

A. SYSTEM DESCRIPTION

1. Enter the full name and acronym for the system, project, application and/or database. Web Applications Usage Statistics, Web Stats

2. Is this a new system? Yes

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

Yes **Vision & Strategy/Milestone 0**

Yes **Project Initiation/Milestone 1**

Yes **Domain Architecture/Milestone 2**

Yes **Preliminary Design/Milestone 3**

Yes **Detailed Design/Milestone 4A**

Yes **System Development/Milestone 4B**

Yes **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? No

A.1 General Business Purpose

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 IRS will collect statistics related to usage of websites. The information will be used to determine how to improve web applications, to track the response rate to notices, and to track usage of website features related to tax account conditions. This data will also be used to determine how website usage correlates to tax and identity fraud.

B. PII DETAIL

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:

Yes **Social Security Number (SSN)**

Yes **Employer Identification Number (EIN)**

Yes **Individual Taxpayer Identification Number (ITIN)**

Yes **Taxpayer Identification Number for Pending U.S. Adoptions (ATIN)**

Yes	Practitioner Tax Identification Number (PTIN)
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Describe the planned mitigation strategy and forecasted implementation date to mitigate or eliminate the use of SSN s (or tax identification numbers).

There are no current plans for Online Account to eliminate the use of SSNs. All taxpayer interactions with this system will take place through secure means and require identification through the IRS secure access eAuthentication systems. 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, which the Service continues to develop strategies to meet. An exception to that requirement is when the SSN is uniquely needed to identify a user's record. The Usage Stats system requires the use of SSNs because no other identifier can be used to uniquely identify a taxpayer at this time. 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.

<u>Selected</u>	<u>PII Element</u>	<u>On Primary</u>	<u>On Spouse</u>	<u>On Dependent</u>
Yes	Name	Yes	Yes	No
Yes	Mailing address	No	No	No
No	Phone Numbers	No	No	No
No	E-mail Address	No	No	No
Yes	Date of Birth	Yes	Yes	Yes
No	Place of Birth	No	No	No
No	SEID	No	No	No
No	Mother's Maiden Name	No	No	No
No	Protection Personal Identification Numbers (IP PIN)	No	No	No
Yes	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
Yes	Financial Account Numbers	No	No	No
No	Photographic Identifiers	No	No	No
No	Biometric Identifiers	No	No	No
Yes	Employment (HR) Information	No	No	No
Yes	Tax Account Information	Yes	Yes	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

Selected	SBU Name	SBU Description
Yes	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
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
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? Yes

If **yes**, describe the other types of SBU/PII that are applicable to this system. The IRS eAuthentication login user name that an external user would use to log in to the application. Internally, that also maps to a login ID that is not shared with the taxpayer.

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

Yes	PII for federal tax administration is generally Internal Revenue Code Sections 6001, 6011, 6012e(a)
Yes	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
No	PII for personnel administration is 5 USC
Yes	PII about individuals for Bank Secrecy Act compliance 31 USC
No	Information by CI for certain money laundering cases may be 18 USC

6f. Has the authority been verified with the system owner? Yes

B.1 BUSINESS NEEDS AND ACCURACY

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.

SSNs are required to uniquely identify individuals impacted by or associated with website activity. Other identifiers, such as website login name or login unique id, are insufficient to identify individuals who do not have an IRS login.

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

Information that may result in adverse action such as audit trail information will be recorded with several pieces of information (such as originating IP address, date / time, account information accessed, success/failure) to reduce the likelihood of incorrect data captured. Other information, such as usage statistics, cyber security analytics, and fraud analytics may be used to identify trends or help identify activity, but will not be used as a basis for adverse action.

C. PRIVACY ACT AND SYSTEM OF RECORDS

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>
IRS 00.001	Correspondence Files and Correspondence Control Fi
IRS 24.030	Customer Account Data Engine Individual Master Fil
IRS 24.046	Customer Account Data Engine Business Master File
IRS 22.062	Electronic Filing Records
IRS 22.061	Information Return Master File
IRS 26.019	Taxpayer Delinquent Accounts Files
IRS 26.020	Taxpayer Delinquency Investigation Files
IRS 37.006	Correspondence, Miscellaneous Records and Informat

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

D. RESPONSIBLE PARTIES

10. Identify the individuals for the following system roles. ## Official Use Only

E. INCOMING PII INTERFACES

11. Does the system receive SBU/PII from other system or agencies? Yes

11a. If **yes**, does the system receive SBU/PII from IRS files and databases? Yes

If **yes**, enter the files and databases.

<u>System Name</u>	<u>Current PIA?</u>	<u>PIA Approval Date</u>	<u>SA & A?</u>	<u>Authorization Date</u>
Online Account (OLA)	Yes	12/23/2016	Yes	11/15/2016

11b. Does the system receive SBU/PII from other federal agency or agencies? No

11c. Does the system receive SBU/PII from State or local agency (-ies)? No

11d. Does the system receive SBU/PII from other sources? No

11e. Does the system receive SBU/PII from **Taxpayer** forms? No

11f. Does the system receive SBU/PII from **Employee** forms (such as the I-9)? No

F. PII SENT TO EXTERNAL ORGANIZATIONS

12. Does this system disseminate SBU/PII? Yes

12a. Does this system disseminate SBU/PII to other IRS Systems? Yes

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

<u>System Name</u>	<u>Current PIA?</u>	<u>PIA Approval Date</u>	<u>SA & A?</u>	<u>Authorization Date</u>
Cyber Security Data Warehouse	Yes	08/14/2014	Yes	09/07/2016

Identify the authority and for what purpose? Web Stats collects information for the purposes of tax administration under Internal Revenue Code Sections 6001, 6011, 6012e(a) to process taxpayer information. Internal Revenue Code Section 6109 authorizes the collection and use of SSN information. They will be able to correlate that behavior in the login environment with internal and external data sources.

