Date of Approval: April 25, 2017   PIA ID Number: **2559**

A. SYSTEM DESCRIPTION

1. Enter the full name and acronym for the system, project, application and/or database. Veterans Employment Tracking System, e-Trak VETS

2. Is this a new system? No

      2a. If **no**, is there a PIA for this system?   Yes

         If **yes**, enter the full name, acronym, PIA ID Number and milestone of the most recent PIA.

         964

         Next, enter the **date** of the most recent PIA.   5/12/2014

         Indicate which of the following changes occurred to require this update (check all that apply).

No	Addition of PII
No	Conversions
No	Anonymous to Non-Anonymous
No	Significant System Management Changes
No	Significant Merging with Another System
No	New Access by IRS employees or Members of the Public
No	Addition of Commercial Data / Sources
No	New Interagency Use
No	Internal Flow or Collection

         Were there other system changes not listed above?   No

3. Check the current ELC (Enterprise Life Cycle) Milestones (select all that apply)

No	Vision & Strategy/Milestone 0
No	Project Initiation/Milestone 1
No	Domain Architecture/Milestone 2
No	Preliminary Design/Milestone 3
No	Detailed Design/Milestone 4A
Yes	System Development/Milestone 4B
No	System Deployment/Milestone 5
No	Operations & Maintenance (i.e., system is currently operational)

4. Is this a Federal Information Security Management Act (FISMA) reportable system?   Yes

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A.1 General Business Purpose

5. What is the general business purpose of this system? Provide a clear, concise description of the system, application or database, the reason for the system, and the benefits to the IRS to use the information, and how the information will be used.

The e-trak automated tracking system will provide the Human Capital, Employment Operations with the flexibility it requires to store, retrieve, update and track non-paid interns participating in the Warrior Intern Program, Non-Paid Work Experience Program and the non-paid Student Veteran Intern Program. e-trak VETS will allow the business coordinators to create positions, provide a review and interns selection process. In addition, it will allow a manager to approve the best candidate intern and track their time worked. All acquired veteran information will be stored in a secured database and provide dynamic report generation. Due process will be provided pursuant to 5 USC.

B. PII DETAIL

6. Does the system use, collect, receive, display, store, maintain, or disseminate IR Code 6103 taxpayer information; or any type of Sensitive but Unclassified (SBU) or Personally Identifiable Information (PII)? Yes

6a. If **yes**, does the system use, collect, receive, display, store, maintain, or disseminate Social Security Numbers (SSN s) or tax identification numbers (i.e. last 4 digits, etc.)? Yes

If **yes**, check who the SSN (or tax identification number) is collected on.

Yes   On Primary   No   On Spouse   No   On Dependent

If **yes**, check all types SSN s (or tax identification numbers) that apply to this system:

Yes	Social Security Number (SSN)
No	Employer Identification Number (EIN)
No	Individual Taxpayer Identification Number (ITIN)
No	Taxpayer Identification Number for Pending U.S. Adoptions (ATIN)
No	Practitioner Tax Identification Number (PTIN)

Describe the planned mitigation strategy and forecasted implementation date to mitigate or eliminate the use of SSN s (or tax identification numbers).

The Office of Management and Budget memorandum M-07-12 requires that federal agencies develop a mitigation or elimination strategy for systems that use SSNs, which the Service continues to develop strategies to meet. An exception to that requirement is when the SSN is uniquely needed to identify a user's record. The E-trak Vets system requires the use of SSN's because no other identifier can be used to uniquely identify a taxpayer at this time. SSNs are permissible from Internal Revenue Code (IRC) 6109, which requires individual taxpayers to include their SSNs on their income tax returns.

6b. Does this system contain other (non-SSN) PII that it uses, collects, receives, displays, stores, maintains, or disseminates? (i.e. Names, addresses, etc.) Yes

If **yes**, specify the information.

