



U.S. Department of the Interior

PRIVACY IMPACT ASSESSMENT

Introduction

The Department of the Interior requires PIAs to be conducted and maintained on all IT systems whether already in existence, in development or undergoing modification in order to adequately evaluate privacy risks, ensure the protection of privacy information, and consider privacy implications throughout the information system development life cycle. This PIA form may not be modified and must be completed electronically; hand-written submissions will not be accepted. See the [DOI PIA Guide](#) for additional guidance on conducting a PIA or meeting the requirements of the E-Government Act of 2002. See Section 6.0 of the DOI PIA Guide for specific guidance on answering the questions in this form.

NOTE: See Section 7.0 of the DOI PIA Guide for guidance on using the DOI Adapted PIA template to assess third-party websites or applications.

Name of Project: Government Retirement Benefits (GRB)

Bureau/Office: Office of the Secretary

Date: September 30, 2021

Point of Contact

Name: Danna Mingo

Title: DOI Departmental Offices Associate Privacy Officer

Email: os_privacy@ios.doi.gov

Phone: (202) 441-5504

Address: 1849 C Street NW, Room 7112, Washington, DC 20240

Section 1. General System Information

A. Is a full PIA required?

- Yes, information is collected from or maintained on
 - Members of the general public
 - Federal personnel and/or Federal contractors
 - Volunteers
 - All

No:

B. What is the purpose of the system?

The Government Retirement Benefits (GRB) system is a Federal Retirement Administration Software as a Service (SaaS) web automated system used by the U.S. Department of the Interior (DOI), Human Resource (HR) Line of Business (HRLoB) for retirement and benefits calculations.



GRB is a subscription based, self-service application with a suite of tools used for assisting HR Specialists to perform accurate service computation date calculations, service computation for leave, service history, full estimate on retirement, deposits for military, civilian time and re-deposits for civilian time, severance pay, disability retirement, calculations, and death benefit estimates. The GRB platform includes the following features: Reports/Estimates, Forms, Documents, and the Electronic Retirement Application Package.

GRB increases productivity within the Benefits Office by helping the benefits specialist formulate and produce a retirement summary report for an employee which eliminates manual calculation errors. GRB also assists HR benefit specialists to provide advisory services to DOI and bureau/office employees.

Each bureau has their own instance of GRB and is responsible for complying with Federal and Departmental legal and policy requirements. The bureaus and offices using the GRB system include: Bureau of Reclamation (BOR), Bureau of Safety and Environmental Enforcement (BSEE), National Parks Service (NPS), United States Geological Survey (USGS), Office of Surface Mining Reclamation and Enforcement (OSMRE), and Interior Business Center (IBC).

C. What is the legal authority?

5 U.S.C. Chapter 83; Retirement, 5 U.S.C. Chapter 84: Federal Employees' Retirement System (FERS), 5 U.S.C 1302; Regulations, 5 U.S.C. 2951; Reports to the Office of Personnel Management, 5 U.S.C 2954; Information to committees of Congress on request, 5 U.S.C. 3301; Civil Service; generally, 5 U.S.C 3372; General Provisions, 5 U.S.C 4118; Regulations, 5 U.S.C 8339; Computation of annuity, 5 U.S.C 8347 Administration; regulations, 5 U.S.C 8415; Computation of basic annuity, Executive Orders 9397, as amended by 13478 relating to Federal agency use of Social Security numbers; and Public Law 101-576 (Nov. 15, 1990), Executive Order 9830; Amending the Civil Service Rules and providing for Federal personnel administration, and Executive Order 12107; Relating to the Civil Service Commission and labor-management in the Federal Service; 5 CFR Parts 831; Retirement, 5 CFR Parts 841; Federal Employees Retirement System-General Administration, 5 CFR Parts 842; Federal Employees Retirement System-Basic Annuity, 5 CFR Parts 843; Federal Employees Retirement System-Death Benefits And Employee Refunds, 5 CFR Parts 844; Federal Employees Retirement System-Disability Retirement, 5 CFR Parts 845; Federal Employees Retirement System-Debt Collection and Civil Service Retirement System (CSRS); and FERS Handbooks.



