Privacy Impact Assessment for

Research and Oversight Repository (ROVR)

October 29, 2025

Contact Point
Kris Goas, Program Manager
Program Development and Support
Healthcare and Insurance

Reviewing Official
Becky Ronayne
Senior Agency Official for Privacy

Abstract

The purpose of the Research and Oversight Repository (ROVR) is to assist the Office of Personnel Management's (OPM) Healthcare and Insurance office (HI) to oversee, manage, and analyze the Federal Employees Health Benefits (FEHB) Program and the Postal Service Health Benefits (PSHB) Program by being a repository for enrollee data. The term "service use and cost data" includes, but is not limited to, medical claims data, pharmacy claims data, encounter data, and provider data. This Privacy Impact Assessment (PIA) is being conducted because ROVR collects, maintains, and uses personally identifiable information (PII) about FEHB and PSHB enrollees, annuitants, and their family members, as well as eligible employees and annuitants who have not enrolled in the FEHB and PSHB Program (e.g., annuitants who suspended their FEHB or PSHB coverage).

The former system name for ROVR was the Health Insurance Data Warehouse (HIDW). This PIA replaces the HIDW PIA dated July 2, 2021.

Overview

The FEHB Program, which includes the PSHB Program[1], provides health insurance benefits to approximately 8.3 million federal employees, U.S. Postal Service employees and their eligible family members, as well as certain Tribal employees and their eligible family members. One of the primary functions of ROVR is to establish and maintain a comprehensive and authoritative FEHB enrollment database, the Master Enrollment Index (MEI), which OPM uses to help administer and manage the FEHB Program to ensure the best value for enrollees and taxpayers. The MEI consists of FEHB enrollees and family members, and those eligible but not enrolled (e.g.,

[1] The Postal Service Reform Act of 2022 (PSRA) added new section 8903c to Chapter 89 of title 5, United States Code. The statute directs OPM to establish the Postal Service Health Benefits (PSHB) Program as a new, separate program within the FEHB Program. Beginning in 2025, Postal Service employees, Postal Service annuitants, and their eligible family members now obtain health benefits coverage through PSHB plans. Throughout this PIA, references to the "FEHB Program" or "FEHB" will include the "PSHB Program" or "PSHB," as relevant.

annuitants who suspended their FEHB coverage). Establishment of the enrollment repository promotes effective FEHB Program management and improves program integrity. Uses of the data include, but are not limited to:

- Developing a baseline for improper enrollments, including dual enrollments and identification of ineligible family members, and determining the associated costs;
- Developing a five-year historical enrollment record to enable OPM's Retirement Services to more quickly and accurately determine annuitants' eligibility for FEHB into retirement;
- Identifying one-person enrollments in Self Plus One or Self and Family coverage, which may facilitate efforts to encourage switching to self-only coverage, thereby resulting in cost savings for the enrollee;
- Analyzing population movement between plans and thereby informing strategies to promote competition, quality and affordability in FEHB plans;
- Facilitating the future goal of an FEHB central enrollment system; and
- Identification of improper payments, and detection of other potential fraud, waste and abuse instances.

FEHB Program enrollment data, received from various sources, comprise the Master Enrollment Index, which is updated monthly to ROVR. Transfer of the enrollment data from the Carriers and other sources to ROVR is accomplished using OPM approved secure cybersecurity protocols, including encryption.

Sources of enrollment data include Carriers, OPM's Office of the Inspector General, OPM's Retirement Services and information technology systems managed by OPM directly and through an interagency agreement with the U.S. Department of Agriculture's National Finance Center (NFC),[2] and from

[2] These systems include the FEHB Data Hub (an OPM system which, in part, receives enrollment transactions from agencies and posts the data to a server for secure distribution to FEHB Carriers), the Enterprise Human Resources Integration (EHRI) warehouse (an OPM reporting system that stores human resources, payroll, and training workforce information sent from Executive Branch agencies), and the Centralized Enrollment Reconciliation

other Federal agencies through data sharing agreements.

Agreements constitute the methods of use and applicable retention and storage protocols.