Selected	PII Element	On Primary	On Spouse	On Dependent
Yes	Name	Yes	No	No
No	Mailing address	No	No	No
Yes	Phone Numbers	No	No	No
Yes	E-mail Address	No	No	No
Yes	Date of Birth	Yes	No	No
Yes	Place of Birth	No	No	No

Yes	SEID	No	No	No
No	Mother's Maiden Name	No	No	No
No	Protection Personal Identification Numbers (IP PIN)	No	No	No
No	Internet Protocol Address (IP Address)	No	No	No
No	Criminal History	No	No	No
Yes	Medical Information	No	No	No
No	Certificate or License Numbers	No	No	No
No	Vehicle Identifiers	No	No	No
No	Passport Number	No	No	No
No	Alien (A-) Number	No	No	No
No	Financial Account Numbers	No	No	No
No	Photographic Identifiers	No	No	No
No	Biometric Identifiers	No	No	No
Yes	Employment (HR) Information	No	No	No
No	Tax Account Information	No	No	No

6c. Does this system contain SBU information that is not PII, it uses, collects, receives, displays, stores, maintains, or   disseminates?   No

6d. Are there other types of SBU/PII used in the system?   No

6e. Cite the authority for collecting SBU/PII (including SSN if relevant)

No	PII for federal tax administration is generally Internal Revenue Code Sections 6001, 6011, 6012e(a)
No	SSN for tax returns and return information is Internal Revenue Code Section 6109
Yes	SSN for personnel administration (IRS Employees) is 5 USC & Executive Order 9397
Yes	PII for personnel administration is 5 USC
No	PII about individuals for Bank Secrecy Act compliance 31 USC
No	Information by CI for certain money laundering cases may be 18 USC

6f. Has the authority been verified with the system owner?   Yes

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B.1 BUSINESS NEEDS AND ACCURACY

7. Explain the detailed business needs and uses for the SBU/PII, and how the SBU/PII is limited only to that which is relevant and necessary to meet the mission requirements of the system. If SSNs (or tax identification numbers) are used, explicitly explain why use of SSNs meets this criteria. Be specific.

The e-trak automated tracking system will provide the Human Capital, Employment Operations with the flexibility it requires to store, retrieve, update and track non-paid interns participating in the Warrior Intern Program, Non-Paid Work Experience Program and the non-paid Student Veteran Intern Program. e-trak VETS will allow the business coordinators to create position, provide a review and interns selection process. In addition, it will allow manager to approve the best candidate intern and track their time worked. All acquired veteran information will be stored in a secured database and provide dynamic report generation. Due process will be provided pursuant to 5 USC. Majority of the veteran's documents that we receive from veterans have SSN and Date of Birth, such as their DD-214 and Disability Rating documents issued from the Department of Veteran Affairs (VA) and we upload these documents into the application. This will allow the veterans to qualify for the internships and if the internships turn into permanent jobs then the documents are sent to the employment office and used to see what veteran hiring authority the veteran qualifies for and can be hired noncompetitively with. SSNs are permissible from Internal

Revenue Code (IRC) 6109, "Identifying Numbers" which requires individual taxpayers to include their SSNs on their income tax returns. All of the veteran's documents that we receive from veterans have SBU/PII data- Name and Address, such as their DD-214, Disability Rating documents issued from the Department of Veteran Affairs (VA) and Resumes, we upload these documents into the application. This will allow us to offer the internships to the veterans.

8. How is the SBU/PII verified for accuracy, timeliness, and completeness? Explain how steps are taken to ensure that all information maintained by the system that is used by IRS to make any adverse determination about an individual's rights, benefits, and/or privileges is maintained with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual in the determination

Users access the e-trak VETS module by authenticating at a login screen using their SEID and password. Users must enter accurate credentials before access is granted to the system. The System Administrator (SA) prepares and reviews monitoring reports based on VETS established timeframes to validate/verify data. PII data is not collected by the application as data elements. But it is provided through the Data Transcript Delivery System (DTS) which is stored for use in the VETS module. There are internal programming consistency checks and record counts to validate the data that is loaded into the DTS and HR systems are accurate. The data that e-Trak VETS receives is from internal IRS systems which are deemed reliable and the data is validated for accuracy by the system sending the data as described in that system's PCLIA. Any determinations made are validated during the examination, and collection process and the taxpayer has appeal rights for any determinations made from the data.

C. PRIVACY ACT AND SYSTEM OF RECORDS

9. Are 10 or more records containing SBU/PII maintained, stored, and/or transmitted by or through this system?   Yes

   9a. If **yes**, are records in the system retrieved by any personal identifier (e.g., name, SSN, Photograph, IP Address) for an individual?   Yes

   If **yes**, is there a System of Records Notice(s) or SORNs that addresses the PII records in this system?   Yes

   If **yes**, enter the SORN number(s) and the complete the name of the SORN.