D. Why is this PIA being completed or modified?

- New Information System – PIA was never documented
- New Electronic Collection
- Existing Information System under Periodic Review
- Merging of Systems
- Significantly Modified Information System
- Conversion from Paper to Electronic Records
- Retiring or Decommissioning a System
- Other: *Describe*

E. Is this information system registered in CSAM?

- Yes:

The UII code for GRB 010-000002821; Government Retirement Benefits (GRB) System Security and Privacy Plan

- No:

F. List all minor applications or subsystems that are hosted on this system and covered under this privacy impact assessment.

Subsystem Name	Purpose	Contains PII (Yes/No)	Describe If Yes, provide a description.
None	None	No	N/A

G. Does this information system or electronic collection require a published Privacy Act System of Records Notice (SORN)?

- Yes:

Records in GRB are maintained under the following SORNs.

- INTERIOR/DOI-85, Payroll, Attendance, Retirement, and Leave Records, 83 FR 34156 (July 19, 2018)
- OPM/GOVT-1, General Personnel Records, 77 FR 73694 (December 11, 2012); modification published at 80 FR 74815 (November 30, 2015)

These SORNs may be viewed on the DOI SORN website at <https://www.doi.gov/privacy/sorn>.



No

H. Does this information system or electronic collection require an OMB Control Number?

Yes:

No

Section 2. Summary of System Data

A. What PII will be collected? Indicate all that apply.

- Name
- Gender
- Birth Date
- Marital Status
- Truncated SSN
- Spouse Information
- Social Security Number (SSN)
- Personal Cell Telephone Number
- Child or Dependent Information
- Employment Information
- Military Status/Service
- Mailing/Home Address
- Other:

Benefits Specialists manually enter data into GRB from the Federal Personnel and Payroll System (FPPS) and the Electronic Official Personnel Folder (eOPF). The FPPS is DOI's system personnel and payroll for employment and compensation data. The eOPF retains personnel documents for each employee's entire Federal service. GRB uses only PII required to respond to employee requests and accurately compute calculations/estimates, including name, dates of birth, home address, personal and work email address, personal telephone number, Social Security numbers (SSNs), health/life insurance enrollment information, retirement contribution information, leave hours, tax status, salary, military status/service information, and service computation date (SCD). Human Resource (HR) Benefits Specialist may require an employee to provide the last four of their SSN for common name identification purposes only. Child or dependent information may be required for instances of employee death in service, however dependent SSN will not be required to provide an estimate calculation.



B. What is the source for the PII collected? Indicate all that apply.

- Individual
- Federal agency
- Tribal agency
- Local agency
- DOI records
- Third party source
- State agency
- Other: *Describe*

GRB is not connected to any other system. FPPS and eOPF data is manually entered into the GRB system to calculate employee retirement benefits.

C. How will the information be collected? Indicate all that apply.

- Paper Format
- Email
- Face-to-Face Contact
- Web site
- Fax
- Telephone Interview
- Information Shared Between Systems Describe
- Other:

FPPS and eOPF data is manually entered into the GRB system to calculate employee retirement benefits. Employees can request for their Retirement Annuity information through email, telephone or face to face contact with their HR Benefits Specialists.

Paper Format

DOI employees must complete Office of Personnel Management (OPM) forms and submit them to their Bureau/Office Benefits Specialist for calculations of their retirement and benefits estimates. These forms include but not limited to:

- Standard Form (SF) 2801, Application for Immediate Retirement (Civil Service Retirement System (CSRS))
- SF 3107, Application for Immediate Retirement (Federal Employees Retirement System)
- SF 2818, Continuation of Life Insurance Coverage (As an Annuitant or



Compensation Federal Employees' Group Life Insurance (FEGLI) Program)

In addition to the above forms, employees may be required to complete bureau-specific forms including the BOR MP-952, Request for Retirement Annuity Estimate.

DOI employees also submit their W-4P, Withholding Certificate for Pension or Annuity Payments, to the Benefits Specialists which is used for the calculations and estimates.

Website

HR Benefits Specialist enter employee information manually into the bureau/office instance of GRB for retirement benefits, and annuity calculations. HR Benefits Specialists redacts or encrypts PII prior to emailing the computation estimates to the intended annuitant or their beneficiaries.

