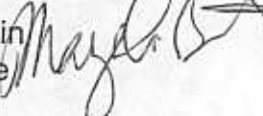




DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

APR 5 2004

MEMORANDUM FOR JIMI STRICKLIN
DIRECTOR, WEB SERVICES

FROM: Maya A. Bernstein
Privacy Advocate 

SUBJECT: E-Learning Austin Campus (AUSC)
Privacy Impact Assessment

The Office of the Privacy Advocate has reviewed the Privacy Impact Assessment (PIA) for the E-Learning AUSC system. Based on the information you provided, the Office of the Privacy Advocate does not have any privacy concerns that would preclude this system from operating. However, a revised PIA is required when considering any future upgrades or major modifications, or at the scheduled recertification of this application.

We are forwarding a copy of the PIA to the Director, Modernization and System Security, to be included in the Security Accreditation Package for formal acceptance for operation. That office may request information concerning the statements contained in the PIA to ascertain compliance with the applicable security requirements. If you have any questions, please contact me at 202-927-5170, or your staff may contact Brian D. Townsend at 202-927-5162.

cc: Director, Modernization and System Security OS:MA:M

Privacy Impact Assessment –E-Learning AUSC

Date: FEBRUARY 2004

MEMORANDUM FOR MAYA A. BERNSTEIN
PRIVACY ADVOCATE

FROM: Jack Barry, Chief, E-Learning Service and Support Branch (ELSS),
Austin Campus Web Services Program Office OS:CIO:I:W:E

SUBJECT: Request for Privacy Impact Assessment (PIA) –
E-Learning AUSC

Name of Request Contact:

Name: Linda Buckner
Organization Name & Symbols: E-Learning Service and Support Branch
(ELSS)
Mailing Address: IRS, 3651 South IH 35,
Stop 6211 AUSC, Austin, TX 78741
Phone Number (with area code): (512) 460-8636

Name of Business System Owner: (Operating or Functional Div; Modernization
or Shared Services)

Name: Jimi Stricklin
Organization Name & Symbols: Web Services Program Office
OS:CIO:I:W
Mailing Address: 5000 Ellin Rd, New Carrollton, MD 20706
Phone Number (with area code): 202-283-3500

Requested Operational Date: 4-1-2004

Category:

New: _____
Existing System:
Recertification, (with no change, date of last certification)

With Significant Modification: _____
National Standard Application (NSA): _____
Modernization Project or System:
Check Milestone: one ___ two ___ three ___ four ___ five ___

System of Record Number(s) (SORN) #:

Treasury/IRS 38.001 General Training Records
Treasury/IRS 34.037 Audit Trail & Security Records
Privacy Act Notification - Privacy Act Handbook Chapter 5

Purpose of the System: The purpose of this system is to give employees access to online courses and learning history. Attachment A shows the login screens for creating a profile. Attachment B shows the diagram of all servers within the E-Learning architecture.

Privacy Impact Assessment –E-Learning AUSC

Data in the System

<p>1. Describe the information (data elements and fields) available in the system in the following categories:</p> <ul style="list-style-type: none"> A. Taxpayer B. Employee C. Audit Trail Information (including employee log-in info) D. Other (Describe) 	<ul style="list-style-type: none"> A. No taxpayer information will be maintained. B. The data collected from the employees include: employee's name, extension, email address, stop number, Manager's name, extension, e-mail address, fax number and agency/Bureau/Business. See attachment A Data is stored on learning events requested, or completed by employees. C. The Audit Trail information elements gathered are: Account Logon – Failed Attempts Logon – Failed Attempts D. The E-Learning AUSC system will keep information on each student's progress through a course. This tracking feature on progress through a course is called a "bookmark" that allows a student to return to the course where they left off.
<p>2. Describe/identify which data elements are obtained from files, databases, individuals, or any other sources.</p> <ul style="list-style-type: none"> A. IRS B. Taxpayer C. Employee D. Other Federal Agencies (List agency) E. State and Local Agencies (List agency) F. Other third party sources (Describe) 	<ul style="list-style-type: none"> A. None B. None C. Data collected on employees on ELMS (Enterprise Learning Management System) from TIMIS (Treasury Integrated Management Information System), TAPS (Totally Automated Personnel System) and Discovery Directory includes SSN (Social Security Number), SEID (Standard Employee Identifier), name, grade, series, ORGSEG (Organizational Segment), POD (Post of Duty) City and State, email address and manager. D. None E. None F. None
<p>3. Is each data item required for the business purpose of the system? Explain.</p>	<p>Yes, Title 5 USC of the Code of Federal Regulation, Chapter 41, Section 410.311, and Executive Order 11348 requires agencies to maintain a record of training events on an employee maintained and organized by SSN. The data must be collected for employees to access courses and receive recognition. The information is stored in the employee's training history file on the Administrative Corporate Education System (ACES) and Enterprise Learning Management System (ELMS) systems.</p>

