Date of Approval: February 19, 2016 PIA ID Number: **1520** 

### A. SYSTEM DESCRIPTION

- 1. Enter the full name and acronym for the system, project, application and/or database. <u>TAS Low Income Taxpayer Clinic Toolkit, LTK</u>
- 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.

Taxpayer Advocate Service Toolkit Website

Next, enter the **date** of the most recent PIA. <u>11/29/2010</u>

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

<u>No</u>	Addition of PII
<u>No</u>	Conversions
No	Anonymous to Non-Anonymous
No	Significant System Management Changes
<u>No</u>	Significant Merging with Another System
No	New Access by IRS employees or Members of the Public
No	Addition of Commercial Data / Sources
<u>No</u>	New Interagency Use
<u>No</u>	Internal Flow or Collection

Were there other system changes not listed above? Yes

If yes, explain what changes were made. Last PIA was updated in 2010.

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

<u>No</u>	Vision & Strategy/Milestone 0
No	Project Initiation/Milestone 1
No	Domain Architecture/Milestone 2
No	Preliminary Design/Milestone 3
<u>No</u>	Detailed Design/Milestone 4A
No	System Development/Milestone 4B
<u>No</u>	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? 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.

Low Income Taxpayer Clinics (LITC) are organizations that represent low-income taxpayers in federal tax controversies with the IRS for free or for a nominal charge, provide tax education and outreach for taxpayers who speak English as a second language, or both. Through the LITC program, the IRS awards matching grants of up to \$100,000 a year to qualifying organizations. LITCs and their employees and volunteers operate independently of the federal government. The LITC grant program is a federal program administered by the Taxpayer Advocate Service, led by the National Taxpayer Advocate. This password protected site is a one-stop place to support the activities of these organizations. http://litctoolkit.com/Users/Account/AccessDenied?ReturnUrl=%2f The sites with passwords are for a specified audience and have controlled access. This includes the Advocate Toolkit (ATK), LITC Toolkit (LTK) and TAPSpace. The LTK is for LITC grant recipients only to obtain grant information and requirements. The information on this site is limited by password to those members and contains working documents and process information to help improve the IRS. None of these sites contains PII. The sites have a privacy policy posted on them, but links do not pop up when an external resource is leveraged. Site is only accessible to grant recipients receiving link. The Managed Services Path is oriented toward selection and acceptance of the managed services solution, i.e., outside source (3rd party), intra-business processes, and/or infrastructure (operational) service provider. All necessary requirements have been met in IRM 2.25.2 and 2.25.5. Site has a single use password for all users and eAuthentication does not apply.

### **B. PII DETAIL**

 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)? No

#### **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. N/A
- 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. N/A

# C. PRIVACY ACT AND SYSTEM OF RECORDS

 Are 10 or more records containing SBU/PII maintained, stored, and/or transmitted by or through this system?

### D. RESPONSIBLE PARTIES

10. Identify the individuals for the following system roles. N/A

### **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? Yes
  - 16a. If **yes**, was (or will) an electronic risk assessment (e-RA) conducted on the system/application? No

If **no**, when will the e-RA be conducted? 9/30/2016

## 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. N/A - Information not gathered on any individual or group.

- 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? N/A Information not gathered on any individual or group.
- 19. How does the system or business process ensure due process regarding information access, correction and redress?

N/A - Information not gathered on any individual or group.

#### 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 Contractor 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? Yes

Contractor Employees?	Yes/No	Access Level	Background Invest.
Contractor Users	Yes	Administrator	Low
Contractor Managers	Yes	Administrator	Low
Contractor Sys. Admin.	Yes	Administrator	Low
Contractor Developers	Yes	Administrator	Low

- 21a. How is access to SBU/PII determined and by whom? <u>N/A Information not gathered on any individual or group.</u>
- 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 documents housed in the LTK site will be erased or purged from the system in accordance with approved retention periods. It is not the official repository for data and documents and does not require National Archives approval to affect data disposition. Any new records generated by the system will be managed according to requirements under IRM 1.15.1 and 1.15.6, and will be destroyed using IRS Records Control Schedules (RCS) 9, and as coordinated with the IRS Records and Information Management (RIM) Program and IRS Records Officer.

### 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. We don't believe there's a specific audit trail for the TAS websites other than what is maintained in the content management system (no PII or SBU is maintained).

### J. PRIVACY TESTING

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

24c. If **no**, please explain why. <u>Site was tested when developed and launched over six years ago and no changes have been made other than textual updates.</u>

### 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:
26b. Contractors:
26c. Members of the Public:
Not Applicable
Not Applicable

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**