

Date of Approval: **November 18, 2019**

PIA ID Number: **4333**

SYSTEM DESCRIPTION

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

IRS AWS GovCloud NetHub Core Services, ANCS

Is this a new system?

Yes

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

Cloud Governance Board C-GB Mission To approve IT decisions and policies related to Cloud adoption, operations, infrastructure and cloud candidates as well as keep the ITE-ESC informed. C-GB Purpose Responsible for IT decisions and policies related to Cloud adoption, operations, and infrastructure; Report Cloud updates and future direction to the ITE-ESC; Receive updates from the Cloud Team and help resolve issues and mitigate risks; Receive information and advice as needed from the EOT

Current ELC (Enterprise Life Cycle) Milestones:

Vision & Strategy/Milestone 0

Project Initiation/Milestone 1

Domain Architecture/Milestone 2

Preliminary Design/Milestone 3

Detailed Design/Milestone 4A

System Development/Milestone 4B

System Deployment/Milestone 5

Is this a Federal Information Security Management Act (FISMA) reportable system?

No

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.

IRS Amazon Web Services (AWS) network hub (IRS AWS Nethub) Project will be used to facilitate the controlled, secure network routing and connectivity to and from trusted IRS Cloud workloads in AWS environments and will provide the Shared Services to support those workloads. Scope Statement: IRS ECM Enterprise Case Management Delivery Partners, working with IRS contractors, will design and implement a solution for Cloud-based IRS production environments in Treasury AWS to meet Information System Security Requirements as specified in IRMs 10.8.24 and 10.8.1. The IRS AWS Nethub Project (Nethub Project) has an IRS Enterprise scope. The Nethub Project will employ iterative and incremental development methodology to meet the current and future requirements of IRS programs being deployed to AWS-hosted environments. The solution will consist of multiple logically isolated sections of the AWS Cloud, where AWS and IRS resources are utilized in defined virtual networks, called Virtual Private Clouds (VPCs). One of the VPCs will be a "Transit VPC" which will provide perimeter security and network services and will function as the central hub for providing Management and Core Services to IRS Cloud workloads. The Nethub Project's Core Services are the foundational components of the IRS Cloud Target State Architecture which include enterprise services including, but not limited to: - Cybersecurity - Privileged Access - Key Management - Monitoring - Auditing - Logging - Identity and Access Management - Other enterprise services for IRS Cloud workloads. IRS AWS Nethub Project's Release 1 scope includes the combination of both Transit VPC and those Core Services VPCs which will provide the minimum mandatory services required to deploy ECM Release 1 and receive Authority to Operate (ATO).

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.)?

Yes

What types of tax identification numbers (TIN) apply to this system?

Social Security Number (SSN)

List the approved Treasury uses of the SSN:

Legal/statutory basis (e.g. where collection is expressly required by statute)

When there is no reasonable alternative means for meeting business requirements

Explain why the authorized use(s) above support the new or continued use of SSNs (or tax identification numbers)

SSNs are currently used to uniquely identify the taxpayer and other authorized persons. SSNs are needed to access the legacy account data due to how existing legacy data is stored and accessed. Nethub Core Services, when implemented on the AWS GovCloud (using Treasury WC2-IaaS), will act a pass through between IRS data center and ECM application (to be implemented in the same Treasury WC2-IaaS). ECM requires the use of SSN's because no other identifier can be used to uniquely identify a taxpayer. SSNs are permissible from Internal Revenue Code (IRC) 6109, which requires individual taxpayers to include their SSNs on their income tax returns.

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 Circular A-130 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. ECM requires the use of SSN's because no other identifier can be used to uniquely identify a taxpayer at this time.

Employer Identification Number

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

Mailing address

Phone Numbers

E-mail Address

Date of Birth

Place of Birth

Standard Employee Identifier (SEID)

Protection Personal Identification Numbers (IP PIN)

Criminal History

Tax Account Information

Centralized Authorization File (CAF)

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

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.

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

Yes

Describe the other types of SBU/PII that are applicable to this system.

Federal Tax Information

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

PII for federal tax administration is generally Internal Revenue Code Sections 6001, 6011, & 6012e(a)

SSN for tax returns and return information is Internal Revenue Code Section 6109

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.

