



Privacy Impact Assessment for  
Service Credit Redeposit and Deposit  
System (SCRD)

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## **Abstract**

The Office of Personnel Management's Retirement Services Program is responsible for the administration of retirement benefits and services for Federal employees, retirees, and their families. The Service Credit Redeposit and Deposit System (SCRD) provides federal employees an opportunity to make payments into the Civil Service Retirement System or Federal Employee Retirement System. These payments are for periods of service during which they either did not contribute to the Federal retirement fund or for which they received a refund of their retirement contributions. This Privacy Impact Assessment is being conducted because the SCRDC collects, maintains, and disseminates information about individuals.

## **Overview**

Service Credit is a federal program that provides federal employees an opportunity to make payments into the Civil Service Retirement System (CSRS) or the Federal Employee Retirement System (FERS) for periods of service during which they either did not contribute or for which they received a refund of their retirement contributions. An employee may participate in the Service Credit program to ensure receipt of the maximum retirement benefits to which he or she is may be entitled.

Eligible federal employees apply to make a deposit or redeposit by completing and submitting the Standard Form 2803 - Application to Make Service Credit Payment, CSRS or the Standard Form 3108 - Application to Make Deposit or Redeposit, FERS to their agency. There are two parts to both forms. The employee completes Part A of the application and submits it to their Human Resources (HR) office. The employing agency's HR office completes and certifies Part B of the application regarding the individual's employment history. The employing agency then sends the application package to the Service Credit Section in the Office of Personnel Management's (OPM) Retirement Services (RS) organization. The Service



Credit Section determines eligibility, calculates the amount due, and mails an initial bill (Form RI 36-23) to the employee. Service Credit personnel determine eligibility by reviewing the information certified by the agency and also by retrieving any records for the employee currently stored within OPM's file section. If the package is incomplete, it is mailed back to the submitting agency for correction.

RS personnel established a payment schedule for employees to complete all payments. The Office of the Chief Financial Officer (OCFO) manages the payment process as the employees make payments according to the billing schedule determined by RS. Employees can opt to pay their bill through Pay.gov, through their bank's Automated Clearinghouse (ACH), or by personal check. Monies paid through Pay.gov or through ACH are collected through a lockbox. These lockbox payments are processed by OCFO personnel who then credit the employee's SCR D accounts.

When the employee retires from Federal service, their SCR D account information will be processed along with their retirement application. During the annuity adjudication process, Legal Administrative Specialists (LAS) can use the Federal Annuity Claims Expert System (FACES) Retirement Benefits Calculator (RBC) to access SCR D. With this access, a LAS can view, print and or close retiree SCR D accounts. The RBC is used to calculate annuities based on employees' records of Federal service from either the CSRS or the FERS.

If the employee's SCR D redeposit or deposit bill has been paid in full, the relevant period of Federal service will be applied to the employee's retirement account. If the SCR D account has been partially paid, the relevant period of Federal service will be used towards the retirement, but the final calculated benefit might be reduced. In some instances, the employee is given an opportunity to repay the balance due in order to receive an increased benefit while the retirement claim is being adjudicated. If the employee separates from Federal service prior to retirement, they can request a return of these payments.



## **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?**

CSRS is administered pursuant to 5 U.S.C. chapter 83 and FERS is administered pursuant to 5 U.S.C. chapter 84. In particular, specific relevant statutory and regulatory provisions include: 5 U.S.C. § 8332 Creditable Service, 5 U.S.C. § 8334 Deductions, Contributions, and Deposits, 5 U.S.C. § 8411 Creditable Service, 5 CFR 831.301-307 Credit for Service, 5 CFR 842, subpart C Credit for Service, and 5 CFR 846.302 Crediting Civilian Service.

Social Security numbers are collected and maintained in accordance with Executive Order 9397 (Numbering system for federal accounts relating to individual persons), as amended by Executive Order 13478 (Relating to Federal Agency Use of Social Security Numbers).

