

Privacy Impact Assessment for

Retirement Services Online (RSO)

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Contact Point

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Abstract

The Office of Personnel Management's Retirement Services program is responsible for the Government-wide administration of retirement benefits and services for Federal employees, retirees, and their survivors. Retirement Services operates Services Online (RSO), an on-demand, web-based system that allows for direct access by authorized Federal retirees and survivor annuitants to their monthly annuity payment information. With this system, retirees and survivor annuitants can quickly and conveniently view and update specific monthly annuity payment options. A Privacy Impact Assessment is being conducted because RSO collects, uses, maintains, and disseminates personally identifiable information about retirees and their survivors.

Overview

OPM Retirement Services (RS) serves millions of Federal retirees and their survivors (such as spouses and children of the retirees) by providing them with retirement benefit services. These benefits are specifically for the Civil Service Retirement System (CSRS), Federal Employees Retirement System (FERS), FERS Special, or the Organization Retirement and Disability System (ORDS) and were earned through Federal government employment.

The Retirement Services Online system (RSO) is used to support the mission of RS. RSO is a web-based system that was developed to provide CSRS/FERS retirees and survivor annuitants with self service capability to view their monthly annuity payment information and to make certain updates or changes to that information. When a retiree or a survivor is placed into an interim or an active payment status, their information is sent to RSO from the Annuity Roll System (ARS) to create an account within RSO. Interim payment status is for those individuals awaiting final approval of their retirement benefits. Individuals are in active payment status once their retirement benefits are approved and they begin to receive a regular

monthly payment. They are provided with information about RSO upon their retirement and can access this at the Services Online feature on OPM.gov, initially with a temporary password and the assigned retirement claim number.

Through the RSO website individuals can update their mailing address, direct deposit information, and Federal or state income tax withholdings. They may also view, print, or request a duplicate Form 1099-R (the IRS form with which an individual reports his or her distributions from annuities), set up checking or savings account allotments, view annuity statements, and request duplicate retirement booklets and cards. Individuals in an active payment status have access to all RSO menu options applicable to their case and can typically see confirmation of any changes they make in RSO within 24 to 48 hours.

At the end of each RSO session, RSO users have the option to take a customer service survey. The survey results are consolidated and distributed to RS for further dissemination.

The information in RSO that the individual can view and provide updates for is obtained from daily and monthly data transfers from the Annuity Roll System (ARS). ARS is the OPM core retirement and benefit management system supporting most retirement functions for RS. ARS is used for the computation of Federal retirement, health, and life insurance benefits, and to determine qualification regarding pay benefits.

Through the RSO interface, any change made by an individual is collected and transmitted to ARS as a transaction. Once the transaction is processed through ARS, updated information is transmitted back to RSO for processing to ensure the synchronization of information.

RSO has three other components: RS Reporting website, Disability Earnings Report (DER), and the Retirement and Insurance Services (RIS) Booklets.

The RS Reporting website https://rsreporting.opm.gov/ enables individuals to make three different types of reports. The Missing Payment report is used to report a missing payment from a retired Federal employee or their survivor, who is receiving a monthly annuity payment. The Death of an Annuitant report is used to report the death of a retiree or survivor annuitant who is currently receiving a benefit from OPM under the CSRS or FERS. The missing payment and the Death of an Annuitant report can be reported by the retiree, survivor, or by a relative, friend, or representative. The Employee Death report is used for claims processing by Federal personnel or payroll officers where there is a widow or widower who may be eligible for recurring monthly payments under the CSRS or FERS.

Once a user submits information in any of these reports, a notice is displayed back to the user stating that OPM will contact them for more information. The information in the Missing Payment and Employee Death reports are collected and sent to RS personnel for analysis, review, and verification. After review, the information is entered into ARS for the appropriate action. Regarding the Employee Death report, RS will not reach out to or contact the agency unless Human Resources also submits a death package. For the Death of an Annuitant report, if the reported information matches the decease retiree's retirement information, the record is updated to ARS. If the reported information does not match, RS personnel will analyze and review the information before updating to ARS.