NetHub is only the transport conduit and source for common services. SBU/PII data is used to: Provide foundational capabilities to ensure that multiple business processes can be integrated over time. The SBU/PII data passes through Nethub Core Services to ECM workload on the Treasury WC2-IaaS

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

NetHub is only the transport conduit and source for common services. The data received from internal IRS systems is deemed reliable and is validated for accuracy by the system sending the data as described in that system's PCLIA.

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 24.046 - Customer Account Data Engine Business Master File

IRS 22.061 - Information Return Master File

IRS 00.333 - Third Party Contact Records

IRS 24.030 - Customer Account Data Engine Individual Master File

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?

Yes

Enter the files and databases:

System Name: Integrated Data Retrieval System (IDRS)

Current PCLIA: Yes

Approval Date: 10/1/2018

SA&A: Yes

ATO/IATO Date: 10/14/2018

System Name: Business Master File (BMF)

Current PCLIA: Yes

Approval Date: 8/27/2018

SA&A: Yes

ATO/IATO Date: 3/12/2019

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)?

No

DISSEMINATION OF PII

Does this system disseminate SBU/PII?

Yes

Does this system disseminate SBU/PII to other IRS Systems?

Yes

Identify the full name and acronym of the IRS system(s) that receive SBU/PII from this system.

System Name: Business Master File (BMF)

Current PCLIA: Yes

Approval Date: 8/27/2018

SA&A: Yes

ATO/IATO Date: 3/12/2019

Identify the authority

PII for federal tax administration is generally IRC Sections 6001, 6011, 6012e(a).

For what purpose?

Nethub Core Services is a conduit by which ECM application on the Cloud interfaces with BMF On-prem (IRS data center). ECM interacts with BMF - To make an adjustment to an entity account such as a name change or address change. SSN for tax returns and return information is IRC Section 6109. The purpose is for tax administration activities.

Does this system disseminate SBU/PII to other Federal agencies?

No

Does this system disseminate SBU/PII to State and local agencies?

No

Does this system disseminate SBU/PII to IRS or Treasury contractors?

No

Does this system disseminate SBU/PII to other Sources?

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 {MM/DD/YYYY}

6/21/2016

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?

High

Is there a breach/incident plan on file?

No

When will Breach/Incident plan be available?

6/30/2020

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?

No

Why not? If information is not collected directly from an individual, please discuss the factors considered in deciding to collect information from third party sources.

Nethub Core Services provides a conduit for ECM application to interface with applications in the IRS data center. It does not provide any taxpayer facing business functions.

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

No

Why not?

Notice, consent, and due process are provided in the form/instructions filed by the taxpayer and pursuant to 5 USC. NetHub does not provide any taxpayer facing business functions.

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

Checks are done to ensure information that is not disclosable is redacted, and that the requestor is authorized to receive information or make requests.

INFORMATION PROTECTION

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 Contractor Operated

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

IRS Employees

System Administrators: Administrator

IRS Contractor Employees

Contractor System Administrators: Administrator

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

Manage Access Authorization is granted in response to an Online-5081 system access request. This process area manages internal user account data and tools such as permission and security associated with users and user groups (including temporary assignment for specified dates).

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.

All data meeting end of retention period requirements will be eliminated, overwritten, degaussed, and/or destroyed in accordance with National Archives and Records Administration (NARA)-approved disposition authorities for that system's data and done so in the most appropriate method based upon the type of storage media used. Nethub Core Services collects system logs for the applications running on the Cloud. It does not collect records that supports taxpayer business functionalities. The system logs are retained based on existing IRS policies for retention.

SA&A OR ASCA

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

In-process

When is the anticipated date of the SA&A or ACS completion?

6/30/2020

Describe the system's audit trail.

SPLUNK - event logging for the AWS GovCloud service NetHub is following the appropriate audit trail elements pursuant to current Audit Logging Security Standards. At this time, the system audit design and requirements definition are in process.

PRIVACY TESTING

Does the system require a System Test Plan?

Yes

Is the test plan completed?

No

When is the test plan scheduled for completion?

1/31/2020

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?

No activities have been conducted to date. However, a Security Change Management request is being submitted to engage IRS Cybersecurity. All customer configurable security controls will be implemented as intended and documented in the NetHub System Security Plan (SSP) - currently in progress.

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: Under 5,000

Members of the Public: Not Applicable

Other: No

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