Privacy Impact Assessment for

Services Online (SOL)

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Abstract

The Office of Personnel Management Retirement Services is responsible for the Government-wide administration of retirement benefits and services for Federal employees, retirees, and their survivors. Retirement Services operates Services Online (SOL), 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 SOL 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 Services Online system (SOL) is used to support the mission of RS. SOL 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 SOL from the Annuity Roll System (ARS) to create an account within SOL. 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 SOL upon their retirement and are able to access this at the Services Online feature on OPM.gov. initially with a temporary password and the assigned retirement claim number.

Through the SOL 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 SOL menu options applicable to their case and can typically see confirmation of any changes they make in SOL within 24 to 48 hours.

At the end of each SOL session, SOL 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 SOL that the individual can view and provide updates to 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 the majority of 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 SOL 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 SOL for processing to ensure the synchronization of information.

SOL has four other components: Student Self-Certification System (SSCS), RS Reporting website, Disability Earnings Survey (DES) and the Retirement and Insurance Services (RIS) Booklets. The SSCS is a secure web-based application (https://www.studentcertification.opm.gov) for student survivors

of deceased annuitants and employees who are between the age of 18 and 22. This component of SOL enables students who receive benefits to self-certify their full-time attendance at a school that is recognized by the State or an accrediting body. The self-certification information is collected and transmitted to ARS during the nightly batch processing cycle.

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 missing payment can be reported by the retiree, survivor, or by a relative, friend, or representative. 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 Report 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 these three reports is collected and sent to RS personnel for analysis and review. After their review, the information is entered into ARS for the appropriate action.

The Disability Earnings Survey (DES) 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. The DES is an affirmative response survey; the annuitant needs to respond only if he or she worked or was self-employed and had earned income. Annually, annuitants are sent an RI 30-2 form with a return envelope for the Human Resources Services Information Technology Program Management Office (HRS IT PMO) location in Macon, Ga. Currently the data for the returned survey is scanned, compiled, and made available for the DES viewer. This data is also used to update the

Disability Earned Income Certification System within ARS. The DES viewer is for use by the Retirement Survey and Students Branch.

Annuitants can also submit their responses to the annual survey on SOL. During the annual survey period, the annuitants eligible for the survey will have a menu option enabled, allowing them to take the survey. As with the paper survey, the online survey collects annual earned income, federal work status and agency information, if applicable. This information is captured, compiled and will be made available for the DES viewer and will ultimately be used to update the Disability Earned Income Certification System within ARS.

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.

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 use 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 SOL 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?

A System Security Plan was completed as part of the Authority to Operate granted to Services Online on July 16, 2019.

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 SOL 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 Student Certification the following form is used RI 25-14 (Self-Certification of Full-Time School Attendance for the School Year), OMB 3206-0032.

For the DES Viewer and DES menu option on SOL, 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.

SOL 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, and financial information. The financial information includes Federal and state income tax withholdings information, form 1099-R information, mailing addresses, checking or savings allotments information, and direct deposit information. If there is a survivor payable, SOL collects the survivor first name and middle initial. In addition, the SSCS component of SOL collects, disseminates and maintains the following information: first and last name, date of birth, SSN, date of marriage, claim number, beginning and ending dates of full-time enrollment, end of school year date, whether the student is returning to school and the estimated return date, date of last full time attendance, school name, address, phone number, confirmation of school accreditation, date of next certification period for school attendance, school type, high school attendance hours, college attendance hours, school hours/credits, and whether the individual is a Co-Op or Intern Participant.

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. Also captured is information about the person reporting the missing payment, including 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 and email address. 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, work, home phone numbers, 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, and child 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, and agency contact phone number, contact fax number and certifying official name.

The Disability Earnings Survey (DES) collects the following information, the annuitant's full name, claim number, phone number, mailing address, and 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 and 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, and survivor(s) information.

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

SOL 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 SOL users for updates via the SOL website. Changes to an individual's information are obtained directly from the individual in SOL and then reconciled in ARS.

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

SSCS obtains information from students based on the semester time frames set by their higher learning institution. These transactions are updated to ARS and then to the Student Certification System for a call up for the beginning of the next semester.

The information in the RS Reporting component of SOL 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. RS personnel retrieve the report and validate the information collected before taking action.

The information for the DES Viewer is collected from the user via the DES menu option and from the scanned copies of the RI 30-2. The Retirement Eligibility Services group uses the DES Viewer to disseminate the survey responses from the DES Viewer and the online survey. This information is then sent to ARS for processing into the Disability Earned Income Certification System within ARS.

The information for the RIS Booklet is collected from ARS when the SOL 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 SOL.

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

SOL, 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 SOL is reviewed by RS personnel and verified against information in paper-based records. The changes that an individual enters in SOL 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' SOL transactions are validated within ARS before the transactions are updated to the SOL 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 theappropriate 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.

SSCS entries are validated for accuracy as the user is entering the data.

The scanned copies of the DES Viewer are validated by input interface that scans the RI 30-2, and then again by the Retirement Survey and Students Branch. The online DES 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 it is necessary for the business purpose of SOL 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 SOL 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 user not to include more information than is necessary.

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

Mitigation: This risk is mitigated by the procedures SOL, including its components, has in place to validate the changes made by individual through the use of field restrictions that permit applicants to enter data only within certain parameters, and through the use of user confirmation. Users are also given the ability to view and access the information and can correct it when necessary and RS employees verify all information collected via the RS Reporting website before any action is taken.