The Disability Earnings Report (DER) allows Retirement Services to determine if disability annuitants are eligible to continue receiving retirement benefits, or if they have earned enough in their current employment to be considered restored to earning capacity. Annually, annuitants not represented by third parties are notified by mail and email to complete their survey online through Services Online. The annuitants eligible for the survey will have a menu option enabled, allowing them to take the survey. The online survey collects annual earned income, federal work status, and agency information, if applicable. Annuitants represented by third parties are

sent a RI 30-2 form with a return envelope for the Retirement Surveys and Students (RSS) Branch located in Washington, DC. The RI 30-2 form is the paper version of the online survey. Beginning with the 2023 DER, all annuitants over 60 are required to respond back to the survey, regardless of no earned income.

The data for the online survey response is compiled and made available to the DER viewer and used to update the Disability Earned Income Certification System within ARS. The data from the returned RI 30-2 form is entered directly into the Disability Earned Income Certification by the RSS staff. The form is then scanned and made available to the DER viewer.

The RIS Booklets are mailed out to new retirees and survivor annuitants when their retirement cases are finally adjudicated. These booklets contain individualized retirement, survivor, health benefit, life insurance, and other information beneficial for the retiree or the survivor annuitant. The Retirement Services Information Technology Program Management Office (RS IT PMO) sends the retirement data for the booklets to the HRS IT PMO for processing and printing. Duplicate booklets are available on-Demand via Services Online.

The Retirement Data Repository (RDR), database and file storage along with the Retirement Data Viewer (RDV), viewer for retirement data, are the major components of the RDR system. The purpose of the system is to collect, integrate, and publish data for 2.8 million retirees (annuitants, survivors and their families). RDR provides OPM with a repository for government-wide retirement data, both pre-retirement and at retirement. It maintains retirement data that is historically paper-based payroll record scanned documents and structured data, following the Guide to Retirement Data Reporting standard dataset. The RDR system maintains and makes all this data available to authorized RDR system users through the RDV. They can effectively query the system to capture required retirement data to include in a retirement determination under various scenarios. This results in

increased efficiencies in retirement processing, to leverage scans and data quickly in developing and processing a retirement application. Other downstream systems including the Digital File System (DFS) and FACES/Janus retirement can leverage this data for authorized users through secured API's.

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. In addition, the following authorities are relevant to the information used in the Retirement Services Office: 5 U.S.C. § 3301 and chapters 87, 89 and 90; 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 records in RSO are covered by the OPM/CENTRAL 1 Civil Service Retirement and Insurance SORN.

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

Yes. The Services Online (RSO) System Security Plan is reviewed and updated annually.

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 and DAA-0478-2017-0001-0002.

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 forms that are directly used by RSO are form RI 38-128 (It's Time to Sign-up for Direct Deposit), OMB 3206-0226, and RI 10-72 (Customer Satisfaction Survey), OMB 3206-0236.

For the RS Reporting website, the following form is used RI 38-31 (We need information about your Missing Payment), OMB 3206-0187.

For the DER Viewer and DER menu option on RSO, the following form is used RI 30-2 (Annuitant's Report of Earned Income for 2019), OMB 3206-0034.

Section 2.0. Characterization of the Information 2.1. Identify the information the project collects, uses, disseminates, or maintains.

RSO collects, uses, disseminates, and maintains the following information:

- full name
- claim number
- date of birth
- Social Security number (SSN)
- mailing and email addresses
- state and federal tax withholdings
- organizational allotments
- the following financial information:
 - Federal and state income tax withholdings information
 - o form 1099-R information
 - mailing addresses
 - o checking or savings allotments information
 - direct deposit information
- If there is a survivor payable, RSO collects the survivor first name and middle initial.

The RS Reporting website captures the following information for the Missing Payment Report:

- claim number,
- payee's full name
- last four digits of the SSN
- date of birth
- date of missing payment and net amount of payment
- payment destination direct payment or US Mail

The following information about the person reporting the missing payment:

- full name
- street address
- city, state and zip code
- home phone
- mobile phone, and email

Individuals can also leave a note with additional information; the note field is limited to 200 characters.

