



Privacy Impact Assessment for
Federal Annuity Claims Expert System
(FACES)

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Contact Point

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Abstract

The U.S. Office of Personnel Management Office of Retirement Services manages the Federal Annuity Claims Expert System (FACES). FACES is a mission critical application that Retirement Services uses to compute Civil Service and Federal Employees Retirement Systems benefits for federal retirees and their survivors. This Privacy Impact Assessment is being conducted because FACES collects, maintains, and uses personally identifiable information about federal retirees and their survivors.

Overview

FACES is a mission critical information technology tool that assists the Office of Personnel Management's (OPM) Office of Retirement Services (RS) in calculating retirement and survivor annuities based on federal employees' records of federal service, and also aids agencies in estimating those annuities for their employees before they retire.

The tool has three components: the Retirement Benefits Calculator (RBC), the Retirement Benefits Estimator (RBE), and the FACES Data Bridge. (The RBE is currently switched off). RS uses the RBC to calculate federal retirement annuities for federal employees in the Civil Service Retirement System (CSRS) and the Federal Employees Retirement System (FERS). Prior to being switched off, Federal Retirement Benefits Officers and Human Resource Specialists used the RBE to compute CSRS and FERS retirement estimates for their agency employees. The Data Bridge is used to extract, transform, and load FACES data from an electronic retirement record (ERR) to the RBC.

The FACES RBC component is the primary retirement claim computation program used by OPM Legal Administrative Specialists (LAS) to compute retirement and survivor benefits based on official payroll and personnel records submitted by the retiring employee's agency. The RBC data, once adjudicated and reviewed, is transferred from FACES to the Annuity Roll System (ARS) for payment, tracking, and other actions needed for benefits management. ARS contains information on annuitants and survivors and is the backbone for maintaining accurate retirement records for proper disbursement of retirement benefits processed through OPM's Office of the Chief Financial Officer. FACES RBC also allows LAS entry into the Service



Credit Redeposit and Deposit (SCRD) System via a web link. The LAS can print out any SCRD documentation needed for the retirement case file. SCRD provides federal employees an opportunity to make payments into the CSRS or FERS. These payments are for periods of service during which they either did not contribute to the Civil Service Retirement and Disability Fund (CSRDF) or for which they received a refund of their retirement contributions. An employee may participate in the service credit program to ensure receipt of the maximum retirement benefits to which he or she is may be entitled.

The FACES RBE component is a web browser-based retirement claims computation program that previously had been used by Federal Retirement Benefits Officers and Human Resource Specialists external to OPM to compute retirement annuity estimates for federal employees considering retirement. The estimates generated by the RBE are shared with the Retirement Benefits Calculator (RBC) once the employee retires from their agency. Until the employee retires, the RBE estimate data is considered the agency's and it is not accessible by OPM RS personnel or the RBC.

The FACES Data Bridge component is a web service that transfers retirement data from electronic retirement records (ERR) to the RBC to reduce data entry and to improve data accuracy. ERR data is received from federal government payroll providers and is based on the Guide to Retirement Data Record (GRDR) standard. The ERR is stored in the OPM Enterprise Human Resources Integration (EHRI) Retirement Data Repository (RDR). The EHRI serves as the Government's source for integrated federal workforce information and includes career lifecycle information, training, and payroll data. At this time, the EHRI RDR contains data from one payroll provider, the Interior Business Center (IBC). Future plans are to add ERRs from all government payroll providers.

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 authority for



maintenance of the system includes the following with any revisions or amendments: Section 3301 and chapters 83, 84, 87, 89, and 90 of Title 5, United States Code, 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 SORN that applies to the information in FACES is OPM, Central-1, Civil Service Retirement and Benefits Records.

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. The Authority to Operate expires on March 08, 2024.

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.

See Appendix A for a list of the forms used to collect the information contained in FACES and their OMB Control numbers, where applicable.

Section 2.0. Characterization of the Information

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

FACES RBC collects, uses, disseminates, or maintains the following information: full name, claim number, date of birth, Social Security number, mailing and email addresses, employment history, financial information,



marital status, health and life insurance information. FACES RBE includes the same information as above, except for the claim number and email address. However; user access to RBE is disabled.

The FACES Data Bridge transfers the following information to the RBC: claim number, name, date of birth, gender, marital status, work information, military affiliations and status and the retirement status information and relevant codes. These data elements are from the Guide to Retirement Data Reporting and are mapped to the FACES RBC field element input tables. In addition, the Social Security number is used for identification purposes.

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

Information is collected from the annuitant's paper-based retirement application and from the employment records (including SCRD records) submitted by the federal agency.