D. What is the intended use of the PII collected?

GRB uses PII such as SSN to identify employees and to create a profile in order to maintain service information, generate service computation date and retirement estimate reports. An HR Benefits Specialist may ask an employee to provide the last four of their SSN for common name purposes only.

PII is used to perform service computation date calculations, service computation for leave, service history, full estimate on retirement, deposits for military, civilian time and re-deposits for civilian time, severance pay, disability retirement, calculations, and death benefit estimates. To respond to requests from employees and provide retirement and benefit estimates and calculations.

E. With whom will the PII be shared, both within DOI and outside DOI? Indicate all that apply.

Within the Bureau/Office:

PII is not shared with the HR Information Systems office. Bureaus/offices have access to their employee data and is responsible for managing their instance of the system.

Data is shared with each Bureau and Office by HR Benefits Specialists to assist bureau/office employees with their retirement and benefit estimate or current calculations.



Other Bureaus/Offices:

Final retirement annuity computations and estimates are provided to IBC for processing in FPPS. Retirement packages include forms downloaded from GRB, are mailed to IBC, and forwarded to OPM for completion. GRB data is not shared between bureaus and offices, as each bureau/office maintains their own instance of the system to provide services to their employees.

Other Federal Agencies:

Information on the standard forms sent to OPM is used to qualify a retiree for health insurance, life insurance, and their retirement annuity. Information may be shared with other Federal agencies as authorized in the routine uses outlined in the INTERIOR/DOI-85, Payroll, Attendance, Retirement and Leave Records and OPM/GOVT-1, General Personnel Records, SORNs.

Tribal, State or Local Agencies:

Contractor:

Government Retirement and Benefits Incorporated is on contract to provide system operations and maintenance only. PII data is not shared with GRB Incorporated.

Other Third Party Sources:

F. Do individuals have the opportunity to decline to provide information or to consent to the specific uses of their PII?

Yes:

Retirement calculations are performed in GRB at the employee's request; thus, consent is provided when employees voluntarily submit forms and requests for retirement annuity calculations and estimates. Retirement estimates cannot be calculated without consent to access this data. Each bureau may have their own processes for collecting PII from their employees requesting retirement annuity calculations.

No:



**G. What information is provided to an individual when asked to provide PII data?
Indicate all that apply.**

Privacy Act Statement:

The required OPM forms contain Privacy Act Statements. Privacy Act Statements are provided on bureau/office forms that are used for the retirement calculation.

Privacy Notice:

HR Benefits Specialists verbally provide notice to employees during retirement counseling sessions. Privacy notice is also provided through the publication of this privacy impact assessment, and the published INTERIOR/DOI-85, Payroll, Attendance, Retirement and Leave Records, and OPM/GOVT-1, General Personnel Records, SORNs which may be viewed at <https://www.doi.gov/privacy/sorn>.

Other:

The GRB Platform website displays a warning banner that states all users are subject to monitoring, and there is no expectation of privacy during the use of the system. A Terms of Service Agreement is also available on the GRB Platform website.

None

H. How will the data be retrieved? List the identifiers that will be used to retrieve information (e.g., name, case number, etc.).

HR Benefits Specialists manually enter data obtained from FPPS and eOPF into the GRB system. FPPS is DOI's system of record for employment and compensation data. The eOPF retains personnel documents for an employee's Federal service. Only pertinent PII that is necessary to accurately compute calculations/estimates is utilized such name, date of birth, home and work address, personal and work telephone numbers, and full and truncated SSNs as necessary.

Each bureau has their own process for retrieving data to generate reports. After information input into GRB is complete and while the employee profile is open, GRB generates automatic reports which can be downloaded by the HR Benefits Specialist to be shared with the requesting employee only. Retirement estimates are maintained in GRB.



I. Will reports be produced on individuals?

Yes:

The system generates reports for Service and Retirement computations only. The estimate is shared with the employee that made the request. Each bureau has a unique process for retrieving data to generate reports.

The report that is generated by GRB is uploaded into eOPF as supporting data for service computation dates and retirement estimates. The retirement estimate report is placed in the requesting employee's retirement file. A copy of the file is typically retained for one (1) year, then destroyed.

