

Date of Approval: **February 18, 2022**

PIA ID Number: **6791**

## **SYSTEM DESCRIPTION**

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

Electronic Enterprise Fax , EEFax, EEFAX

*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?*

Enterprise Electronic Fax (EEFax), PCLIA# 3960

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

3/21/2019

*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.*

User and Network Services (UNS)

*Current ELC (Enterprise Life Cycle) Milestones:*

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 EEFax system allows an individual to send, receive, review, store, and work a 'fax document' from their desktop or laptop computer. This method reduces the amount of time to print a document, walk to a physical fax machine, transmit and return to the desk. In addition, EEFax electronically delivers incoming faxes based upon phone numbers or bar codes - reducing the unintentional storage of faxes at the machine; as well as reducing the number of individuals sorting through a pile of faxes at the physical fax machine. The benefits include increased employee efficiencies, reduced paper usage, and reduced overall telecommunications costs. The EEFax goal is to allow the IRS to increase its technology offerings and provide the Service a mechanism to further reduce its reliance on paper records while decreasing the need for additional standalone fax hardware and consumables. This can be accomplished by providing an electronic fax solution that can receive, route, and deliver electronic fax documents. This solution acts as a 'fax utility' or edge service and simply provides the fax handling infrastructure. EEFax uses unique telephone numbers or barcodes for electronic delivery. This transport service will bring the added business value associated with transmitting and viewing faxed documents from the desktop and maintaining them electronically.

## 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:*

Security Background Investigations

Interfaces with external entities that require the SSN

Legal/statutory basis (e.g., where collection is expressly required by statute)

When there is no reasonable alternative means for meeting business requirements

Statistical and other research purposes

Delivery of governmental benefits, privileges, and services

Law enforcement and intelligence purposes

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).*

EEFax is a mode of transmission for a variety of official IRS business.

*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 CIRCULAR NO. A-130 requires that federal agencies develop a mitigation or elimination strategy for systems that use SSNs. An exception to that requirement is when the SSN is uniquely needed to identify a user's record. SSNs are permissible from Internal Revenue Code (IRC) 6109, which requires individual taxpayers to include their SSNs on their income tax returns.

Employer Identification Number

Other Taxpayer Identification Number

*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  
Mailing address  
Phone Numbers  
E-mail Address  
Date of Birth  
Place of Birth  
Standard Employee Identifier (SEID)  
Mother's Maiden Name  
Criminal History  
Medical Information  
Certificate or License Numbers  
Vehicle Identifiers  
Passport Number  
Alien Number

Financial Account Numbers  
Photographic Identifiers  
Employment Information  
Tax Account Information  
Centralized Authorization File (CAF)

*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:*

Procurement sensitive data    Contract proposals, bids, etc.

Official Use Only (OUO) or Limited Official Use (LOU)    Information designated as OUO or LOU is information that: is exempt under one of the statutory Freedom of Information Act exemptions; is prohibited by other laws or regulations; would significantly impede the agency in carrying out a responsibility or function; or would constitute an unwarranted invasion of privacy.

Criminal Investigation Information    Information concerning IRS criminal investigations or the agents conducting the investigations.

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

Yes

*Describe the other types of SBU/PII that are applicable to this system.*

The system does not store or process PII and users cannot access any information other than that which has been delivered via fax protocols. There are a small number of users with elevated permissions via Online 5081, who manage print queues where incoming faxes are stored temporarily, until the faxes are printed. The fax image is stored temporarily in cases where re-printing is needed due to printer errors. The default value to automatically delete all faxes is 5 days. By exception, this can be extended during a prolonged printer outage. EEFax electronically receives facsimiles. The information that comes in on a traditional facsimile machine is the same information that comes into EEFax (i.e., the same fax protocols). No data is parsed or extracted from the fax files. Possible information could include (but not limited to) taxpayer information in the form of signature documents, tax returns, and income verification requests. The files will be stored only long enough for the system to verify delivery to the final destination.

