



Privacy Impact Assessment for
Interim Closeout Data Capture (ICDC)

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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 families. The Interim Closeout Data Capture system (ICDC) is used by the OPM Retirement Services Program Office to store Individual Retirement Records (IRRs) received from agency payroll office legacy systems and to permit the appropriate agency personnel to access and update those records until an individual retires, separates from, or dies within Federal service. This Privacy Impact Assessment is being conducted because ICDC contains personally identifiable information about federal employees, retirees, and their families.

Overview

The Individual Retirement Record (IRR) is the information recorded on Standard Form 2806 (for those covered by the Civil Service Retirement System (CSRS)) and Standard Form 3100 (for those covered by the Federal Employee Retirement System (FERS)). It serves as a subsidiary reporting record for an agency's retirement control accounts and is maintained on a current basis during the course of an individual's federal employment. Current maintenance expedites closing out the SF 2806/SF 3100 when an employee is separated and, for those covered by FERS, when an individual moves and another agency assumes responsibility for the IRR. An individual's employing agency generally maintains the IRR until the individual retires or leaves Federal service, at which time it is transferred to OPM and used as the basic record for determining retirement benefits for the employee or his or her survivors. Agencies may use either a manual (hard copy) or automated version of the SF 2806 and SF 3100.

OPM developed the Interim Closeout Data Capture system (ICDC) in 2006, when many agencies were moving from their own agency-specific payroll system to one of the shared payroll service providers within the Federal government and needed a place to store the IRRs for their employees.



Several agencies opted to transfer their employees' IRRs into ICDC. ICDC is a static data set, containing only information from the agencies who opted to transfer their IRRs at the time the system was established, and only information on the respective agencies' current employees as of the date of that transfer. Individual employees and retirees do not have access to this government system. The records were sent in bulk by the respective agencies in electronic format and loaded into ICDC after being reviewed by the submitting agency and certified by the submitting agency's payroll office. The submitting agency maintains ownership of their employee records in ICDC until the employee retires or otherwise separates from the agency. OPM personnel do not access a particular IRR in ICDC until it is time to adjudicate a retirement claim. At that point, an OPM retirement specialist adjudicates the retirement and adds a code in the ICDC system regarding the adjudication status.

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?

5 U.S.C. Chapter 84 governs the Civil Service Retirement System (CSRS). 5 U.S.C. Chapter 83 governs the Federal Employees Retirement System (FERS). 5 C.F.R. Part 850 further delineates OPM's authority to process retirement benefits electronically.

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

The applicable SORN is OPM/ Central-1, Civil Service Retirement and Insurance Records.

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

A current System Security Plan was completed for the system as part of the Authority to Operate that is scheduled to be renewed on December 31, 2019.



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

Yes. The applicable records schedule for IRRs is DAA-0478-2017-001.

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 is not applicable to Standard Forms 2806 and 3100 (IRR). The information on the IRR is not collected from the individual; the respective agency human resources personnel provide and maintain the information.

Section 2.0. Characterization of the Information

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

ICDC stores officially certified payroll data intended to be used in the calculation of retirement benefits for retiring federal employees. An ICDC record contains an employee's service history and a fiscal summary by year of retirement deductions. The system also captures base pay, military service earnings, military deposits, if military buy back: the amount owed, amount paid, and balance due. More specifically, ICDC collects, uses, and maintains information on current and former Federal employees and members of Congress who performed or are performing service subject to the Civil Service Retirement System (CSRS) or Federal Employees' Retirement System (FERS). This information includes: full name, Social Security number, date of birth, name changes, and information related to their FERS or CSRS service, such as dates of service, awards, salary, dates and salary for any temporary employment, part-time hours, leave without pay, intermittent service, and any military service that can be counted toward retirement.

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

The information in ICDC was submitted by those agencies that transitioned from a legacy payroll system to one of the shared payroll service providers. The records were submitted electronically all at one time or in batches, depending on the number of records being submitted. The incoming files



were formatted according to OPM data specifications and encrypted before being sent to OPM either on physical media such as CD or DVD, or using a secure file transfer method. Any updates that an agency may make to the records in ICDC are done by an HR specialist from that agency.

