

Date of Approval: **September 30, 2020**

PIA ID Number: **5166**

SYSTEM DESCRIPTION

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

moveLINQ, mLINQ

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?

moveLINQ. PIAMS #1829

What is the approval date of the most recent PCLIA?

9/19/2016

Changes that occurred to require this update:

Addition of Personally Identifiable Information (PII)

New Access by IRS employees or Members of the Public

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.

Internal Management Executive Steering Committee (IM ESC)

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?

Yes

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.

MoveLINQ is a cloud base, FedRAMP approved application that manages employee relocations through submission of authorizations and vouchers. The application performs all aspects of official relocation travel management with processes and procedures consistent with the federal travel regulations. The application does not collect employee information such as address or social security numbers. The system does collect date of birth of dependent children to determine the applicable per diem entitlement for reimbursement. The application interfaces with the Integrated Finance System (IFS) for budget and accounting processing and payment to travelers and calculation of relocation W2 for travelers; information is not sent from IFS back to moveLINQ. The information entered obligates expenses to reserve funds in IFS for later payment to traveler or vendor, accounting codes and information for calculating tax withholding. Custom interface download files must be created for advances, obligation, vouchers and 3rd party payments and interface upload files as Advice of Payment (AOP). This 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.

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.)?

No

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

Date of Birth

Standard Employee Identifier (SEID)

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:

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

Are there other types of SBU/PII used in the system?

No

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

PII for personnel administration is 5 USC

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.

Contact information Name of approver (manager)/business unit point-of-contact (POC), employee, spouse and/or children, if applicable and business number of approver/business unit POC 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. Social Security Numbers (SSNs) are not used, instead employees will be identified by the Integrated Financial System (IFS) employee vendor unique identification number (ID).

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

City and state information is entered directly into moveLINQ by Beckley Finance Center (BFC) technicians from paperwork submitted from traveler (relocatee) 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 also verify accuracy of data submitted by travelers. BFC will also obtain IFS employee vender (ID) from IFS and enter into moveLINQ instead of using SSN for interface between moveLINQ and IFS.

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 36.003 General Personnel and Payroll 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?

Yes

Does the system receive SBU/PII from IRS files and databases?

No

Does the system receive SBU/PII from other federal agency or agencies?

No

Does the system receive SBU/PII from State or local agency (-ies)?

No

Does the system receive SBU/PII from other sources?

No

Does the system receive SBU/PII from Taxpayer forms?

No

Does the system receive SBU/PII from Employee forms (e.g. the I-9)?

Yes

Please identify the form number and name:

Form Number: Internal Form Form Name: moveLINQ Questionnaire - Transfer

Form Number: Form 4253-C Form Name: Relocation Travel Advance Request

Form Number: Form 4282 Form Name: Twelve-Month-Service Agreement

Form Number: Form 4527 Form Name: Employee Application for Reimbursement of Expense Incurred Upon Sale and/or Purchase of Residence Upo

Form Number: Form 4702 Form Name: Temporary Quarters Subsistence Expenses For Thirty (30) Days

Form Number: Form 8445 Form Name: Statement of Income and Filing Status

Form Number: Form 8518 Form Name: Request for the use of Relocation Services Contract

Form Number: Form 10902 Form Name: Overseas Transportation - Service Agreement

Form Number: Form 13378 Form Name: IRS Relocation Travel - Cost Comparison

Form Number: Form 14564 Form Name: Request for Approval for Basic Plus Relocation Allowance Shipment of Privately Owned Vehicle

Form Number: Form 14565 Form Name: Property Management Reimbursement Request

Form Number: Internal Form Form Name: Relocation Cost Comparison Worksheet

Form Number: Form 8714 Form Name: Relocation Voucher

Form Number: Form 9803 Form Name: Transportation Agreement Non-Foreign Post of Duty

Form Number: Internal Form Form Name: moveLINQ Questionnaire - CONUS to OCONUS Foreign

Form Number: Internal Form Form Name: moveLINQ Questionnaire - CONUS to OCONUS Non-Foreign

Form Number: Internal Form Form Name: moveLINQ Questionnaire - Last Move Home

Form Number: Internal Form Form Name: moveLINQ Questionnaire - New Appointee

Form Number: Internal Form Form Name: moveLINQ Questionnaire - OCONUS Foreign to CONUS

Form Number: Internal Form Form Name: moveLINQ Questionnaire - OCONUS Foreign to OCONUS Foreign

Form Number: Internal Form Form Name: moveLINQ Questionnaire - OCONUS Non-Foreign to CONUS

Form Number: Internal Form Form Name: moveLINQ Questionnaire - OCONUS Non-Foreign to OCONUS Non-Foreign

Form Number: Internal Form Form Name: moveLINQ Questionnaire - Return Rights for Separation

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?

