



Privacy Impact Assessment for
Acceptance of Scanned Retirement
Documents Project

June 16, 2020

Contact Point

Nicholas Ashenden
Deputy Associate Director
Retirement Services

Reviewing Official

Kellie Cosgrove Riley
Chief Privacy Officer



Abstract

The Retirement Services Acceptance of Scanned Retirement Documents Project is a joint effort between RS and the Office of the Chief Information Officer (OCIO) to establish and implement a secure process by which electronic PDFs of retirement application package are forwarded from qualified payroll providers to RS so that retirement applications for Federal employees can be timely processed and paid. This project is designed to provide payroll providers with a secure portal as a means of transmitting packages to RS if employees are unable to access their building and mail retirement packages in the normal manner. This Privacy Impact Assessment is being conducted because personally identifiable information about individuals will be collected and disseminated via the secure portal.

Overview

The submission of retirement application packages by Federal agencies to the Office of Personnel Management (OPM) Retirement Services (RS) is primarily a paper-based process requiring wet signatures on various retirement application forms. RS processes, on average, 100,000 retirements a year. Under normal circumstances, payroll providers obtain retirement application packages from agencies on behalf of employees along with payroll data and send paper files to RS. In turn, RS enters the application package into its systems, creates a retirement case, and forwards the case to staff for adjudication and processing of the benefit. On average, the amount of paper for an immediate retirement averages approximately 30 pages per case, but a disability retirement case can be voluminous. The retirement application packages contain a great deal of personally identifiable information (PII), running the gamut of name, correspondence and bank address, Social Security number, date of birth, family members, health and life insurance choices, survivor elections, retirement records and payroll contributions to agencies, military service, annuity amounts and bank account information, and, in disability retirement



applications, protected health information which could include medical diagnoses, medical histories, laboratory and other tests, and mental health conditions.

In response to the COVID-19 situation, many Federal agencies are operating under varying levels of telework and are not consistently able to submit retirement application packages to RS in the usual manner. Teleworking poses logistical challenges for employees of both agency human resources and payroll offices as well as payroll providers to transport paper to OPM and significantly impacts RS's ability to process retirements timely. As a result, OPM has issued a Benefits Administration Letter (BAL) that instructs agencies to continue, if possible, with the normal process but that also allows for certain flexibilities for electronic submission of retirement packages. The BAL will temporarily suspend requirements to submit paper documents with wet signatures and provide a means to submit application packages electronically.

This project is a joint effort between RS and the Office of the Chief Information Officer (OCIO) to establish and implement a secure process by which scanned PDFs of retirement packages are forwarded from qualified payroll providers to RS so that retirement applications for Federal employees can be timely processed and paid. This project is designed to provide payroll providers with a means of transmitting packages to RS if employees are unable to access their building and mail retirement packages in the normal manner. Payroll providers whose responsibility it is to submit retirement packages to RS will use this in circumstances where they are unable to mail retirement packages in the usual process.

OPM will use the secure FTP (TIBCO) drop-box to receive the scanned retirement packages, in PDF, from the payroll providers. These packages will include the register (a description of the documents contained in the package) and retirement documents listed on the register and will mimic the current physical packages that are currently submitted in hard copy to RS. To the extent any of the documents require wet signatures when they are



submitted using the current paper process, the PDFs will contain electronic signatures. A limited number of people, no more than four, from each of the payroll providers will have access to the secure portal and will be responsible for sending the packages to OPM. Likewise, a limited number of personnel in RS will have access to the portal to retrieve the submitted packages. The RS personnel in Boyers, Pennsylvania, will print the documents submitted via the portal to a dedicated, high speed printer and place the printed, hard copy versions of the packages into the normal workflow for retirement applications. The payroll providers will not later furnish a paper record, and these submissions are in lieu of the usual normal paper submission process. RS will print the submitted documents from a dedicated printer in its Boyers facility and move them into the evaluation and review process.

In order to take advantage of this electronic submission option, agencies will work with their payroll providers, which will submit the packages to OPM, and must have a record of where each document submitted came from, who sent the document, how the document was sent, and which documents were sent together; a process in which an agency official compares the original document to the scanned PDF; and a certification from the document custodian (OPM considers the agency submitting the retirement package to be the document custodian) attesting that the documents were produced within the context of the written records management procedures prescribed in regulation and guidance. The retirement packages will be submitted by the payroll providers to OPM via an OPM secure drop box. The payroll provider will upload the documents into the secure drop box and RS staff will print them and move them into the processing queue.



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 Employee Retirement System (FERS) is administered pursuant to 5 U.S.C. chapter 84. In addition, the following authorities are relevant to the information in ARS: 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. The submission and processing of retirement applications is also subject to 5 C.F.R. § 293.103 and 36 C.F.R. § 1234 and other guidance concerning chain of custody.

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

The records relevant to this project 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?

OPM's secure drop box is within the boundary of the Cyber GSS, which has been granted an ATO that includes a system security plan. The secure drop box is subject to all appropriate vulnerability assessments and scans.

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

Yes. The records that are uploaded into the secure drop box are Intermediary Records covered by GRS 5.2, Item 020.



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 PRA does not apply to this project because the retirement packages are received into the secure drop box from payroll providers and not from individual members of the public. Several of the forms that make up the retirement packages are subject to the PRA, however, and have applicable control numbers. See Appendix A for a list of relevant forms.

