

Date of Approval: **February 06, 2023**

PIA ID Number: **7563**

## **SYSTEM DESCRIPTION**

*Enter the full name and acronym for the system, project, application and/or database.*

Veterans Employment Tracking System, E-TRAK VETS

*Is this a new system?*

No

*Is there a PCLIA for this system?*

Yes

*What is the full name, acronym, and milestone of the most recent PCLIA?*

Veterans Employment Tracking System, VETS, PCLIA # 4778

*What is the approval date of the most recent PCLIA?*

3/29/2020

*Changes that occurred to require this update:*

Expiring PCLIA

*Were there other system changes not listed above?*

No

*What governance board or Executive Steering Committee (ESC) does this system report to? Full name and acronym.*

Human Capital Board

*Current ELC (Enterprise Life Cycle) Milestones:*

System Development/Milestone 4B

Operations & Maintenance (i.e., system is currently operational)

*Is this a Federal Information Security Management Act (FISMA) reportable system?*

Yes

## GENERAL BUSINESS PURPOSE

*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, the non-paid Student Veteran Intern Program, and the DoD SkillBridge Program such as names, locations, months required to participate in 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.

## PII DETAILS

*Does the system use, collect, receive, display, store, maintain, or disseminate IR Code 6103 taxpayer information: or any other type of Sensitive but Unclassified (SBU) information or PII such as information about IRS employees or outside stakeholders?*

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

*What types of tax identification numbers (TIN) apply to this system?*

Social Security Number (SSN)

*List the approved Treasury uses of the SSN:*

Interfaces with external entities that require the SSN

Another compelling reason for collecting the SSN

*Explain why the authorized use(s) above support the new or continued use of SSNs (or tax identification numbers).*

The e-Trak program requires the use of SSN's because no other identifier can be used to uniquely identify a veteran 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.

*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 Circular A-130 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.

*Does this system use, collect, receive, display, store, maintain or disseminate other (non-SSN) PII (i.e., names, addresses, etc.)?*

Yes

*Specify the PII Elements:*

Name  
Phone Numbers  
E-mail Address  
Date of Birth  
Standard Employee Identifier (SEID)  
Medical Information  
Employment Information  
Tax Account Information

*Does this system use, collect, receive, display, store, maintain, or disseminate SBU information that is not PII?*

Yes

*Specify the types of SBU from the SBU Types List:*

Protected Information - Information which if modified, destroyed, or disclosed in an unauthorized manner could cause loss of life, loss of property or funds by unlawful means, violation of personal privacy or civil rights, gaining of an unfair procurement advantage by contractors bidding on government contracts, or disclosure of proprietary information entrusted to the Government.

*Are there other types of SBU/PII used in the system?*

No

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

SSN for tax returns and return information is Internal Revenue Code Section 6109

SSN for personnel administration (IRS Employees) is 5 USC & Executive Order 9397

PII for personnel administration is 5 USC

*Has the authority been verified with the system owner?*

Yes

## **BUSINESS NEEDS AND ACCURACY**

*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 positions, 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, Proof of Military Service and Disability Rating documents issued from the Department of Veteran Affairs (VA). 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. This information will be 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.

*How is the SBU/PII verified for accuracy, timeliness, and completion?*

Users access the e-Trak VETS module by authenticating at a login screen using their Standard Employee Identifier (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. The taxpayer (veteran) has appeal rights for any determinations made from the data.

## **PRIVACY ACT AND SYSTEM OF RECORDS**

The Privacy Act requires Federal agencies that maintain a system of records to publish systems of records notices (SORNs) in the Federal Register for records from which information is retrieved by any personal identifier for an individual who is a US citizen, or an alien lawfully admitted for permanent residence. The Privacy Act also provides for criminal penalties for intentional noncompliance.

*Does your application or this PCLIA system pertain to a group of any record from which information is retrieved by any personal identifier for an individual who is a US citizen, or an alien lawfully admitted for permanent residence? An identifier may be a symbol, voiceprint, SEID, or other personal identifier that is used to retrieve information.*

Yes

*Identify the Privacy Act SORN(s) that cover these records.*

IRS 36.003 General Personnel and Payroll Records

## **RESPONSIBLE PARTIES**

*Identify the individuals for the following system roles:*

## Official Use Only

## **INCOMING PII INTERFACES**

*Does the system receive SBU/PII from other systems or agencies?*

Yes

*Does the system receive SBU/PII from IRS files and databases?*

Yes

*Enter the files and databases:*

System Name: Integrated Data Retrieval System (IDRS)

Current PCLIA: Yes

Approval Date: 10/26/2021

SA&A: Yes

ATO/IATO Date: 9/20/2022

*Does the system receive SBU/PII from other federal agency or agencies?*

Yes

*For each federal interface, identify the organization that sends the SBU/PII, how the SBU/PII is transmitted and if there is an Inter-Agency Agreement (ISA) /Memorandum of Understanding (MOU).*