Yes

Is the cloud service provider (CSP) Federal Risk and Authorization Management Program (FedRAMP) certified?

Yes

Date Certified

9/8/2017

Please identify the ownership of the CSP data.

IRS

Does the CSP allow auditing?

Yes

Who audits the CSP Data?

IRS

What is the background check level required for CSP?

Moderate

Is there a breach/incident plan on file?

Yes

Privacy laws (including access and ownership) can differ in other countries. This cloud will be Continental US (CONUS) only for:

Storage

Transmission

Maintenance

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?

Yes

How is notice provided? Was the individual notified about the authority to collect the information, whether disclosure is mandatory or voluntary, the purpose for which the information will be used, with whom the information may be shared, and the effects on the individual, if any, if they decide not to provide all or any of the requested information?

Email communication to travelers (relocatee) informed them of transition from Government Relocation System (GRAS) to moveLINQ. The communication informed relocatee 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.

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

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 of the relocatee and/or payment to third party relocation vendors, and to liquidate the obligation when payment is made.

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.

INFORMATION PROTECTION

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

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

IRS Employees

Users: Read Write

Managers: Read Only

System Administrators: Administrator

IRS Contractor Employees

Contractor System Administrators: Administrator

Contractor Developers: Read Write

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

As with other IRS applications, Online 5081 (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. IRS will access the moveLINQ production site via web browser with multifactor authentication, leveraging the Treasury Single Sign-On (SSO) solution. mLINQS will access the moveLINQ test environment (via web browser with a user id and password) for troubleshooting issues. The test environment does not store any IRS transactional data. mLINQS will access a

limited portion of the production environment (via web browser with a user id and password) to load tax and per diem rates. No IRS transactional data may be accessed with these permissions. Access to the data is determined by the manager based on a user's position and need-to-know. The manager will request a user to be added. They must submit the request via the OL5081 process to request access to the System.

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.

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 National Archives and Records Administration (NARA) guidelines regarding records disposition, are specified in the contract.

SA&A OR ASCA

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

Yes

What date was it completed?

9/22/2017

Describe 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, Regression Systems (Testing), Business Warehouse (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. The only IRS users of moveLINQ will be Chief Financial Office technicians at Beckley Finance Center (BFC).

PRIVACY TESTING

Does the system require a System Test Plan?

Yes

Is the test plan completed?

Yes

Where are the test results stored (or documentation that validation has occurred confirming that requirements have been met)?

The Test Plan was complete and approved 3/17/2017. Testing is targeted from 7/5/2017-9/5/2017. The End of Test Report was completed and approved 9/2017. Testing was done against the developed relocation Requirements. All test cases will be mapped to requirements to ensure full requirement coverage, the relocation Requirements include the 10 Reusable Program Level Requirements (RPLRs) prepared by Privacy. mLINQS will access the moveLINQ test environment (via web browser with a user id and password) for troubleshooting issues. The test environment does not store any IRS transactional data. mLINQS will access a limited portion of the production environment (via web browser with a user id and password) to load tax and per diem rates. No IRS transactional data may be accessed with these permissions. IRS will access the moveLINQ production site via web browser with multifactor authentication, leveraging the Treasury SSO solution.

Were all the Privacy Requirements successfully tested?

Yes

Are there any residual system privacy, civil liberties, and/or security risks identified that need to be resolved?

No

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?

See above

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: Under 50,000

Contractors: Not Applicable

Members of the Public: Under 100,000

Other: Yes

Identify the category of records and the number of corresponding records (to the nearest 10,000).

Does collect the name of spouse and children, when applicable, well under 100 records.

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