Section 2.0. Characterization of the Information

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

This project collects, uses, disseminates, or maintains applications for retirement, disability retirement, and death in service. These retirement application packages include the following information: full name, date of birth, Social Security number, address, marital status, financial and banking information, health and life insurance benefits, email address, telephone number, service credit deposits, employee service history, retiring agency information, retirement plan (CSRS or FERS), retirement contributions, military service, military deposits.

Additionally, if a survivor's annuity is elected and/or there are former spouses payable, the retirement application package contains: survivor/former spouse full name, survivor/former spouse date of birth, survivor/former spouse social security number, survivor/former spouse address, survivor/former spouse place of marriage, date of marriage and if applicable date of divorce.



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

The information is uploaded into OPM's Secure Portal by Federal government payroll providers.

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.

2.4. Discuss how accuracy of the data is ensured.

The accuracy of the information in the retirement application package is the responsibility of the individual who provides information at the initial point of collection, the employing agency, and the payroll provider who uploads the packages into the secure drop box. OPM requires agencies that use the secure drop box to have a record of where each document submitted came from, who sent the document, how the document was sent, and which documents were sent together; a process in which an agency official compares the original document to the scanned document; and a certification from the document custodian (OPM considers the agency submitting the retirement application the document custodian) attesting that the documents were produced within the context of the written records management procedures prescribed in regulation and guidance.

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

Privacy Risk: There is a risk that the retirement application packages that are submitted through the secure drop box will contain extraneous or inaccurate information and result in erroneous processing.

Mitigation: This risk is mitigated through clear requirements for agencies who use the secure drop box, as outlined in the Benefits Administration Letter, as outlined in Section 2.4 above.



Section 3.0. Uses of the Information

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

The retirement application packages that are uploaded into the secure drop box will be printed by RS personnel and the printed application packages will be used to determine eligibility and entitlement to retirement benefits.

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.

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

Only a small number of RS staff in Boyers, Pennsylvania, will have access to the secure drop box in order to print retirement application packages and put the paper print outs into the RS processing queue.

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

Privacy Risk: There is a risk that unauthorized individuals will have access to the documents uploaded into the secure drop box, or that authorized individuals will access the documents for an unauthorized purpose.

Mitigation: This risk is mitigated by controlling access to a limited number of individuals assigned to access the secure drop box and blocking others from access and through audit functions that document who accesses and downloads documents.



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 do not have direct access to or otherwise interact with the secure drop box and therefore do not receive any notice prior to information being uploaded into the drop box. They do, however, receive notice through Privacy Act statements and from their agency human resources personnel concerning the collection and use of their information for determining their retirement benefits when they provide information on the relevant retirement forms. They also receive notice about the use of the secure drop box through 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?

Individuals do not have an opportunity to consent or decline to have their retirement application packages uploaded into the secure portal.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that individuals will not receive notice that their information is included in this project.

Mitigation: 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 application packages are intermediary records and are retained in the secure drop box only as long as is necessary to print them and move the hard copy documents into the RS processing queue, in no case longer than 30 days.



5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that the retirement application packages will be retained in the secure drop box for longer than is necessary to meet the defined business need to submit the packages to RS in pdf form in those instances where the payroll providers are unable to mail paper documents.

Mitigation: This risk is mitigated because the RS personnel can delete the documents in the secure drop box once they access the files and verify that they have printed all documents. In addition, the secure drop box is configured to delete the documents no more than 30 days after they have been uploaded.

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 retirement application packages that are uploaded into the secure portal by the agencies can be accessed only by OPM RS personnel to print and move into their processing queue.

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

Not applicable.

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

Not applicable.

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

Not applicable.

6.5. Privacy Impact Analysis: Related to Information Sharing

Not applicable.



Section 7.0. Redress

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

Individuals do not have access to the secure drop box but may generally request access to their retirement records by following the process outlined on the OPM/Central 1 Civil Service Retirement and Insurance system of records notice.

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

Individuals do not have the ability to amend records in the secure drop box but may generally request amendment of their retirement records by following the process outlined on the OPM/Central 1 Civil Service Retirement and Insurance system of records notice.

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

Individuals do not have the ability to amend records in the secure drop box but may generally request amendment of their retirement records by following the process outlined on the OPM/Central 1 Civil Service Retirement and Insurance system of records notice.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals will not be able to access and/or amend their records.

Mitigation: Although individuals do not have an opportunity to access or amend their records as they sit in the secure drop box, this risk is mitigated through numerous opportunities throughout the retirement application and processing activities for individuals to access and amend records and through the OPM Central 1 SORN.



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?

Access to the retirement application packages in the secure drop box is strictly limited to a small number of personnel who only have access to the specific documents that they have a need to know. Access logs are available that document who accessed the secure drop box and what documents they downloaded. The drop box only provides authorized users with the ability to access the site, upload and download files; they cannot open and read the documents on the drop-box site.

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

All OPM personnel are required to complete annual IT Security and Privacy Awareness Training annually.

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

Each payroll provider determines the appropriate personnel to upload documents into the drop box. RS management determines the appropriate staff within RS to have access to the drop box to access and print the documents.

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 additional use, sharing, or access to the information in the secure portal will be addressed by RS leadership and vetted with appropriate stakeholders.



Responsible Officials

Kenneth Zawodny
Associate Director

Approval Signature

Signed Copy on file with Chief Privacy Officer

Kellie Cosgrove Riley
Chief Privacy Officer