No

Section 3. Attributes of System Data

A. How will data collected from sources other than DOI records be verified for accuracy?

Information is provided by employees through standard forms. Employees verify the accuracy and completeness of estimates provided to them by their HR Benefits Specialist.

DOI's FPPS and eOPF systems are the official system of records for DOI and Bureaus to maintain employee personnel and pay records, therefore presumed to be accurate and the only data source used in GRB for calculating estimated employee retirement annuity benefits. FPPS performs regular data validation to ensure accurate information. e-OPF is operated by OPM, and provides official documentation of federal service from other agencies outside DOI.

HR Benefits Specialist also routinely update federal service information changes for employees in the FPPS system.



B. How will data be checked for completeness?

Benefits Specialist staff members or assistants thoroughly review and document each employee's personnel actions within FPPS and eOPF before data is manually entered into GRB. Data is also checked for completeness within FPPS prior to being entered into GRB. Information is routinely updated as Federal service information changes for employees. Verification of GRB records is required prior to generating reports.

C. What procedures are taken to ensure the data is current? Identify the process or name the document (e.g., data models).

FPPS and eOPF store current and historical employment information documenting the employee's entire Federal service. The Benefits Specialist or staff members manually enter the information requested for each GRB field. Information in the system is routinely compared to other HR systems such as FPPS and eOPF to verify accuracy. The retirement estimate scenarios are projections of retirement benefits in the future. The employee reviews the projections for accuracy and completeness.

When an employee requests a "new" or revised estimate, the HR point of contact or Benefits Specialist reviews all the necessary records and updates or adjusts as necessary based on findings.

D. What are the retention periods for data in the system? Identify the associated records retention schedule for the records in this system.

GRB records are maintained under the Departmental Records Schedule (DRS) 1.2.0004 - Short-Term Human Resources Records (DAA-0048-2013-0001-0004), which is approved by the National Archives and Records Administration (NARA). These records are only for estimated employee retirement benefits. Records are cut-off on employee separation or transfer. An estimate file can be re-created for an employee whenever required or upon retirement. Destroy 3 years after cut-off, this disposal authority applies to all DOI bureaus and offices.

E. What are the procedures for disposition of the data at the end of the retention period? Where are the procedures documented?

When approved for destruction, paper records are disposed of by shredding or pulping, and records contained on electronic media are degaussed or erased in accordance with NARA guidelines and Departmental policy using the DI 1941 processes.



F. Briefly describe privacy risks and how information handling practices at each stage of the “information lifecycle” (i.e., collection, use, retention, processing, disclosure and destruction) affect individual privacy.

There is a moderate risk to the privacy of individuals due to the sensitive nature and volume of PII maintained in the system. GRB is undergoing a formal Assessment and Authorization for issuance of an authority to operate in accordance with the Federal Information Security Modernization Act (FISMA) and National Institute of Standards and Technology (NIST) guidelines. GRB has been rated as a moderate system requiring strict security and privacy controls to protect the confidentiality, integrity, and availability of data in the system. As part of the continuous monitoring program, continuous auditing will occur on the system to identify and respond to potential impacts to the PII collected and used within the system.

There is a risk that GRB may collect more PII than necessary. HR Benefits Specialist only enters PII necessary to provide an accurate calculation of retirement benefit and annuity estimates to DOI employees into the GRB system. HR Benefits Specialists may require an employee to provide the last four of their SSN for common name identification purposes only. Child dependent information may be required for instances of employee death in service however, dependent SSN will not be required to provide an estimate calculation. Employee PII used in GRB is manually sourced from DOI FPPS and OPM eOPF systems to calculate employee retirement benefits.

There is a risk that PII will be used outside of the scope of initial collection for an unauthorized purpose. Employee PII in GRB is only used for retirement benefit and annuity calculation. Retirement estimate is only shared with the requesting DOI employee. Each Bureau/Office HR Benefits Specialist is required to take role-based training on how to protect DOI employee PII data, including the required annual Cybersecurity, Privacy Awareness, Records Management and Controlled Unclassified Information (CUI) training, and sign the DOI Rules of Behavior.

