
A. SYSTEM DESCRIPTION

1. Enter the full name and acronym for the system, project, application and/or database. Skype for Business, SfB

2. Is this a new system? No

3. Check the current ELC (Enterprise Life Cycle) Milestones (select all that apply)

- No Vision & Strategy/Milestone 0
- Yes Project Initiation/Milestone 1
- Yes Domain Architecture/Milestone 2
- Yes Preliminary Design/Milestone 3
- Yes Detailed Design/Milestone 4A
- No System Development/Milestone 4B
- No System Deployment/Milestone 5
- No 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. Internal office collaboration and instant messaging client for Internal IRS communications and meetings. This is part of the Office Pro Plus 365 Suite of Tools. Skype is a collaboration tool that will enable employees to: hold online meetings (video or audio) with IRS co-workers, conduct online peer-to-peer conversations, share information / files, send instant messages (IM), indicate availability (presence) and screen sharing. There will be no direct contact with taxpayers and only between IRS Users. This tool will enable efficient and effective communications, information sharing and rapid collaboration for a wide range of functions including but not limited to tax administrative, personnel management, performance counseling and distributed meetings. Skype for Business Online allows staff to connect with co-workers, and leverages multiple devices through an enterprise-grade, secure, Information Technology (IT) managed platform. Contact information such as phone numbers and email addresses are used to communicate and connect users, which are only viewable by the specific IRS users of the service. Use of Skype is optional within the IRS.

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 Yes On Spouse Yes 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)
 Yes 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). The system could record anything that is being displayed (shared) during a Skype meeting and recorded in the form of a MP4 (video) file. Not any raw data, meaning no numbers or text other than that which is displayed within the video. The recordings will be in the form of MP4 files. Meetings, IMs and other types of conversations can be recorded and saved. These are maintained within the Conversation History folder within Microsoft Outlook. This data is protected by encryption of the hard drive.

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.

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

If **yes**, select the types of SBU

<u>Selected</u>	<u>SBU Name</u>	<u>SBU Description</u>
Yes	Agency Sensitive Information	Information which if improperly used or disclosed could adversely affect the ability of the agency to accomplish its mission
Yes	Procurement sensitive data	Contract proposals, bids, etc.
Yes	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.
Yes	Proprietary data	Business information that does not belong to the IRS
Yes	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
Yes	Physical Security Information	Security information containing details of serious weaknesses and vulnerabilities associated with specific systems and facilities
No	Criminal Investigation Information	Information concerning IRS criminal investigations or the agents conducting the investigations.

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. The Skype Client can record (if selected by the meeting presenter) a video record of an online meeting (screen share) that could include anything that is shared by the participants. It can also record conversations within a Skype meeting in the form of textual messages exchanged between the participants. Both of these scenarios would only be collaboration between IRS employees (internal) and not with taxpayers. This video and recording functionality is the very same as being used with OCS and Lync and similar to the Live Meeting functionality. These were all approved for use within the IRS. This functionality is also being reviewed by the Video Review Board. Any use of Skype to display or share SBU/PII would be between only the individuals on the call and the responsibility of the participants. Any saved conversations are stored within an Outlook folder on the hard drive of the user who recorded it. Any videos are stored on the local C drive which is encrypted and accessible only by the user who recorded it. The system will display the following banner for each conversation should a record need to be created: Instant messaging (IM) should not be used to create federal records. If you create a federal record, you are required to preserve the message. To save in your Outlook folder, press CTRL + S. The program could include the following statement in a quick reference guide. It would require potential changes to the Skype tool to include in the actual tool but that is being investigated: Skype for Business Usage and Data Privacy Statement Skype for Business video functions are optional to use. Participants can join an Online Meeting in any mode (Audio-only or Audio & video. In order to ensure security of data and the privacy of persons who may be within range of the audio and video device, all individuals utilizing a video device agree to:
- Adjust the camera so that persons not participating in the call / video will not be in the camera view
 - Inform the remote participants about any other local participant who is not in scope of the camera but may be able to hear the conversation
 - Inform participants if the Online Meeting will be recorded
 - Group employees, contractors, consultants or other representatives shall ensure that use of the Skype for Business video function will not reveal confidential or secret information unless all parties involved in the Online Meeting are bound by appropriate contractual obligations such as a Non-Disclosure-Agreement.
 - Unauthorized video recording utilizing Skype for Business is prohibited and, in some instances may be illegal.
 - By using the Skype for Business functions, you agree to the terms above.
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. The system does not use or process any SBU/PII. SKYPE for Business allows employees to communicate, schedule and attend virtual meetings and share their desktops, which allows you to collaborate on documents with other co-workers. The act to Record any meeting must be selected by the user otherwise there is no storage of the PII. Any employee email and contact information is being directly read from MS Outlook / Exchange. The privacy statement is described above.

