



**USAID**  
FROM THE AMERICAN PEOPLE

## Government Retirement & Benefits Privacy Impact Assessment (PIA)

### UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT

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Office of the Chief Information Officer (M/CIO)  
Information Assurance Division  
Government Retirement & Benefits (GRB)  
Approved Date: January 24, 2017

#### Additional Privacy Compliance Documentation Required:

- None
- System of Records Notice (SORN)
- Open Data Privacy Analysis (ODPA)
- Privacy Act Section (e)(3) Statement or Notice (PA Notice)
- USAID Web Site Privacy Policy
- Privacy Protection Language in Contracts and Other Acquisition-Related Documents
- Role-Based Privacy Training Confirmation

#### Possible Additional Compliance Documentation Required:

- USAID Forms Management. [ADS 505](#)
- Information Collection Request (ICR). [ADS 505](#), [ADS 506](#), and [ADS 508 Privacy Program](#)
- Records Schedule Approved by the National Archives and Records Administration. [ADS 502](#)

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## 1 Introduction

The USAID Privacy Office is using this Privacy Impact Assessment (PIA) Template to gather information from program managers, system owners, and information system security officers in order to analyze USAID information technology and information collections (systems) that collect, use, maintain, or disseminate personally identifiable information (PII). See [ADS 508 Privacy Program](#) Section 503.3.5.2 Privacy Impact Assessments.

## 2 Information

### 2.1 Program and System Information

#### 2.1.1 Describe the PROGRAM and its PURPOSE.

USAID's Human Capital and Talent Management Division use the Government Retirement and Benefits (GRB) System to perform accurate retirement calculations for USAID staff. The GRB Platform is the only known customized and distinctive software system capable of providing accurate retirement and benefit estimates for both the Civil Service (CS) and Foreign Service (FS) retirement system, which include the Civil Service Retirement System (CSRS), Federal Employees Retirement System (FERS), Foreign Service Retirement and Disability (FSRDS) and Foreign Service Pension System (FSPS).

The GRB Platform is a complete Software-as-a-Service (SaaS) Federal Retirement and Benefits Administration solution that meets the goals and objectives of the HR Line of Business (HRLoB). Offered on a subscription basis for unlimited use and developed specifically for the Federal sector, the GRB Platform combines tools and capabilities for human resource specialists, managers, and employees into a common system. The GRB Platform contains a flexible bi-directional interface used to communicate with an Agency's payroll/human resource information system (HRIS), third-party benefits providers, and any outside parties as necessary. Hosted in GRB's data center, the GRB Platform has received certification and accreditation by meeting the stringent security requirements of FIPS 199 and NIST 800-60. This Platform also provides HR Specialists with a suite of tools for assisting employees with their retirement and benefits decision in which it increases productivity and lowers cost by providing the framework for organizing and managing a high volume caseload.

The Department of State (DOS) and USAID use the same SaaS Platform for employee retirement information. GRB will facilitate the processing of benefits and prevent errors and other issues arising as the two agencies work together to provide these services. There is no interface or connection of any kind with the DOS instance of GRB. Rather, through GRB, USAID will conduct retirement calculations in a similar manner to DOS.

### **2.1.2 Describe the SYSTEM and its PURPOSE.**

GRB is a web-based application that assists in calculating an employee's retirement options and benefits. The GRB system is replacing the legacy FedHR (FHR) Navigator tool, which provided largely the same functionality; however, its calculations for Foreign Service Officers (FSOs) did not align with the DOS FSO calculations. Transitioning to GRB will provide consistency across the FSO community. GRB includes functionality for HR Specialists and for use via self-service.

GRB requires the use of PII, which will be provided to GRB through the National Finance Center (NFC) payroll system. The NFC serves as the data collection for the employment and compensation data used in GRB. Only pertinent PII that is necessary to accurately compute retirement estimates would be extracted from NFC, including names, dates of birth, and Social Security numbers (SSNs). In cases where there are gaps in the NFC data provided (i.e., federal service from another agency or USAID service prior to implementation of NFC), HCTM's HR Specialists may manually input data from the user's federal employment history to complete the calculations. See 3.4.5 for storage, archiving, and disposition procedures for these data.

