

Date of Approval: **July 22, 2021**

PIA ID Number: **6044**

## **SYSTEM DESCRIPTION**

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

Integrated Virtual Learning Platform Project, IVLPP

*Is this a new system?*

Yes

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

User and Network Services (UNS) Governance Board

*Current ELC (Enterprise Life Cycle) Milestones:*

Vision & Strategy/Milestone 0

Project Initiation/Milestone 1

*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 Integrated Virtual Learning Platform Project (IVLPP), initiative is to replace the current enterprise VE Saba Meeting 8.3.5 platform with a Software-As-A-Service (SAAS) solution hosted by a third-party vendor. The intent is to acquire a future-proof solution to meet the IRS Taxpayer First Act requirement to establish a continuous learning environment with new technology to create accessible, high-quality, and effective program to optimize the employee training experience.

## 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.)?*

No

*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  
E-mail Address  
Standard Employee Identifier (SEID)  
Photographic Identifiers  
Biometric Identifiers

*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:*

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.

Proprietary data Business information that does not belong to the IRS.

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

No

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

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 business need is for Adobe Connect to utilize single sign-on (SSO) authentication capabilities for IRS employees. The SSO capability will promote ease of use for IRS employees by eliminating the need to enter their HRConnect User/Employee ID and password to login. Adobe Connect will be integrated with the Integrated Talent Management (ITM) system, complying with the Homeland Security Presidential Directive 12 (Policy for a Common Identification Standard for Federal Employees and Contractors).

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

Employee PII is verified by ITM. ITM is the Treasury Integrated Talent Management (ITM) System that manages the IRS secure access to applications.

## **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?*

No

*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: Department of Treasury ITM  
Transmission Method: HTTPS  
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?*

Yes

*Does this system disseminate SBU/PII to other IRS Systems?*

Yes

*Identify the full name and acronym of the IRS system(s) that receive SBU/PII from this system.*

System Name: Splunk  
Current PCLIA: Yes  
Approval Date: 1/27/2020  
SA&A: Yes  
ATO/IATO Date: 6/25/2021

*Identify the authority.*

5 U.S.C 301, 1302, 2951, 4118, 4308 and 4506 18 U.S.C. 1030 (a)(2)(B) 26 U.S.C. 7801  
Executive Orders 9397 and 10561.

*For what purpose?*

To identify and track any unauthorized accesses to sensitive but classified information and potential breaches or unauthorized disclosures of such information.

*Does this system disseminate SBU/PII to other Federal agencies?*

Yes

*Identify the full names of the federal agency(s) that receive SBU/PII from this system, and if there is an Inter-Agency Agreement (ISA) / Memorandum of Understanding (MOU).*

Organization Name: Dept of Treasury ITM  
Transmission Method: HTTPS  
ISA/MOU: Yes

*Identify the authority.*

The intent is to acquire a future-proof solution to meet the IRS Taxpayer First Act requirement to establish a continuous learning environment with new technology to create accessible, high-quality, and effective program to optimize the employee training experience.

*Identify the Routine Use in the applicable SORN (or Privacy Act exception).*

IRS 36.003 General Personnel and Payroll Record

*For what purpose?*

For Authentication purposes.

*Does this system disseminate SBU/PII to State and local agencies?*

No

*Does this system disseminate SBU/PII to IRS or Treasury contractors?*

No

*Does this system disseminate SBU/PII to other Sources?*

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.?*

Yes

*Briefly explain how the system uses the referenced technology.*

Cameras will be used by instructors to provide training.

*Does the system use cloud computing?*

Yes

*Is the cloud service provider (CSP) Federal Risk and Authorization Management Program (FedRAMP) certified?*

Yes

*Date Certified*

6/27/2019

*Please identify the ownership of the CSP data.*

IRS

*Does the CSP allow auditing?*

Yes

*Who audits the CSP Data?*

IRS

*What is the background check level required for CSP?*

Moderate

*Is there a breach/incident plan on file?*

Yes

*Privacy laws (including access and ownership) can differ in other countries. This cloud will be Continental US (CONUS) only for:*

Storage  
Transmission  
Maintenance

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

Yes

*Was an electronic risk assessment (e-RA) conducted on the system/application?*

Not Applicable

*Please explain.*

DIRA Cyber team examined the system and reported no e-Ra was required.

## 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 business units are responsible for notifications to individuals. The host of the Adobe Connect session will have the ability to record the session. When the recording feature is initialized, all attendees of that Adobe Connect session will receive an on-screen notification stating that the session is now being recorded. And those attending that session will then be given an option to remain in, or to leave the meeting.

*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):*

The individual can refuse to stay in a recorded session and leave the meeting.

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

Adobe Connect provides IRS personnel a mechanism to conduct teleconferences and web conferences with personnel within the IRS WAN (Wide Area Network) and external participants via the Internet. As a result, the potential exists for sharing personally identifiable information (PII) and sensitive but unclassified (SBU) data. During the Adobe Connect sessions and web conferences, hosts and participants may discuss PII and SBU data in support of the IRS mission so long as IRS employees and cleared contractors adhere to all IRMs governing discussion of PII and/or SBU.

## 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 Contractor Operated



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

*IRS Employees*

Users: Read Only

Managers: Read Only

System Administrators: Administrator

Developers: Read Write

*IRS Contractor Employees*

Contractor Users: Read Only

Contractor System Administrators: Administrator

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

The Adobe Connect recordings will be saved in the Cloud. The Host will have the ability to download detailed reports from his/her hosted session from the Adobe Connect web portal. The reports are only available to those with an Adobe Connect host license, which is approved through the OnLine 5081/Bears Business Entitlement Access Request System (BEARS) process. Access is secured via IRS PIV Card identification and authentication services. The PII data available for access in this application is required for their operation.

## **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.*

All records will be deleted or destroyed in accordance with approved retention periods. Any records will be managed according to requirements under IRM 1.15.1 and 1.15.6.14 Use of Collaboration Tools and will be destroyed using IRS General Records Schedule (GRS) or IRS Records Control Schedule (RCS) and as coordinated with the IRS Records and

Information Management (RIM) Program and IRS Records Officer. Log files will be maintained in accordance with GRS 3.2, item 030, or 031.

## **SA&A OR ASCA**

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

In-process

*When is the anticipated date of the SA&A or ACS completion?*

10/31/2021

*Describe the system's audit trail.*

Currently, this project is being conducted as a Proof of Concept in order to test the security and 508 compliance. We plan on integrating Splunk with Adobe Connect in order to retrieve SAML and event/activity logs to meet the IRM 10.8.1.4.3.2 standards. I believe that this is also part of the ELC process.

## **PRIVACY TESTING**

*Does the system require a System Test Plan?*

Yes

*Is the test plan completed?*

No

*When is the test plan scheduled for completion?*

9/30/2021

*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?*

Because this is a managed service in the cloud, we can only test our use cases. The results are in the IVLPP share point folder.

## **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: 50,000 to 100,000

Contractors: More than 10,000

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