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. The system does not use information from commercial sources or publicly available data.

2.4. Discuss how accuracy of the data is ensured.

The accuracy of the information in ICDC is initially the responsibility of the agency that submitted it to OPM. The records were sent in bulk by the respective agencies in electronic format and loaded into ICDC after being reviewed by the submitting agency and certified by the submitting agency's payroll office. The submitting agency maintains ownership of their employee records in ICDC until the employee retires or otherwise separates from the agency. When the records were received by OPM, OPM verified that they were in the correct format and then they were loaded into a test environment so that designated testers from the submitting agency could verify and check the quality of the information. Records of interest were selected by the agency's HR Specialists, subject matter experts, for review. The records were loaded into ICDC for actual use only after the submitting agency completed reviewing the data for accuracy and approved them for use in production. The name of the certifying official and the date certified is included in the data loaded.

After the initial data set was loaded into ICDC, the respective agency HR specialists continue to be responsible for the accuracy of the information. They update an individual's record with relevant information, such as salary, name changes, and dates of separation until such time as the individual retires or otherwise separates from Federal service. At that point, OPM adjudicators in Retirement Service take over responsibility for the record and, based on their training and on policy and regulation, are responsible for accurately adjudicating a retirement claim and coding the record in ICDC.



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

Privacy Risk: There is a risk that ICDC will contain more information than is needed for the stated business purpose.

Mitigation: This risk is mitigated because ICDC is designed to accept only the information contained on the SF 2806 and 3100.

Privacy Risk: There is a risk that the information in ICDC will not be accurate and will result in an adverse adjudication decision for an individual retiree.

Mitigation: This risk is mitigated by the detailed procedures ICDC had in place for the initial load of the information, with agency subject matter experts verifying the quality and accuracy of the information, as well as through the continued and current updating that agency experts do to the record as an individual proceeds through federal service. It is important that each SF 2806 and SF 3100 be correct, complete, clear in every detail, and properly certified so that claims may be processed expeditiously and correctly. This risk is also mitigated by providing individuals, prior to retirement, an opportunity to review data in ICDC with an HR specialist and to request changes if needed.

Section 3.0. Uses of the Information

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

The information in ICDC is used by OPM as the basic record for determining the retirement benefits payable to a separated employee or his or her survivors. Specific significant data elements and their purpose and use are as follows: Social Security numbers are used to identify unique employees across multiple agencies and payroll systems; Name, including history of any name changes, is used for employee identification; Date of Birth is used to determine retirement status; Payroll Office ID and Name is used to identify the relevant agency payroll office; information about pay, dates of service, military service, and service deductions are used to estimate interim pay and calculate final annuity pay.



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.

There is no electronic querying of ICDC data to perform predictive analytics.

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

Within OPM, only RS personnel who adjudicate retirement claims or those responsible for administering the system have access to the information in ICDC. OPM users are not permitted to make any changes to an individual IRR, but may add an appropriate action code once they have adjudicated a retirement case. Agency HR and Payroll users are granted the ability to add, update, or delete information for IRRs that belong to their agency. Both OPM RS users and agency users may print an official (watermarked) IRR. The ICDC Administrator is responsible for managing access of ICDC user accounts by granting appropriate authorization for the access and privileges requested and removing users' privileges once that authorization has expired.

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

Privacy Risk: There is a risk that unauthorized users may access the information in the system or that authorized users may access the information for an unauthorized purpose.

Mitigation: This risk is mitigated by the user roles established by the ICDC Administrator, which limits access and exposure of the records. Only an external agency HR specialist can edit records that belong to their agency employees and certify that they are correct. OPM cannot update external agency employee data and can only add an adjudication code after a claim has been adjudicated, consistent with their appropriate role.

Privacy Risk: There is a risk that the integrity of information could be compromised or a user may access the information for an unauthorized purpose.



