Date of Submission: December 8, 2016   PIA ID Number: **2020**

A. SYSTEM DESCRIPTION

1.   Enter the full name and acronym for the system, project, application and/or database. Embedded Quality Review System - Campus, EQRS-C

2. Is this a new system? No

    2a. If **no**, is there a PIA for this system?   Yes

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

       Embedded Quality Review System - Campus, EQRS-C, 719, Final Approval

       Next, enter the **date** of the most recent PIA.   2/5/2014

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

No	**Addition of PII**
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**

       Were there other system changes not listed above?   No

3. Check the current ELC (Enterprise Life Cycle) 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?   Yes

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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.

EQRS-C allows managers and quality reviewers to capture data from taxpayer contacts (via phone, correspondence/paper, electronic, or walk-in) using an online data collection instrument. Users enter the data into online forms, which are utilized by users having input/edit capabilities to capture the data. The collected data is stored in a database and various ad hoc reports can be subsequently generated for planning, training, and evaluative purposes. The EQRS-C application consists of an input/edit function, a reporting function, a user maintenance function, and a call/paper volume function. EQRS-C contains data falling into the following categories: Taxpayer Data -- Taxpayer Identification Number (TIN) -- Master File Tax Code (MFT) -- Tax Period -- IRS Received Date Employee Data -- Reviewer Number -- Employee Name -- Standard Employee Identifier (SEID) -- Organization Code Audit Trail Information -- User login -- Data access and modification by employee's SEID -- Web server access logs capture user login, logout and Internet Protocol (IP) address -- Database logs capture user access and activity -- Data Collection Instrument (DCI) record input/modified by date and employee SEID Other Data (when applicable) -- Application-generated unique DCI Number -- Product Line -- Contact Recording ID -- Case Type -- Length of Call -- Time -- Review Date -- Closing Date, Organization Function Program (OFP) Code -- Attribute Codes EQRS-C is comprised of two main modules: NQRS (National Quality Review System) for non-evaluative product review and "Employee" Quality Review System (EQRS) for evaluative/non-evaluative managerial review. EQRS reviews are performed by managers, work unit leads, and centralized evaluators who measure an individual employee's action on a work product. NQRS reviews are performed by quality review personnel (generally at a centralized site) for the entire work process based on random case selection. The data collected consists of several different product lines, which may contain different attributes. An attribute is a specific aspect of the work product where defects and successes are coded. NQRS data is weighed by the total volume for a specific time period and site for a specific product line. Reports are generated for planning, training, evaluative purposes, and identifying problems and trends within a product line. The reports are used to improve the quality process. Managers also utilize the system to track employee performance and training needs. Requirements for review are included in Internal Revenue Manual (IRM) 21. Due process is provided pursuant to 5 USC and 26 USC.

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   No   On Spouse   No   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)**
No	**Taxpayer Identification Number for Pending U.S. Adoptions (ATIN)**
Yes	**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).

There are no plans at this time. Although, 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, an exception to that requirement is when the TIN is uniquely needed to identify a user's record. Only when necessary, EQRS-C records the taxpayer TIN so that the taxpayer account record involved in the selected employee or product review can later be referenced and verified for correct resolution/actions. The EQRS application requires the use of TINs because no other identifier can be used to uniquely identify a taxpayer at this time. TINs are permissible from Internal Revenue Code (IRC) 6109, which requires individual taxpayers to include their TINs 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.) <u>Yes</u>

If **yes**, specify the information.

Selected	PII Element	On Primary	On Spouse	On Dependent
No	Name	No	No	No
No	Mailing address	No	No	No
No	Phone Numbers	No	No	No
No	E-mail Address	No	No	No
No	Date of Birth	No	No	No
No	Place of Birth	No	No	No
Yes	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
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
Yes	Tax Account Information	Yes	No	No

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

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

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)**
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**
Yes	**PII for personnel administration is 5 USC**
No	**PII about individuals for Bank Secrecy Act compliance 31 USC**

6f. Has the authority been verified with the system owner?   <u>Yes</u>

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.