The Data Bridge receives retirement data from EHRI and loads it to FACES RBC. Currently, EHRI only houses electronic retirement data from the Interior Business Center (IBC).

Legal Administrative Specialists in RS enter data from paper records to calculate retirement benefits under CSRS and FERS in RBC.

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.

Legal Administrative Specialists (LAS) and Reviewers in Retirement Services manually review individual annuity computations in FACES and compare the information used to the paper-based retirement record prior to payment of benefits. The accuracy of the data is enforced through the separation of duties between the LAS and a LAS reviewer. The LAS enters data from the paper-based records into FACES to compute the retirement annuity. A LAS reviewer verifies the computational data against the paper-based records before the computational data is authorized for payment. The data that is



transferred from the Data Bridge to the RBC is verified by the LAS prior to adjudication. If information is found to be inaccurate, the information is updated in the RBC.

The FACES computational data is then set up to create transactions to ARS. These transactions are used for payment processing to the annuitant through the U.S. Treasury.

Additionally, every month a sample of active retirement claims is pulled and reviewed for quality and accuracy. The results of these monthly audits are provided to Retirement Operations for resolution.

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

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

Mitigation: This risk is mitigated by the detailed procedures FACES 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 then submitted appropriately.

Privacy Risk: There is a risk regarding the accuracy of information that comes from the paper-based form (completed by the annuitant) which might be input incorrectly or improperly transcribed.

Mitigation: This risk is mitigated by the separations of duties between the LAS and the LAS reviewer. There are two levels of verification built into these two roles as described in Section 2.4. Additionally, there are monthly audits conducted by the RS Quality Assurance Division, which validate and verify the information processed by the LAS and LAS reviewer.

Section 3.0. Uses of the Information

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

FACES uses the annuitant information listed in Section 2.1 to process CSRS and FERS retirement and survivor benefits. These annuity benefits are based on either a retired or a deceased federal employee's service and salary history. The printed output from FACES is added to individual annuitant's paper-based records.



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.

FACES does not use any special technology or tools for electronic searches, queries, or analysis of its data.

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

Program Offices and IT systems within OPM with which information from the FACES is shared are Retirement Services, the Office of the Chief Information Officer (OCIO), Data Center Group (DCG), and the Retirement Services Information Technology Program Management Office (RS IT PMO).

OCIO has access to FACES in order to provide the following IT system services: 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 the system will be accessed by unauthorized individuals who do not have a need to know the information or by authorized individuals for an unauthorized purpose.

Mitigation: This risk is mitigated through the use of assigned roles with specific responsibilities including the use of access controls that restrict the ability to retrieve data based on an individual's authorization and access permissions that are built into the system. The system maintains access roles that restrict and grant access to information and functionality to support the unique business process needs.

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.

FACES cannot be accessed by retirees and survivors and, therefore, there is no direct notice to individuals from the system. However, individuals applying for retirement benefits are provided with notice concerning the collection and use of their information through Privacy Act statements on the



application they complete. In addition, notice is provided via the OPM/Central 1 SORN and this PIA.

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 completed and signed their application for retirement benefits, individuals are considered to have consented to the general use of the information as described in the Privacy Act statement. They do not have the ability to decline to have their information collected, used, and maintained in FACES. The Privacy Act statement does explain that the provision of the requested information is voluntary but that the failure to provide some or all of 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 individuals will not know that their information is being collected, used, and maintained in FACES in order to compute their retirement benefits.

Mitigation: This risk is mitigated through publication of this PIA and, while not directly referencing FACES, through the Privacy Act statements on relevant forms that explain why information is being collected and how it will be used.

Section 5.0. Data Retention by the Project

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

FACES calculates retirement annuities based on data transferred to FACES from ARS, EHRI (via Data Bridge), and from information entered by Legal Administrative Specialists from paper-based case files. Once the calculation is complete, the retirement annuity information is transferred to ARS for payment. The electronic record of these calculations is retained in FACES. FACES follows the ARS records retention schedule.

For ARS, all Retirement Case Records are considered "cutoff" after all benefits have been applied for and paid to all eligible heirs. These records are destroyed after cutoff, 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(s) after the retirement case file is closed.

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 personally identifiable information which is no longer needed for processing or is retained longer than the approved schedule.

Mitigation: This risk is mitigated by trained OPM staff following the established retention schedule.

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.

FACES records are not shared externally unless OPM is directed to do so by court order.

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

In the event OPM receives a court order to disclose records, the court order becomes a permanent appendage to the record and serves as the official accounting of disclosure. This court order becomes subject to the approved record disposition schedule.