Section 3.0. Uses of the Information

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

SOL provides CSRS/FERS retirees and survivor annuitants the ability to view and access their monthly annuity payment information online. Through direct access to the SOL website, individuals can make requests and update certain information in their records. Once changes are made by individuals in SOL, the SOL 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 SOL 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 Student Self-Certification System (SSCS) is a website for student survivors of deceased annuitants and employees between the age of 18 and 22. The functionality for self-certification of full-time school attendance is provided through this service delivery system for students who receive benefits to certify their full-time attendance at a school that is recognized by the State or an accrediting body instead of completing the form, "Self-Certification of Full-Time School attendance for the School Year", RI 25-14.

The DES viewer uses the scanned copies of the RI 30-2 and the online submissions to provide information for the Retirement Surveys and Students 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 SOL 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 Office (OCIO) also have access to the system. OCIO provides the following system development

functionality for SOL: 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 a unique identifier and complex password and to establish security questions and a valid email address in order to reset their password. This risk is further mitigated through OPM employees and contractors being subject to role-based 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.

SSCS users are required to have a unique identifier, their claim number, and a password in order to access the system.

The RS Reporting website does not require authentication credentials; however, all information collected, transmitted and retrieved is handled by RS personnel with role-based access to the system and those providing reports via this component do not have access to information in the system. 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 DES 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 DES 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 SOL and notes that they will separately receive an initial password to access the system. Once they receive that password, retirees are able to log in to SOL, are prompted to create a new strong password known only to them, establish personal security questions and are able to access their records in SOL. They also are provided notice at that time about the operation of SOL through the Terms and Conditions and Privacy Act Statement.

In addition to the specific notices that individuals receive regarding SOL, 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 SOL. This PIA and the SORN referenced in Section1.2 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.

Students eligible for benefits are notified by OPM at age 18. They receive information on how to log into SSCS.

For the DES, 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?

SOL use is voluntary. If individuals opt not to use SOL, 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 SOL or its components. Students have to contact the Retirement Eligibility Services to make changes to their student account information. Customer Service Representatives can make changes to the student address, phone number and email address, not student specific information.

For the DES survey annuitants can opt not to use SOL 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 SOL 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 SOL 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 SOL 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.

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

Additionally, once each month ARS completely repopulates the information in SOL. Since SOL 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 SOL 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.

SOL does not share information directly with any external entities. SOL is populated with information from ARS and any updates that an individual makes in SOL are then sent back to ARS. When information that is contained in SOL 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 the SSCS, RS Reporting website, DES Viewer, and RIS Booklet are not shared outside of OPM. As with the SOL application, all of this information is eventually transmitted or entered into ARS to update the individual's account record.

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

SOL does not share information directly with any external entities. When information in SOL 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.

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

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

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

SOL 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 SOL logs of dissemination outside of

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

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 SOL in the course of their official business only and by permitting the retirees and survivor annuitants to access only their own information via the SOL 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 SOL and notes that they will separately receive an initial password to access the system. Once they receive that password, retirees are able to log in to SOL, are prompted to create a new strong password known only to them, and are able to access their records in SOL. They also are provided notice at that time about the operation of SOL through the Terms of Service and Privacy Act Statement. Within SOL, individuals are able to view their annuity information, form 1099R, and their payment history.

Students using SSCS can update their records as often as needed regarding the certification of their student status for a particular period in question. In order to change personal information such as SSN, date of birth, and their mailing address they must contact Retirement Services directly. The RS contact information is available on the SSCS website.

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 to send an email regarding their submission.

For the DES Viewer, the user is able to change their information either by submitting a new paper form, or by contacting the Retirement Surveys and Students 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 SOL, 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, passwords, allotments, direct deposit payment options, opt-in to receive information and to be able to print out associated notices, cards or statements. If they require correction to information that they cannot correct through SOL, they are provided with a phone number for the Retirement Information Office as well as an email address.

Students using SSCS can change information pertaining to the self-certification of their full-time attendance by contacting the Retirement Surveys and Students Branch, either by email or toll-free by phone. This information is available on the SSCS web site.

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 SOL home page to send an email to our Retirement Information Office for further information.

For the DES Viewer, the user can change their information either by submitting a new paper form, or by contacting the Retirement Surveys and Students 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; 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.

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

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

Individuals are also notified about the availability of SOL 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 DES 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 SOL home page and on the OPM website at www.opm.gov/retirement-services/my-annuity-and-benefits/. Information on SSCS can be found at www.opm.gov/retirement-services/my-annuity-and-benefits/life-events/ on the Death/Survivors tab. 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 send inquiries via email to retire@opm.gov.

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 SOL or to correct that information as needed.

Mitigation: This risk is mitigated by providing individuals with information about accessing their information via the SOL 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 SOL website by selecting the "Need Help" link at the top of the SOL 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.

SOL'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. SOL's system administrators also maintain system access for SSCS, the DES 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. SOL transactions are validated by programs within ARS before the transactions are updated to the SOL 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 SSCS and the DES Viewer is limited to OPM employees and contractors who have a need to access the system in the course of their official duties. Individuals who have access to SSCS must authenticate to the system using credentials. 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 SOL, SSCS and DES Viewer web site users have unique identification credentials that grant full access only to their respective account information. SOL, SSCS and DES 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 SOL 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 SOL.

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 information in SOL is not shared with external organizations as part of OPM RS operations and no new uses of the information are anticipated.

However, any new uses, MOUs or ISAs regarding the program would be approved by the SOL System Owner and other appropriate OPM officials.

Responsible Officials

Rosemarie Lawler
Business Program Manager
Retirement Services

Approval Signature

Singed Copy on file with the Chief Privacy Officer

Kellie Cosgrove Riley
Chief Privacy Officer