

Date of Approval: September 19, 2016

PIA ID Number: **1829**

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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. moveLINQ, moveLINQ

2. Is this a new system? Yes

If **yes**, enter the full name, acronym, PIA ID Number and milestone of the most recent PIA.

Next, enter the **date** of the most recent PIA.

Indicate which of the following changes occurred to require this update (check all that apply).

<u>No</u>	<b>Addition of PII</b>
<u>No</u>	<b>Conversions</b>
<u>No</u>	<b>Anonymous to Non-Anonymous</b>
<u>No</u>	<b>Significant System Management Changes</b>
<u>No</u>	<b>Significant Merging with Another System</b>
<u>No</u>	<b>New Access by IRS employees or Members of the Public</b>
<u>No</u>	<b>Addition of Commercial Data / Sources</b>
<u>No</u>	<b>New Interagency Use</b>
<u>No</u>	<b>Internal Flow or Collection</b>

Were there other system changes not listed above?

If yes, explain what changes were made.

3. Check the current ELC (Enterprise Life Cycle) Milestones (select all that apply)

<u>No</u>	<b>Vision &amp; Strategy/Milestone 0</b>
<u>Yes</u>	<b>Project Initiation/Milestone 1</b>
<u>Yes</u>	<b>Domain Architecture/Milestone 2</b>
<u>No</u>	<b>Preliminary Design/Milestone 3</b>
<u>No</u>	<b>Detailed Design/Milestone 4A</b>
<u>No</u>	<b>System Development/Milestone 4B</b>
<u>No</u>	<b>System Deployment/Milestone 5</b>
<u>Yes</u>	<b>Operations &amp; Maintenance (i.e., system is currently operational)</b>

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 Internal Revenue Service must replace its current Government Relocation Accounting System (GRAS), which is used for processing relocation travel which does authorizations, advances and vouchers for relocation travelers. mLINQS Subscription Shared Service is the selected replacement system. MoveLINQS, which is mLINQ relocation system, will provide the IRS with the capability to perform all aspects of official relocation travel management with processes and procedures consistent with applicable federal travel regulations (FTR) that incorporate the latest technical advances within the relocation travel industry. MoveLINQ is a fully functional system designed expressly for government agencies to manage employee relocation. The IRS doesn't expect any custom changes to moveLINQ once implementation takes place. MoveLINQ will be interfaced to the Integrated Finance System (IFS) for budget and accounting processing and payment to travelers and calculation of relocation W2 for travelers. Information to be entered into moveLINQ is obligation expense data to reserve funds in IFS for later payment to traveler, accounting codes and information for calculating tax withholding.

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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.)? No

If **yes**, check who the SSN (or tax identification number) is collected on.

No    On Primary        No    On Spouse        No    On Dependent

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

- No        Social Security Number (SSN)
- No        Employer Identification Number (EIN)
- No        Individual Taxpayer Identification Number (ITIN)
- No        Taxpayer Identification Number for Pending U.S. Adoptions (ATIN)
- No        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).

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.

<u>Selected</u>	<u>PII Element</u>	<u>On</u> <u>Primary</u>	<u>On</u> <u>Spouse</u>	<u>On</u> <u>Dependent</u>
<b>Yes</b>	<b>Name</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
<b>Yes</b>	<b>Mailing address</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Yes</b>	<b>Phone Numbers</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>No</b>	<b>E-mail Address</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Yes</b>	<b>Date of Birth</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
<b>No</b>	<b>Place of Birth</b>	<b>No</b>	<b>No</b>	<b>No</b>

No	SEID	No	No	No
No	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
No	Criminal History	No	No	No
No	Medical Information	No	No	No
No	Certificate or License Numbers	No	No	No
No	Vehicle Identifiers	No	No	No
No	Passport Number	No	No	No
No	Alien (A-) Number	No	No	No
No	Financial Account Numbers	No	No	No
No	Photographic Identifiers	No	No	No
No	Biometric Identifiers	No	No	No
No	Employment (HR) Information	No	No	No
No	Tax Account Information	No	No	No

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
No	Procurement sensitive data	Contract proposals, bids, etc.
No	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
Yes	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
No	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? No

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

No	PII for federal tax administration is generally Internal Revenue Code Sections 6001, 6011, 6012e(a)
No	SSN for tax returns and return information is Internal Revenue Code Section 6109
No	SSN for personnel administration (IRS Employees) is 5 USC & Executive Order 9397

<b>Yes</b>	<b>PII for personnel administration is 5 USC</b>
<b>No</b>	<b>PII about individuals for Bank Secrecy Act compliance 31 USC</b>
<b>No</b>	<b>Information by CI for certain money laundering cases may be 18 USC</b>

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.

Contact information (Name, mailing address, phone numbers are (is) stored in moveLINQ for the purpose of sending year end summary of (yearly) relocation totals, transactions, and taxes withheld as a result of relocation payments. MoveLINQ uses PII information for correct calculation of tax withholding. SSNs will NOT be used, instead employees will be identified by the Integrated Financial System (IFS) employee vendor unique identification number (ID).

