
A. SYSTEM DESCRIPTION

1. Enter the full name and acronym for the system, project, application and/or database. IRS Marketing Express, IME, Marketing Express Tool

2. Is this a new system? No

2.a. If **no**, is there a Privacy Civil Liberties Impact Assessment (PCLIA) for this system? Yes

If **yes**, enter the full name, acronym, and milestone of the most recent PCLIA.

IRS Marketing Express, IME PIA ID Number 1479

Enter the approval **date** of the most recent PCLIA. 11/03/2015

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

- No Addition of Personally Identifiable Information (PII) (PII is any information that is linked or linkable).
- 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
- Yes Expiring PCLIA

Were there other system changes not listed above? No

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

Communications and Liaison Governance

3.a. Check the current Enterprise Life Cycle (ELC) 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? 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 Marketing Express tool is a web-based photo and message library to produce turnkey and customizable communication products based on the Earned Income Tax Credit (EITC) marketing campaign and other filing season marketing materials. The IRS Marketing Express application will allow IRS personnel and designated business partners to quickly and easily produce versions of prints ads and other marketing materials, with a high degree of accuracy and consistency. There will be two types of users on the system: General User: These users will access the application through a username/password combination. All general users will have the ability to generate and edit ads and submit ads for approval. A small number of ads / brochures will be available as is without an approval requirement. Once ads are approved, final PDF's can be downloaded for use. The base user universe will include representatives from more than 300 Stakeholder Partnerships, Education and Communication (SPEC) coalitions and a limited number of tax practitioners. IRS Content Managers: These users will access the application through a username/password combination. All content managers will have the ability to approve ads submitted by general users and generate and edit ads. These users will also have access to Marketing Express reporting features. Data in the System - All information in the electronic toolkits will be used for outreach efforts only. General public users will not have access to the content to make changes. Changes to content can only be approved by authorized IRS personnel.

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

6.a. 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

6.b. Does this system use, collect, receive, display, store, maintain, or disseminate other (non-SSN) PII (i.e. Names, addresses, etc.)? Yes

If **yes**, specify the information.

<u>Selected</u>	<u>PII Element</u>
Yes	Name
Yes	Mailing address
Yes	Phone Numbers
Yes	E-mail Address
No	Date of Birth
No	Place of Birth
No	Standard Employee Identifier (SEID)
No	Mother's Maiden Name
No	Protection Personal Identification Numbers (IP PIN)
No	Internet Protocol Address (IP Address)
No	Criminal History
No	Medical Information
No	Certificate or License Numbers
No	Vehicle Identifiers
No	Passport Number
No	Alien Number
No	Financial Account Numbers
No	Photographic Identifiers
No	Biometric Identifiers
No	Employment Information
No	Tax Account Information

No Centralized Authorization File (CAF)

6.c. Does this system contain SBU information that is not PII, it uses, collects, receives, displays, stores, maintains, or disseminates? No

6.d. Are there other types of SBU/PII used in the system? No

6.e. 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)

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

Yes PII for personnel administration is 5 USC

No PII about individuals for Bank Secrecy Act compliance 31 USC

No Information by CI for certain money laundering cases may be 18 USC

6.f. 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.

Users will not have access to any personal information but their own. The system contains no other data or information related to an individual or organization. A. The system contains only information about authorized users. These may be IRS partners (identified by name, address and phone number) B. The system contains only information about authorized users. These may be IRS employees identified by name, phone number and email address. C. Each object in the system has a 'history' record that notes times and if field-level changes were made. Purpose of the Electronic Toolkits: Various web-based electronic toolkits are needed in our outreach efforts. These toolkits include enhanced software such as flash that cannot be placed on IRS systems. IRS operating divisions and functional organizations use the toolkits to support their communications, marketing, outreach and education business goals, and will act as supplements to IRS.gov. Generally, an online toolkit includes easy to understand communications and marketing materials such as animated ads, stories, videos, photos, key messages and related materials. The toolkits also provide information in other languages. The toolkits are used by tax practitioners, outreach partners, non-profit organizations and the press although access to view the information is for the general public. Data in the System - All information in the electronic toolkits will be used for outreach efforts only. General public users will not have access to the content to make changes. Changes to content can only be approved by authorized IRS personnel.

8. How is the SBU/PII verified for accuracy, timeliness, and completeness?

The Marketing Express tool and the electronic toolkits are needed to provide information to the public for the tax filing season. Our SPEC partners need to use the marketing express tool to prepare for the tax filing season.

