Privacy Impact Assessment for

Retire Portal

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Abstract

Office of Personnel Management (OPM) Retirement Services (RS) uses the Retire Portal to process Federal retirement applications. It has three parts: the Online Retirement Application (ORA), the Digital File System (DFS), and the Representative Payee Hub (RPH).

ORA lets current and former Federal employees, eagency Human Resources (HR) offices, and payroll providers complete and certify retirement applications. DFS keeps each application and its supporting documents in one searchable electronic case file for RS staff. RPH helps RS staff manage representative payees, who are people or organizations that receive and manage annuity payments for annuitants who can't manage their own money.

This Privacy Impact Assessment (PIA) is being conducted because the Retire Portal collects personally identifiable information (PII) about Federal employees, retirees, their families, and their representatives.

Overview

Retire Portal is an OPM-managed, FedRAMP-authorized Microsoft Azure Commercial cloud (Platform-as-a-Service and Software-as-a-Service). Applicants, agency HR offices, and payroll providers enter and certify retirement information in ORA, which also pulls data from other OPM systems. ORA sends the completed application to DFS, where RS staff add information from other OPM systems, review it, and decide the case. These steps support benefits under the Civil Service Retirement System (CSRS) and the Federal Employees Retirement System (FERS). RPH is separate and RS staff key in paper representative payee applications (Form RI 20-7) and decide whether to approve each payee.

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 authorities related to this system include:

- 5 U.S.C. § 3301 and 5 U.S.C. Chapters 83, 84, 87, 89, 89A, 89B, and 90. CSRS is administered under Chapter 83 and FERS under Chapter 84.
- Public Laws 86-724 and 94-455.
- 5 CFR Parts 831, 835, 838, 839, 841, 842, 843, 844, 845, 846, 847, 848, 849, 870, 875, 880, 890, 891, and 894. Part 850 further defines OPM's authority to collect and use PII.
- Executive Order 9397, as amended by 13478, which permits the collection of Social Security Numbers (SSNs) to carry out their missions.

Representative payees (RPH)

- CSRS: 5 U.S.C. § 8345(e) authorizes OPM to pay an annuity for a minor or a person with a legal disability to a guardian, another fiduciary, or a person OPM selects.
- FERS: 5 U.S.C. § 8466(c) gives parallel authority.
- 5 CFR Part 849 covers how OPM selects payees, the information it considers, and payee accountability.
- Representative Payee Fraud Prevention Act of 2019.

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

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?

Yes.

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

Yes. NARA schedules DAA-0478-2017-0001-0001 and -0002 apply.

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.

See Appendix A.

Section 2.0. Characterization of the Information

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

ORA and DFS:

- Full name, date of birth, date of death, SSN, and claim number
- Address, email address, and telephone number
- Marital status
- Financial and banking information
- Health and life insurance benefits
- Service credit deposits and employee service history
- Retiring agency information
- Retirement plan (CSRS or FERS) and retirement contributions
- Military service and military deposits
- Medical records (for disability retirement applications)
- If a survivor annuity is elected or there are survivors (for example, a current or former spouse), the survivor's or former spouse's full name, date of birth, SSN, address, and the place and date of marriage and divorce (if applicable).

RPH (about the Annuitant)

- Claim number (CSA/CSF), full SSN, name, and physical address
- Living situation, including who else lives in the residence
- Why the annuitant can’t manage their benefits, and whether a state court found them incompetent

RPH (about the payee applicant)

- Name, SSN (individuals) or Employer Identification Number (organizations), date of birth, other names used, address, and relationship to the annuitant
- Phone number and email address

- Caregiving and expense responsibilities, commuting distance, and prior payee experience or dismissals
- How the payments will be used and saved for the annuitant
- Employment and main source of income
- Felony convictions and unsatisfied arrest warrants (from a background check required by the Representative Payee Fraud Prevention Act of 2019).