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

Address information will be directly entered into moveLINQ by Beckley Finance Center(BFC) technicians from paperwork submitted from traveler (relocate) for the purpose of sending year end summary reports, (and) letters of transactions completed during the calendar year, and tax impacts based upon those transactions. When BFC technicians go into IFS they can also verify accuracy of data submitted by travelers. BFC will also obtain IFS employee vendor (ID) from IFS and enter into moveLINQ instead of using SSN for interface between moveLINQ and IFS.

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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

If **yes**, enter the SORN number(s) and the complete the name of the SORN.

<u>SORNS Number</u>	<u>SORNS Name</u>
<b>GSA/GOVT-4</b>	<b>Contracted Travel Services Program.</b>
<b>Treas- 009</b>	<b>Treasury Financial Management Systems</b>
<b>Treas/IRS 36.003</b>	<b>General Personnel and Payroll Records</b>

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. ##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? Yes

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?

Email communication to travelers (relocate) informed them of transition from Government Relocation System (GRAS) to moveLINQ. The communication informed relocate that their GRAS profile information would be transferred to the moveLINQ system. This is a purely internal system and is not the official system of record. It does not make any determinations on its own. Any individual information is received from a system that provides employees with notice and rights to consent and/or amend, as needed. Notice comes through such communications as the Privacy Act notification on HR Connect and e-Performance, SETR, and other personnel systems. Employee rights are covered through appropriate legal and NTEU contractually negotiated process for remediation.

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? Federal Travel Regulation (FTR) mandate the use of an electronic system to do relocation. The relocation data are required to record the obligation of funds, to accurately calculate and accomplish reimbursement o the relocate and/or payment to third party relocation vendors, and to liquidate the obligation when payment is made.

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

The system will allow affected parties the opportunity to clarify or dispute information that could be used against them. Due process is provided pursuant to 5 USC.

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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)

Contractor Owned and Operated

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

IRS Employees? Yes

<u>IRS Employees?</u>	Yes/No	Access Level(Read Only/Read Write/Administrator)
<b>Users</b>	<b>Yes</b>	<b>Read and Write</b>
<b>Managers</b>	<b>No</b>	
<b>Sys. Administrators</b>	<b>No</b>	
<b>Developers</b>	<b>No</b>	

Contractor Employees? No

21a. How is access to SBU/PII determined and by whom? As with other IRS applications, OL5081 is the primary provisioning tool for moveLINQ. The only access allowed will be by IRS technicians at BFC who are currently in GRAS. Using hard copy documents generated by the traveler and their management and budget staff will be used by BFC to enter relocation and profile data into moveLINQ.

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? Yes

22a. If **yes**, how long are the records required to be held under the corresponding RCS and how are they disposed of? In your response, please include the complete IRM number 1.15.XX and specific item number and title.

IRS relocation records are scheduled under General Records Schedule (GRS) 1.1 - Financial Management and Reporting Records, Item 011. The records must be retained for 6 years and 3 months after the fiscal year in which travel occurred. These disposition instructions are published in IRS Document 12829. MoveLINQ will manage/dispose of transactional data. Related hard copy materials will be shredded using shredders located in office areas or placed in locked sensitive waste disposal bins for collection and destruction by moveLINQ Security. Electronic media will be securely overwritten (at least six passes) or degaussed, or turned in to moveLINQ Security for destruction in accordance with IRS data destruction requirements. All of these guidelines, including NARA guidelines regarding records disposition, are specified in the contract.

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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)? In-process

23b. If **in process**, when is the anticipated date of the SA&A or ECM-R completion? 10/1/2016

23c. If **no**, is the system secured in accordance with all applicable federal, treasury, and IRS security policy, procedures, and requirements?

23.1 Describe in detail the system s audit trail. Audit activities will be captured at the administrator level. Access logs are kept and analyzed for unauthorized access. moveLINQ activities are traceable to an individual through the unique account identity. The specific audit records maintained internally by the moveLINQ system are part of the proprietary design of the moveLINQ service. However, IRS has access to these audit records and will regularly audits the audit logs to achieve assurance that controls and mechanisms are in place that restrict unauthorized access. IRS audits are performed on both scheduled and non-scheduled basis. Each interface user is assigned a role and responsibility. The data files, database access and system access are assigned accordingly. The users are required to complete the privacy certification process on regular basis. Monitoring and Reporting: Current IFS system performance monitoring and security scanning is conducted on this and all connections associated with the IFS solution; to include Informatica, R3, BW, and the associated components. Logging and Audit Trails: The IFS system is configured to log all metadata regarding access and data exchange throughout the process thread. All activity on the Secure Data Transfer server in support of data movement is logged and monitored.

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## **J. PRIVACY TESTING**

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24. Does the system require a System Test Plan? Yes

24b. If **yes**, Is the test plan in process or completed: In Process

If **in process**, when is the test plan scheduled for completion? 8/31/2016

24.3 If **completed/ or in process**, 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?

Testing will be done against the developed relocation Requirements. All test cases will be mapped to requirements to ensure full requirement coverage. The relocation Requirements include the 38 Reusable Program Level Requirements (RPLRs) prepared by Privacy.

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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: Under 50,000  
26b. Contractors: Not Applicable  
26c. Members of the Public: Not Applicable  
26d. Other: No

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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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