12b . Does this system disseminate SBU/PII to other Federal agencies? No

12c. Does this system disseminate SBU/PII to State and local agencies? No

12d. Does this system disseminate SBU/PII to IRS or Treasury contractors? No

12e. Does this system disseminate SBU/PII to other Sources? No

G. PRIVACY SENSITIVE TECHNOLOGY

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

H. INDIVIDUAL NOTICE AND CONSENT

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.gov has several methods of informing the taxpayer about these issues. The irs.gov website has a Privacy Policy which states "Using these services is voluntary and may require that you provide additional personal information to us. Providing the requested information implies your consent for us to use this data in order to respond to your specific request." Prior to using the Online Account application, Online Account has the required notice that this is a US Government system for authorized use only.

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

18a. If **yes**, describe the mechanism by which individuals indicate their consent choice(s):
The Usage Statistic component does not collect any information directly from taxpayers. All information that is stored in the Usage Statistic component comes from the submission of tax returns submitted directly to the IRS through other IRS systems. Information from the tax returns is subsequently shared from the other applications to the Usage Statistic component. The tax return form provides taxpayers information regarding the opportunity to decline or consent to providing the information. Users who don't wish to have their information stored in usage statistics can choose not to use online applications that use usage statistics.

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

The taxpayer has due process by writing, calling, faxing or visiting the IRS. They are also provided due process rights on the tax forms.

I. INFORMATION PROTECTION

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>	Yes/No	Access Level(Read Only/Read Write/Administrator)
Users	Yes	Read-Only
Managers	Yes	Read-Only
Sys. Administrators	Yes	Read and Write

Developers	No		
Contractor Employees?	<u>Yes</u>		
<u>Contractor Employees?</u>	Yes/No	Access Level	Background Invest. Level
Contractor Users	Yes	Read-Only	Moderate
Contractor Managers	Yes	Read-Only	Moderate
Contractor Sys. Admin.	Yes	Read and Write	Moderate
Contractor Developers	No		

21a. How is access to SBU/PII determined and by whom? All contractors and employees must go through the Public Trust Clearance process before access is considered. Once cleared, access to Usage Statistics is obtained through the Online 5081 (OL5081) process. All access must be approved by the user's manager who reviews the OL5081 at the time of submission and on an annual timeframe. The system administrators/approvers will also verify group membership to ensure only the appropriate rights are granted based on need-to-know. For non-production supporting environments users must complete the necessary SBU data training, request access through the OL5081, and in some cases as outlined by the requirements set forth within the IRM submit an elevated access letter that is approved by the Associate Chief Information Officer (ACIO) prior to granting access. The non-production environment will also routinely review access lists and verify accounts, removing ones that are no longer necessary. Every individual is reminded of their Unauthorized Access (UNAX) requirements where they are restricted to see certain taxpayer data and in many instance a third-party tool is implemented to restrict access to that data.

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

I.1 RECORDS RETENTION SCHEDULE

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.

Web Stats System Data is unscheduled. All IRS records must have a National Archives and Records Administration (NARA)-approved records disposition authority (must be "scheduled") before they can be destroyed and/or purged from IRS electronic systems. This is required under Title 44 of the United States Code. Web Applications Usage Statistics PMO staff will work with the IRS Records and Information Management (RIM) Program Office to develop and submit to NARA requests for records disposition authorities for Web Stats DATA records (in all formats) as they are identified and/or developed. Web Applications Usage Statistics uses GRS references for Inputs, Outputs, and System Documentation. Listed below are the GRS references: Inputs are covered in GRS 4.3, item 020 for electronic inputs. Outputs are covered in GRS 4.3, item 031 for data files, and GRS 4.3, item 030 for ad hoc output reports. System Documentation is covered in GRS 3.1, item 051. System Access Records for Audit, Usage, and Extracts are covered under GRS 3.2, item 031.

I.2 SA&A OR ECM-R

23. Has the system been through SA&A (Security Assessment and Authorization) or ECM-R (Enterprise Continuous Monitoring Reauthorization)? No

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

23.1 Describe in detail the system s audit trail. An Audit Plan has been created for this system by the project team with the support of ESAT/SAAS. It records all actions of the taxpayer/user in near-real-time and transmits to SAAS/ESAR logs for Cyber security Operations review.

J. PRIVACY TESTING

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? 6/28/2016

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?

The system will go through a continuous Testing Strategy Implementation Plan due to its ongoing development. It will be assessed against the selected privacy requirements. To accomplish this, the project not only addresses the overarching Privacy Requirements but will break down the requirements to decomposed requirements that are reviewed, implemented, tested, and documented to ensure appropriate action was taken to address them. All this is being coordinated by the Requirement Engineering Program Office (REPO) and Cyber security and tracked in the Rational Requirements Tool and developer security (SA-11) testing. Please note that authentication is delegated to the eAuthentication system.

K. SBU Data Use

25. Does this system use, or plan to use SBU Data in Testing? No

L. NUMBER AND CATEGORY OF PII RECORDS

26. Identify the number of individual records in the system for each category:

26a. IRS Employees: Not Applicable
26b. Contractors: Not Applicable
26c. Members of the Public: More than 1,000,000
26d. Other: No

M. CIVIL LIBERTIES

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? Yes

If **yes**, describe the type of information derived from these efforts and the technical (e.g., audit trails) or other processes used to limit unauthorized monitoring. By using taxpayer-supplied PII plus IP Addresses, the IRS will have the capability to identify, locate, and monitor taxpayers. Audit trails will track all accesses to data. Access is protected though access control means by including OL5081 please refer to question 21a.

N. ACCOUNTING OF DISCLOSURES

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

End of Report