There is a risk that unauthorized individuals may be able to access data stored in the GRB information system. Access to GRB is limited to a small group of authorized HR Benefits Specialists within each bureau/office to provide retirement benefit estimates. Each authorized GRB Bureau Privileged Licensed Administrator is responsible for managing user accounts and can view a list of users in the GRB User Management screen area, including username, email, display name, role name, enabled (active) and disabled users. Each Bureau Licensed Administrator reviews the GRB Access List(s) no less than quarterly, or in the event of a termination, and is responsible for working with their Bureau Associate Privacy Officer to address all privacy requirements. This process



includes reviewing employment status of each individual on the GRB access list, position description, and access privileges.

There is a risk that the use of shared printers within some DOI bureaus and offices may be viewed by non-intended individuals. For bureaus and offices with shared printers, a PIN code is entered into the printer in order for the retirement estimate output to be printed out to ensure only the intended individuals can view the documents.

There is a risk that retirement annuity computations and estimates results sent through email may contain sensitive PII. HR Benefits Specialists redact PII from estimates and/or encrypt PDF versions of the document before sending to the requesting DOI employee's official or personal email. Only employee name is shown on the Retirement Annuity estimate report and employee date of birth is redacted. The intended annuitant or their beneficiaries is also provided with a password either by phone or email to access their computation estimates. Retirement annuity estimates results can also be requested through telephone or in-person.

There is a risk that DOI employees may not have adequate notice on how their PII may be used. Privacy notice is provided through the publication of this privacy impact assessment. Notice is also provided through the Privacy Act Statements provided on OPM and bureau/office forms, and the published INTERIOR/DOI-85, Payroll, Attendance, Retirement and Leave Records and OPM/GOVT-1, General Personnel Records, SORNs which may be viewed at <https://www.doi.gov/privacy/sorn>. These notices provide information to individuals on how their PII will be used and shared and how they may seek notification, access, or amendment of their records. Notice is also provided by HR personnel during retirement counseling sessions.

There is a risk that PII collected by this system may be retained longer than necessary. Records are maintained and disposed of under a NARA approved records schedule. Information collected and stored within GRB is maintained, protected, and destroyed in compliance with all applicable Federal laws, Executive Orders, directives, policies, regulations, standards, and operational requirements.

Section 4. PIA Risk Review

A. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

Yes:

The system produces retirement calculations, death benefits, and service computation date calculations, which are part of the stated purpose in Section 1.B above. The PII



collected is relevant and necessary to identify the requesting employee and to accomplish the purpose.

No

B. Does this system or electronic collection derive new data or create previously unavailable data about an individual through data aggregation?

Yes:

No

C. Will the new data be placed in the individual's record?

Yes:

No

D. Can the system make determinations about individuals that would not be possible without the new data?

Yes:

No

The data analysis that is conducted and produced on the reports will identify the employees appropriate Service Computation Date for leave and Retirement estimate.

E. How will the new data be verified for relevance and accuracy?

The GRB does not produce new data.

F. Are the data or the processes being consolidated?

Yes, data is being consolidated.

Yes, processes are being consolidated.

No, data or processes are not being consolidated.



G. Who will have access to data in the system or electronic collection? Indicate all that apply.

- Users
- Contractors
- Developers
- System Administrator (Benefits Specialists)
- Other:

Each DOI GRB Bureau Licensed Administrator with an elevated role manage and implement functions such as account creation, modification, enabling, and removal for all HR Benefits Specialists user accounts for their bureau.

Bureau HR Benefits Specialist are the end users of GRB system to provide retirement benefit and annuity estimates to bureau employees.

DOI HR Assistants have a limited role to only provide Service Computation Dates.

The GRB Vendor provide system maintenance services, however, they do not have access to the PII.

H. How is user access to data determined? Will users have access to all data or will access be restricted?

Each bureau has their own instance of GRB and its usage is limited to the bureau's HR Benefits/Retirement Specialists. HR Benefits staff members have access to GRB as their official duties require. Bureau/Office administrators are responsible for controlling and monitoring access of authorized employees. User access to this system is limited to authorized HR Benefit Specialist personnel only to access, view, and input data into GRB system.