Enrollment data included in ROVR will not be used to affect the enrollment of any individual except to the extent that information is already used for such a purpose in accordance with OPM statutes, regulations, and guidance. For example, enrollment data may reveal instances where an enrollee is covered under more than one FEHB contract. Generally, that is an erroneous enrollment that may be revealed through enrollment files included in ROVR, but in limited circumstances dual enrollments may be permitted when the enrollee or family member would otherwise lose coverage. Typically, such an occurrence would be identified and addressed outside of ROVR, but data from ROVR may be used as part of the analysis.

Another function of ROVR is to collect and maintain service use and cost data on FEHB Program enrollees and their family members. This data will allow OPM to analyze and manage the FEHB Program to ensure the best value for the enrollees and taxpayers. These analyses may include examination of the cost of care, utilization of services, and comparing these across specific population groups, geographic areas, health plans, health care providers, and disease conditions. Pharmacy claims data also includes pharmacy manufacturer payments and rebate information to allow for a comprehensive assessment of pharmacy benefits in the FEHB program.

Further, the data will be used to detect patterns indicative of potential fraud, waste, and abuse, including but not limited to identifying potential overpayments and improperly disbursed amounts. OPM may also use the data to assess the effects of new policy and legislative initiatives to improve its assessment of FEHB plan performance.

Pursuant to an Information Exchange Agreement (IEA), Centers for Medicare

---

Clearinghouse System (CLER) operated for OPM by NFC (a system which receives quarterly enrollment data from Federal agencies and FEHB Carriers to facilitate reconciliation and reporting).

& Medicaid Services (CMS) provides service use and cost data[3] to OPM, including health claims information for FEHB enrollees and their eligible family members who are also enrolled in Medicare programs. OPM uses this data in its administration of the FEHB Program, including examining patterns of service use, statistical analyses of service use, risk and cost for dual FEHB and Medicare enrollees, and the relationship between FEHB and Medicare coverage more generally.

While much of the analyses based on service use and cost data conducted by OPM will be completed using non-identifiable data, OPM also requires record-level identifiable data to create person-level longitudinal records. Longitudinal records are necessary because individuals may change plans over the years while remaining in the FEHB Program. The ability to link data for analysis over time at various levels is essential to examine issues both within and across health plans.

Most service use and cost data in ROVR will be used for administrative and analytical purposes related to coverage of benefits; and otherwise is generally not used for purposes related to a specific individual except when OPM suspects or has confirmed that fraud, waste, or abuse has occurred with respect to services rendered or payments made in connection with the FEHB Program. No disclosure of information in ROVR related to service use and cost data will be made outside of OPM unless permitted under the Privacy Act.

ROVR replaces the Health Insurance Data Warehouse (HIDW), which in turn replaced the Health Claims Data Warehouse (HCDW). The primary function of the former HCDW was to receive and analyze service use and cost data supplied by FEHB Carriers to support management and administration of the FEHB Program.

[3] The term "service use and cost data" includes, but is not limited to, medical claims data, pharmacy claims data, encounter data, and provider data.

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?

Authority for requiring FEHB Carriers to provide enrollment, service use and cost data to OPM is provided by 5 U.S.C. § 8910, which requires OPM to continually study the operation and administration of the FEHB Program and requires the Carriers to furnish reports and provide OPM access to records upon request. Enrollment and service use and cost data are also being collected by OPM in its capacity as a health oversight agency under the Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy Rule, for the purposes set forth in 45 CFR 164.512(d)(1). OPM also obtains enrollment data and service use and cost data from other Federal agencies through appropriate data sharing agreements.

1.2. What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?

The applicable SORNs are OPM/Central-15 and OPM/Central-23.

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

A system security plan was completed for ROVR as part of the Authority to Operate, which was granted on July 11, 2025, through July 11, 2028.

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

All records in ROVR are retained pursuant to NARA Records Schedule Number DAA-0478-2017-0006.

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.

Enrollment information is usually collected from enrollees through the Health Benefits Election Form, Standard Form (SF) 2809 or OPM 2809 (OMB Control Number 3206-0160 for both), or electronic equivalent. Information is also collected from agencies through the Notice of Change in Health Benefits Enrollment Form (SF 2810), which is not subject to the PRA. Enrollment information is forwarded to the relevant FEHB plan for purposes of effectuating enrollment and changes to enrollment. Currently, PRA clearance covering service use and cost data is in progress, and an OMB Control number will be assigned upon completion.

