

SUPPORTING STATEMENT
Office of Personnel Management (OPM) Retirement Systems Modernization (RSM)
Defined Benefits Licensed Technology Solution (DBTS)

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

A strategic objective of the Office of Personnel Management (OPM) is to ensure the Federal civilian workforce will have career opportunities, benefits, and service delivery that compete successfully with other employers. To support this strategic objective, OPM has established an operational goal to build, test, and implement the Retirement Systems Modernization (RSM) program.

The RSM program addresses the people, process, and technology used for Federal retirement operations. A core component of the RSM investment is the Defined Benefits Technology Solution (DBTS), a web-based suite of technology tools and services that will be the cornerstone of the modern Federal retirement system.

The DBTS will be implemented through 5 ‘waves’. Each wave will include a release of the DBTS technology and business tools to all active federal employees served by each of the 5 Shared Service Centers listed in Table A-1 - RSM Wave Schedule below. In addition, data for all current annuitants will be converted into the DBTS from the legacy OPM applications in August 2008. The August 2008 conversion will enable OPM and current federal retirees to conduct post-adjudicative actions using the DBTS.

Table A-1 - RSM Wave Schedule

Wave #	Target Date	Population
1	February 2008	General Services Administration (GSA) Shared Service Center
	August 2008	All annuitant data is converted into the DBTS
2	March 2008	US Postal Service (USPS)
3	August 2008	National Business Center (NBC) Shared Service Center
4	November 2008	National Finance Center (NFC) Shared Service Center
5	February 2009	Defense Finance and Accounting Service (DFAS) Shared Service Center

This emergency clearance request is focused on the members of the public (e.g, survivors and beneficiaries) that will be affected as a result of the implementation of Wave 1 (GSA). Since the DBTS is currently completing its final testing phases before the first wave, the forms and screens contained in this submission are only representative samples

of actual screens and forms. A full clearance request will be submitted by OPM prior to the release of the DBTS to the annuitant population in August 2008.

Title 5, U.S. Code, Chapters 83 through 89 authorize OPM to administer the Civil Service Retirement System (CSRS) and the Federal Employees Retirement System (FERS) as well as support administration of associated Federal health and life insurance plans and programs. These statutes provide justification for the information collections proposed in this emergency clearance request.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The purpose for this information collection(s) is to support timely processing and administration of retirement benefits to annuitants and their survivors and beneficiaries. The information collected will be used by OPM to maintain records for the Federal Retirement Program and to process and administer benefits. A general description of each of the proposed information collections can be found in table B-1 below.

The frequency of information collection will vary based on the volume of DBTS usage for each member of the public. Due to anticipated improvements in efficiencies and processing gained from the DBTS, information collection may only be required once in some cases. Table B-1 below provides a general assessment of the anticipated frequency of each proposed information collection to be used in the first phase; the full PRA submission to be submitted before August 2008 will address all forms and screens that will be used by DBTS. The frequency of information collection is categorized as follows:

- **High** – Information collection may occur on a daily or monthly basis
- **Medium** – Information collection may occur on a quarterly or semi-annual basis
- **Low** – Information collection may occur once a year or every few years

The information collected will not be used for dissemination to the public or for any other need not specific to the administration of retirement benefits by OPM.

Table B - 1 DBTS Information Collections - Frequency

Form Name	Description	Estimated Frequency
Confirmation of Password Reset	Sent to the employee or annuitant after the password has been reset to mitigate possible fraud.	High
Confirmation of Security Change	This notice is sent to anyone who updates or changes their security credentials on Your Benefits Resources (YBR) to mitigate possible fraud.	High
Confirmation of Preference Change	This notice is sent to anyone who changes the preference of how they would like to receive forms from DBTS (electronic or US Mail).	High

Form Name	Description	Estimated Frequency
Designation of Beneficiary Form Cover Letter	This cover letter accompanies the Designation of Beneficiary Form (SF2823)	High
Notice of Time Limit to Change Your Election	This letter alerts retirees of the deadline they have to make changes to their annuity election options relating to survivor benefits and to make changes to their post-retirement basic life insurance reduction election.	High
FEGLI Conversion Notice Option C	This notice, which is generated when an annuitant enrolled FEGLI Option C dies, provides family members the necessary plan information so that he or she may convert to a private insurance policy.	Medium
Confirmation of Coverage	After the annuitant or survivor initiates a change in coverage the DBTS issues this notice to indicate a change in coverage.	Medium
Qualifying Life Event - Confirmation of Election	Sent to a n annuitant to confirm benefit changes based on a Qualifying Life Event.	Medium
Confirmation of Address Change	This notice is sent to any annuitant or former employee on DBTS who changes their address to mitigate possible fraud (it is sent to the former and new address).	Low
Assignment Cover Letter	This cover letter accompanies the Assignment Form which provides a method to the annuitant of assigning his or her Basic Life Insurance, Option A Standard Life Insurance, and Option B Additional Life Insurance to another individual or a trust.	Low
Starting Your Beneficiary Pension Benefit – In Pay Status	Sent to a survivor / beneficiary in the annuitant death process to make them aware of their benefit, and the need to return written application to receive their benefit.	Low
CSRS Beneficiary Pension Election Authorization Form	Form sent to annuitants to collect beneficiary information and authorization.	Low
CSRS Beneficiary Pension Election Authorization Form	Sent to a survivor or beneficiary after they have returned their Pension Election Authorization notifying them that their authorization form has been approved, and they can expect payment by a certain date.	Low
FERS Pension Recalculation Notice – Annuity	Sent to an annuitant if their initial payment has changed due to additional data from the agency or OPM.	Low

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

RSM will leverage Human Resources (HR) data in Federal IT systems to support the DBTS. As a result, current retirement information collections from the public (performed by OPM) will be impacted.