GRB system access is controlled by the HR Benefits Specialist Licensed Administrator with an elevated role such as an HR Manager within each Bureau's Human Resources Office. Bureau Benefit/Retirement Specialists are provided full access to the system in order to run various types of estimates. HR Assistants are provided limited access to calculate service computation dates only and are unable to access all retirement information.



I. Are contractors involved with the design and/or development of the system, or will they be involved with the maintenance of the system?

Yes.

Each DOI Bureau/Office has included Privacy Act clauses in their contract with GRB Inc.

No

J. Is the system using technologies in ways that the DOI has not previously employed (e.g., monitoring software, SmartCards or Caller ID)?

Yes.

No

K. Will this system provide the capability to identify, locate and monitor individuals?

Yes.

GRB monitors HR Benefits Specialists and assistants who are the only officials that can access the system. The audit records contain information on the activities performed while using the system, such as duration, number of bytes received and sent, etc.

No

L. What kinds of information are collected as a function of the monitoring of individuals?

The GRB Platform generates audit records that contain the following information: session, connection, transaction, or activity duration; for client-server transactions, the number of bytes received, and bytes sent; additional informational messages to diagnose or identify the event; characteristics that describe or identify the object or resource accessed.



M. What controls will be used to prevent unauthorized monitoring?

GRB tracks user logon and logoff events, reports success/failure of any local or remote access-based logon, object access, policy change, privilege use, process tracking, and system events. Auditable events are reviewed and updated at least annually.

N. How will the PII be secured?

(1) Physical Controls. Indicate all that apply.

- Security Guards
- Key Guards
- Locked File Cabinets
- Secured Facility
- Closed Circuit Television
- Cipher Locks
- Identification Badges
- Safes
- Combination Locks
- Locked Offices
- Other. *Describe*

(2) Technical Controls. Indicate all that apply.

- Password
- Firewall
- Encryption
- User Identification
- Biometrics
- Intrusion Detection System (IDS)
- Virtual Private Network (VPN)
- Public Key Infrastructure (PKI) Certificates
- Personal Identity Verification (PIV) Card
- Other. *Describe*

(3) Administrative Controls. Indicate all that apply.

- Periodic Security Audits
- Backups Secured Off-site.



- Rules of Behavior
- Role-Based Training
- Regular Monitoring of Users' Security Practices
- Methods to Ensure Only Authorized Personnel Have Access to PII
- Encryption of Backups Containing Sensitive Data
- Mandatory Security, Privacy and Records Management Training
- Other. *Describe*

O. Who will be responsible for protecting the privacy rights of the public and employees? This includes officials responsible for addressing Privacy Act complaints and requests for redress or amendment of records.

The Director, Human Resource Information Systems, within the Office of the Secretary serves as the GRB Information System Owner and the official responsible for oversight and management of security controls and the protection of agency information processed and stored in GRB. Each bureau GRB Licensed Administrator is responsible for ensuring the security of data maintained in GRB, and for meeting privacy and security requirements within their organization. The Information System Owner, Information System Security Officer and Privacy Act system managers are responsible for addressing privacy rights and complaints, and ensuring adequate safeguards are implemented to protect individual privacy in compliance with Federal laws and policies for the data managed and stored in GRB, in consultation with the Bureau and Office Associate Privacy Officers.

P. Who is responsible for assuring proper use of the data and for reporting the loss, compromise, unauthorized disclosure, or unauthorized access of privacy protected information?

The GRB Information System Owner is responsible for daily operational oversight and management of the system's security and privacy controls, for ensuring to the greatest possible extent that the data is properly managed and that all access to the data has been granted in a secure and auditable manner. The GRB Information System Owner and Information System Security Officer are responsible for ensuring that any loss, compromise, unauthorized access or disclosure of PII is reported to DOI-CIRC, DOI's incident reporting portal, and appropriate DOI privacy officials in accordance with DOI policy and established procedures.

Each bureau Licensed Administrator is responsible for ensuring the security of data maintained in GRB, and for meeting privacy and security requirements within their organization and immediately reporting any potential compromise of data in accordance with Federal policy and the DOI Privacy Breach Response Plan.