RPH (supporting documents and financial information)

- Certified court order (guardian or conservator) or, if none, medical documentation and two sworn affidavits
- Photo ID for individual applicants
- Direct deposit details: account type, account number, routing number, and a voided check Payee accountability reports, change-of-address notices, and notices of death or recovery

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

ORA: The applicant, their agency's HR office, and their agency's payroll office enter the information. ORA also imports data from OPM systems, including the Electronic Official Personnel Folder (eOPF) and Enterprise Human Resources Integration (EHRI), when current data is available. During the application, ORA sends service history information to JANUS, which returns an annuity estimate to the applicant.

DFS: Receives the completed application from ORA and adds information from ARS, EHRI Data Warehouse (EHRI DW), eOPF, and benefit calculations from Janus. The PIAs for those systems describe their collection practices (www.opm.gov/privacy).

RPH: Applicants mail a paper Form RI 20-7. RS staff key the information into RPH.

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

is used.

No.

2.4. Discuss how accuracy of the data is ensured.

ORA and DFS: The applicant completes the application and an agency HR specialist checks it for completeness. The applicant, the HR specialist, and the payroll provider then certify it before it goes to OPM. In DFS, Customer Service Specialists (CSSs) and Legal Administrative Specialists (LASs) check the package for completeness and compare data across systems (EHRI, ARS, Janus). If they find differences, RS staff contact the agency or individual for correct information. Section 7 explains how individuals can correct errors found later.

RPH: The Quality Assurance team checks applications information against ARS. The Fraud team investigates every application before the Customer Inquiries (CI) team approves or denies it based on the Fraud team's recommendation.

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

Privacy Risk: The Retire Portal could collect more information than necessary, or too little, to process a retirement application.

Mitigation: The Retire Portal collects the same information as the paper application, which OPM has determined is relevant to the retirement decision.

Privacy Risk: OPM may not identify an applicant correctly, or the information could be inaccurate.

Mitigation: The system collects enough identifying data to tell applicants apart. The applicant, the agency HR and payroll offices certify it, and CSSs and LASs review it across systems before OPM decides the case.

Privacy Risk: Someone without authority could submit a representative payee application, for example for a deceased annuitant.

Mitigation: The Fraud team investigates every application. It also takes reports through its hotline and re-reviews cases flagged by the payee survey.

Section 3.0. Uses of the Information

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

ORA and DFS: OPM uses the information to confirm the applicant's identity and federal employment history and to decide eligibility for retirement benefits. ORA passes the application to DFS to process those benefits. The SSN and email address identify applicants across OPM systems that don't share a unique identifier. Pulling data from other OPM systems reduces repeat data entry.

RPH: OPM uses the information to approve or deny representative payee applications for annuitants who cannot manage their money.

3.2. Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how OPM plans to use such results.

No.

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

ORA: OPM RS staff; OCIO staff; agency HR specialists; payroll service providers; and applicants. A few agency and payroll provider staff also manage access for others in their organization.

DFS: OPM CSSs, LASs, medical specialists, their managers, and OCIO support staff. Retirees and survivors have no direct access.

RPH: OPM RS teams: Customer Inquiries (CI), Survivor Processing (SPS), Boyers Disability Section (BDS), the Fraud Branch, and Retirement Policy staff. Roles include CSS, LAS, medical specialist, program manager, management and program analyst, and user management.

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

Privacy Risk: Authorized users could use information for unauthorized purposes, or unauthorized users could gain access.

Mitigation: Access is limited to users with a documented need to know,

based on their role. Audit logs record system activity, and anomalies are flagged.

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.

ORA shows applicants a Privacy Act Statement (PAS) before they enter information. It explains why OPM collects the information, how it is used, and how it may be shared. OPM also gives notice through this PIA and the OPM/Central-1 SORN.

Annuitants, spouses, and survivors whose information an applicant provides get no direct notice, because OPM collects it from the applicant. They are covered by this PIA and the OPM/Central-1 SORN.

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

Applicants consent to the use of their information before logging in to ORA by acknowledging the consent statement. They can read the PAS before logging in, providing information, or certifying their application. Providing information is voluntary, but without it OPM may be delayed in processing or unable to process the application. Applicants who are unable to use ORA due to extenuating circumstances, such as illness or hospitalization, may apply using the paper forms listed in Appendix A.

RPH: Payees cannot opt out. OPM removes payees from the system if they do not provide the requested information.