Section 2.0. Characterization of the Information

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

The records in ROVR contain enrollment information and service use and cost data for eligible individuals and those individuals who are or have been enrolled in the FEHB and their covered family members, as well as Medicare enrollment information and service use and cost data for Medicare eligible and enrolled FEHB enrollees.

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

Data sent to ROVR is securely transmitted from participating FEHB Carriers, Federal agencies, and other OPM data sources to the ROVR system on the schedule outlined in the data sharing agreements (biweekly, monthly, annually, etc.).

In cases where the population needs to be determined by OPM, for example with CMS or SSA, the OPM/HI office sends a finder file containing FEHB enrollees and covered family members, as appropriate, and the agency sends a return file with the information associated with those records. Data is shared through secure transmissions protocols and record retention follows the parameters set forth in the data sharing agreements.

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

ROVR receives reference data (containing information such as diagnosis and procedure descriptions, drug names, uses, industry categorizations, and reference costs) from commercial sources. This data is not specific to a particular individual and contains no personally identifiable information. Medicare reference files made publicly available by CMS containing information such as code values descriptions and plan benefit design are also used in ROVR.

2.4. Discuss how accuracy of the data is ensured.

The OPM/HI office validates the enrollment and service use and cost data for quality and integrity of the information. The Carriers and Federal agencies are responsible for the accuracy of the data they submit to OPM. It is presumed that the Carriers will provide accurate data, as inaccurate data may have an adverse impact on any analysis concerning their performance. Federal agencies work with OPM to provide validity checks to the data they provide; any anomalies are examined and addressed.

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

Privacy Risk: There is a risk that ROVR may collect and maintain more information than is necessary for OPM to effectively administer the FEHB Program.

Mitigation: This risk is mitigated by the OPM/HI office verifying that the data it requests from the Carriers and other sources is the minimum necessary to

administer the program. In addition, the OPM/HI office specifies the file formats and specific data elements to ensure that it does not over collect information.

Privacy Risk: There is a risk that the information received from the Carriers and other sources will contain inaccuracies that impact the OPM/HI office's analysis and an individual's experience in the FEHB Program.

Mitigation: This risk is mitigated in part by the quality control checks that the OPM/HI office conducts on the data it receives from the Carriers and other sources. These checks include review of the consistency and completeness of the data and cross-verification of sources to ensure their appropriate integration. Any anomalies are examined and addressed. This risk is further mitigated in part by Carriers, who have a business interest in providing accurate information. Finally, enrollment and service use and cost data included in ROVR will not be used to affect the enrollment and benefits of any individual except to the extent that information is already used for such a purpose in accordance with OPM statutes, regulations, and guidance.

Section 3.0. Uses of the Information

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

The information in ROVR is used to ensure program oversight and integrity and maximize value for enrollees and taxpayers by using evidence-based data analytics and business intelligence tools to: detect patterns indicative of potential fraud, waste, and abuse, including but not limited to identifying potential overpayments and improperly disbursed amounts; assess the accuracy and appropriateness of costs; evaluate Carrier compliance with contractual obligations; assure value and accountability for services provided to enrollees; examine health conditions, particularly chronic conditions, across health plans; and make informed decisions to optimally manage the FEHB Program.

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.

Yes. Techniques used on the data include, but are not limited to, statistical analyses, data mining, predictive analyses and machine learning. The use of these techniques is focused on uncovering patterns, trends and actionable insights to drive cost savings and actionable oversight of the FEHB Program.

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

OPM has assigned roles and responsibilities with respect to the information in ROVR to a limited number of HI analysts, as more fully described in Section 8.3. The OCIO supports ROVR through a service level agreement. No other programs or offices within OPM or within other Federal agencies have roles or responsibilities within ROVR.

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

Privacy Risk: There is a risk that an authorized user may access the information in ROVR for an unauthorized purpose, such as to conduct searches on themselves, friends, family members or others.

Mitigation: This risk is mitigated by ensuring that only a limited number of well-trained HI analysts have access to the PII information in ROVR. PII information will be encrypted and access to ROVR is audited systematically, and atypical activity is monitored.

Privacy Risk: Because ROVR compiles identifiable data from multiple sources and information that previously was not accessible in a single system, there is a risk that authorized users will unnecessarily have access to comprehensive, sensitive information about individuals.