Name: Veterans Administration  
Transmission Method: Secure Data Transport (SDT)  
ISA/MOU: Yes

*Does the system receive SBU/PII from State or local agency (-ies)?*

No

*Does the system receive SBU/PII from other sources?*

No

*Does the system receive SBU/PII from Taxpayer forms?*

No

*Does the system receive SBU/PII from Employee forms (e.g., the I-9)?*

No

## **DISSEMINATION OF PII**

*Does this system disseminate SBU/PII?*

No

## **PRIVACY SENSITIVE TECHNOLOGY**

*Does this system use social media channels?*

No

*Does this system use privacy-sensitive technologies such as mobile, global position system (GPS), biometrics, RFID, etc.?*

No

*Does the system use cloud computing?*

No

*Does this system/application interact with the public?*

No

## **INDIVIDUAL NOTICE AND CONSENT**

*Was/is notice provided to the individual prior to collection of information?*

Yes

*How is notice provided? Was the individual notified about the authority to collect the information, whether disclosure is mandatory or voluntary, the purpose for which the information will be used, with whom the information may be shared, and the effects on the individual, if any, if they decide not to provide all or any of the requested information?*

The IRS notifies all individuals who file tax returns of such collection via the Privacy Act Notice in tax return instructions. This (Privacy Act Notice) information can be found in the IRS Form instructions. For example - Form 1040 (A lot of IRS systems contain information from Form 1040). The legal right to ask for information is Internal Revenue Code sections 6001, 6011, and 6012(a), and their regulations. They say that you must file a return or statement with us for any tax you are liable for. Your response is mandatory under these sections.

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

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 longer interested in the internship, they or their Coordinator contacts our office to notify us, and we stop with the internship process.

*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.

## INFORMATION PROTECTION

*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

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

*IRS Employees*

Users: Read Write

Managers: Read Write

System Administrators: Read Write

Developers: Read Write

*How is access to SBU/PII determined and by whom?*

The eTrak VETS system utilizes the Business Entitlement Access Request System (BEARS) 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 BEARS to their local management for approval consideration. Users are not permitted access without a signed BEARS form from an authorized management official. Specific permissions (Read, Write, Modify, Delete, and/or Search) are defined on the BEARS 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 Personal Identifiable Information (PII) within the application.

## RECORDS RETENTION SCHEDULE

*Are these records covered under a General Records Schedule (GRS, IRS Document 12829), or has the National Archives and Records Administration (NARA) approved a Records Control Schedule (RCS, IRS Document 12990) for the retention and destruction of official agency records stored in this system?*

Yes

*How long are the records required to be held under the corresponding GRS or RCS, and how are they disposed of? In your response, please provide the GRS or RCS chapter number, the specific item number, and records series 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. GRS 2.1 Item 150-Records of delegation of authority for examination and certification. Destroy 3 years after agreement terminates but longer retention is authorized if required for business use.

## **SA&A OR ASCA**

*Has the system been through SA&A (Security Assessment and Authorization) or ASCA (Annual Security Control Assessment)?*

Yes

*What date was it completed?*

10/25/2022

*Describe the system's audit trail.*

All account access to the system is granted through the BEARS authorization process thus ensuring that authorization is granted from appropriate designated officials and that identifiers are securely distributed to the individuals requesting access. E-trak regularly runs audits to determine accounts that no longer need access to PII or our inactive. Per IRM 10.8.1.4.1.1.3, 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. Disabled or deleted accounts require that the user go through the BEARS process to regain access to the system. 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.

## **PRIVACY TESTING**

*Does the system require a System Test Plan?*

Yes

*Is the test plan completed?*

Yes

*Where are the test results stored (or documentation that validation has occurred confirming that requirements have been met)?*

The plans are stored in DocIT and Collaborative Lifestyle Management (CLM) tools.

*Were all the Privacy Requirements successfully tested?*

Yes

*Are there any residual system privacy, civil liberties, and/or security risks identified that need to be resolved?*

No

*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?*

Test cases and test scripts are created 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. In addition, the e-Trak system is currently in the Operations and Maintenance phase of its lifecycle. Continuous Monitoring (eCM) (now called Annual Security Control Assessment) occurs annually to ensure that controls remain in place to properly safeguard Personal Identified Information (PII).

## **SBU DATA USE**

*Does this system use, or plan to use SBU Data in Testing?*

No

## **NUMBER AND CATEGORY OF PII RECORDS**

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

IRS Employees: Under 50,000

Contractors: Not Applicable

Members of the Public: Under 100,000

Other: No

## **CIVIL LIBERTIES**

*Does the system maintain any information describing how any individual exercises their rights guaranteed by the First Amendment?*

No

*Is the system information used to conduct 'data-mining' as defined in the Implementing Recommendations of the 9/11 Commission Act of 2007, Public Law 110-53, Section 804?*

No

*Will this system have the capability to identify, locate, and monitor individuals or groups of people?*

No

*Does computer matching occur?*

No

## **ACCOUNTING OF DISCLOSURES**

*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