage and process retirement applications. DFS is the primary and authoritative source of retirement data for the digital retirement case file. This personal data will be used 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 DFS will contain personally identifiable information (PII) about federal employees, retirees, and their families.

Overview

OPM Retirement Services (RS) program office administers the Civil Service Retirement System (CSRS) and Federal Employees Retirement System (FERS) Programs. Collectively, these systems cover approximately 2.8 million active employees, including the United States Postal Service, and pays out an annuity for more than 2.4 million annuitants, survivors, and family members.

The Digital File System (DFS) collects all the information needed to process a retirement application into one system, electronically, and make it readily available and searchable. This is a transformative leap forward in case management, empowering staff to work smarter, faster, and more effectively while providing a significantly better customer experience. Additionally, DFS is embracing the cloud which will grant employees secure access to case information from anywhere, anytime across branches and physical locations.



A retirement application is completed using the OPM Online Retirement Application (ORA) via a web based portal and then sent to DFS. Upon receipt of an application, a claim number is generated and assigned to the retirement package.

To process an application in DFS the system also collects:

- 1) Information from the individual's record in the Annuity Roll System (ARS),
- 2) Information from the individual's Electronic Retirement Record in the Enterprise Human Resources Integration Data Warehouse (EHRI DW), and OPM Electronic Official Personnel Folder (eOPF).
- 3) The individual's retirement calculation, which is done using either Federal Annuity Claims Expert System (FACES) or Janus.

The following RS case management process begins after a complete retirement package is received in DFS:

- 1) The package goes to a chief/branch manager to perform an initial review.
- 2) The package goes to a customer service specialist (CSS) to confirm that all the items needed to process the retirement application are present and accurate. If not, the CSS will contact the agency and/or individual to acquire the information.
- 3) The package goes to a legal administrative specialist (LAS) to adjudicate the case. As part of this process, the LAS enters the information needed to calculate the retirement benefit into FACES/Janus for immediate voluntary, involuntary, disability, phased/composite and deferred retirements. On occasion ARS is used for a max computation CSRS retirement and then records the results in DFS. The final calculation is automatically posted to the ARS master record.
- 4) The package goes to a LAS Reviewer to review the work of the first line LAS. If correct, the LAS Reviewer (a) instructs ARS to instruct



Treasury to begin paying the retirement benefits to the annuitant and then (b) moves the retirement package to a part of DFS for long-term storage. If the LAS Reviewer identifies an error, the retirement package goes back to the first line LAS who adjudicated the case to make the updates.

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 authorities related to this system include:

- 5 USC Section 3301 and 5 USC Chapters 83, 84, 87, 89, 89A, 89B, and 90. In particular, CSRS is administered pursuant to 5 USC Chapter 83 and FERS is administered pursuant to 5 USC Chapter 84.
- Public Laws 86-724 and 94-455.
- 5 CFR Parts 831, 835, 838, 839, 841, 842, 843, 844, 845, 846, 847, 848, 849, 870, 875, 880, 890, 891, and 894. Part 850 further delineates OPM's authority to collect and use personally identifiable information (PII).
- Executive Order 9397, as amended by 13478, which permits the collection of Social Security Numbers to accomplish a federal agency's mission.

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 DFS was approved as a part of the Security Assessment and Authorization process. The Authority to Operate (ATO) was granted on March 25, 2025.

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

Yes. These records are covered under the retirement case files records retention schedule with disposition authority DAA-0478-2017-0001-0001 (Destroy after cutoff, and 115 years from the date of employee's death, whichever is sooner (5 U.S.C. 8345(i))). and DAA-0478-2017-0001-0002 (Transfer to the National Archives in 10 year blocks 30 year(s) after cutoff).

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 DFS is obtained from a variety of forms, some of which are subject to PRA and others that are not. Please see Appendix A, which identifies the forms and, where applicable, the corresponding OMB control number.