The DBTS uses a combination of web-based functionality and paper forms to collect information from the public. Users of the DBTS website (referred to hereafter as Your Benefits Resources (YBR)) will input information into YBR and, based on a series of rules embedded in the tool, paper forms may then be sent to the annuitant, survivor, or other member of the public depending on the action taken in the system. In some cases the paper communication is only a validation of a change made online; in others it represents a request for new or additional information from the individual.

Attachment A – DBTS Information Collection Screens and Forms includes sample representations of the forms that will be sent to the public from YBR for Wave 1 in addition to representative screenshots of the YBR screens that capture the data that subsequently triggers the form to be sent to members of the public. It is important to note that these forms and screens are only samples and are intended to demonstrate the basic process and outcomes of each collection; the content of the forms and screens may be revised as part of the remaining test phases of RSM in place at the time of this submission.

This emergency clearance request focuses on the paper kits generated by the DBTS. Although the DBTS will send some kits as part of Wave 1, all existing paper-based information collections (forms) in support of retirement operations will remain in place indefinitely as there may be a number of reasons why members of the public and federal employees cannot or will not use the DBTS after it is fully operational.

The extent to which the DBTS will accommodate all of the current retirement-related information collections performed by OPM is still under evaluation as the system completes its initial design and testing phases.

4. Describe efforts to identify duplication

This information is not available elsewhere therefore duplication of this information collection is minimized. Additionally, OPM is developing internal control processes that will address parallel processing of paper and web-based information collection that will remain in place until the final RSM wave is implemented.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

N/A

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

Accuracy of retirement information, timeliness of benefit payments and quality of customer service provided to both active and retired Federal employees will be negatively impacted should these information collections not be conducted.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

N/A

8. Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A copy of the PRA Federal Register Notice is provided with this supporting statement. Comments and subsequent agency actions, if required, will be updated upon completion of the review period.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

N/A

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

The information collection is protected by the Privacy Act of 1974 and OPM regulations (5 CFR 831.106). The routine uses of disclosure appear in the Federal Register for OPM/Central-1 (64 FR 54930, et seq., October 8, 1999, as amended at 65 FR 25775 May 3, 2000). OPM/Central-1 is being revised to include RSM and will be submitted separately.

In addition, transmission of information collections via DBTS is subject to compliance with OPM security policies and procedures. The security of the DBTS and its associated systems undergo a rigorous certification and accreditation process as well as a complete privacy impact assessment for all qualifying systems and tools. The DBTS and its associated systems are also subject to compliance with FIPS 199 and NIST SP 800-53, as well as other industry standard IT security specifications.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

This information collection does not include questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. **Note:** disability retirement documents both prior to and after approval of disability retirement will be included with the full PRA to be submitted prior to August 2008.

12. Provide an estimate in hours of the burden of the collection of information.

An independent test to determine the exact length of time to complete the collection of information has not been completed at this time. OPM estimates that the public burden reporting for this collection of information will vary from 1 to 60 minutes with an average of 20 minutes

per response, including time for reviewing instructions, internet connection speed, searching existing data sources, gathering the data needed, and completing and reviewing the collection of information. OPM estimates that roughly 8200 respondents (retirees) will have access to the DBTS by August 2008 (the scope of this request) at an estimate burden of 2,733 hours. Burden adjustments will be reflected in the full clearance when it is submitted in August 2008.

In addition, it is expected that the public burden from many of the paper forms currently cleared under the PRA will significantly decrease as the legacy paper-based retirement information collections migrate into the DBTS due to the efficiencies gained through information technology and data processing.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).

There is no cost to the respondents.

14. Provide estimates of annualized cost to the Federal government.

A full annualized cost to the government cannot be calculated at this time due to a lack of sufficient data on government FTEs needed to support information collections in the DBTS. Data needed to estimate government FTE costs will be provided as part of the full PRA clearance to be submitted later this year.

A partial cost can be provided specific to annual contractor costs in generating and processing paper forms for the DBTS. During the first year of DBTS operations (2/08-2/09) this cost is estimated to be \$1,001,250. It is important to note that (per DBTS vendor contract) this cost reflects annual forms support for over 2.25M annuitants; due to limited information this cost does not reflect the subset of annuitants, survivors, and other members of the public impacted for Wave 1 specific to this emergency clearance request.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.

N/A

16. For collections whose results will be published, outline the plans for tabulation and publication.

The results for this information collection will not be published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

The OMB approval number will appear on the opening page of the DBTS and will be printed on all paper items sent to annuitants and survivor annuitants.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

There are no exceptions to the Certifications Statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methods.
