



Privacy Impact Assessment for
Online Retirement Application (ORA)

July 14, 2025

Contact Point

Kimya Lee
Deputy Associate Director
Retirement Services

Reviewing Official

Becky Ronayne
Acting Senior Agency Official for Privacy



Abstract

The Office of Personnel Management (OPM) Retirement Services (RS) program, in partnership with the OPM Office of the Chief Information Officer's Retirement Services Information Technology Program Management Office (OCIO/RSITPMO), developed the Online Retirement Application (ORA) to be used by current and former Federal government employees, Federal agencies' Human Resources offices, and payroll providers to complete and certify retirement applications. The certified retirement application and associated document(s) collected using ORA is the primary and authoritative source of retirement data for the applicant and provides OPM officials with the personal data needed to initiate base entitlement and computation of the Civil Service Retirement System (CSRS) and the Federal Employees Retirement System (FERS) benefits. This Privacy Impact Assessment (PIA) is being conducted because ORA continues to contain personally identifiable information about federal employees, retirees, and their families.

Overview

Retirement Services (RS) is responsible for the administration of two primary Federal Retirement Programs covering millions of active employees who are eligible but not yet receiving retirement benefits, and nearly 2.7 million annuitants currently receiving benefits.

- The Civil Service Retirement System (CSRS) is a defined benefit, retirement system. Employees share in the expense of the annuities to which they become entitled. CSRS covered employees contribute a percentage of their pay to CSRS. The employing agency matches the employee's CSRS contributions. The Civil Service Retirement Act established the CSRS for certain Federal employees and it was replaced by Federal Employees Retirement System (FERS) for



- Federal employees who first entered covered service on and after January 1, 1987.
- The FERS is a defined contribution retirement plan that provides benefits from three different sources: a Basic Benefit Plan, Social Security, and the Thrift Savings Plan (TSP). Two of the three components of FERS (Social Security and the TSP) transfers with an employee to any job if they leave the Federal government before retirement. FERS Basic Benefit and Social Security components require employees to pay a share each pay period. The agency withholds the cost of the Basic Benefit and Social Security from an employee's pay as payroll deductions. The agency pays its part, too. Then, after an employee retires, they receive annuity payments each month for the rest of their lives. The TSP part of FERS is an optional account that an agency automatically sets up for the employees. Each pay period the agency deposits into their TSP account an amount equal to a percentage of the basic pay the employee earns for the pay period. Employees can also make their own contributions to their TSP account, and the agency makes a matching contribution. These contributions are tax deferred.

The Online Retirement Application (ORA) replaces the current paper process used to apply for federal retirement with a standardized and significantly more efficient electronic process. Today, the process by which current employees apply for retirement benefits occurs in three stages:

- Application Package compiled by Applicant and HR: The applicant completes the application and submits it to their employing agency's human resource (HR) specialist. The HR specialist uses a checklist to confirm the application, including any supplemental forms uploaded with the application, are complete ("Agency Checklist of Immediate Retirement Procedures"). The HR specialist also creates a chart showing the applicant's service history to confirm they are eligible for retirement (called the "Certified



- Summary of Federal Service”). The HR specialist then forwards the application, checklist, and service history to the applicant for their review and signature.
- Application Package Reviewed by Payroll Office: Using the Payroll Checklist the payroll office ensures all necessary data has been entered and submits the completed application and supporting documentation to Office of Personnel Management (OPM).
 - Application Received by OPM: The applicant is notified via an automated ORA email that their package was submitted to OPM.

ORA converts these three steps into a more streamlined electronic process. When a qualified federal employee is ready to retire, they are sent an email request by their HR department with instructions to complete a retirement application using ORA. After successfully logging into ORA, the applicant enters their retirement application information. They complete a series of online retirement forms based on selections made during the application process. The estimated annuity can be calculated using OPM’s JANUS calculator. Applicants may save and return to the application until they send it to the HR specialist at their employing agency for review. The HR specialist reviews the application, completes the agency checklist and other required forms, then submits them back to the applicant for final review and certification. When the retirement application is complete and certified by the applicant, and by their agency’s HR and payroll offices, the application is released to OPM.

OPM receives the ORA application into a system called Digital File System (DFS). When this occurs, OPM sends the applicant an email stating their application was successfully received. OPM then compares and combines the application with information from various systems to calculate the applicant’s base entitlement and CSRS or FERS benefit. The DFS privacy impact assessment (PIA) provides more information about this process.



ORA is launched as a cloud-based solution hosted in a Federal Risk and Authorization Management Program (FedRAMP)-certified public cloud environment.

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.
- Executive Order 9397, as amended by 13478, which permits the collection of Social Security Numbers (SSN) 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?

Yes, the ORA system has a completed system security plan and has an authority to operate through March 2027.



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

Yes. The applicable NARA retention schedule is DAA-0478-2017-0001-0001; *Section 5.0. Data Retention by the Project*, contains more information about this retention schedule.