### **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?**

SCRD is undergoing a physical relocation to Macon, Georgia. OPM granted an Authority to Operate which expires on July 23, 2021.

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

The records in this system are covered under the retirement case files records retention schedule with disposition authority DAA-0478-2017-0001-0001.



**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.**

SF 2803 Application to Make Service Credit Payment, Civil Service Retirement System, OMB Control No. 3206-0134.

SF 3108 Application to Make Deposit or Redeposit, Federal Employee Retirement System, OMB Control No. 3206-0134.

## **Section 2.0. Characterization of the Information**

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

SCRD collects, uses, disseminates, or maintains the following information for employees in both CSRS and FERS: full name, aliases used, date of birth, Social Security number, mailing address, telephone number, e-mail address, employee's current agency information, prior Service Credit application information (if applicable), Service Credit Payment Type (Civilian), and retirement type (CSRS or FERS). In addition for those with civilian service not under a retirement system for federal employees, SCRDC collects nature of action, effective date, basic salary rate, salary basis, leave without pay. If available at the certifying agency, actual earnings, and dates for those period(s) of service will also be collected, as well as agency comments, agency address, agency official title, email, telephone, and fax number.

For CSRS Applicants the following additional information is collected:

Department or Agency where employed, employment location, title of position, periods of service, selections for retirement deductions for periods of service: not withheld, withheld and refunded or withheld, and refunded, current retirement plan deduction, and separation date of last federal position under CSRS.



For FERS Applicants the following additional information is collected:

Department or Agency where employed, employment location, title of position, periods of service, selections for retirement deductions for periods of service: not withheld, withheld and refunded or withheld, and refunded, current retirement plan deduction, and separation date of last federal position under FERS, FERS transfer selection, effective date of employee transfer to FERS, employee agency information, retirement system, and date for period(s) of service at agency.

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

The information in the system is provided by the applicant's agency in the form of certified records that are transmitted to OPM Retirement Services by U.S. mail, fax, or email. The application data is originally provided to the certifying agency by the individual applicant.

**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. SCR D does not use information from commercial sources.

**2.4. Discuss how accuracy of the data is ensured.**

The application data provided by the individual Federal employee is certified by the agency before being sent over to the Service Credit section. When the application arrives from the employing agency, the package is checked for completeness and for monetary and procedural accuracy before the data is entered into SCR D. Daily and quarterly reviews are conducted on SCR D accounts that meet specific criteria.

Additionally, the RS Quality Assurance Division reviews all initially adjudicated claims. The quality assurance review is a full review of all RS procedures and guidance pertaining to initially adjudicated cases. If a



service credit package is within the case file, it will be reviewed for quality and accuracy as well.

Once the payments are received, OCFO personnel cross references the check images and ACH Detail Report listings received from US Bank Lockbox and the Pay.gov emails received from Treasury against the employee information listed within the SCR D accounts. This supporting documentation helps to ensure payment posting accuracy.

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

**Privacy Risk:** There is a risk that the information in SCR D is not accurate.

**Mitigation:** This risk is mitigated by the detailed procedures described in Section 2.4 to ensure that the information is as accurate as possible. OPM also assumes that the information regarding the Federal employees provided directly from the employing agency is correct and has been validated by the employing agency and submitted appropriately. Additionally, the Service Credit section in RS has audit and review procedures in place to measure the quality of SCR D payments being processed.

**Privacy Risk:** There is a risk that the user account and payment information sent to SCR D is not accurate.

**Mitigation:** This risk is mitigated by the validation program that pre-processes the SCR D information before updating the user accounts and a new bill is issued.

## **Section 3.0. Uses of the Information**

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

SCR D uses the information in the system to process redeposit and deposit payments. Retirement Services' personnel use the information in SCR D to determine an applicant's eligibility and calculate the amount of the redeposit



or deposit due and to set up a billing schedule based on the amount due. The Office of the Chief Financial Officer (OCFO) personnel use the information provided by RS to manage the SCR D repayment process.