SORNS Number	SORNS Name
Treasury/IRS 34.037	Audit Trail and Security Records
Teasury/IRS 36.003	General Personnel and Payroll Records
OPM/GOVT-1	General Personnel Records
OPM/GOVT-5	Recruiting, Examining, and Placement Records

   If **yes**, does the System of Records Notice(s) (SORN) published in the Federal Register adequately describe the records as required by the Privacy Act?   Yes

D. RESPONSIBLE PARTIES

10. Identify the individuals for the following system roles. ## Official Use Only

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E. INCOMING PII INTERFACES

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11. Does the system receive SBU/PII from other system or agencies?   No

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F. PII SENT TO EXTERNAL ORGANIZATIONS

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12. Does this system disseminate SBU/PII?   No

G. PRIVACY SENSITIVE TECHNOLOGY

13. Does this system use social media channels?   No

14. Does this system use privacy-sensitive technologies such as mobile, cloud, global position system (GPS), biometrics, RFID, etc.?   No

15. Does the system use cloud computing?   No

16. Does this system/application interact with the public?   No

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H. INDIVIDUAL NOTICE AND CONSENT

17. Was/is notice provided to the individual prior to collection of information?   Yes

17a. If **yes**, how is notice provided? Was the individual notified about the authority to collect the information, whether such is mandatory or voluntary, the purpose for which the information will be used, with whom the information may be shared, and the effects, if any, if they decide not to provide any of the requested information?
A listing of available internships pdf file is sent out bi-weekly via email to the Veteran Employment Coordinators (VEC) at the Department of Veteran Affairs (VA) and to Wounded Warrior (also known as Operation Warfighter- OWF) Coordinators at the Department of Defense (DOD) requesting resumes, DD-214s, and other pertinent documents (school transcripts, VA disability ratings) from veteran candidates who are interested in the open internships at the IRS. The bi-weekly listing of available internships pdf file contains the internship position ID number, the location, description of the duties, and the basic skills required for each open internship. After the pdf file is sent out, our office receives the documents from the interested veterans themselves or from the assigned VA or DOD Coordinators on behalf of the veteran along with the internship position ID number they are interested in. If there is no interest in the internship from any veteran, then no documents will be submitted to our office for consideration.

18. Do individuals have the opportunity to decline from providing information and/or from consenting to particular uses of the information?   Yes

18a. If **yes**, describe the mechanism by which individuals indicate their consent choice(s):
If there is no interest in the internship from any veteran, then no documents will be submitted to our office for consideration. Also, if a veteran changes their mind and decide they are no are longer interested in the internship, they or their Coordinator contacts our office to notify us and we stop with the internship process.

19. How does the system or business process ensure due process regarding information access, correction and redress?

The system will allow affective parties the opportunity to clarify or dispute negative information that could be used against them. Due process is provided pursuant to 5 USC. This only refers to interns. Their information is only entered when they accept a non-paid internship. The entire process and procedures are dictated by the Internal Revenue Manual guidelines. IRS policy allows individuals whose data is in the system the opportunity to clarify or dispute negative determinations through the appeals process."

I. INFORMATION PROTECTION

20. Identify the owner and operator of the system (could be IRS owned and Operated; IRS owned, contractor operated; contractor owned and operated)

IRS Owned and Operated

21. The following people have access to the system with the specified rights:

IRS Employees?   Yes

IRS Employees?	**Yes/No**	**Access Level(Read Only/Read Write/ Administrator)**
Users	Yes	Read and Write
Managers	Yes	Read and Write
Sys. Administrators	Yes	Read and Write
Developers	Yes	Read And Write

Contractor Employees?   No

21a. How is access to SBU/PII determined and by whom? The e-Trak VETS system utilizes the IRS OL-5081 application to document approvals for access. Data access is granted on a need-to-know basis. A potential user must submit a request for access via IRS On–Line application 5081 (OL5081) to their local management for approval consideration. Users are not permitted access without a signed 5081 form from an authorized management official. Specific permissions (Read, Write, Modify, Delete, and/or Print) are defined on the OL5081 form and set (activated) by the System Administrator prior to the user being allowed access. User privileges and user roles determine the types of data that each user has access to. VETS administrator of the application will create and assign role based user accounts to designate/control user access to PII within the application.

21b. If computer matching occurs, can the business owner certify that it meets requirements of IRM 11.3.39 Disclosure of Official Information, Computer Matching & Privacy Protection Act ? Not Applicable

I.1 RECORDS RETENTION SCHEDULE

22. Are these records covered under the General Records Schedule (GRS), or have a National Archives and Records Administration (NARA) archivist approved a Record Control Schedule (RCS) for the retention and destruction of official agency records stored in this system?   Yes

    22a. If **yes**, how long are the records required to be held under the corresponding RCS and how are they disposed of? In your response, please include the complete IRM number 1.15.XX and specific item number and title.