Mitigation: The Office of the Chief Information Officer conducts continuous monitoring of the system and limits the users and their access to ensure all user access is in alignment with Federal standards for access control, audit and accountability controls. OPM's Information Security Continuous Monitoring (ISCM) program is a part of OPM's Risk Management Framework. ISCM identifies system security controls, sets a frequency for their review and assesses their impact on the system. Additional risk mitigation is handled with training the users who have access to the system about the sensitivity and proper handling of the information.

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.

The public does not have direct access to the ICDC system, therefore notice is not provided directly by the system. Individuals do receive notice generally about the retirement process and the use of their information from their employing agencies, which are responsible for counseling their employees regarding their retirement rights and benefits. Notice is also provided to individuals via this PIA.

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

The use of ICDC and the transfer of information to the system is a decision made by the employing agency. Individuals do not have the opportunity to consent to having their information included in the system.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: There is a risk that individuals are not given notice directly from the system and therefore are not aware that ICDC contains their information.

Mitigation: This risk is mitigated by the requirement that employing agencies provide information regarding an individual's retirement benefits. OPM assumes that the agencies comply with relevant regulations and



individuals are made aware that certain information is used for retirement and annuity calculations as indicated in 5 CFR 850.

Section 5.0. Data Retention by the Project

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

The information in the system is retained in accordance with the records schedule identified in Section 1.4. This retention is mandated by 5 U.S.C. 8345(i): records must be destroyed 30 years after the date of the individual's death or 115 years after the date of the individual's birth, whichever is sooner, but never before all benefits have been applied for and paid to all eligible heirs. This retention period protects the legal and financial rights of federal retirees and their heirs and dependents.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a risk that the information in the system will not be retained for an appropriate time, resulting in keeping it for longer than necessary or deleting it before the business need for it has passed.

Mitigation: This risk is mitigated by establishing an appropriate NARA-approved records schedule and adhering to its terms.

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.

Data in ICDC is accessible by the employing agency that submitted it and continues to own and control it until an individual employee has retired from Federal service or otherwise separated from that agency. Agency access is controlled by the ICDC Administrator and agencies cannot access information about other agencies' employees and retirees. The following federal agencies have access to their employee's information in ICDC:



- African Development Foundation
- Advisory Council on Historic Preservation
- Commission of Fine Arts
- Department of Energy
- Department of Education
- Department of the Interior
- Department of Justice
- Department of Labor
- Department of Transportation
- Environmental Protection Agency
- Federal Energy Regulatory Commission
- Federal Labor Relations Authority
- Federal Trade Commission
- Department of Health and Human Services
- Inter-American Foundation
- U.S. International Trade Commission
- James Madison Memorial Fellowship Foundation
- Nuclear Regulatory Commission
- National Science Foundation
- Overseas Private Investment Corporation
- Pension Benefit Guaranty Corporation
- Presidio Trust
- Social Security Administration
- Selective Service System
- Trade and Development Agency
- U.S. Holocaust Memorial Museum
- U. S. Courts
- Utah Reclamation Mitigation and Conservation Commission
- Department of Veterans Affairs

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

Consistent with the purpose articulated in the OPM/Central 1 SORN, agencies use the records in ICDC in order to provide information and verification on which to base entitlement and computation of CSRS and FERS benefits



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

The ICDC Administrator controls access to the records such that agency officials only have access to their respective agency records. These officials are trained in the appropriate regulations governing these records to ensure that they handle them appropriately.

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

The ICDC application captures sufficient information in audit records to establish what events occurred, the sources of the events, and the outcome of the events. Audit record content includes, for most audit records: (i) date and time of the event; (ii) the component of the information system, where the event occurred; (iii) type of event; (iv) subject identity; and (v) outcome of the event (success or failure) of the event.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a risk that information in ICDC may be used outside of OPM for a purpose other than that for which it was collected.