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.

<u>SORNS Number</u>	<u>SORNS Name</u>
Treas/IRS 00.001	Correspondence Files and Correspondence Control Fi
Treas/IRS 34.037	IRS Audit Log and Security Records System

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, global position system (GPS), biometrics, RFID, etc.? No

15. Does the system use cloud computing? 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. Skype does notify meeting participants if the meeting is being recorded. There is an indicator (pop-up) that states 'Recording has started'. In addition, if you hover on the recording indicator (red light) it will tell you who is recording the session. Further, it takes an action from any user to share their screen to other meeting participants. When you share your content...Skype does inform the user that other users can see their content. Information is not directly being collected but it could be recorded.

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): They would need to willingly share their content or screen. This would require a user action.

19. How does the system or business process ensure due process regarding information access, correction and redress? The system does not process any information. IRS business units that use SKYPE for a tax administration purpose – Internal/collaboration - have customer service units and complaint processes by which an individual may request access to and/or correction of their information.

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	Yes	Read and Write
Managers	Yes	Read and Write
Sys. Administrators	Yes	Administrator
Developers	Yes	Administrator

Contractor Employees? Yes

<u>Contractor Employees?</u>	Yes/No	Access Level	Background Invest. Level
Contractor Users	Yes	Read and Write	Moderate
Contractor Managers	Yes	Read and Write	Moderate
Contractor Sys. Admin.	Yes	Read and Write	Moderate
Contractor Developers	Yes	Read and Write	Moderate

21a. How is access to SBU/PII determined and by whom? It is the responsibility of every user who is sharing the information during a meeting. The data can only be accessed by the user who recorded the data. It will reside on the individuals IRS Laptop.

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 Skype For Business Utility will be erased or purged from the system in accordance with approved retention periods. It is the official repository for data and has National Archives approval to affect data disposition. Any records generated and maintained by the utility will be managed according to requirements under IRM 1.15.1 and 1.15.6, and will be destroyed using IRS General Records Schedule (GRS) 6.1, items 010, 011, 012 or as coordinated with the IRS Records and Information Management (RIM) Program and IRS Records Officer. If used non-recordkeeping, temporary data is maintained according to GRS 4.3, Item 040, Non-recordkeeping copies of 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? 12/22/2017

23.1 Describe in detail the systems audit trail. Monitored as part of the Microsoft Exchange and Mail system.

J. PRIVACY TESTING

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

24c. If **no**, please explain why. This is a Commercial Off-the-Shelf (COTS) product being used as a part of the Microsoft Office Pro Plus 365 suite.

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: More than 10,000
26c. Members of the Public: Not Applicable
26d. Other: Yes

If **other**, identify the category of records and the number of corresponding records (to the nearest 10,000). No. Just a note to describe. Skype could be used to coordinate with other IRS users and could include the viewing / exchange of taxpayer SBU/PII within the IRS firewall through Instant Messaging, Screen Sharing or File sharing.

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