The RS Reporting website captures the following information for the Report of Annuitant Death: Annuitant Claim number, deceased full name, last four digits of SSN, date of death, date of birth, surviving spouse information, surviving child information as to whether the children are minor, student, or disabled. Informant full name, street address, city, state, zip code, telephone, alternate phone, email address, and relationship to deceased. Individuals can also leave a note with additional information; the note field is limited to 200 characters.

The RS Reporting website also captures the following information to Report of Death of an Employee. This reporting system can be used for both CSRS and FERS employees. For a CSRS federal employee, the following information is collected:

deceased full name

- aliases
- SSN
- date of death
- date of birth
- health benefit code at death
- service computation date
- final salary
- CSRS-Offset
- CSRS 4/7/1986 service
- intermittent service
- marital status
- surviving spouse full name
- date of birth
- date of marriage
- home phone number
- cell phone number
- street address
- city, state, and zip code

For a FERS federal employee, the following information is collected:

- deceased full name,
- aliases
- SSN
- date of death
- · date of birth
- health benefit code at death,
- total civilian years and months
- final full-time salary
- full time average high 3 salary
- part time service on/after 4/7/1986
- intermittent service
- employee marital status

If the deceased employee was married, the following information is collected:

- spouse's full name at death
- date of birth
- date of marriage
- SSN
- Cell phone number
- Work phone number
- home phone number
- street address
- city, state, and zip code

If the deceased employee has children, the following information is collected:

- number of minor children
- student children
- disabled children
- children under the age of 26 to be covered by insurance

If the deceased employee death involves an Office of Workmen's Compensation Program (OWCP) claim or was due to a work-related illness or injury, or a homicide, additional information is collected for the OWCP.

The system also collects information about the agency where the deceased was employed to include:

- agency name
- street address
- city, state, zip code
- phone number
- fax number
- agency email address

- agency contact name
- agency payroll contact
- agency contact phone number
- contact fax number
- certifying official name

The Disability Earnings Report (DER) collects the following information:

- annuitant's full name,
- claim number
- phone number
- mailing address
- annual earned income amount

If the annuitant is currently employed in the Federal Service, the system prompts for the following information:

- appointment type
- grade
- step
- dates of employment
- agency name
- agency address

RIS Booklet collects the following information:

- Full name,
- claim number
- date of birth
- SSN
- Mailing and email addresses
- state and federal tax withholdings
- organizational allotments
- financial institution(s) information
- health benefit and life insurance information
- survivor(s) information

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

RSO obtains information from the Annuity Roll System (ARS) via an electronic process on a daily and monthly basis. The information in ARS primarily originates from the retiree's paper application for benefits and from employment records submitted by a respective retiree's former agency. The information from ARS is then made available to RSO users for updates via the RSO website. Changes to an individual's information are obtained directly from the individual in RSO and then reconciled in ARS.

Since RSO provides federal retirees and survivor annuitants the ability to manage their monthly annuity payment information online, information is collected (updated) directly from the user.

The information in the RS Reporting component of RSO is provided by either the individual retiree or survivor annuitant or, in the case of those reporting a death, another individual. In the case of the report of death of an employee, the information is entered by the deceased employee's Human Resources office. In the case of all information reported through the RS Reporting website, the information is sent nightly as a report to ARS. For the Missing Payment and Employee Death reports, RS personnel retrieve the reports and validate the information collected before taking an action. For the Report of Annuitant Death, if the reported information matches the decease retiree's retirement information, the record is updated to ARS. If the reported information does not match, RS personnel will analyze and review the information before taking an action.

The information for the DER Viewer is collected from the user via the DER menu option and from the scanned copies of the RI 30-2. RSS staff uses the DER Viewer to disseminate the survey responses from the DER Viewer and the online survey.

The information for the RIS Booklet is collected from ARS when the RSO user's retirement claim is completely adjudicated. Annuitants are provided a

printed booklet with this process, and they also can request a duplicate copy of the booklet within RSO.

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

RSO, including its components, does not use information from commercial sources or publicly available data.