These payments are for periods of service during which the employee either did not contribute to the Federal retirement fund or for which they received a refund of their retirement contributions. Once these payments are complete, the time and service for which the payment was calculated is used to increase the employee's retirement annuity.

**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.**

SCR D does not use any special technology or tools for electronic searches, queries, or analysis of its data.

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

Personnel within the Office of the Chief Financial Officer (OCFO), Office of the Chief Information Officer (OCIO), and Retirement Services (RS) are granted SCR D access according to their respective program office roles and responsibilities.

OCFO personnel responsibilities include the production and distribution of paid in full statements, receipts, collecting payments, making the necessary adjustment to correct the payment information, and making changes to personal information on the account if needed. OCIO personnel provide IT infrastructure, development, and maintenance support to RS. RS personnel establish the SCR D user accounts and calculate the redeposit and deposit amounts due to be paid. Additionally, Legal Administrative Specialists in RS access SCR D through FACES RBC to ensure that any SCR D information is printed and processed with the employee's retirement package. FACES is an





information technology tool used to compute benefits for federal retirees and their survivors.

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

**Privacy Risk:** There is a risk that an authorized user may access the system for an unauthorized purpose or that an unauthorized user may access the system. Likewise, there is a risk that authorized users may have access to more information than they have a need to know within the system.

**Mitigation:** These risks are mitigated by using assigned roles with specific responsibilities including the use of access controls that restrict the ability to retrieve data based on an individual's authorization and access permissions that are built into the system. The system maintains access roles that restrict and grant access to information and functionality to support the unique business process needs. For example, with in the accounts receivable process, technicians can enter payments, only supervisors can approve these payments.

## **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 SCRD and, therefore, do not receive any notice directly from the system. However, individuals receive notice concerning the collection and use of their information via Privacy Act statements on the forms used to collect their information and 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?**

The system does not provide direct access to the public, therefore the opportunity to consent is not within SCRD. Individuals do not have the



ability to specifically consent or decline to have their information included in SCR D, but by completing and submitting their retirement application, federal employees are consenting to particular uses of the information as outlined in the Privacy Act statement provided with the application. Individuals can also opt out of paying their redeposit or deposit amounts at any time, with any partially paid money left in SCR D after opting out will be paid out either when the individual separates or retires from federal service.

#### **4.3. Privacy Impact Analysis: Related to Notice**

**Privacy Risk:** There is a risk that individuals do not have notice about how their information will be used within the system, or they are not aware that SCR D is using their information to compute the amount owed on their redeposit and deposits and that their payment information is sent to OCFO systems for account updates and history.

**Mitigation:** This risk is mitigated by providing notice to individuals through a Privacy Act statement on relevant forms and through the publication of this PIA. This PIA provides notice that SCR D uses and shares data with internal source systems. Notice is also provided that individual information may be shared outside of OPM through the Routine Use sections of the applicable SORN.

## **Section 5.0. Data Retention by the Project**

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

In accordance with records retention schedule disposition authority DAA-0478-2017-0001-0001, all Retirement Case Files (including SCR D information) are closed after all benefits have been applied for and paid to all eligible heirs.

Most records are destroyed after they are deemed closed, 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 they are deemed closed.

## **5.2. Privacy Impact Analysis: Related to Retention**

**Privacy Risk:** There is a risk that information about individuals contained in the system will be retained for longer than in necessary to meet the business needs for which it was originally collected.

**Mitigation:** This risk is minimized by adherence to the applicable retention schedule and through training personnel about proper procedures to destroy or archive data appropriately.

## **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.**

RS and OCFO personnel can access SCR D to provide billing and payment information to the individual account owner and their human resources office. This information is provided by secure email, fax, or postal mail. As part of the normal business operations, this information is generally not shared outside of OPM.

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

As part of the normal business operations, the information in SCR D is generally shared outside of OPM only with the individual and the individual's human resources office. To the extent such sharing is necessary, it is done in accordance with an applicable routine use in the OPM/Central 1 Civil Service Retirement and Insurance Records SORN and only for a purpose compatible with the purpose outlined in that SORN.