Mitigation: This risk is mitigated through training HI staff who have access to ROVR regarding the sensitivity and proper handling of the information it contains, and through encrypting the identifiable information and using de-identified information to conduct analyses whenever possible. PII can only be accessed by a very limited number of HI analysts.

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 who participate in the FEHB Program do not interact directly with ROVR and therefore do not receive direct notice from ROVR prior to the collection of information. Individuals receive notice about why the information they provide in the enrollment process is being collected and how it will be used via the Privacy Act statement on the Health Benefits Election Form (SF 2809 or OPM 2809) or on the Postal Service Health Benefits System (PSHBS). In addition, this PIA as well as the SORNs referenced in Section 1.2 provide notice to individuals.

FEHB Carriers are responsible for notifying enrollees that they are sharing service use and cost data with OPM. OPM will ensure that Carriers comply with this notification requirement.

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

Although individuals enrolled in the FEHB do not have the opportunity to specifically consent or decline to have their information included in ROVR, details provided in 4.1. convey the varied ways enrollees are notified of the data collection.

4.3 Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that individuals are not clearly informed that their enrollment data and service use and cost data will be collected and stored in ROVR or notice regarding how it will be used.

Mitigation: This risk is mitigated primarily through publication of this PIA and, more indirectly, by providing individuals with the Privacy Act statements found on the SF 2809 or OPM 2809 and the Carriers' brochure and/or the Carrier websites, and through publication of the SORNs referenced in Section 1.2. A secondary mitigation for this risk would be to work with OPM's Retirement Services (RS) to utilize processes they currently have in place to communicate with annuitants.

Section 5.0. Data Retention by the Project

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

All records (enrollment and service use and cost data) in ROVR are retained pursuant to NARA Records Schedule Number DAA-0478-2017-0006. Information obtained from the Carriers that has been entered into a master file or database and verified will be deleted according to the approved NARA records schedule. Data received from other agencies will be retained in compliance with the agreements specific to each data set.

5.2. Privacy Impact Analysis: Related to Retention

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

Mitigation: This risk is mitigated by properly training HI staff to dispose of records as designated in the relevant records schedule. ROVR oversight and management maintains a comprehensive list of retention periods to ensure compliance and deletion.

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.

The OPM/HI office shares certain enrollment data about Medicare-eligible FEHB enrollees and their Medicare-eligible covered family members with CMS and SSA as described and for the reasons given in Section 2.2 above. OPM/HI may also share information with a Federal agency or contractor to enable the administration of a Federal health benefits program, or to fulfill a requirement of a Federal statute or regulation that implements a health benefits program funded as a whole or in part with Federal funds.

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

The limited information sharing of enrollment data with CMS and SSA described in Section 2.2 is conducted in accordance with routine uses "k" and "m" described in OPM/Central-23,[4] FEHB Program Enrollment Records.

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

Re-dissemination of data by OPM or participating agencies is generally limited by terms set forth in agreements between the agencies.

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

The OPM system manager maintains a record of disclosures under routine uses pursuant to OPM/Central-15. OPM also maintains a copy of the finder file provided to CMS and SSA pursuant to the agreements between the agencies.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that information will be shared outside of OPM for purposes other than the purpose for which it was collected.

Mitigation: This risk is mitigated in part through training HI staff on the proper handling of the information in the system, including appropriate disclosures as directed by OPM. This risk is further mitigated through specific agreements with agencies that outline the purposes of data sharing. These agreements require both OPM and partner agencies to limit data re-dissemination and adhere to Privacy Act requirements in any information use or disclosure. This risk cannot be completely mitigated by OPM.

Section 7.0. Redress

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

Individuals do not have direct access to ROVR to access their FEHB enrollment information or service use and cost data. Some individuals may,

[4] OPM/Central-23, published September 6, 2024, at 89 FR 72902.The CMS IEA reflects routine uses "j" and "l" published January 21, 2021, at 86 FR 6377.

however, be able to access their enrollment information directly through the self-service enrollment system employed by their agency.

Health Benefit Election Forms (SF 2809 or OPM 2809) and enrollment plan changes are also maintained and may be viewed in the employee's official personnel folder. Individuals may also be able to access and confirm certain enrollment information directly with their FEHB plan.