Mitigation: This risk is mitigated through limiting access to ICDC to only those agency personnel with a legitimate need-to-know in order to process retirement and death benefits for their federal employees and their survivors. OPM technical personnel review and analyze application audit records regularly to ensure that information is accessed appropriately.

Section 7.0. Redress

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

Individuals do not have direct access to ICDC. However, they may request access to their records by contacting their employing HR or payroll office or the OPM system manager identified in the SORN referenced in Section 1.2.

Individuals must furnish the following information for their records to be located and identified:



- Name, including all former names.
- Date of birth.
- SSN.
- Name and address of office in which currently and/or formerly employed in the Federal service.
- Annuity, service credit, or voluntary contributions account number, if assigned.

Individuals requesting access must also follow OPM's Privacy Act regulations on verification of identity and access to records (5 CFR 297).

In accordance with 5 CFR § 850.303, an individual who submits personal documents to OPM in support of a claim for retirement or insurance benefits may have such documents returned to the individual if he or she requests the return of the documents when submitting the documents. If OPM receives a request for return of such documents at a later time, OPM may provide the individual with a copy of the document that is derived from electronic records.

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

Individuals wishing to request amendment of their records in this system that are originated by OPM should contact the system manager identified in the SORN referenced in Section 1.2. Individuals must furnish the following information for their records to be located and identified: Name, including all former names, date of birth, SSN, name and address of office in which currently and/or formerly employed in the Federal service, and annuity, service credit, or voluntary contributions account number, if assigned. In addition, individuals requesting amendment of their records must also follow OPM's Privacy Act regulations regarding verification of identity and amendment of records (5 CFR part 297).

Individuals requesting amendment of records that were not originated by OPM must contact the agency that established the record in accordance with 5 CFR §§ 831.102 and 841.106. Information may be corrected by agency HR or payroll offices. Prior to retirement, the employee is afforded an opportunity review data in ICDC with an HR specialist and to request changes if needed.



The correction of errors made on IRRs transmitted to OPM for separated employees is generally made on SF 2806-1, Notice of Correction of Individual Retirement Record for CSRS, and on SF 3101, Notice of Correction of Individual Retirement Record for FERS, and forwarded to OPM as soon as possible. Typical errors include:

- Error in service history data (such as salary rates, sick leave);
- Understatement of retirement fund deductions;
- Overstatement of retirement fund deductions.

Individuals wanting to make corrections to errors in service history data should fill out and forward the SF 2806-1 for CSRS and SF 3101 for FERS, then forward it to Office of Personnel Management, Retirement Operations Center, Post Office Box 45, Boyers, PA 16017-0045

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

Individuals are notified by their agencies, which are responsible for counseling employees regarding their rights and benefits under CSRS and FERS, and through publication of this PIA and the SORN referenced in Section 1.2. Information may be corrected by agency HR or payroll offices based upon the agency policy and procedures for correction, which will provide individuals with information concerning the procedures to correct information.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: There is a risk that individuals may not understand how to access information about them that is contained in ICDC or how to correct inaccurate information.

Mitigation: This risk is mitigated by agency HR offices that provide retirement information to their employees and through publication of the relevant SORN referenced in Section 1.2 and this PIA.



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?

ICDC maintains access roles for external agencies and OPM personnel that grant access to information and functionality based on the individual's business need to know. The ICDC web application captures sufficient information in audit records to establish what events occurred, the sources of the events, and the outcomes of the events. 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.

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

All OPM employees receive annual Security and Privacy Awareness Training which covers the handling of PII. External agencies must comply with ICDC Rules of Behavior for accessing the system.

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

Users must request access from the ICDC Administrator after obtaining their supervisor's approval. The ICDC Administrator is responsible for ensuring the appropriate authorization has been granted for the access and the privileges requested, and is responsible for the removal of the user's privileges once that authorization has ceased.

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 new information sharing agreements or MOUs and any new uses of the ICDC information or new access to the ICDC system must be approved by the ICDC System Owner in coordination with the requesting Agency and the appropriate OPM offices.



Responsible Official

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Approval Signature

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