2.4. Discuss how accuracy of the data is ensured.

The information in ARS which is used to populate RSO is reviewed by RS personnel and verified against information in paper-based records. The changes that an individual enters in RSO are subject to validation checks. For example, financial institution routing numbers are validated against a list of approved financial institutions within the Federal Reserve System.

Individuals' RSO transactions are validated within ARS before the transactions are updated to the RSO users' individual record. If the user's record is missing information needed by ARS to identify the user's ARS account, the record will be rejected, a report will be created, and the appropriate personnel will resolve the issue. Rejected records are reviewed by authorized staff for indications of inappropriate or unusual activity.

Information collected on the RS Reporting web pages is validated by RS Personnel before any action is taken on the individual retirement record. The RI 30-2 is mailed directly to the RSS Branch for dissemination. RSS staff enter the data directly into the Disability Earned Income Certification System from the form. The data is validated by the internal review process for reported earned income at or above eighty percent. The online DER information is validated as the user completes the form; the user must certify that all information is correct before the survey is accepted by the system.

The information in the RIS Booklet is validated by the adjudicative process, which entails a legal administrative specialist reviewing the annuitant's retirement case data and a secondary review by a legal administrative reviewer.

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

Privacy Risk: There is a risk that more PII than necessary for the business purpose of RSO will be collected and maintained.

Mitigation: This risk is mitigated through the establishment of effective policies to avoid unnecessary collection of PII and to redact PII if it is collected inadvertently. In addition, the PII that is necessary for RSO to function, as well as any PII that may be collected inadvertently, is masked, and transmitted via secure connections so that its exposure is limited. The risk of collecting more information, possibly including sensitive PII, in the free text field available to users is currently unmitigated but RS is taking steps to inform systems users not to include more information than is necessary.

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

Mitigation: This risk is mitigated by the procedures RSO, including its components, has in place to validate the changes made by individuals, using field restrictions that permit applicants to enter data only within certain parameters, and using user confirmation. Users are also given the ability to view and access the information and can correct it when necessary. For the Report of Annuitant Death, if the reported information matches the deceased retiree's retirement information, the record is updated to ARS. If the reported information does not match, RS personnel will analyze and review the information before taking an action.

Section 3.0. Uses of the Information

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

RSO provides CSRS/FERS retirees and survivor annuitants the ability to view and access their monthly annuity payment information online. Through direct access to the RSO website, individuals can make requests and update certain information in their records. Once changes are made by individuals in RSO, the RSO information is transmitted to ARS to update the individual's ARS records. Once that update happens, the individual's information is then sent back to RSO to confirm the update to the individual's records.

The missing payment, report of death of an annuitant, and report of death of employee web pages, provide individuals with a self-service option of reporting this information in lieu of a placing a phone call or sending an email. The information collected is sent to RS for processing and review before any action is taken on the individual's record.

The DER viewer uses the scanned copies of the RI 30-2 and the online submissions to provide information for the RSS Branch to validate the annual earned income of the disability annuitants subject to the survey.

The RIS booklet information is used to provide the annuitant a comprehensive report of their retirement annuity from their annuity commencement date and into the future. The information is collected and transmitted to ARS during the nightly batch processing cycle.

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.

The system does not use technology to conduct electronic searches, queries, or analyses for the purpose of discovering or locating a predictive pattern or anomaly.

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

In addition to the individuals in RS who have a need to access the information in RSO in accordance with their business roles, OPM's Human Resource Services Information Technology Program Management Office (HRS IT PMO) and the RS Information Technology Program Management Office (RS IT PMO) in the Office of the Chief Information Officer (OCIO) also have access to the system. OCIO provides the following system development functionality for RSO: 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 an authorized user may access the information for an unauthorized purpose or that an unauthorized person may gain access to the system.

