

The Defined Benefit Technology Solution (DBTS)

Privacy Impact Assessment

1. IT System or Electronic Information Collection Identification

a. Who is completing the initial screening assessment?

Program Security Officer,
Office of Retirement Systems Modernization/HRPS.

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

Program Executive,
Office of Retirement Systems Modernization/HRPS.

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

The Defined Benefit Technology Solution.

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 will process retirement benefits for all Federal employees managed by the Office of Personnel and Management.

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

Development.

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.
Hewitt Associates.

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

Illinois.

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?

Defined Benefits information for Federal Government employees. In addition to collecting data on Federal employees, the system will collect and store pension-related beneficiary information. The system will also collect spouse, beneficiary, and dependent data for retirees.

b. What is the source of the information?

Directly from the person to whom the information pertains;

Other sources such as databases, web sites, etc.

3.2. Reason for Collection of Information

a. Why is the information being collected?

Information must be collected to support retirement activities for current and former Federal Government employees.

b. Is there legal authority for collecting the information?

Yes.

The legal citation for the retirement program are Title 5 USC 83, 84, 87 and 89. The regulatory citations are 5 CFR 83, 84, 87, and 89.

3.3. Intended Use of the Collected Information

a. What is the intended use of the information?

Information will be used to process retirement activities for current and former Federal government employees.

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.

With other Federal agencies.

Department of Defense/Defense Manpower Data Center,
Centers for Medicare and Medicaid Services,
Department of Labor/Office of Workers' Compensation
Programs,
Railroad Retirement Board,
Social Security Administration,
Veterans Administration,
U.S. Postal Service,
Department of Health and Human Services,
U.S. Department of Housing and Urban Development,
Internal Revenue Service,
e-OPF,
EHRI.

With state and local governments

For tax purposes.

With members of the public

Retirees and Plan beneficiaries have access to the DBTS
system.

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

Users, Administrators, Contractors, and Public.

c. Is information part of a computer matching program?

Yes.

**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?**

Yes.

Privacy Act Statement.

- 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?**

No.

The Defined Benefits Technology solution is currently going through a certification and accreditation process. This process will be used to obtain authorization.

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

No.

The system is in the development phase. Once the system is live, a continuous monitoring program will be in place and a formal certification and accreditation process will be conducted once every 3 years or if there are any significant modifications to the DBTS. Annual testing will be performed on a subset of controls.

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

No.

The system is in the development phase. Once the system is live, a continuous monitoring program will be in place and a formal certification and accreditation process will be conducted once every 3 years or if there are any significant modifications to the DBTS. Annual testing will be performed on a subset of controls.

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

No.

The system is in the development phase. Once the system is live, a continuous monitoring program will be in place and a formal certification and accreditation process will be conducted once every 3 years or if there are any significant modifications to the DBTS. Annual testing will be done on a subset of controls.

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.

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.