> Documents stored in this eTrak repository are the official records and therefore this is considered an official recordkeeping system. The Owner will ensure that documents are appropriately destroyed/deleted when no longer needed. Official recordkeeping copies of e-Trak vets records are maintained in accordance with General Records Schedule (GRS)1, Item 33(e), (g), (l), (m), (n), (p) published in IRS Document 12829. If necessary, a request for any unscheduled eTrak VETS data and associated records will be drafted with the assistance of the IRS Records and Information Management (RIM) Program Office, and submitted to the National Archives and Records Administration (NARA) for disposition approval.

I.2 SA&A OR ECM-R

23. Has the system been through SA&A (Security Assessment and Authorization) or ECM-R (Enterprise Continuous Monitoring Reauthorization)?   Yes

    23a. If **yes**, what date was it completed?   1/13/2017

        23.1 Describe in detail the system s audit trail.   e-trak VETS application has full audit trail capabilities. The audit trail   assures that those who use e-trak VETS only have permission to view and use the modules their role allows. The Site   Administrator (SA) prepares and reviews monitoring reports based on Identity Theft and Incident Management (ITIM) established timeframes. E-trak regularly runs audits to determine accounts that no longer need access to PII or our inactive.   Per IRM 10.8.1.5.1.3, after 120 days of inactivity, the user's account will be disabled, but not removed from the system. After   365 days of inactivity, the account will be automatically deleted.. In addition, the SSP is reviewed annually during continuous   monitoring initiatives, and updated at least every three years or whenever there are significant changes to the system

J. PRIVACY TESTING

24. Does the system require a System Test Plan? Yes

    24b. If **yes**, Is the test plan in process or completed: Completed

    24.3 If **completed/ or in process,** describe what testing and validation activities have been conducted or are in progress to verify and validate that the applicable Privacy Requirements (listed in header) have been met?
Create test cases and test scripts for security and privacy requirements. These test cases and test scripts are to validate and verify user access control procedures, ensure strict confidentiality, use of data, and accountability. For example of testing login with valid credentials, 1) Click on the URL to e-trak VETS module using Single Sign-On (SSO), 2) System should automatically put you on the landing page (Tracking inbox); 3) User role should be displayed on the upper right hand corner next to user's SEID according to the 5081 approval. To validate and verify system user accountability by ensuring roles and permissions are defined based on proper unique assignments. For example, 1) After logged into the system, in case search, enter any part of case number or First Name or Last Name, system will return a list of cases only assigned to you, click

on the case ID link in the search results listing, and system will display that specific case details screen. Continuous Monitoring (eCM) (now called Annual Security Control Assessment (ASCA)) occurs annually to ensure that controls remain in place to properly safeguard PII."

24b.1. If **completed**, where are the test results stored (or documentation that validation has occurred confirming that requirements have been met)?   System Test Plan, Unit Test Plan, User Acceptance testing, test cases and test scripts. The plans are stored in the DocIT repository. The test cases, test scripts and test plans are generated and stored in CLM Collaborate Lifecycle Management Quality Manager Tool.

24b.2. If **completed**, were all the Privacy Requirements successfully tested?   Yes

24.2 If **completed**, are there any residual system privacy, civil liberties, and/or security risks identified that need to be resolved? No

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K. SBU Data Use

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25. Does this system use, or plan to use SBU Data in Testing?   No

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L. NUMBER AND CATEGORY OF PII RECORDS

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26. Identify the number of individual records in the system for each category:

    26a. IRS Employees: Under 50,000
    26b. Contractors: Not Applicable
    26c. Members of the Public: Under 100,000
    26d. Other: No

M. CIVIL LIBERTIES

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27. Does the system maintain any information describing how any individual exercises their rights guaranteed by the First Amendment?   No

28. Is the system information used to conduct data-mining as defined in the *Implementing the 9/11 Commission Recommendations Act of 2007, Public Law 110-53, Section 804?* No

29. Will this system have the capability to identify, locate, and monitor individuals or groups of people? No

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N. ACCOUNTING OF DISCLOSURES

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30. Does the system include or require disclosure of tax or employee information to anyone other than IRS employees in the performance of their duties, or to the person to whom the information pertains or to a 3rd party pursuant to a Power of Attorney, tax or Privacy Act consent? No

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End of Report