Though HCTM attempts to use the SSN sparingly, it is the sole unique identifier in the NFC payroll system. For this reason, the SSN must be used in GRB because a consistent unique identifier for each employee must be used for the data update process. Additionally, the agencies that process retirement packages for USAID retirees (OPM for Civil Service and State Department for Foreign Service) require the SSN for processing.

To minimize the risk of exposing the SSN, the whole SSN is masked to the regular employee end user. The SSN is not masked on the HR side because the system is using SSN as the employee unique identifier. The reason is that the HR user will be looking up the employee by SSN and that the SSN will be used on OPM forms that require the SSN to be displayed. This information is extracted by USAID and provided to GRB via a Secure File Transfer Protocol (SFTP) process.

No information is collected directly by the GRB system. Rather, NFC compensation and employment data will be uploaded into GRB using the following steps:

1. Data set is manually queried from the NFC system.
2. The .csv file is downloaded, encrypted with AES128 or better, and saved onto the user's network drive.
3. The encrypted .csv file is sent securely via SFTP and uploaded into GRB.
4. The encrypted .csv file is permanently deleted from the user's network drive after a successful SFTP.

The data are used in a series of projections and calculations associated with retirement benefits and planning; it includes pertinent PII that is necessary for these calculations, including names, dates of birth, and SSNs.

HR Specialists consult with USAID employees on the process and may walk through the information contained in GRB.

There is no direct connection between GRB and any other system.

<b>2.1.3 What is the SYSTEM STATUS?</b>
<input checked="" type="checkbox"/> New System Development or Procurement
<input type="checkbox"/> Pilot Project for New System Development or Procurement
<input type="checkbox"/> Existing System Being Updated
<input type="checkbox"/> Existing Information Collection Form or Survey OMB Control Number:
<input type="checkbox"/> New Information Collection Form or Survey
<input type="checkbox"/> Request for Dataset to be Published on an External Website
<input type="checkbox"/> Other:

<b>2.1.4 What types of INFORMATION FORMATS are involved with the program?</b>
<input type="checkbox"/> Physical only
<input type="checkbox"/> Electronic only
<input checked="" type="checkbox"/> Physical and electronic combined

<b>2.1.5 Does your program participate in PUBLIC ENGAGEMENT?</b>
<input checked="" type="checkbox"/> No.
<input type="checkbox"/> Yes: <ul style="list-style-type: none"> <li><input type="checkbox"/> Information Collection Forms or Surveys</li> <li><input type="checkbox"/> Third Party Web Site or Application</li> <li><input type="checkbox"/> Collaboration Tool</li> </ul>

<b>2.1.6 What type of system and/or TECHNOLOGY is involved?</b>
<input type="checkbox"/> Infrastructure System (Local Area Network, Wide Area Network, General Support System, etc.)
<input checked="" type="checkbox"/> Network
<input type="checkbox"/> Database
<input type="checkbox"/> Software
<input type="checkbox"/> Hardware
<input type="checkbox"/> Mobile Application or Platform
<input type="checkbox"/> Mobile Device Hardware (cameras, microphones, etc.)
<input type="checkbox"/> Quick Response (QR) Code (matrix geometric barcodes scanned by mobile devices)
<input type="checkbox"/> Wireless Network
<input type="checkbox"/> Social Media



<b>2.1.6 What type of system and/or TECHNOLOGY is involved?</b>
<input type="checkbox"/> Web Site or Application Used for Collaboration with the Public
<input type="checkbox"/> Advertising Platform
<input type="checkbox"/> Website or Webserver
<input checked="" type="checkbox"/> Web Application
<input type="checkbox"/> Third-Party Website or Application
<input type="checkbox"/> Geotagging (locational data embedded in photos and videos)
<input type="checkbox"/> Near Field Communications (NFC) (wireless communication where mobile devices connect without contact)
<input type="checkbox"/> Augmented Reality Devices (wearable computers, such as glasses or mobile devices, that augment perception)
<input type="checkbox"/> Facial Recognition
<input type="checkbox"/> Identity Authentication and Management
<input type="checkbox"/> Smart Grid
<input type="checkbox"/> Biometric Devices
<input type="checkbox"/> Bring Your Own Device (BYOD)
<input type="checkbox"/> Remote, Shared Data Storage and Processing (cloud computing services)
<input type="checkbox"/> Other:
<input type="checkbox"/> None