Mitigation: This risk is mitigated by requiring the CSRS/FERS retiree and survivor annuitant users of the system to log in using Login.gov which provides additional multi-factor authentication options. This risk is further mitigated through OPM employees and contractors being subject to rolebased access controls, which limit the information authorized users can access to that which they need to know. There is also a warning displayed on a splash screen when a user opens the website explaining that accessing the system without a need to know may subject them to criminal, civil, or administrative penalties. The RS Reporting website does not require authentication credentials beyond the employees' PIV card; however, all information collected, transmitted, and retrieved is handled by RS personnel with role-based access to the system. Employees providing reports via this component do not have access to information in the system beyond the information they submit from their account/files. Additionally, RS Reporting website users must accept the Terms and Conditions of the "Notice of Users" message displayed prominently on the opening page of each of the reports. The DER Viewer has an access control list which is managed by the HRS IT

PMO; users of the system must have prior supervisory approval before access to the system is granted. No Annuitants have access to the DER Viewer. The RIS Booklet process is managed by the HRS IT PMO; no annuitants have access to the booklet printing processed, only authorized HRS IT PMO staff.

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.

OPM provides retirees with a welcome letter upon their retirement. That letter informs them of the availability of RSO and notes that they will separately receive temporary password to access the system. Once they receive that temporary password, retirees are required to change password to a complex password when the users initially log into the RSO web site. Once they have logged in with their temporary password and authenticated with Login.gov they will no longer need that password. They also are provided notice at that time about the operation of RSO through the Terms and Conditions and Privacy Act Statement.

In addition to the specific notices that individuals receive regarding RSO, they also receive information more generally about the collection and use of their retirement information through Privacy Act statements on each paper application for retirement benefits given to employees by their employing agency prior to the use of RSO. This PIA and the SORN referenced in Section 1.2 also provide notice. OPM also provides retirees and survivor annuitants with a retirement booklet upon final adjudication of their annuity. Within that booklet is information about Services Online and the OPM retirement website; along with information on how to contact OPM. The report of death of a deceased employee is for use by the deceased employee's human resources personnel.

For the DER, the RI 30-2 informational package is mailed to the annuitant with a self-addressed envelope with which to return the form. Notice is

provided in the instructions provided in the information package. For the annuitants that take the survey online, there is a help file that contains the instructions and contents located on the back of the RI 30-2.

The RIS Booklet is the printed result of the retirement adjudication process. Notice would be provided in the instructions provided on the standard retirement forms completed by the annuitant.

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

RSO use is voluntary. If individuals opt not to use RSO, they have the option of contacting the Retirement Information call center and speaking with a Customer Services Representative to make any changes to their retirement account or make any reports they could otherwise submit via RSO or its components.

For the DER - annuitants can opt not to use RSO and can contact the Retirement Eligibility Services to get instructions on how to get a paper copy in the mail.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that individuals are not aware that RSO collects and uses their information, or that they will not receive adequate notice concerning why their information is being collected and how it will be used.

Mitigation: This risk is mitigated through the communication that retirees receive about RSO when they first retire and that student survivors receive upon turning 18. In addition, information is provided on the website for all individuals who use the system. In addition, notice about RSO is provided through this PIA; and notice regarding retirement information more generally is provided through Privacy Act Statements on relevant retirement forms and through the OPM/CENTRAL 1 SORN.

Section 5.0. Data Retention by the Project

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

RSO is populated with information from ARS nightly and any updates that an individual makes in RSO are then sent back to ARS for reconciling nightly.

Additionally, once each month ARS completely repopulates the information in RSO. Since RSO records are intermediary in nature, the system defers to the ARS records retention schedule. For ARS all Retirement Case Files are cut off after all benefits have been applied for and paid to all eligible heirs.

Most records are destroyed after cutoff, and 115 years from the date of employee's birth or 30 years after the date of employee's death, whichever is sooner (5 U.S.C. 8345(i)). However, for High Profile Retirement Case Files, the final disposition is instead permanent. Records are transferred to the National Archives in 10 years blocks 30 years after cutoff.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that information will be kept for longer than is necessary or will be deleted before it is no longer needed.

Mitigation: This risk is mitigated by adhering to the applicable records schedule and having a process in place to reconcile records in RSO and ARS on a regular basis.

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.

RSO does not share information directly with any external entities. RSO is populated with information from ARS and any updates that an individual makes in RSO are then sent back to ARS. When information that is contained in RSO must be shared externally, primarily for a series of

individual matching validations to ensure correctness and completeness of information and for retirement benefit distribution and fraud prevention, the dissemination is done from ARS.

