

Date of Approval: **January 07, 2021**

PIA ID Number: **5677**

SYSTEM DESCRIPTION

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

Skype for Business, SfB

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?

Skype for Business PIA # 2934

What is the approval date of the most recent PCLIA?

11/30/2017

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.

Unified Communications Approval Board

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?

No

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.

Internal office collaboration and instant messaging client for Internal IRS communications and meetings. This is part of the Office Pro Plus 365 Suite of Tools. Skype is a collaboration tool that will enable employees to: hold online meetings (video or audio) with IRS co-workers, conduct online peer-to-peer conversations, share information / files, send instant messages (IM), indicate availability (presence) and screen sharing. There will be no direct contact with taxpayers and only between IRS Users. This tool will enable efficient and effective communications, information sharing and rapid collaboration for a wide range of functions including but not limited to tax administrative, personnel management, performance counseling and distributed meetings. Skype for Business Online allows staff to connect with co-workers, and leverages multiple devices through an enterprise-grade, secure, Information Technology (IT) managed platform. Contact information such as phone numbers and email addresses are used to communicate and connect users, which are only viewable by the specific IRS users of the service. Use of Skype is optional within the IRS.

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:

When there is no reasonable alternative means for meeting business requirements

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

Skype is an internal communications tool of the IRS. It supports IRS business processes that provides collaboration among employees and managers that may include the discussion or visual image on an SSN, as in the normal course of business.

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

There is no mitigation strategy as Skype is an internal communications and collaboration tool and is used in the normal course of business in the IRS, which may include discussions of SSN's.

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

Standard Employee Identifier (SEID)

Internet Protocol Address (IP Address)

Photographic Identifiers

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.

Agency Sensitive Information Information which if improperly used or disclosed could adversely affect the ability of the agency to accomplish its mission

Procurement sensitive data Contract proposals, bids, etc.

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.

Skype is an internal communications tool of the IRS. It supports IRS business processes that provides collaboration among employees and managers that may include the discussion or visual image on any type of SBU/PII that is communicated between employees in the normal course of business.

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

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 Skype Client can record (if selected by the meeting presenter) a video record of an online meeting (screen share) that could include anything that is shared by the participants. It can also record conversations within a Skype meeting in the form of textual messages exchanged between the participants. Both of these scenarios would only be collaboration between IRS employees (internal) and not with taxpayers. This video and recording functionality is the very same as being used with OCS and Lync and similar to the Live Meeting functionality. These were all approved for use within the IRS. This functionality is also being reviewed by the Video Review Board. Any use of Skype to display or share SBU/PII would be between only the individuals on the call and the responsibility of the participants. Any saved conversations are stored within an Outlook folder on the hard drive of the user who recorded it. Any videos are stored on the local C drive which is encrypted and accessible only by the user who recorded it. The system will display the following banner for each conversation should a record need to be created: Instant messaging (IM) should not be used to create federal records. If you create a federal record, you are required to preserve the message. To save in your Outlook folder, press CTRL + S. The program could include the following statement in a quick reference guide. It would require potential changes to the Skype tool to include in the actual tool but that is being investigated: Skype for Business Usage and Data Privacy Statement Skype for Business video functions are optional to use. Participants can join an Online Meeting in any mode (Audio-only or Audio & video. In order to ensure security of data and the privacy of persons who may be within range of the audio and video device, all individuals utilizing a video device agree to: Adjust the camera so that persons not participating in the call / video will not be in the camera view Inform the remote participants about any other local participant who is not in scope of the camera but may be able to hear the conversation Inform participants if the Online Meeting will be recorded Group employees, contractors, consultants or other representatives shall ensure that use of the Skype for Business video function will not reveal confidential or secret information unless all parties involved in the Online Meeting are bound by appropriate contractual obligations such as a Non-Disclosure-Agreement. Unauthorized video recording utilizing Skype for Business is prohibited and, in some instances may be illegal. By using the Skype for Business functions, you agree to the terms above.

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

The system does not use or process any SBU/PII. SKYPE for Business allows employees to communicate, schedule and attend virtual meetings and share their desktops, which allows you to collaborate on documents with other co-workers. The act to Record any meeting must be selected by the user otherwise there is no storage of the PII. Any employee email and contact information is being directly read from MS Outlook / Exchange. The privacy statement is described above.

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

IRS 34.037 Audit Trail and Security 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?

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?

No

Why not? If information is not collected directly from an individual, please discuss the factors considered in deciding to collect information from third party sources.

Skype does notify meeting participants if the meeting is being recorded. There is an indicator (pop-up) that states 'Recording has started'. In addition, if you hover on the recording indicator (red light) it will tell you who is recording the session. Further, it takes an action from any user to share their screen to other meeting participants. When you share your content...Skype does inform the user that other users can see their content. Information is not directly being collected but it could be recorded.

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):

They would need to willingly share their content or screen. This would require a user action.

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

The system does not process any information. IRS business units that use SKYPE for a tax administration purpose - Internal/collaboration - have customer service units and complaint processes by which an individual may request access to and/or correction of their information.

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

IRS Contractor Employees

Contractor Users: Read Write

Contractor Managers: Read Write

Contractor System Administrators: Read Write

Contractor Developers: Read Write

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

It is the responsibility of every user who is sharing the information during a meeting. The data can only be accessed by the user who recorded the data. It will reside on the individuals IRS Laptop.

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.

Skype for Business is a collaboration platform. Content owners are required to maintain records created on this platform in accordance with records management rules and regulations, including disposition requirements found in Documents 12990 and 12829. The IRS Records Office is available to assist with recordkeeping questions.

SA&A OR ASCA

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

No

Is the system secured in accordance with all applicable federal, treasury, and IRS security policy, procedures, and requirements?

Yes

Describe the system's audit trail.

Monitored as part of the Microsoft Exchange and Mail system by Enterprise Operations (EOPS). Audit trails are available on the Skype for Business servers.

PRIVACY TESTING

Does the system require a System Test Plan?

No

Please explain why:

This is a Commercial Off-the-Shelf (COTS) product being used as a part of the Microsoft Office Pro Plus 365 suite.

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: 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