



PRIVACY IMPACT ASSESSMENT

SYSTEM OR APPLICATION NAME: Railroad Retirement Board's Customer PIN\Password (PPW) Master File System

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Overview

The Personal Identification Number (PIN)\Password system provides current and former covered railroad employees with the ability to obtain a Password Request Code (PRC) and subsequently establish an individual PIN\Password account to conduct official business with the U.S. Railroad Retirement Board (RRB) on the Internet.

To receive a PRC, the railroad employee must provide their name, social security number, date of birth and mailing address. After entering the required data in the PIN\Password (PPW) web form on the agency website rrb.gov, the PPW system validates the information received against existing RRB electronic records to authenticate the identity of the employee. Once the information has been validated, the system randomly assigns a PRC. The PRC is mailed to the last known address on record via RRB Form Letter GL-60, *Important Information About Your RRB Internet Services Account*, and is the key to establish a PIN and password on rrb.gov. Once the PIN\Password is established, the user has access to RRB Internet applications.

Section 1.0 – The Nature of the Information in the PIN\Password System and Its Source

Personally identifiable information (PII) including name, social security number, date of birth and address is collected by the RRB from current and former railroad employees who wish to use RRB benefit applications on rrb.gov. The RRB has the authority to collect this information is Section 7(b)(6) of the Railroad Retirement Act.

Section 2.0 -- The Uses of the Information

The information collected by PPW web forms on rrb.gov is used solely for validation against RRB records to verify the identity of the employee and produce the credentials needed to access on-line benefit applications.

RRB does not manipulate or analyze the PPW information for any other purpose, nor does it use any commercial or other publicly available information in conjunction with the PPW process.

Section 3.0 – Retention of Information

The information collected in the PIN\Password web form is saved in the PIN\Password database. A log of transactions is also saved on a secure RRB network area. Both the database and the network area have secure, restricted access to prevent unauthorized exposure or alteration, and are backed up regularly to preserve the information.

The records are being retained permanently until their official retention period is established. The retention schedule has not been submitted to the National Archives and Records Administration (NARA) yet; however, it is expected to be submitted in the near future.

Section 4.0 -- Internal Sharing and Disclosure of Information

Within the RRB, access to PPW information is restricted to authorized RRB staff that need it to perform their official duties. The RRB has established security and privacy awareness training and standard rules

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of behavior to help mitigate improper disclosure.

Section 5.0 -- External Sharing and Disclosure of Information

PPW collected information may be disclosed to any person for whom the employee has provided written authorization. Also, disclosure may be made for the routine uses described in Privacy Act System of Records [RRB-51](#), *RRB Customer PIN\Password (PPW) Master File System*. Information may be disclosed in any form that ensures secure delivery, provided the release of information is authorized.

Section 6.0 – Notice

A Privacy Act Notice and a Paperwork Reduction Act Notice regarding collection of information in the PPW system are provided within the application on the [rrb.gov](#) web site, as well as in [RRB-51](#) which is published in the Federal Register. These notices describe the scope of information collected, the opportunity to consent to uses of the information, and the right to decline to provide information.

Although the employees have the right to decline providing information requested by the PPW system, the RRB cannot create a PIN\Password account without it.

Section 7.0 -- Individual Access and Redress

An employee has the ability to review and correct information about themselves in records contained in the PIN\Password system, as provided under the Privacy Act and described in the system notice for [RRB-51](#) available on [rrb.gov](#).

Employees who wish to review or correct the records about themselves in the PPW, should submit a request in writing to the Systems Manager identified in [RRB-51](#), including their full name and social security number. Before information about any record will be released, the System Manager may require the employee to provide proof of identity.

Section 8.0 -- Technical Access and Security

The information in the system is secured in accordance with Federal Information Security Management Act (FISMA) requirements, and was certified and accredited in September 2008.

PPW system access is restricted to the RRB system administrators and programmers who have a specific role in operating or supporting the system. Audit trails are created for each transaction entered that identifies the person who initiated the transaction. The transactions cannot be altered. Role-specific training and rules of behavior are established to prohibit misuse of data.

Section 9.0 – Technologies Used by the PIN\Password System

The PPW system was built for the Internet with the validation of the employee's identity and security of

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the PRC carefully considered. Receiving the PRC is the most crucial step in the PPW process. The PRC letter is mailed to the address that we have verified on our records as an extra step in getting it to the correct user.

The priority of the PPW application is security. All PII received through secure (HTTPS) web browser with end to end encryption. No PII is transmitted back to the user.

Data is encrypted via secure VPN from RRB.GOV to the internal network boundary. Query to the EDM database is an automated process (server to server) and to a read only record. Network activity is monitored by security staff, devices and applications. Screen messages to the user do not contain any personally identifiable information (PII).

Conclusion

The Personal Identification Number (PIN)/Password system provides railroad employees with a secure and private method to request a Password Request code (PRC) and subsequently establish an individual PIN\Password account which is the initial step to conducting transactions with the RRB through the Internet.

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