The information from RS Reporting website and DER Viewer are not shared outside of OPM. As with the RSO application, all of this information is eventually transmitted or entered into ARS to update the individual's account record.

The RIS Booklet data is shared with a subcontractor that prints and mails the booklets to annuitants. The subcontractor does not share booklet data with external entities, any sharing of booklet data which originates from ARS, would be from ARS.

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

RSO does not share information directly with any external entities. When information in RSO must be shared externally, the dissemination is done from ARS. External sharing of the information from ARS is done in accordance with the OPM/CENTRAL 1 SORN.

The information in the system is shared with the print subcontractor pursuant to routine use "k" in the OPM/Central-1 SORN.

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

RSO does not share information directly with any external entities. When information in RSO must be shared externally, the dissemination is done from ARS.

The print subcontractor is bound contractually to protect RSO data and not further disseminate it outside of the stated contractual purpose.

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

RSO captures transactional information in audit records to establish the time, date, and source of the transactions submitted, and the outcome of those audited events. However, there are no RSO logs of dissemination outside of OPM because RSO does not share information directly with any external entities. When information in RSO must be shared externally, the dissemination is done from ARS.

RSO captures transactional information in audit records to establish the time, date, and source of the transactions submitted, and the outcome of those audited events. Audit logs, quality assurance, and verification reports are available for the booklet data shared with the print subcontractor.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that the information will be disclosed or will be used outside of the scope of the purpose for which the initial collection was made.

Mitigation: This risk is mitigated by permitting access to only those OPM personnel who have a need to use the information in RSO in the course of their official business only and by permitting the retirees and survivor annuitants to access only their own information via the RSO website. Agency users have appropriate security clearances and are annually trained about the use of sensitive data. In addition, they are on notice that unauthorized user attempts or acts to accrue resources for unauthorized use, or otherwise misuse this system are strictly prohibited and may result in criminal, civil, or administrative penalties.

Section 7.0. Redress

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

OPM provides retirees and survivor annuitants with a welcome letter upon their retirement. That letter informs them of the availability of RSO and notes that they will separately receive temporary password to access the system. Once they receive that temporary password, retirees are required to change password to a complex password when the users initially log into the RSO web site. Once they have logged in with their temporary password and authenticated with Login.gov they will no longer need that password. They are also provided notice at that time about the operation of RSO through the Terms of Service and Privacy Act Statement. Within RSO, individuals are able to view their annuity information, form 1099R, and their payment history.

The information submitted to the RS Reporting website requires a point of contact if RS personnel require more information. Individuals will have an opportunity to change their information when they are contacted.

Additionally, individuals using these reports can return to the Service Online home page and use the Quick Links menu contact Retirement Services regarding their submission.

For the DER Online submission, users are able to change their information either by submitting a new paper form, or by contacting the RSS Branch for assistance.

If the information in the retirement booklet is incorrect the individual can contact the Retirement Operations Center to request a correction, and the new booklet will be generated and sent to them.

In addition, individuals may request access to their records by contacting the system owner identified in the OPM/CENTRAL 1 SORN and providing the following information: name, including all former names; date of birth; SSN;

the name and address of the office in which he or she is currently or was formerly employed in the Federal service; and annuity, service credit, or voluntary contributions account number, if assigned. Individuals requesting access must also follow OPM's Privacy Act regulations, 5 C.F.R. part 297, regarding verification of identity and access to records.

7.2. What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

Once individuals gain access to RSO, they are given options and instructed to make changes to their own records. The system is designed to permit changes to income tax withholdings, mailing address, allotments, direct deposit payment options, opt-in to receive information and to be able to print out associated notices, cards, or statements. Individuals may contact the Retirement Services Support Center at

https://www.opm.gov/support/retirement/contact/ or toll-free at 1-888-767-6738 to correct information that they cannot correct via RSO.

The reports on the RS Reporting website are validated by RS personnel before any action is taken. Users of these applications can return to the RSO home page to send an email to our Retirement Information Office for further information.