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 online collection mirrors the questions asked on the manual paper forms listed in Appendix A, some of which are subject to the PRA.

Section 2.0. Characterization of the Information

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

ORA collects, uses, disseminates, and maintains the following information: full name, claim number, date of birth, SSN, 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), ORA collects the survivor/former spouse's full name, date of birth, SSN, 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?

Information is provided by the applicant, their agency's HR office, and their agency's payroll office. The HR specialist provides the chart showing the



applicant's service history to confirm they are eligible for retirement and verifies parts of the application are correct. The payroll provider confirms the day the person retired, the amount of money they should receive, and that they are eligible for benefits. Information is also imported from OPM owned systems such as the electronic official personnel folder (eOPF) and the Enterprise Human Resources Integration (EHRI) where current and accurate data is available. During the application process, ORA sends service history information to JANUS, which calculates the individual's annuity/benefit estimate, then return that information to ORA so the applicant can see it.

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

2.4. Discuss how accuracy of the data is ensured.

The retirement application in ORA is completed by the applicant themselves, after which an agency human resource (HR) specialist uses a checklist to assure the application is complete and includes the correct information, and then the application is certified by the applicant, the HR specialist, and the agency's payroll provider before it goes forward. This process results in information that is generally accurate.

Moreover, before the application created in ORA is used to determine an applicant's retirement, OPM staff manually compare the information from ORA to various OPM systems (e.g., DFS, Annuity Roll System, Federal Annuity Claims Expert System) to further verify the information is correct. If problems are identified, OPM staff will contact the agency and/or applicant to acquire complete and accurate information.

Beyond all the checks within ORA and the downstream systems, if errors are discovered, applicants 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 ORA will collect more information than necessary to meet the business needs of the system or will not collect enough information to adequately process an applicant's retirement application.

Mitigation: This risk is mitigated by collecting the same information that is collected in the manual, paper application and asking for information that has been deemed pertinent to the retirement decision.

Privacy Risk: There is a risk that OPM will be unable to correctly identify an applicant in ORA and process their retirement benefits.

Mitigation: This risk is mitigated by collecting enough data into ORA to distinguish each applicant and by providing applicants and respective agency personnel the ability to confirm the accuracy of the information prior to submitting it to OPM within ORA.

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

Mitigation: OPM assumes that information regarding the Federal employees applying for retirement and that comes directly from the applicant or from the agencies is correct and has been validated by the employing agency. ORA's processes further mitigate the risk of inaccuracy by requiring the applicant, HR office, and Payroll provider to certify the accuracy of the information submitted.

Section 3.0. Uses of the Information

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

The information collected in ORA is used to determine eligibility and entitlement to 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 is entered into other OPM retirement systems to expedite the processing of the application and to ensure compliance with legislative mandates and adherence to OPM policies and regulations.

The SSN is used, along with the email, to identify the applicant's information in several systems that do not all share another unique identifier.

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.

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

OPM RS program staff and OCIO staff involved in developing and administering ORA will have access to the system with assigned roles and responsibilities. HR specialists at the employing agencies, and payroll service providers, will access ORA to add information related to the retirement application. A small number of staff at the employing agencies and payroll providers will also manage access for others within their agency or department who have a need to access ORA in the performance of their duties.

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

Privacy Risk: There is a risk that authorized applicants may use information within ORA for unauthorized purposes or that unauthorized applicants 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 with access appropriate to their



roles and responsibilities. In addition, the system employs audit logs that will 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.

When applicants access ORA to submit their retirement application information, they are provided a Privacy Act Statement (PAS) that explains why their information is being collected, how it will be used, and how it may be disclosed to others. In addition, OPM provides notice to individuals about the collection of their information through the publication of this PIA.

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

If an applicant chooses to apply for retirement benefits after reviewing the PAS and are enrolled by their Agency, they have consented to provide their information.

Individuals may elect not to provide voluntary information; however, doing so may delay or prevent the processing of their retirement application. The intent is for ORA to replace the manual, paper process and applicants wishing to apply for retirement benefits will be required to do so through ORA.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that an applicant may not know how information is used or that the system contains their information.

Mitigation: This risk is mitigated by providing applicants a Privacy Act Statement when they provide their information in ORA. In addition, this risk is mitigated through publication of this PIA.



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 ORA 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: This risk is mitigated because OPM retains immediate retirement application records in accordance with DAA-0478-2017-0001, Retirement Case Files. The risk is mitigated by having the 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.

Yes, the Federal agency HR and payroll office associated with a particular applicant's retirement application in ORA will have access to the relevant information in ORA. The information is accessible to the respective agency personnel via the ORA and is used by them to submit and/or modify previously submitted applications as required. Once the applicant is certified as retired by RS, the applicant's former agency will have read only access to the records.