4.3. Privacy Impact Analysis: Related to Notice

Privacy Risk: An applicant may not know how OPM uses their information or that the system holds it.

Mitigation: The PAS, this PIA, and OPM/Central-1 SORN explain the collection and use.

Section 5.0. Data Retention by the Project

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

OPM keeps retirement case files until all eligible heirs are paid, and until 115 years after the employee's birth or 30 years after the employee's death, whichever is sooner (5 U.S.C. § 8345(i)) (DAA-0478-2017-0001-0001). Under DAA-0478-2017-0001-0002, high-profile retirement case files are transferred to the National Archives in 10-year blocks, 30 years after cutoff. RPH records follow the same schedule.

5.2. Privacy Impact Analysis: Related to Retention

Privacy Risk: OPM could keep the information longer than necessary.

Mitigation: Trained staff follow the NARA schedule, which sets retention by record type.

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.

Yes. The agency HR and payroll offices tied to an application can see the relevant information in ORA. They use it to submit or change applications. After RS certifies the applicant as retired, the former agency has read-only access.

RPH: OPM may give information to the Department of Justice (DOJ) depending on the outcome of a fraud investigation and may refer cases to DOJ for litigation. A due process period is offered during which the annuitant can contest the approval and denial of the application, through the Merit Systems Protection Board (MSPB).

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

The sharing fits the purpose of the collection and is permitted by routine uses of OPM/Central-1. RPH is covered by the same SORN.

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

OPM's Memoranda of Understanding (MOUs) with payroll providers apply to the agencies they serve and cover any limitations that

apply.

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

Audit logs record who accesses data in the Retire Portal. RS also keeps written justification and approval for access or data removal outside the logs. OPM uses these records to account for disclosures from OPM/Central-1. OPM tracks RPH disclosures to DOJ and MSPB internally.

6.5. Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: Information could be shared outside OPM inappropriately or for a purpose that is not consistent with the purpose for which it was collected.

Mitigation: Access is limited to individuals with a demonstrated need to know. MOUs with payroll providers govern ORA sharing, and the Privacy Act limits disclosures from OPM/Central-1 to its routine uses and statutory exceptions.

Section 7.0. Redress

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

ORA: Applicants sign in to ORA to fill out, review, and submit their application. Their HR office or RS staff give instructions before access.

DFS: Retirees do not have direct access. They get personalized retirement documents by mail when recurring payments start or change and can view their information in Retirement Services Online (https://www.servicesonline.opm.gov).

Privacy Act requests: Individuals may request their records from Retirement Services, Office of Personnel Management, 1900 E Street, N.W., Washington, D.C. 20415-0001. Include your full name (with any former names), date of birth, SSN, the name and address of your current or former Federal employing office, and your annuity, service credit, or voluntary contributions account number (if assigned). Requests must follow 5 CFR Part 297.

RPH: Payees can't access RPH directly. They may call or write to OPM for a copy of their application and receive personalized documents by mail when recurring

payments start or change.

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

Applicants can update their application in ORA before final submission. After submission, they can contact RS directly, which may ask for documents to verify identity and the change. Annuitants can also use Retirement Services Online or the Retirement Services Support Center (https://www.opm.gov/support/retirement/contact).

If the record came from another agency, the individual must contact that agency. Agency HR or payroll offices can send corrections via SF 2806-1 (CSRS) or SF 3101 (FERS) to: Office of Personnel Management, Retirement Operations Center, P.O. Box 45, Boyers, PA 16017-0045.

Individuals may also file a Privacy Act amendment request using the address and information in Section 7.1 and 5 CFR part 297.

RPH: To correct information on an application, the payee submits a new, complete application which follows the new application process. Payees can change their address, phone, or email by contacting Retirement Information Office (RIO). An annuitant can contest approval or denial of a payee application through the Merit Systems Protection Board (MSPB).

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

Applicants learn how to correct records from their HR office, OPM RS staff, the Retire Portal website, this PIA, and the OPM/Central-1 SORN.

For RPH, Form RI 20-7 and the representative payee survey explain the process.

7.4. Privacy Impact Analysis: Related to Redress

Privacy Risk: Applicants may not understand how to access, correct, or amend their records.