Section 2.0. Characterization of the Information

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

DFS collects, uses, disseminates, and 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, and medical records if applying for disability retirement.

Additionally, if a survivor's annuity is elected and/or there are survivors (e.g., current or former spouse), DFS collects the survivor/former spouse's full name, date of birth, social security number, address, place of marriage, date of marriage, and date of divorce if applicable.

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

The information in DFS is provided directly by the retiree and their agency's Human Resource office through ORA, ARS, EHRI DW, FACES, and Janus. The Privacy Impact Assessments (PIAs) for those systems provide more information on how they collect the information (see www.opm.gov/privacy).

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

2.4. Discuss how accuracy of the data is ensured.

The systems that initially provide information to DFS, as well as the built in reviews to the information provided, are designed to ensure the information they contain is accurate. For example, the retirement application coming from ORA is completed by the federal employee, and an agency human resource (HR) specialist reviews a checklist to assure the application is complete and includes the correct information, and then the application is certified by federal employee, the HR specialist, and the agency's payroll provider before it goes to DFS.

Moreover, once it goes to DFS, the above-mentioned CSSs and LASs, and their managers, review the application to ensure the package is complete



and look for discrepancies across the data acquired from different systems (e.g., EHRI, ARS, FACES). If problems are identified, the RS employees will contact the agency and/or individual to acquire the complete and accurate information.

Based on the source of the information- the federal employee and an HR specialist, and the opportunity to confirm accuracy prior to submission within the system, that the information submitted is generally 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 DFS will collect more information than 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 by collecting the same information in DFS that had been collected to successfully process applications using the prior paper process and asking for information that has been deemed pertinent to the retirement decision.

Privacy Risk: There is a risk that the information in DFS will not be accurate.

Mitigation: This risk is mitigated by asking applicants and agency personnel to confirm the accuracy of the information that goes into the ORA and other systems which are then shared with DFS. Because the information comes directly from the Federal employees applying for retirement and is verified by their employing agencies, the information is generally accurate. As another verification point, RS staff also checks for discrepancies among the records before the case is adjudicated.



Section 3.0. Uses of the Information

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

The information collected into DFS is used to process 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 will be gathered from other OPM retirement systems to reduce duplicative data entry and enhance processing efficiency 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. The system also does not use any artificial intelligence.

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

Only the above-mentioned CSSs and LASs, their managers, and OCIO support staff involved in developing and administering DFS will have access to the system.

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 provide those individuals with access appropriate to their roles and responsibilities. In addition, the system employs audit logs that record anomalous behavior within the system.



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.

DFS cannot be accessed by retirees and survivors so there is no direct notice to individuals from the system. However, individuals applying for retirement benefits are provided notice concerning the collection and use of their information through a Privacy Act Statement (PAS) on the application they complete. In addition, this PIA is a public resource explaining the purpose of the DFS, applicable SORNs, and other privacy-related information.

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

Once they have reviewed the PAS and then completed and signed their application for retirement benefits in ORA, individuals have consented to the general use of the information to process their retirement as described in the PAS. The PAS explains that the provision of the requested information is voluntary but that failure to provide some or all the information requested may delay or prevent action on their application.

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 through the publication of this PIA as well as the PAS on the retirement application. This risk is also mitigated by having ORA ask the individual for their consent to process their retirement, and certify their information is accurate, before their retirement application is processed.



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 DFS 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)).

5.2. Privacy Impact Analysis: Related to Retention

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

Mitigation: The risk is mitigated by having 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.

DFS does not share information directly with any external entities. RS staff may share a small amount of PII about a retirement applicant if they need to contact an agency where that individual worked to acquire additional information about their service history or similar information to support their retirement application.

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

As explained in 6.1, DFS does not generally share information directly with any external entities in the course of regular agency operations, except to gather additional information to support an individual's retirement



application. Apart from that, the agency only shares information pursuant to a Privacy Act exception or pursuant to a routine use for OPM/Central—1, the SORN that covers DFS.