<b>2.1.7 About what types of people do you collect, use, maintain, or disseminate personal information?</b>
<input type="checkbox"/> Citizens of the United States
<input type="checkbox"/> Aliens lawfully admitted to the United States for permanent residence
<input checked="" type="checkbox"/> USAID employees and personal services contractors
<input type="checkbox"/> Employees of USAID contractors and/or services providers
<input type="checkbox"/> Aliens
<input type="checkbox"/> Business Owners or Executives
<input type="checkbox"/> Others:
<input type="checkbox"/> None



## 2.2 Information Collection, Use, Maintenance, and Dissemination

2.2.1 What types of personal information do you collect, use, maintain, or disseminate?
<input checked="" type="checkbox"/> Name, Former Name, or Alias
<input type="checkbox"/> Mother's Maiden Name
<input checked="" type="checkbox"/> Social Security Number or Truncated SSN
<input checked="" type="checkbox"/> Date of Birth
<input type="checkbox"/> Place of Birth
<input checked="" type="checkbox"/> Home Address
<input type="checkbox"/> Home Phone Number
<input type="checkbox"/> Personal Cell Phone Number
<input type="checkbox"/> Personal E-Mail Address
<input type="checkbox"/> Work Phone Number
<input checked="" type="checkbox"/> Work E-Mail Address
<input type="checkbox"/> Driver's License Number
<input type="checkbox"/> Passport Number or Green Card Number
<input type="checkbox"/> Employee Number or Other Employee Identifier
<input type="checkbox"/> Tax Identification Number
<input type="checkbox"/> Credit Card Number or Other Financial Account Number
<input type="checkbox"/> Patient Identification Number
<input checked="" type="checkbox"/> Employment or Salary Record
<input type="checkbox"/> Medical Record
<input type="checkbox"/> Criminal Record
<input type="checkbox"/> Military Record
<input type="checkbox"/> Financial Record
<input type="checkbox"/> Education Record
<input type="checkbox"/> Biometric Record (signature, fingerprint, photo, voice print, physical movement, DNA marker, retinal scan, etc.)
<input checked="" type="checkbox"/> Sex or Gender
<input checked="" type="checkbox"/> Age

### 2.2.1 What types of personal information do you collect, use, maintain, or disseminate?

- Other Physical Characteristic (eye color, hair color, height, tattoo)
- Sexual Orientation
- Marital status or Family Information
- Race or Ethnicity
- Religion
- Citizenship
- Other: Employment record documented on SF-50 (e.g. promotion, change in duty station, leave without pay)
- No PII is collected, used, maintained, or disseminated

### 2.2.2 What types of digital or mobile data do you collect, use, maintain, or disseminate?

- Log Data (IP address, time, date, referrer site, browser type)
- Tracking Data (single- or multi-session cookies, beacons)
- Form Data
- User Names
- Passwords
- Unique Device Identifier
- Location or GPS Data
- Camera Controls (photo, video, videoconference)
- Microphone Controls
- Other Hardware or Software Controls
- Photo Data
- Audio or Sound Data
- Other Device Sensor Controls or Data
- On/Off Status and Controls
- Cell Tower Records (logs, user location, time, date)
- Data Collected by Apps (itemize)
- Contact List and Directories



**2.2.2 What types of digital or mobile data do you collect, use, maintain, or disseminate?**

<input type="checkbox"/> Biometric Data or Related Data
<input type="checkbox"/> SD Card or Other Stored Data
<input type="checkbox"/> Network Status
<input type="checkbox"/> Network Communications Data
<input type="checkbox"/> Device Settings or Preferences (security, sharing, status)
<input type="checkbox"/> Other:
<input type="checkbox"/> None

**2.2.4 Who owns and/or controls the system involved?**

<input checked="" type="checkbox"/> USAID Office: HCTM
<input type="checkbox"/> Another Federal Agency:
<input checked="" type="checkbox"/> Contractor: GRB, Inc.
<input type="checkbox"/> Cloud Computing Services Provider:
<input type="checkbox"/> Third-Party Website or Application Services Provider:
<input type="checkbox"/> Mobile Services Provider:
<input type="checkbox"/> Digital Collaboration Tools or Services Provider:
<input type="checkbox"/> Other:

**3 Privacy Risks and Controls**

**3.1 Authority and Purpose (AP)**

**3.1.1 What are the statutes or other LEGAL AUTHORITIES that permit you to collect, use, maintain, or disseminate personal information?**

5 U.S.C 8415 and 8339 provide USAID with the legal authority to calculate retirement annuities.

**3.1.2 Why is the PII collected and how do you use it?**

GRB is a consumer of existing PII data collected by the NFC. This PII is necessary to identify individuals and to calculate their retirement estimates.

In cases in which gaps in the NFC data provided (i.e., federal service from another agency or USAID service prior to implementation of NFC), HR Specialists may manually input data from the user’s federal employment history to complete the calculations. They may use data that is in the employee’s eOPF or official documentation provided by the employee.

**3.1.3 How will you identify and evaluate any possible new uses of the PII?**

Prior to using PII in GRB other than its current intended purpose of computing retirement calculations, a full review of routine uses documented in both the OPM GOVT-1 and USDA OP-1 SORNs would be conducted. If the new use of PII is not covered in the routine uses of either of these SORNs, USAID would either need to amend an existing SORN, or publish a new SORN. A notice would go out to individuals informing them of any change to the use of their PII.

**3.2 Accountability, Audit, and Risk Management (AR)**

**3.2.1 Do you use any data collection forms or surveys?**

No:

Yes:

Form or Survey (Please attach)

OMB Number, if applicable:

Privacy Act Statement (Please provide link or attach PA Statement)

**3.2.3 Who owns and/or controls the personal information?**

USAID Office: HCTM

Another Federal Agency:

Contractor:

Cloud Computing Services Provider:

Third-Party Web Services Provider:

Mobile Services Provider:

Digital Collaboration Tools or Services Provider:

Other:

**3.2.8 Do you collect PII for an exclusively statistical purpose? If you do, how do you ensure that the PII is not disclosed or used inappropriately?**

No.

Yes:

### 3.3 Data Quality and Integrity (DI)

**3.3.1 How do you ensure that you collect PII to the greatest extent possible directly from the subject individual?**

The PII is pulled from NFC which holds the original system of record; GRB does not directly collect from the individual.

**3.3.2 How do you ensure, to the greatest extent possible, that the PII is accurate, relevant, timely, and complete at the time of collection?**

The PII is pulled from NFC; it is not collected directly for GRB. See 3.5.2 for additional information on accessing and amending records.

**3.3.3 How do you check for, and correct as necessary, any inaccurate or outdated PII in the system?**

The PII is pulled from NFC; it is not collected directly for GRB. Any changes or corrections are made in the source system (NFC). See 3.5.2 for additional information on accessing and amending records.

### 3.4 Data Minimization and Retention (DM)

**3.4.1 What is the minimum PII relevant and necessary to accomplish the legal purpose of the program?**

The SSN is the unique identifier in the USAID payroll system, NFC, and is thus required in GRB. The rest of the PII is necessary to perform accurate retirement estimates.

**3.4.3 Does the system derive new data or create previously unavailable data about an individual through aggregation or derivation of the information collected? Is the PII relevant and necessary to the specified purposes and how is it maintained?**

No.

Yes: The system produces retirement estimates, which are part of the stated purpose of GRB in 2.1.1 and 2.1.2 (to provide accurate retirement and benefit estimates for both the CS and FS retirement system). The PII collected by GRB is relevant and necessary to accomplish the purposes outlined above.

**3.4.4 What types of reports about individuals can you produce from the system?**

Retirement calculations are produced by GRB.

**3.4.6 Does the system monitor or track individuals?**

*(If you choose Yes, please explain the monitoring capability.)*

No.

Yes:

**3.5 Individual Participation and Redress (IP)****3.5.1 Do you contact individuals to allow them to consent to your collection and sharing of PII?**

No. The data imported from NFC is collected for payroll purposes. Retirement calculations are performed in GRB at the employee's request; thus consent is presumed.