For the online DER submission, the user can change their information either by submitting a new paper form, or by contacting the RSS Branch.

If the information in the retirement booklet is incorrect the individual can contact the Retirement Operations Center to request a correction.

Individuals may also request that their information be corrected by following the instructions in the Contesting Record Procedure section of the OPM/CENTRAL 1 SORN. Individuals may request that their records be corrected by contacting the system owner identified in the SORN and providing the following information:

- name, including all former names
- date of birth
- SSN
- name and address of the office where currently or formerly employed in the Federal service
- any annuity, service credit, or voluntary contributions account number

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 receive notice about RSO from the retiree welcome letter, the RSO website, this PIA, and the applicable SORN.

Individuals are also notified about the availability of RSO as a tool for accessing and correcting their information through various subsequent mailings after they have retired.

The procedures for changing information submitted through the DER Viewer are included with the instructions provided with the RI 30-2.

If the information in the retirement booklet is incorrect the individual can contact the Retirement Operations Center to request a correction.

Information about the RS Reporting website can be found on the RSO home page at ServicesOnline.opm.gov. If a retiree or survivor has a question concerning any information associated with an account, they can contact OPM's Retirement Services at 1 (888) 767-6738 for further information. Hearing impaired customer should utilize the Federal Relay Service by dialing 711. Individuals may also contact us at the Retirement ServicesSupport Center.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals may not have adequate information concerning how to access information that is contained in RSO or to correct that information as needed.

Mitigation: This risk is mitigated by providing individuals with information about accessing their information via the RSO website, this PIA, as well as through the procedures outlined in the OPM/CENTRAL 1 SORN. This risk is further mitigated through publishing clear instructions on other OPM websites and retirement brochures that inform individuals on how to access and request amendment to their records. Further assistance to gain access or make amendments is given on the RSO website by selecting the "Need Help" link at the top of the RSO Login section or by selecting the Retirement FAQs available on the OPM website.

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 personnel review and analyze application audit records for indications of inappropriate or unusual activity, investigate suspicious activity or suspected violations, report findings to appropriate officials, and take necessary actions.

RSO's system administrators also maintain access roles for OPM personnel and contractors that restrict and grant access to information and functionality based on the user's role in supporting the business process need. RSO's system administrators also maintain system access for the DER Viewer, and the RIS Booklet. The system captures transaction and audit records to establish what events occurred, the sources of the events, and the outcomes of the events. RSO transactions are validated by programs within ARS before the transactions are updated to the RSO users' individual record.

Rejected records are reviewed by authorized staff for indications of inappropriate or unusual activity. The authorized OPM staff investigates suspicious activities or suspected violations, reports findings to appropriate officials, and takes necessary actions.

Access to the DER Viewer is limited to OPM employees and contractors who have a need to access the system in the course of their official duties. RS Reporting website does not require credentials as individuals are only permitted to submit reports, but not access annuitant accounts, and the information is analyzed by RS personnel before any action is taken within ARS.

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

OPM's internal system users are required to take the annual Information Technology Security and Privacy Awareness training. OPM's OCIO will terminate system access to the OPM network if the training is not taken within the required time. System users whose access is terminated will require supervisory intervention to regain system access.

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

Individual RSO and DER Viewer web site users have unique identification credentials that grant full access only to their respective account information. RSO and DER Viewer system support personnel within OPM such as System and Database Administrators and Development staff must have security clearances and are required to take the annual OPM Information Technology Security and Privacy Awareness Training. System user access to RSO data is based on system users' role and functional business purpose.

No authentication credentials are needed for the reports on the RS Reporting website as individuals are only permitted to submit reports, but not access

annuitant accounts. The information there is validated by RS personnel before any action is taken.

The RIS Booklet is printed and sent out to annuitants as a part of the adjudicative process, duplicates copies are available by request through RSO.

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 RIS Booklet data is shared with a subcontractor that prints and mails the booklets to annuitants. The subcontractor does not share booklet data with external entities, any sharing of booklet data which originates from ARS, would be from ARS.

Responsible Officials

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Approval Signature

Becky Ronayne Senior Agency Official for Privacy Office of Personnel Management