   <u>EQRS-C is employee-based and is not considered a taxpayer-related application, as its purpose is to track employee and organizational performance. EQRS-C end users review work of users from other applications that do include a reference to taxpayer data (i.e., the references to the taxpayer data is obtained from applications outside of EQRS-C). EQRS-C users do not access tax records directly or interface with taxpayers via the EQRS-C application. When necessary, EQRS-C records the taxpayer TIN so that the taxpayer account record involved in the selected employee or product review can later be referenced and verified for correct resolution/actions. Although the TIN is displayed on an individual Data Collection Instrument (DCI), it is not a searchable field within the application. EQRS-C stores the employee SEID and name but the SEID is searchable only to users of the application given the rights to manage user profiles. The employee name is visible and searchable to users with the proper permission level, but without the associated SEID</u>

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

   <u>EQRS-C is employee-based and is not considered a taxpayer-related application. EQRS-C users do not access tax records directly or interface with taxpayers via the EQRS-C application, nor does it interface with human resource data on IRS employees. There are internal programming consistency checks to ensure the data entered into the EQRS-C application is accurate and valid.</u>

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?   <u>Yes</u>

   9a. If **yes**, are records in the system retrieved by any personal identifier (e.g., name, SSN, Photograph, IP Address) for an individual?   <u>Yes</u>

   If **yes**, is there a System of Records Notice(s) or SORNs that addresses the PII records in this system?   <u>Yes</u>

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

SORNS Number	SORNS Name
Treas/IRS 00.008	Recorded Quailty Review Records

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?   No

F. PII SENT TO EXTERNAL ORGANIZATIONS

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, 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?
For EQRS managerial review, the use of the Embedded Quality Review System (EQRS-C) is stipulated in the 2016 National Agreement with NTEU under Article 12, Section 12, Embedded Quality (EQ).

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?   The use of the Embedded Quality Review System (EQRS-C) as part of the employee evaluation process was negotiated with NTEU and is stipulated in the 2016 National Agreement with NTEU under Article 12, Section 12, Embedded Quality (EQ).

19. How does the system or business process ensure due process regarding information access, correction and redress?
All data comes from managerial or product reviews of employee work. The manager's employee visually inspects any defects cited by the reviewer. The employee has the opportunity to explain, refute, or otherwise respond to the data via a dispute resolution panel or rebuttal process. The application also has the option to delete the data and exclude it from employee performance if so warranted.

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

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

   Contractor Employees?   No

   21a. How is access to SBU/PII determined and by whom? Data access to PII is limited to employees under their separate individual login and limited based on the user's organizational rights as determined by business need and the user's specific application profile. To gain access to the EQRS-C application, all users must submit an official request (via the OL-5081 application) stating the reasons that access is needed.

   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?   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.

         EQRS and NQRS recordkeeping data is approved for destruction under approved Job No. N1-58-12-16 (signed 11/27/12). This 2012 disposition approval by the National Archives and Records Administration (NARA) supersedes 2006 disposition

determinations approved under Job No. N1-58-06-8. EQRS data is approved for destruction 5 years after close of reporting year. This is published in IRS Document 12990, Records Control Schedule 31 for Customer Service, item 10(2). NQRS data is approved for destruction 7 years after close of reporting year. This will be published in IRS Document 12990, Records Control Schedule 21 for Strategic Planning, item 17 when next updated. All records housed in the system will be erased or purged from the system at the conclusion of their retention period(s) as required under IRM 1.15.6 Managing Electronic Records.

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)?   In-process

    23b. If **in process**, when is the anticipated date of the SA&A or ECM-R completion?   1/4/2017

23.1 Describe in detail the system s audit trail.   Application-level audit trails monitor and log user activities. An event record in the EQRS-C audit log table can specify the following: -- Data reports viewed when containing PII ; -- Specific actions, such as adding, editing or deleting, and when PII data is involved; -- IP address and SEID of user associated to what type of auditable action taken. ☐

J. PRIVACY TESTING

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

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

    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?
    Rational ClearQuest stores the test specifications used to test and validate each defect, and the System Test Plan is completed and approved before any release to production.

    24b.1. If **completed**, where are the test results stored (or documentation that validation has occurred confirming that requirements have been met)?   System testing occurs against the current requirements throughout the development life cycle before each release. Testing includes Unit, Regression, Acceptance, Accessibility, and Integration testing. Privacy concerns are addressed in developer's meeting when discussing new defects that are identified. Annual Security Controls Assessment (ASCA) testing occurs during annual security testing.

    24b.2. If **completed**, were all the Privacy Requirements successfully tested?   Yes

    24.2 If **completed**, are there any residual system privacy, civil liberties, and/or security risks identified that need to be resolved? No

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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: More than 100,000
      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? No

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