**3.5.2 What mechanism do you provide for an individual to gain access to and/or to amend the PII pertaining to that individual?**

Employees should contact the HR Service Desk (Called Service Central) for HR for any corrections to their PII in the source system, NFC. They may contact the HR Service Desk in the following ways: calling 202-712-1234, emailing [hr-helpdesk@usaid.gov](mailto:hr-helpdesk@usaid.gov), or creating a ticket at [support.usaid.gov](http://support.usaid.gov). Again, corrections would not be made directly in GRB.

**3.5.3 If your system involves cloud computing services and the PII is located outside of USAID, how do you ensure that the PII will be available to individuals who request access to and amendment of their PII?**

Not Applicable

**3.7 Transparency (TR)****3.7.1 Do you retrieve information by personal identifiers, such as name or number?**

*(If you choose Yes, please provide the types of personal identifiers that are used.)*

No.

Yes: First Name, Middle Initial, Last Name, SSN

### 3.7.2 How do you provide notice to individuals regarding?

- 1) The authority to collect PII:
  - a. see NFC SORN (USDA OP-1 at <https://www.ocio.usda.gov/sites/default/files/docs/2012/OP%20-%201.txt>) and
  - b. OPM GOVT-1 at <https://www.opm.gov/information-management/privacy-policy/sorn/opm-sorn-govt-1-general-personnel-records.pdf>.
- 2) The principal purposes for which the PII will be used: Retirement benefits calculations
- 3) The routine uses of the PII: Retirement benefits calculations.
- 4) The effects on the individual, if any, of not providing all or any part of the PII: Inability to calculate retirement estimates

### 3.7.3 Is there a Privacy Act System of Records Notice (SORN) that covers this system?

- No
- Yes:
- OPM GOVT-1 (<https://www.opm.gov/information-management/privacy-policy/sorn/opm-sorn-govt-1-general-personnel-records.pdf>)
  - NFC SORN (USDA OP-1 at <https://www.ocio.usda.gov/sites/default/files/docs/2012/OP%20-%201.txt>)

### 3.7.4 If your system involves cloud computing services, how do you ensure that you know the location of the PII and that the SORN System Location(s) section provides appropriate notice of the PII location?

Not Applicable

## 3.8 Use Limitation (UL)

### 3.8.1 Who has access to the PII at USAID?

Only HCTM HR Specialists (based on role) and GRB administrators. In addition, individual USAID employees have access to their own PII, as authenticated by Active Directory.

### 3.8.3 With whom do you share the PII outside of USAID? And whether (and how, if applicable) you will be using the system or related web site or application to engage with the public?

Not Applicable

**3.8.4 Do you share PII outside of USAID?**

**If so, how do you ensure the protection of the PII 1) as it moves from USAID to the outside entity and 2) when it is used, maintained, or disseminated by the outside entity?**

No. GRB does not share the PII outside of USAID.

Compensation and employment data from the NFC is manually queried, extracted, encrypted with AES128 or better, securely transmitted via SFTP, and uploaded into GRB. There is no flow of information from GRB to NFC or to any other system.

Yes:

**3.9 Third-Party Web Sites and Applications****3.9.1 What PII *could be made available* (even though not requested) to USAID or its contractors and service providers when engaging with the public?**

Not Applicable

## Appendix A. Links and Artifacts

A.1 Privacy Compliance Documents or Links
<input type="checkbox"/> None. There are no documents or links that I need to provide.
<input type="checkbox"/> Privacy Threshold Analysis (PTA)
<input type="checkbox"/> Privacy Impact Assessment (PIA)
<input type="checkbox"/> System of Records Notice (SORN)
<input type="checkbox"/> Open Data Privacy Analysis for Posting Datasets to the Public (ODPA)
<input type="checkbox"/> Data Collection Forms or Surveys
<input type="checkbox"/> Privacy Act Section (e)(3) Statements or Notices
<input type="checkbox"/> USAID Web Site Privacy Policy
<input type="checkbox"/> Privacy Policy of Third-Party Web Site or Application
<input type="checkbox"/> Privacy Protection Language in Contracts and Other Acquisition-Related Documents