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

As part of the normal business operations, the information in SCRDC is generally shared outside of OPM only with the individual and the individual's human resources office.

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

RS and OCFO personnel record in the "Notes" section of the SCRDC system, requests for information from Agency personnel and the individual account owners.

### **6.5. Privacy Impact Analysis: Related to Information Sharing**

**Privacy Risk:** There is a risk that information will be disclosed outside of OPM for a purpose that is not compatible with the purpose for which it was collected and that the information in transit will be compromised.

**Mitigation:** This risk is mitigated by adhering to the routine uses in the applicable SORN and using appropriate mechanisms to securely transmit information.

## **Section 7.0. Redress**

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

Individuals do not have direct access to SCRDC. Once RS personnel establish an SCRDC account, a service credit statement is prepared and sent to the employee. The service credit statement contains a summary of all applicable information listed in Section 2.1. Additionally, the statement includes amounts due, to include redeposit and deposit amounts, interest and additional interest, and amount paid.

Generally, individuals may also request access to their retirement records by contacting the system manager identified in the OPM Central 1 Civil Service Retirement and Insurance SORN.



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

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

Individuals cannot access SCR D directly to amend inaccurate or erroneous information, but they can contact RS to request corrections to their information account. If corrections are warranted, RS can change service history, OCFO can change payment and personal information. More generally, individuals may request that inaccurate or erroneous information be corrected by contacting the system manager identified in the OPM Central 1 Civil Service Retirement and Insurance SORN. Individuals requesting amendment to their records must also follow OPM's Privacy Act regulations regarding verification of identity and amendment of records (5 CFR part 297).

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

Individuals are notified by OPM or their employing agency regarding the procedures to correct their information, as well as through the applicable SORN and this PIA. Information may be corrected by agency Human Resources (HR) or Payroll offices based upon the agency policy and procedures for correction. The external agency HR or payroll office will outline the procedures to correct information. Individuals can also request that their information be updated after reviewing the monthly billing statements provided to them by the OCFO personnel.

Retiring employees with a partially paid deposit or redeposit amount due; will be granted one last opportunity to pay the entire amount owed to OPM's Retirement Services. At that time, the employee/retiree could challenge any incorrect information.



#### **7.4. Privacy Impact Analysis: Related to Redress**

**Privacy Risk:** There is a risk that individuals may not be able to access their information and amend any erroneous or incomplete information.

**Mitigation:** This risk is mitigated by clear communication from OPM and the employing agency, as well as through instructions in this PIA and the applicable 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?**

SCRD captures transaction and audit records to establish what events occurred, the sources of the events, and the outcomes of the events. The Service Credit Billing and Collection System validates the SCRD data before the transactions are updated to the federal employee's service credit record. Authorized OPM staff investigate suspicious activity or suspected violations, reports findings to appropriate officials, and takes necessary actions.

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

All OPM employees and contractors must take the annual IT Security and Privacy Awareness Training to retain access to OPM IT systems and tools. OPM's OCIO will terminate system access to the OPM network if the training is not taken within the required time. Any OPM employee or contractor 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?**

Potential users must complete OPM's approved application for access. This form must be approved by the employee's supervisor and authorized by a Retirement Service System Support employee. System Support manages the IT requests and permissions for SCR D users in coordination with OCIO. The SCR D administrator assigns the role(s) designated on the authorized form. The roles and responsibilities listed on the form are specific to the SCR D Program Office responsibilities. No external agency or members of the public have access to this system.

**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 SCR D information or new access to SCR D, must be approved by the SCR D System Owner in coordination with the requesting Agency and the appropriate OPM offices.

## **Responsible Officials**

Rosemarie Lawler  
Business Program Manager  
Retirement Services



## Approval Signature

*Signed Copy on file with the Chief Privacy Officer*

Kellie Cosgrove Riley  
Chief Privacy Officer