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

PII for federal tax administration is generally Internal Revenue Code Sections 6001, 6011, & 6012e(a)

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

PII about individuals for Bank Secrecy Act compliance 31 USC

Information by CI for certain money laundering cases may be 18 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.*

EEFax electronically sends and receives facsimiles. The information that comes in sent and received on a traditional facsimile machine is the same information that comes into EEFax (i.e., the same fax protocols). No data is parsed or extracted from the fax files. Possible information could include (but not limited to) taxpayer information in the form of signature documents, tax returns, and income verification requests. The files fax messages are stored only long enough for the system to verify delivery to the final destination. The only exceptions to this rule are faxes sent to high-speed printers. Faxes destined for printing are retained for a period of five days so faxes can be reprinted in case there is a printer malfunction. When faxes are received, they are delivered to High-Speed Printer(s), SharePoint Uniform Resource Locator (URL), Universal Naming Convention (UNC) File Storage, Individual or Organizational Mailbox. The majority of the EEFax traffic is to and from the Exchange email environment. EEFax messages delivered to Individual or Organizational mailboxes are unencrypted. EEFax messages sent from Outlook clients are unencrypted and without a digital signature. EEFax is projected to provide services for the entire enterprise and handle approximately 20M fax pages per month. EEFax will maintain employee standard employer identifier (SEID) and employee e-mail address information in the activity logs to track audit trails on fax activity.

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

Enterprise e-Fax only collects the telephone number that the file was sent to and from as well as the time it was delivered via an audit stamp. The documents contain Tagged Image File Format (TIFF) images of requested documentation i.e., receipts, birth certificates, authorization signatures etc., however the system does not extract and cannot decipher the contents of the fax. The only data elements that are collected and managed by the system are the metadata associated with the fax, including date/time, telephone number etc. EEFax will obtain Standard Employee Identifier (SEID) information from Active Directory. The SEIDs are used for routing, to track fax transmission and for audit trails. EEFax provides each fax with an audit trail.

## **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 00.001 Correspondence Files and Correspondence Control Files

## **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?*

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.

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

No

*Why not?*

The legal right to ask for information is Internal Revenue Code sections 6001, 6011, and 6012(a), and their regulations. These sections state that individuals must file a return or statement with IRS for any tax for which they are liable, and response is mandatory.

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

Publication 1 - "Your Rights as a Taxpayer" explains the rights of the taxpayer, which includes the right to challenge the IRS' position and be heard; and the right to appeal an IRS decision in an independent forum.

## **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: Administrator

Managers: Read Write

System Administrators: Administrator

Developers: Read Write

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

Users are provided access to the EEFax system through use of the Online 5081 process. User requests are approved by their managers, which are then routed to the EEFax Project Management Office (PMO) queue for approval. The EEFax PMO determines what resources the user needs access to and is annotated in the OL5081 request. Once approved by the EEFax PMO, the request is then routed to the EEFax System Administrators, who in turn add the users domain account information to the EEFax system. Once a user no longer requires access to the system, the user performs an OL5081 DELETE request which is approved by the EEFax PMO and routed to the EEFax System Administrators, and the users access privileges are removed. EEFax PMO employees and contractors have access to the EEFax system database tables for running reports. EEFax PMO employees and contractors obtain access by using the OL5081 process. Employee and contractor requests are approved by the EEFax PMO and then by their managers. When access to the database tables are no longer needed, EEFax PMO employees and contractors submit an OL5081 DELETE request and access rights to the database are removed.

## **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?*

No

*You must work with the IRS Records and Information Management (RIM) Program Office to address records retention requirements before you dispose of any records in this system.*



## **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?*

5/3/2021

*Describe the system's audit trail.*

There are advanced audit logs that are saved for each outgoing and incoming fax. This captures all metadata associated with receiving the fax: Job ID - Unique key for the system Computer Name - ID of the Faxcom Server that received the fax Creation Date - The Greenwich Mean Time (GMT) date and time the fax was received Status Value - The result of the fax reception Transmitting Station Identifier (TSI) - Phone number passed by the sending fax CallerID - Phone number from Caller ID service Connect Time - Length of time the call is connected while the fax is sent Transfer Rate - Data transfer rate in baud, or symbols per second Fall Back - Boolean value, a logical data type having one or two values, true if the final transfer rate is lower than the one originally negotiated Pages - Number of pages (including the cover) received as part of the fax Fax Port - Port number on which the fax is received Direct Inward Dial (DID) - Dial number that the fax sender dialed bActive - Boolean value, true until the fax has been delivered to its final destination bError - Boolean value, true if any route were to fail.

## **PRIVACY TESTING**

*Does the system require a System Test Plan?*

No

*Please explain why:*

The system has been in production for 7 years, and nothing has changed that would require a System Test Plan.

## **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: More than 100,000

Contractors: Not Applicable

Members of the Public: More than 1,000,000

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