
A. SYSTEM DESCRIPTION

1. Enter the full name and acronym for the system, project, application and/or database. TAS Tax Toolkit, TTK

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 Tax Toolkit

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

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? 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)

- 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? 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 Tax Toolkit (TTK), was revamped and debuted in January 2015. This responsive site is the primary destination for information about TAS. The site contains detailed information on the Taxpayer Bill of Rights. The site is structured around search to get visitors information quickly. The site contains videos, a "Suggestion Box" to provide input to the National Taxpayer Advocate, and links to the TAS social media sites. It is available to taxpayers in English and also has limited information in Spanish. If a taxpayer submits a comment/suggestion, it is not housed anywhere within the content management system and is sent directly to an IRS email address for review. After the information is received, if the taxpayer has submitted any PII (which we specifically request that they do not do), the comments are stripped of that information and just the suggestion is rolled up on a SP site. If we were then to retrieve information, it would be a search based on a topic or comment, and no other information (such as name, email, etc.)
<http://www.taxpayeradvocate.irs.gov/> 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 ATK is for TAS employees with limited access to store procedures and additional information for casework. The LTK is for LITC grant recipients only to obtain grant information and requirements. TAPSpace is for the volunteer members that are part of the Taxpayer Advocate Panel. 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.

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.)? No

If **yes**, check who the SSN (or tax identification number) is collected on.

No On Primary No On Spouse No On Dependent

If **yes**, check all types SSN s (or tax identification numbers) that apply to this system:

No Social Security Number (SSN)
No Employer Identification Number (EIN)
No Individual Taxpayer Identification Number (ITIN)
No Taxpayer Identification Number for Pending U.S. Adoptions (ATIN)
No Practitioner Tax Identification Number (PTIN)

6b. Does this system contain other (non-SSN) PII that it uses, collects, receives, displays, stores, maintains, or disseminates? (i.e. Names, addresses, etc.) 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? Yes

If **yes**, describe the other types of SBU/PII that are applicable to this system. Requesting customer feedback and comments to improve the tax process -

known as tax reform suggestions on the Tax Toolkit and ImproveIRS.org. We do not request contact information, SSN's or any other identifying information. All other sites to not gather information.

6e. Cite the authority for collecting SBU/PII (including SSN if relevant)

<u>No</u>	PII for federal tax administration is generally Internal Revenue Code Sections 6001, 6011, 6012e(a)
<u>No</u>	SSN for tax returns and return information is Internal Revenue Code Section 6109
<u>No</u>	SSN for personnel administration (IRS Employees) is 5 USC & Executive Order 9397
<u>No</u>	PII for personnel administration is 5 USC
<u>No</u>	PII about individuals for Bank Secrecy Act compliance 31 USC
<u>No</u>	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.

External source for gathering input and tax suggestions for tax reform on two sites. Specifically state the following above the comment box: To protect your privacy, do NOT include any confidential information, such as your name, address, phone number, or Social Security Number. Site is accessible from IRS.gov via multiple links as well as from search engines. 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 does not require a password and eAuthentication does not apply.

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

Information from tax reform comments is systemically routed directly to an IRS email address and is not stored or maintained by any website or content management system. If PII is received is received, it is deleted from all comments and not maintained. All comments are received by two IRS employees. No IRS contractors have access to the information. Comments are copied to a spreadsheet and no PII received is carried over from any email received.

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? No

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? 3/5/2015

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?

Information provided above comments box indicates the following: To protect your privacy, do NOT include any confidential information, such as your name, address, phone number, or Social Security Number.

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):
Information not required. Voluntary comments box. Customer not required to complete.

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

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

Contractor Employees? Yes

<u>Contractor Employees?</u>	<u>Yes/No</u>	<u>Access Level</u>	<u>Background Invest.</u>
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? The vendor that has established the site has set the tax reform suggestions to be emailed directly to the IRS and they do not maintain or store any content on their servers.

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.

Official copies of TAS Microsites information are maintained in accordance with Records Control Schedule (RCS) 9 for Taxpayer Advocate, published in Document 12990. Copies maintained for ease of reference can be destroyed when superseded, obsolete, or no longer needed. Taxpayer suggestions/comments received and saved

to a SharePoint site, however, are unscheduled. TAS and the IRS Records Office will work together to draft disposition instructions for submission to NARA for approval.

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. We use DoneDone to maintain a test and resolution plan for the sites. This creates an audit trail of adjustments and enhancements.

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