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

OPM does not disclose FACES records externally unless directed to do so by court order. IF FACES is directed by court order to disclose records, the records would be retrieved from the Annuity Roll System (ARS).

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

OPM does not disclose FACES records externally unless directed to do so by court order. In the event OPM receives a court order to disclose records, the court order becomes a permanent appendage to the record and serves as the official accounting of disclosure.

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 RS does not disclose the information in FACES unless required to do so by court order and through access controls that permit only those with a need to know and who have been trained on the proper use of the information in FACES to access the system.

Section 7.0. Redress**7.1. What are the procedures that allow individuals to access their information?**

Individuals do not have direct access to FACES. However, individuals have access to their retirement information through retirement booklets that are 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. Individuals can also access their information through [Services Online](#) and annual notices are sent at the beginning of each calendar year.

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?

Individuals do not have direct access to FACES but may contact Retirement Services 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; 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 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, the OPM/CENTRAL 1 SORN 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 be able to access their information in FACES nor be afforded adequate opportunity to correct that information.

Mitigation: This risk is mitigated by affording an opportunity to request modifications of records via [Services Online](#) or calling Retirement Services directly.

Individuals may also request changes via email at retire@opm.gov. Users are allowed direct access to Services Online and other information regarding the annuity payments, as well as the ability to ensure all data is accurate,



relevant, and up-to-date, through contacting agency personnel to assist at retire@opm.gov, reference to a [Frequently-Asked-Questions](#) webpage, and other contact points where they can obtain assistance.

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. In addition, the OPM/CENTRAL 1 SORN 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?

By utilizing separation of duties to review and authorize computations; annuity computations are compared to the paper-based retirement records; and then reviewed and authorized by RS personnel prior to payment of benefits.

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

All OPM employees and contractors must take the annual Security and Privacy Awareness Training.

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

All federal employees requesting access to FACES must be approved by a Federal supervisor. Contractor access is based on contractor functional business purpose to handle FACES data and the Contracting Officer Representative's (COR) approval. OPM RS personnel and Independent Auditors are required to complete RBC Forms. The RBC forms are processed and reviewed through the RS authorization process. These forms are sent to the FACES Help Desk. The FACES Help Desk processes these applications and manages user account access.



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 FACES 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 FACES System Owner and other appropriate OPM officials.



Responsible Officials

Ben Gorog
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Retirement Services

Approval Signatures

Kellie Cosgrove Riley
Senior Agency Official for Privacy



Appendix

An asterisk (*) indicates a form that is not subject to the PRA.

Standard Forms

- SF-2800, Application for Death Benefits (Civil Service Retirement System), OMB No. 3206-0156
- SF -2800A, Documentation and Elections in Support of Application for Death Benefits When Deceased Was an Employee at the Time of Death, 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 Compensationner*
- SF-2821, Agency Certification of Insurance Status*
- SF-2822, Request for Insurance*
- SF-31 01, 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-3104B, Documentation and Elections in Support of



Application for Death Benefits when deceased was an Employee at the Time of Death (FERS), OMB No. 3206-0172

- SF -3106, Application for Refund of Retirement Deductions (Federal Employees Retirement System) (SF 31 06A, Current/Former Spouse's Notification for Refund Retirement Deductions is included with this form.), OMB No.3206-0 170
- SF-3107 and SF 3113, Application for Immediate Retirement (Federal Employees Retirement System)*
- SF-3109, Election of Coverage (Federal Employees Retirement System)*
- SF 3110, Former Spouse's Consent to FERS Election*
- SF -3111, Request for Waiver, Extension, or Search in Connection with Election of FERS 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 1510, Certification of Agency Officer of Position and Required Documentation for Discontinued Service Retirement under CSRS or FERS*
- OPM 1514, Military Deposit Worksheet*
- OPM 1515, Military Service Deposit Election*
- OPM 1519, Survivor's Military Service Election -Deceased Employee Covered by Civil Service Retirement System (CSRS) or CSRS Offset*
- 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 Services Forms

- RI20-7, Representative Payee Application, OMB No. 3206-0140
- RI20-120, Request for Change to Unreduced Annuity, OMB No. 32206-0245
- RI20-122, Certification of Physicians' Comparability Allowances (PCS)*
- RI38-45, We Need the Social Security Number of the Person Named Below, OMB No. 3206-0144
- RI38-133, Certification of Title 38, Physicians and Dentists*
- RI76-10, Assignment if Federal Employees' Group Life Insurance*
- RI92-19, Application for Deferred or Postponed Retirement-Federal Employees Retirement System (FERS), OMB No. 3206-0190