In addition, individuals may obtain access to their information by following the process outlined in the applicable SORNs referenced in Section 1.2 and submitting a request in writing to the U.S. Office of Personnel Management or by emailing foia@opm.gov; ATTN: Healthcare and Insurance. Individuals must provide the following information for their records to be located: full name (including any former names), date of birth, Social Security number, name and address of employing agency or retirement system, reasonable specification of the information requested, the address to which the information should be sent, and signature. Individuals must also comply with OPM's Privacy Act regulations regarding verification of identity and access to records (5 CFR Part 297).

Enrollees who request access to their enrollment records will have access to the entirety of their records, to include information about all covered family members who are part of their enrollment record. Enrollees who request access to their service use and cost records will have access to their own records, but not to that of other covered family members. Family members of the enrollee who request access to their records may have access only to their own information and not to that of the enrollee or other covered family members.

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 ROVR to correct their FEHB enrollment information or service use and cost data. Employees should contact their employing agency to assist in correcting inaccurate or erroneous enrollment information. Federal annuitants should contact OPM

Retirement Services to assist in correcting inaccurate or erroneous enrollment information. Individuals may be able to make certain corrections to their enrollment information directly through the self-service enrollment system employed by their agency or through their FEHB plan. Individuals must contact their respective FEHB carrier or CMS regarding corrections in their service use and cost data.

In addition, individuals wishing to request amendment of records about them in ROVR may make that request according to the applicable SORNs referenced in 1.2 as well as in writing to the U.S. Office of Personnel Management, Office of General Counsel - FOIA, 1900 E Street NW., Washington, DC 20415-7900 or by emailing foia@opm.gov; ATTN: Healthcare and Insurance. Requests for amendment of records should include the words "PRIVACY ACT AMENDMENT REQUEST" in capital letters at the top of the request letter; if e-mailed, include those words in the subject line. Individuals must provide the following information for their records to be located: full name (including any former names), address, date of birth, Social Security number, name and address of employing agency or retirement system, precise identification of the information to be amended, and signature. Individuals must also comply with OPM's Privacy Act regulations regarding verification of identity and access to records (5 CFR Part 297).

OPM may refer to amendment requests to employing agencies, retirement systems, FEHB Carriers, or other sources that may be the original source of FEHB records.

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

Individuals do not receive any notice directly from ROVR about the procedures for correcting their information. However, they are provided notice through this PIA, the applicable SORNs referenced in Section 1.2, and from their individual agencies regarding how to correct any erroneous or inaccurate information.

Individuals must contact their respective FEHB Carrier or CMS regarding

corrections in their service use and cost data.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals will be unable to correct or amend information about them that is contained in ROVR.

Mitigation: This risk is not fully mitigated as the OPM/HI office cannot amend the read-only files that it obtains from the Carriers and other sources and does not have relevant information to determine whether the information requires correction. OPM can only direct individuals to correct information through their employing agency, OPM Retirement Services, the applicable self-service system, the Carrier, or through formal Privacy Act requests. If the correction is communicated to the Carrier, the updated information should be transmitted from the Carrier to ROVR in the usual course of reporting up-to-date enrollment and service use and cost data information. The risk to the individual is low, however, as the information in ROVR is not being used to make any decisions that would affect the individual's benefits.

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?

The system audits access to ROVR records according to user ID and session ID. OPM also maintains internal management controls to minimize access, monitor employee access, and ensure the quality of the data.

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

All HI analysts with access to ROVR take OPM's annual IT Security and Privacy Awareness Training. In addition, employees with IT administration and security responsibilities are required to take additional specialized training as identified by OPM.

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

HI staff who have a need to access the information in ROVR are required to have an appropriate background investigation that must be favorably adjudicated before they are hired and allowed access to ROVR system. Once an HI employee is favorably adjudicated and credentialed, access is granted by an HI authorizing official who determines that the employee needs access and is eligible to obtain access.

Additionally, OPM uses software which allows system administrators to provide for account and role management. The software is restricted to authorized system administrators. Supervisors must submit a technical personnel access request via an IT service portal. Only system administrators can grant 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?

All access to the system, and any uses of the information in the system, are evaluated and approved by ROVR Program Manager and HI executive leadership.

Responsible Officials

Kris Goas, Program Manager, Healthcare and Insurance

Approval Signature

Becky Ronayne
Senior Agency Official or Privacy