

Date of Approval: May 25, 2016

PIA ID Number: 1627

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## A. SYSTEM DESCRIPTION

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1. Enter the full name and acronym for the system, project, application and/or database. Electronic Enterprise Fax , EEFax

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.

Enterprise Electronic Fax (EEFax), PCLIA# 570 EDS/EEFAX, Milestone 5

Next, enter the **date** of the most recent PIA. 11/14/2014

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  
No System Development/Milestone 4B  
No System Deployment/Milestone 5  
Yes 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

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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 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.

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**B. PII DETAIL**

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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      Yes On Spouse      Yes On Dependent

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

<u>Yes</u>	Social Security Number (SSN)
<u>Yes</u>	Employer Identification Number (EIN)
<u>Yes</u>	Individual Taxpayer Identification Number (ITIN)
<u>Yes</u>	Taxpayer Identification Number for Pending U.S. Adoptions (ATIN)
<u>Yes</u>	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-07-16 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.

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	Yes	Yes
Yes	Mailing address	No	No	No
Yes	Phone Numbers	No	No	No
Yes	E-mail Address	No	No	No
Yes	Date of Birth	Yes	Yes	Yes
Yes	Place of Birth	No	No	No
Yes	SEID	No	No	No
Yes	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
Yes	Criminal History	No	No	No
Yes	Medical Information	No	No	No
Yes	Certificate or License Numbers	No	No	No
Yes	Vehicle Identifiers	No	No	No
Yes	Passport Number	No	No	No
Yes	Alien (A-) Number	No	No	No
Yes	Financial Account Numbers	No	No	No
Yes	Photographic Identifiers	No	No	No
No	Biometric Identifiers	No	No	No
Yes	Employment (HR) Information	No	No	No
Yes	Tax Account Information	Yes	Yes	Yes

6c. Does this system contain SBU information that is not PII, it uses, collects, receives, displays, stores, maintains, or disseminates? Yes

If **yes**, select the types of SBU

<u>Selected</u>	<u>SBU Name</u>	<u>SBU Description</u>
No	Agency Sensitive Information	Information which if improperly used or disclosed could adversely affect the ability of the agency to accomplish its mission
Yes	Procurement sensitive data	Contract proposals, bids, etc.
Yes	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.
No	Proprietary data	Business information that does not belong to the IRS
No	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
No	Physical Security Information	Security information containing details of serious weaknesses and vulnerabilities associated with specific systems and facilities
Yes	Criminal Investigation Information	Information concerning IRS criminal investigations or the agents conducting the investigations.

6d. Are there other types of SBU/PII used in the system? Yes

If **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.

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

<u>Yes</u>	PII for federal tax administration is generally Internal Revenue Code Sections 6001, 6011, 6012e(a)
<u>Yes</u>	SSN for tax returns and return information is Internal Revenue Code Section 6109
<u>Yes</u>	SSN for personnel administration (IRS Employees) is 5 USC & Executive Order 9397
<u>Yes</u>	PII for personnel administration is 5 USC
<u>Yes</u>	PII about individuals for Bank Secrecy Act compliance 31 USC
<u>Yes</u>	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**

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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.

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.

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

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 images (TIFF format) 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 employee 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.

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

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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

**SORNS Number SORNS Name**

Treas/IRS 00.001 Correspondence

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

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### **D. RESPONSIBLE PARTIES**

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10. Identify the individuals for the following system roles. ## Redacted Information For 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

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**G. PRIVACY SENSITIVE TECHNOLOGY**

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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**

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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?

The IRS notifies all individuals who file tax returns of such collection via the Privacy Act Notice in tax return instructions.

18. Do individuals have the opportunity to decline from providing information and/or from consenting to particular uses of the information? No

18b. If 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.

19. 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.

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**I. INFORMATION PROTECTION**

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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

<u>IRS Employees?</u>	<u>Yes/No</u>	<u>Access Level(Read Only/Read Write/Administrator)</u>
Users	Yes	Administrator

Managers	Yes	Read and Write
Sys. Administrators	Yes	Administrator
Developers	Yes	Read And Write

Contractor Employees? No

21a. 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.

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

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## **I.1 RECORDS RETENTION SCHEDULE**

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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? No

22b. If **no**, how long are you proposing to retain the records? Please note, if you answered no, you must contact the IRS Records and Information Management Program to initiate records retention scheduling before you dispose of any records in this system.

All records housed in the Electronic Enterprise Fax system will be erased or purged from the system at the conclusion of their retention period(s) as required under IRM 1.15.6. The method used for sanitization will follow NIST SP 800-88 guidelines. It is not the official repository for data and documents and does not require National Archives approval to affect data disposition. For different data types, there are different retention periods. Retention schedules are documented in the Functional specification packages. Information ages off (is deleted from) the database at varying intervals.

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## **I.2 SA&A OR ECM-R**

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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? 12/11/2015

23.1 Describe in detail 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.

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## J. PRIVACY TESTING

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24. Does the system require a System Test Plan? No

24c. If **no**, please explain why. The system has been in production for 5 years, and nothing has changed that would require a System Test Plan.

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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:	<u>More than 100,000</u>
26b. Contractors:	<u>Not Applicable</u>
26c. Members of the Public:	<u>More than 1,000,000</u>
26d. Other:	<u>No</u>

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## 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**

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