Privacy Impact Assessment –E-Learning AUSC

<p>4. How will each data item be verified for accuracy, timeliness, and completeness?</p>	<p>The email information is verified through the Exchange server, built-in error checking in Web forms, and validation from ACES Database. Source of ELMS and ACES data is TAPS, TIMIS and Discovery Directory. Whether or not a course is actually completed is an integrity issue. We depend on the integrity of employees that they will mark the course as completed to be true.</p>
<p>5. Is there another source for the data? Explain how that source is or is not used.</p>	<p>No. Individuals are responsible for the accuracy of their own data they use to create their e-learning account. Source of ELMS and ACES data is TAPS, TIMIS and Discovery Directory.</p>
<p>6. Generally, how will data be retrieved by the user?</p>	<p>Each employee can access only their own e-learning account by SSN and PIN. Their account lists all course titles they are currently enrolled in, courses completed and courses dropped. System Administrator(s) (SA) will have access to database files that contain the employee e-learning accounts. Student account data is automatically uploaded to ACES upon completion of a course.</p>
<p>7. Is the data retrievable by a personal identifier such as name, SSN, or other unique identifier?</p>	<p>Yes, Before an employee can access their e-learning account, the employee must input their SSN and PIN (Personal Identification Number). SA (System Administrators), CA (Course Administrators) and Web Administrators from ELSS can access employee accounts for the purpose of correcting records and resetting PIN numbers. Training Directors or Course Administrators from any Treasury bureau cannot access employee data.</p>

Access to the Data

<p>8. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Others)?</p>	<p>Users have access to their own account data. System Administrators, Course Administrators, and Web Masters will have access to the data for correcting employee accounts.</p> <p>System Administrators will have restricted access to employee records in ELMS, based on security domains.</p> <p>Managers can access their own employee's training history records from the ACES system of records restricted to business unit, division, branch or unit.</p>
--	---

Privacy Impact Assessment –E-Learning AUSC

<p>9. How is access to the data by a user determined and by whom?</p>	<p>Users (students of the ELSS) can only access their own account. Web Masters have read, write, and edit privileges and access to the student, course, course launch databases, tables, and program files. Systems Administrators have read and copy access to these files and the Course Administrators have read, write and edit privileges to the course database files and tables. Access to ELMS data is restricted by security domains.</p>
<p>10. Do other IRS systems provide, receive, or share data in the system? If YES, list the system(s) and describe which data is shared. If NO, continue to Question 12.</p>	<p>Yes, Employee data is currently received from ACES weekly (ACES data is from TAPS, TIMIS, and Discovery Directory). Data on learning events is currently sent to ACES weekly. Future state ELMS will receive data directly from TAPS, TIMIS, Discovery Directory and HR Connect.</p>
<p>11. Have the IRS systems described in Item 10 received an approved Security Certification and Privacy Impact Assessment?</p>	<p>Yes</p>
<p>12. Will other agencies provide, receive, or share data in any form with this system?</p>	<p>No</p>

Administrative Controls of Data

Privacy Impact Assessment –E-Learning AUSC

<p>13. What are the procedures for eliminating the data at the end of the retention period?</p>	<p>Data is retained indefinitely to allow students access to completed courses for reference purposes. The employee official training history file once marked completed is kept in ACES. The employee profile will be kept indefinitely as long as they are an IRS employee.</p> <p>In Centra, practice events are deleted once the practice session is complete.</p> <ul style="list-style-type: none"> - Meeting events will be kept for 3 years - Training events will be kept as long as the material is valid. Due dates are to validate this material in the knowledge library. - Every quarter the Business Operating Divisions (BOD) are notified to inquire which events, subjects, recordings are no longer needed. We delete all event data, and subjects that are obsolete based on the response from the BOD's
<p>14. Will this system use technology in a new way? If "YES" describe.</p>	<p>No</p>
<p>15. Will this system be used to identify or locate individuals or groups? If so, describe the business purpose for this capability.</p>	<p>No</p>
<p>16. Will this system provide the capability to monitor individuals or groups? If yes, describe the business purpose for this capability and the controls established to prevent unauthorized monitoring.</p>	<p>No The only "monitoring" capability for http://learning.irs.gov site is the Bookmark Feature the employee activates.</p> <p>Yes, for Centra portion http://learning.irs.gov/centra. The system has the capability to monitor individuals or groups during an actual event session i.e. meeting or virtual class. Only public events can be enrolled in by all participants. Non-public events can be enrolled in by only persons with "Event Manager" level access (specific permission assigned after certain levels of courses are successfully completed). You must have a login and password to enter any event session.</p> <p>Yes, ELMS will be used to report out data on learning events both individually and service wide as required by management.</p>

Privacy Impact Assessment –E-Learning AUSC

17. Can use of the system allow IRS to treat taxpayers, employees, or others, differently? Explain.	NO
18. Does the system ensure "due process" by allowing affected parties to respond to any negative determination, prior to final action?	NA
19. If the system is web-based, does it use persistent cookies or other tracking devices to identify web visitors?	NO. The Server only makes "per session" cookies, while the student's browser is open. Nothing is saved or written to the hard drive of the user's/student's system.