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

The external sharing described in 6.1 is compatible with the purpose for which the information was collected, which is in part to determine retirement benefits, and the applicable SORN (OPM/Central—1, Civil Service Retirement and Insurance Records) contains appropriate routine uses to permit this access. This includes:

v. To disclose information to any source from which additional information is requested relevant to OPM determination on an applicant's eligibility for or entitlement to coverage under the retirement, life insurance, and health benefits program, to the extent necessary to identify the applicant and the type of information requested.

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

The system does not explicitly limit the re-dissemination of retirement application information by the agencies. However, OPM does have Memorandum of Understandings (MOUs) with the payroll providers that also apply to the agencies they service.

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

ORA contains automated audit log capabilities that record all access and review of the data/folders. ORA also established manual processes that require documentation, justification and approval of all access, reviews and removal of data that occurs outside the automated audit log functionality. These functionalities assist OPM in complying with the Privacy Act provisions that require it to keep an accounting of all relevant disclosures from 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 ORA to only those external Federal agency personnel who have a need to know the information to submit and process an applicant's retirement application. In addition, OPM developed MOUs with payroll offices outlining appropriate use. These MOUs apply to the agencies serviced by each payroll office. Finally, the Privacy Act limits disclosure of information in each system of record (in this case, OPM/Central—1) only to certain exceptions enumerated in the Act.

Section 7.0. Redress

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

ORA is designed so that applicants for Federal retirement can sign on to the system and populate and submit their retirement application. They will be provided with information about how the system works and how they access and update their information prior to being given access to ORA by their HR office and/or RS program staff.

Alternatively, applicants can also file a Privacy Act to request to access their records by contacting the system manager identified in the OPM OPM/Central—1, Civil Service Retirement and Insurance SORN. They must also follow OPM's Privacy Act regulations, 5 CFR 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?

ORA is designed so that applicants for Federal retirement can sign on to the system and populate and submit their retirement application. They will be



provided with information about how the system works and how they access and update their information prior to being given access to ORA by their HR office and/or RS program staff. More generally, applicants may contact RS directly to notify the agency of changes to personal information. Based on the type of change, RS may require the applicant to submit evidence to prove identity and /or the validity of the change.

Alternatively, applicants can also file a Privacy Act to request their records be amended by contacting the system manager identified in the OPM OPM/Central—1, Civil Service Retirement and Insurance SORN. They must also follow OPM's Privacy Act regulations, 5 CFR part 297, regarding verification of identity and access to records.

If the record did not originate with OPM, applicants must contact the agency that established the record and Agency HR or payroll offices may make a correction by completing SF 2806-1 for CSRS and SF 3101 for FERS and forwarding to OPM.

7.3. How does the project notify individuals about the procedures for correcting their information?

Applicants will receive information about how to correct information from their HR offices or from OPM RS program staff. Communication on the ORA website inform applicants about how the system operates, including how they may correct or request correction of erroneous information. More generally, applicants are notified by their agencies about the retirement process and are provided with information about how to request correction and amendment of their records through the publication of the OPM/Central—1 SORN and this PIA.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that applicants may not understand how to access, correct, or amend their records maintained in this system.



Mitigation: This risk will be mitigated by providing applicants with information about how they can access ORA to populate and submit their information. It is further mitigated by providing notice in the OPM/Central—1 SORN how to access and amend records. As ORA processes are developed, RS will determine whether additional communication is necessary with applicants to provide information regarding access and amendment of the information contained in ORA.

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?

System administrators, security 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 are employed to limit the access of information by different users and administrators based on the 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. As ORA adoption continues to grow, the information that the system collects, maintains, and disseminates will be reviewed and the privacy impact of any changes and updates will be evaluated and documented in an updated PIA.

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 IT Security and Privacy Awareness Training. All ORA users are required to take their agency's IT Security and Privacy Awareness Training. Their supervisor and Agency Benefit's officer must certify the training. If an agency does not have



such a training, their users can take the OPM training to fulfill this requirement.

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 ORA is approved and granted based on user roles, as outlined below. Multifactor authentication is in place. 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.

- OPM RS Account Administrator: authorization will follow the OPM process of completing and submitting Form 1665. Accounts will be created by the Office of the Chief Information Officer's Retirement Services Information Technology Program Management Office (OCIO/RSITPMO) ORA Account Administration.
- OPM RS Users: authorization will follow the OPM process of completing and submitting Form 1665. Accounts will be created by the RSITPMO ORA Account Administration.
- Other Agency HR/Payroll Specialist: account authorization is approved and created by RS Account Administrators based on user role and required access.
- Applicant: account authorization is approved and created by the applicant's Agency HR Specialist

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 applicants or organizations are evaluated by the RS program managers. The program managers coordinate with the Office of General Counsel, Office of the Chief Information Officer and with the Chief Privacy Officer, as appropriate, to review information sharing agreements, including Memoranda of Understanding, computer matching agreements and



information exchange agreements to ensure that appropriate privacy and security provisions are included to safeguard personally identifiable information. As ORA usage grows, any 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

Kimya Lee
Deputy Associate Director
Retirement Services

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)	
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