C. 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.

9. 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. No

*IRS is required to have a published Privacy Act system of records in the Federal Register. Please identify the Privacy Act SORN(s) that cover these records. If you need additional assistance identifying the correct SORNs please email *Privacy.*

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? No

F. DISSEMINATION OF PII

12. Does this system disseminate SBU/PII? 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, global position system (GPS), biometrics, Radio Frequency Identification (RFID), etc.? No
15. Does the system use cloud computing? No
16. Does this system/application interact with the public? Yes
- 16.a. If **yes**, was (or will) an electronic risk assessment (e-RA) conducted on the system/application? Yes
- 16.a.1. If **yes**, when was the **e-RA** conducted? 01/11/2009
- If **yes**, what was the approved level of authentication?
- Level 4: Very High confidence in the asserted identity's validity.

H. INDIVIDUAL NOTICE AND CONSENT

17. Was (or is) notice provided to the individual prior to collection of information? Yes

17.a. 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?

Privacy Notice is provided in the Privacy Policy statement posted on IRS.gov which is used to access the Marketing Express tool.

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

18.a. If **yes**, describe the mechanism by which individuals indicate their consent choice(s):

The user will enter a password which will provide him or her access to the Marketing Express tool. If the user wishes to use a standardized marketing product, he or she can download that product. If the user wishes to tailor a marketing product to a specific target market, the user will enter the proposed language which will then be approved by an IRS employee. Users will not have access to any personal information but their own.

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

The IRS system administrator will be able to retrieve identifiable information about users of the system. The users themselves will only be able to retrieve marketing products available in the system. Providing identifying data is optional and only needed if the user wants to customize an item within Marketing Express. We store an email address supplied by the user. The IRS system administrator will be able to retrieve identifiable information about users of the system. The users themselves will only be able to retrieve marketing products available in the system. The ad firm administrator and web developers will also have access for maintenance purposes. No users will be able to access information. Users will only have access to marketing tools available through the system. Due Process is provided pursuant to 5 USC.

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	No	
Managers	No	
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	No		
Contractor Managers	No		
Contractor Sys. Admin.	No		
Contractor Developers	Yes	Read and Write	Moderate

21.a. How is access to SBU/PII determined and by whom? The IRS system administrator will be able to retrieve identifiable information about users of the system. The user will voluntarily enter a password which will provide him or her access to the Marketing Express tool. If the user wishes to use a standardized marketing product, he or she can download that product. If the user wishes to tailor a marketing product to a specific target market, the user will enter the proposed language which will then be approved by an IRS employee. Users will not have access to any personal information but their own. The system contains no other data or information related to an individual or organization. The users themselves will only be able to retrieve marketing products available in the system. Providing identifying data is optional and only needed if the user wants to customize an item within Marketing Express. We store an email address supplied by the user. The IRS system administrator will be able to retrieve identifiable information about users of the system. The IRS system administrator themselves will only be able to retrieve marketing products available in the system via Online 5081. The ad firm administrator and web developers will also have access for maintenance purposes. No users will be able to access information. Users will only have access to marketing tools available through the system.

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? Yes

22.a. 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.

All records housed in the IRS Marketing Express IME will be erased or purged from the system in accordance with approved retention periods. It is the official repository for data and documents and has National Archives approval to affect data disposition. Any records generated and maintained by the system will be managed according to requirements under IRM 1.15.1 and 1.15.6 and will be destroyed using IRS Records Control Schedule (RCS) 29, Item 447 and as coordinated with the IRS Records and Information Management (RIM) Program and IRS Records Officer.

I.2 SA&A OR ASCA

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

23.a. If **yes**, what date was it completed? 01/31/2018

23.1. Describe in detail the system's audit trail. Based on a review, the IRS Marketing Express was categorized as non-FISMA reportable. IRS Marketing Express is monitored by using all available means including audit trails and real time monitoring capabilities of IRS Marketing Express.

J. PRIVACY TESTING

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

24.a. If **yes**, was the test plan completed? Yes

24.a.1. If **yes**, where are test results stored (or documentation that validation has occurred confirming that requirements have been met)? The system was first completed by Marketing Branch in National Communication and Liaison (C&L) office.

24.a.2. If **yes**, were all the Privacy Requirements successfully tested? Yes

24.1. Describe what testing and validation activities which have been conducted or are in process to verify and validate that the applicable Privacy Requirements (listed in header) have been met? Continuous Monitoring (eCM) (now called Annual Security Control Assessment (ASCA)) occurs annually to ensure that controls remain in place to properly safeguard PII.

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:

26.a. IRS Employees:	<u>Under 50,000</u>
26.b. Contractors:	<u>Not Applicable</u>
26.c. Members of the Public:	<u>Under 100,000</u>
26.d. Other:	<u>No</u>

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 Recommendations of the 9/11 Commission 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

30. Does Computer matching occur? No

N. ACCOUNTING OF DISCLOSURES

31. 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
