Date of Approval: 12/04/2017 PIA ID Number: **2919**

A. SYSTEM DESCRIPTION

- 1. Enter the full name and acronym for the system, project, application and/or database. Response Tracking Tool, RTT
- 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. 990

Next, enter the date of the most recent PIA. 10/14/2014

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

No	Addition of PII
Yes	Conversions

No Anonymous to Non-Anonymous

No Significant System Management Changes No Significant Merging with Another System

Yes New Access by IRS employees or Members of the Public

No Addition of Commercial Data / Sources

No New Interagency Use Yes 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		
Vac	Operations & Maintenance (i.e. system is		

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 Response Tracking Tool (RTT) Program is part of the Return Integrity & Correspondence Services (RICS) under the purview of the Director of the Refund Integrity Correspondence, Wage and Investment (W&I). The RTT is a database to store and track various stakeholders such as individuals, taxpayers, preparers, IRS employees and external partners, and tracks our responses to them. Information is typically received manually (via email, fax, letter or by phone) and stored in the database for future use and analysis. RTT does not maintain PII information in the database of who sent the request. Any personal identifying information is redacted before it's entered into the database. The only need is to know the nature of the request and how it was responded to. RICS work is part of an overall revenue protection strategy. RICS' main mission is to protect public interest by improving IRS' ability to detect and prevent improper refunds.

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.)? <u>No</u>
 - 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.

Selected	PII Element	<u>On</u>	<u>On</u>	<u>On</u>
		<u>Primary</u>	<u>Spouse</u>	<u>Dependent</u>
No	Name	No	No	No
No	Mailing address	No	No	No
No	Phone Numbers	No	No	No
Yes	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	No	No	No
	PIN)			
No	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
No	Tax Account Information	No	No	No

- 6c. Does this system contain SBU information that is not PII, it uses, collects, receives, displays, stores, maintains, or disseminates? No
- 6d. Are there other types of SBU/PII used in the system? No
- 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)
- 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
- No 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
 - 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. No individual's SBU/PII information is gathered or stored in RTT. The RTT database stores information received from various stakeholders (individuals, taxpayers, preparers, IRS employees and external partners) and tracks our responses to them. RTT also uses stored responses to assist in responding to similar inquires. The only need is to know the nature of the request and how it was responded to. The information needed to respond to the requestor, mainly the requestor's email address, is generally stored on a RICS group mailbox until the response is recorded in our database, then the email is deleted.
- 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. RTT is used to capture emails received in EITC program box and responses. All PII information is removed from emails that are sent to inbox before being captured in RTT for the protection of the person who submitted an email to the inbox. After the redacted email mail is captured in the RTT it's then deleted from the program mailbox.

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.

SORNS Number SORNS Name Treas/IRS 00.001 Correspondence

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? <u>Yes</u>

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, 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? No

17b. If **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. The individual initiated an email and submitted it to program inbox usually asking about Earned Income Tax Credit (EITC) or Other Refundable Credits qualifications or where to find additional information about the credits. A very simplified response is sent back to individual with a Uniform Resource Locator (URL) to link them IRS.gov or EITC Central Microsite to the information they are requesting or to based on request to call the IRS 800 number depending on if the information they are requesting can't be found or answered on IRS.gov or EITC Central Microsite.

- 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):

 Occasionally, a paid practitioner will request to have their Due Diligence Training Module account reset or unlocked. Prior, to that a standard response is sent to the practitioner asking if they are granting permission for their Due Diligence Training Module account be reset. They have the opportunity to reply "yes" granting permission or "no".
- 19. How does the system or business process ensure due process regarding information access, correction and redress? <u>Due process is provided pursuant to Title 26 United States Code (USC).</u>

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

- 1 - 7				
IRS Employees?	Yes/No	Access Level(Read Only/Read Write/ Administrator)		
Users	Yes	Read and Write		
Managers	Yes	Read and Write		
Sys. Administrators	Yes	Read and Write		
Developers	Yes	Read And Write		
Contractor Employees? No				

Yes/No

Contractor Users
Contractor Managers
Contractor Sys. Admin.
Contractor Developers

Contractor Employees?

21a. How is access to SBU/PII determined and by whom? In order to obtain access to the RTT Inventory database, all prospective users must adhere to the Online 5081 process. This procedure is used for controlling access, managing (create, modify, disable, delete) user accounts, and providing administrative rights to users. All requests are handled by the RICS Service Desk and stored for auditing purposes. All standard access requests must be authorized by the user's manager as well as a RICs database administrator. All approved database accounts will be logged in and authenticated through the Windows main frame. User level and access permissions are automatically configured to the database server.

Access Level

Background Invest. Level

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. All records housed in the RTT 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, The data in the RTT database will be backed up daily and weekly. Stakeholder information is stored in the database for responding to similar, future inquiries and analysis. Records are eligible for destruction under General Records Schedule (GRS) 4.2, item 010. Responses to Freedom of Information Act (FOIA) or Privacy Act requests for information are to be managed in accordance with GRS 4.2, item 050.

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? Yes
 - 23.1 Describe in detail the system's audit trail. If any PII information is accidently entered in the RTT database it is because a RICs employees manually entered into the RTT database on error. Accuracy and completeness of data is based on the employee input. A peer and manger audit is completed yearly to make sure no PII information has been captured.

J. PRIVACY TESTING

24. Does the system require a System Test Plan? No

24c. If **no**, please explain why. <u>The Response Tracking Tool (RTT) is a database that doesn't retain</u> who sent the request since it's not necessary for RICS to perform analysis, research and track the requests and responses.

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:Under 50,00026b. Contractors:Not Applicable26c. Members of the Public:Under 100,000

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