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

As explained above, DFS does not generally share information directly with any external entities in the course of regular agency business. Information from DFS, which is part of OPM/Central—1, may be shared pursuant to a Privacy Act exception or a routine use associated with that SORN.

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

DFS contains automated audit log capabilities that record all access, review, and disclosure of the data/folders. DFS also has established manual processes that require documentation, justification and approval of all access, reviews and removal of data that occur outside the automated audit log functionality. These capabilities assist OPM in fulfilling its Privacy Act obligations to keep an accounting of disclosures of records in OPM/Central—1.

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 DFS to only to above-mentioned CSSs and LASs, their managers, and the OCIO personnel who have a need to know the information and who have been trained on the proper use of the information in DFS.



Section 7.0. Redress

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

Individuals do not have direct access to DFS. However, individuals receive information about their retirement in the mail whenever a regular monthly recurring payment, or an adjustment to that monthly payment, is authorized. Annuitants that are receiving regular recurring payments can also access their information through Services Online (<https://www.servicesonline.opm.gov>).

Individuals can also file a Privacy Act request to access their records. To do this, they would need to contact the Retirement Services office at the Office of Personnel Management, 1900 E Street, N.W., Washington, D.C. 20415-0001. They 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. They 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 DFS. However, individuals have access to their retirement information through personalized retirement documentation mailed to the annuitant when regular recurring payments are authorized. In addition, annuity statements are sent to individuals when adjustments to recurring monthly payments occur. Annuitants that are receiving regular recurring payments can also access their information through Services Online (<https://www.servicesonline.opm.gov>).

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.

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.

Individuals can also file a Privacy Act request to amend to their records using the procedures set forth in OPM/Central—1. To do this, they would need to contact the Retirement Services office at the Office of Personnel Management, 1900 E Street, N.W., Washington, D.C. 20415-0001. They 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. They 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 about mechanisms for accessing and correcting their information. In addition, OPM/Central—1 provides notification concerning correcting records, as does 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 is mitigated by affording an opportunity to request modifications of records via Services Online (<https://www.servicesonline.opm.gov/>) or calling Retirement Services



directly. Individuals may also request changes through the Retirement Services Support Center at <https://www.opm.gov/support/retirement/contact>. Users can also use the support center to reference the Frequently-Asked-Questions webpage, and other contact points where they can obtain assistance. This risk is also mitigated through notification that is provided to individuals at the time of retirement, as well as through subsequent mailings. In addition, OPM/Central—1 and this PIA provide 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?

OPM system administrators, IT specialists, and analysts have access to the system to perform their duties in managing, upgrading, and using the system. Role-based access controls limit access of information by different users and administrators to that which they 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.

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

All OPM employees and contractors, including those who access DFS, must take OPM's annual Security and Privacy Awareness Training



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 DFS 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.

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 RS program managers coordinate with the Office of General Counsel, Office of the Chief Information Officer, and Chief Privacy Officer, as appropriate, to review information sharing agreements, including Metadata File Storage NDA of Understanding (MOUs), computer matching agreements, and information exchange agreements to ensure that appropriate privacy and security provisions are included to safeguard PII. Any new requests or 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

Benjamin Gorog
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Approval Signature

Becky Ronayne
Acting Senior Agency Official for Privacy



Appendix A		
Form	Title	OMB Number (if provided)
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	3206-0128
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	3206-0160
SF 2810	Notice of Change in Health Benefits Enrollment	
SF 176, SF 176T, SF 2817	Life Insurance Election	3206-0230
SF 2818	Continuation of Life Insurance Coverage As an Annuitant or Compensation	
SF 2821	Agency Certification of Insurance Status	
SF 54 & SF 2823	Life Insurance Designation of Beneficiary	3206-0136
SF 3102	FERS Designation of Beneficiary	3206-0173
SF 3103	Register of Separations and Transfers	
SF 3106	Application for Refund of Retirement Deductions	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)	



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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	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	1545-0074