Mitigation: Guidance is built into the portal. Individuals can also contact RS, Retirement Services Online, or the Support Center. Payees can call RIO, which refers questions it can’t resolve to Survivor Processing.

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?

Role-based access limits users to what they need to know for their official duties. Separation of duties prevents unauthorized disclosure or change. The system enforces these controls automatically, and OPM security officers oversee them. OPM updates this PIA when system changes affect privacy.

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

All OPM employees and contractors take annual IT Security and Privacy Awareness Training. Other Retire Portal users take their agency's training, and their supervisor and Agency Benefits Officer certify it. Users whose agency has no such training can take OPM's.

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

Access is approved by role, limited to people with an official need, and protected by multifactor authentication.

- OPM RS Account Administrators and Users: approved through the OPM Form 1665 process. OCIO/RED ORA Account Administration creates accounts.
- Agency HR and payroll specialists: Each agency is assigned an account administrator, who reviews and approves access requests and creates accounts based on the user's role within HR or payroll. Administrators manage access only for users within their own agency. Applicants: the applicant's Agency HR Specialist approves and creates the account.
- Login.gov identity verification is used for applicants who come directly to ORA to complete an application, such as individuals who have already separated from their agency. Login.gov verifies the applicant's identity, and only after successful verification is the applicant permitted to access their application.

- DFS users (CSSs, LASs, medical specialists, and OCIO support staff): RS managers submit an access request to the DFS team that includes the user's name and the specific role required to perform their job functions. RS account administrators review and approve the request and create the account with access limited to that role.
- RPH users: access is limited to internal OPM RS staff in the business process, who sign in using a PIV card.

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?

RS program managers evaluate new agreements, uses, and access requests with the OPM Office of General Counsel, Office of the Chief Information Officer, and the Senior Agency Official for Privacy, as appropriate.

Responsible Officials

Kimya Lee
Deputy Associate Director
Retirement Services

Approval Signature

Becky Ronayne
Senior Agency Official for Privacy

Appendix A

Form	Title	OMB Control Number (if provided)
SF 2801	Application for Immediate Retirement (CSRS)	
SF 2801-1	Certified Summary of Federal Service (CSRS)	
SF 2801-2	Spouse's Consent to Survivor Election (CSRS)	
SF 2802	Application for Refund of Retirement Deductions	3206-0128
SF 2802A	Current/Former Spouse's Notification of Application for Refund of Retirement Deductions Under the Civil Service Retirement System*	
SF 2809	Employee Health Benefits Election Form	3206-0160
SF 2810	Notice of Change in Health Benefits Enrollment	
SF 176, SF 176T, SF 2817	Life Insurance Election	3206-0230
SF 2818	Continuation of Life Insurance Coverage as an Annuitant or Compensationer	
SF 2821	Agency Certification of Insurance Status	
SF 54 & SF 2823	Life Insurance Designation of Beneficiary	3206-0136
SF 3102	FERS Designation of Beneficiary	3206-0173
SF 3103	Register of Separations and Transfers	
SF 3106	Application for Refund of Retirement Deductions	3206-0170
SF 3106A	Current/Former Spouse's Notification of Application for Refund of Retirement Deductions Under the Federal Employees Retirement System	
SF 3107	Application for Immediate Retirement (FERS)	
SF 3107-1	Certified Summary of Federal Service (FERS)	

SF 3107-2	Spouse's Consent to Survivor Election (FERS)	
SF 3112	Documentation in Support of Disability Retirement	3206-0228
OPM Form 1496A	Application for Deferred Retirement (CSRS)	3206-0121
RI 92-19	Application for Deferred/Postponed Retirement (FERS)	
OPM Form 1510	Cert of Agency Offer of Position and Required Doc.	
OPM Form 1515	Military Service Deposit Election	
RI 76-10	Assignment FEGLI Program	
RI-20-124	LEO CERT	
DD 214	Certificate of Release or Discharge from Active Duty	
W-4	Employee's Withholding Allowance Certificate	1545-0074
RI 20-7	Representative Payee Application	3206-0140
RI 38-115	Representative Payee Survey	3206-0208