

Office of Retirement Systems Modernization Paper Data Capture and Conversion Services (PDCCS)

Privacy Impact Assessment

1. IT System of Electronic Information Collection Identification

a. Who is completing the initial screening assessment?

Project Manager,
Office of Retirement Systems Modernization/HRPSD.

b. Who is the IT system or electronic information collection owner?

Program Executive,
Office of Retirement Systems Modernization/HRPSD.

c. What is the IT system or electronic information collection name?

Paper Data Capture and Conversion Services (PDCCS).

d. Does the activity represent a new or significantly modified IT system or information collection?

Yes.

e. Is this an IT system or project or an electronic information collection?

IT System or Project.

f. What is the Unique Project Identifier (UPI)?

027-00-01-02-01-1010-00-403-130.

g. Will this IT system or electronic information collection use web technology?

Yes.

h. What is the purpose of the IT system or electronic information collection and why is the information being collected?

The IT system's purpose is to convert the format of the current paper records to an electronic picture format and allow the OPM workers to pull the records via a secure Web interface in support of the same processes currently used with retrieval of the current paper records by hand. Record retrieval, handling, and storage are made more cost effective and efficient by this system. Paper Data Capture and Convergence Services System is collocated with the paper records within OPM Retirement Operations Center.

i. What is the IT system or electronic information collection status?

Operational.

j. Is the IT system or electronic information collection operated by OPM staff, contractor staff, or a combination of OPM and contractor staff?

Combination of OPM staff and contractor staff.
Integic/Anacomp.

k. Where is the IT system or electronic information collection physically located?

Pennsylvania.

2. Initial Screening Assessment

- a. Is an OMB mandated PIA required for this IT system or electronic information collection?**

No.

- b. Does the system or electronic information collection contain or collect any Personally Identifiable Information (PII)?**

Yes.

- c. Is this an IT system that collects PII on members of the public?**

Yes.

- d. Is this an electronic information collection that collects PII on members of the public?**

Yes.

- e. Is this an electronic information collection that collects PII on Federal employees?**

Yes.

3. The PIA

3.1. Nature and Source of Information to Be Collected

- a. What is the nature of the information to be collected?**

The information being collected pertains to service and salary information on Federal employees that is generally used to

calculate and pay retirement benefits. It would be classified as payroll and human resource data.

b. What is the source of the information?

Directly from the person to whom the information pertains;
From other people.

3.2. Reason for Collection of Information

a. Why is the information being collected?

The information is being collected to support OPM's Retirement System Modernization Project and will be used to calculate retirement related benefits for Federal employees former employees and survivors of deceased employees and retirees.

b. Is there legal authority for collecting the information?

Yes.
5 USC chapters 83, 84, 87, 89.

3.3. Intended Use of the Collected Information

a. What is the intended use of the information?

Calculate and pay retirement related benefits.

b. For major IT investments as defined in OMB Circular A-11, a high-level data flow diagram must be prepared?

Yes.

3.4. Purpose and Identification of Information to Be Shared

- a. Does the system share Personally Identifiable Information (PII) in any form?**

Yes.

Within OPM.

CRIS shared online image in a similar fashion as they use paper records from Boyers today.

- b. Who will have access to the PII on the system?**

Users, Administrators, and Contractors.

- c. Is information part of a computer matching program?**

No.

3.5. Opportunities Individuals Have to Decline to Provide Information or to Consent to Particular Uses of the Information

- a. Is providing information voluntary?**

No.

- b. Are individuals informed about required or authorized uses of the information?**

No.

- c. Will other uses be made of the information than those required or authorized?**

No.

3.6. Security of Information

a. Has the system been authorized to process information?

Yes.

b. Is an annual review of the IT system or electronic information collection conducted as required by the Federal Information Security Management Act (FISMA)?

Yes.

c. Are security controls annually tested as required by FISMA?

Yes.

d. Are contingency plans tested annually as required by FISMA?

Yes.

e. Have personnel using the system been trained and made aware of their responsibilities for protecting the PII being collected and maintained?

Yes.

f. Are rules of behavior in place for individuals who have access to the PII on the system?

Yes.

General users, System/database, administrators, developers, etc.

3.7. System of Records as Required by the Privacy Act, 5 U.S.C. 552a

- a. Are records on the system routinely retrieved by a personal identifier?**

Yes.
The Privacy Act applies.

- b. Has a Privacy Act System of Records Notice (SORN) been published in the Federal Register?**

Yes.
OPM Central – 1.

- c. Does the SORN address all of the required categories of information about the system?**

Yes.
System name; System location; Categories of records; Purpose; Disclosure to consumer reporting agencies; Contesting record procedure; Notification procedure; System exempted from certain provisions of the Act; System classification; Categories of individuals covered by the system; Authority of maintenance; Routine uses of records maintained; System Manager and contact information; Record access procedure; Record source categories; Policies and practices for storing, retrieving, accessing, retaining, and disposing of records.

- d. Has any of the information in the SORN changed since the information was published?**

No.

- e. **Are processes in place for periodic review of Personally Identifiable Information contained in the system to ensure that it is timely, accurate, and relevant?**

No.

A new records retention schedule is being revised.

4. Certification

A PIA is required and the OPM Chief Privacy Officer signed the PIA on September 5, 2007.