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

JUN 1 0 2004

MEMORANDUM FOR Stan Collins,
Chief Benefits and Services Team,
Human Capital Office

FROM: Maya A. Bernstein
Privacy Advocate

SUBJECT: Privacy Impact Assessment -
Employee Benefits Information System (EBIS) –
Retirement Calculator

The Office of the Privacy Advocate has reviewed the Privacy Impact Assessment (PIA) for the Employee Benefits Information System (EBIS) – Retirement Calculator. Based on the information you provided, our office does not have any privacy concerns that would preclude the EBIS – Retirement Calculator from operating. A revised PIA is required when considering any major modifications to the EBIS – Retirement Calculator, or at the scheduled recertification of this system/application.

We will forward a copy of the PIA to the Director, Modernization and System Security, to be included in the Certification and Accreditation package for formal acceptance. That office may request information concerning the statements contained in the PIA to ascertain compliance with applicable security requirements.

Note that the Electronic Government Act of 2002 requires that the IRS make this PIA available to the public. If there is any portion of this PIA that you believe would cause harm to the IRS or any party if disclosed to the public, please mark those portions and return to our office within ten days.

If you have any questions, please contact me at 202-927-5170, or your staff may call Mary Ronan at 202-622-9474.

Attachment

cc: Director of Regulatory Compliance

FROM: Stan Collins, Chief Benefits and Services Team, Human Capital Office, OS:HC:PS:C:B

SUBJECT: Request for Privacy Impact Assessment (PIA) – The Employee Benefits Information System (EBIS) – *Retirement Calculator*

Purpose of the System: The Employee Benefits Information System (EBIS) is a web-based application that allows employees to access personal and benefits-related information. The EBIS system will replace the gap created with the loss of the free calculator on the seniors.gov web site. Employees can use the system to generate either a "quick" or detailed retirement annuity estimate using EBIS calculators. IRS will provide information to EBIS in order for the employee to accurately and quickly generate an estimate. Data will be updated each pay period by a FOCUS report from the TIMIS system. The reports will be given to the Contractor responsible for EBIS on a CD-ROM. .

Name of Request Contact:
Name: Rocco Martinez, Analyst
Organization Name & Symbols: Benefits and Services Team, OS:HC:PS:C:B
Mailing Address: Austin Federal Building; 300 E. 8th St.; MS 1010AUS, Room 400, Austin, TX 78701
Phone Number (with area code): (512) 499-5004; x5061 Fax

Name of Business System Owner:
Name: *Rich Cronin, Director, Personnel Field Services*
Organization Name & Symbols: Personnel Field Services, OS:HC:PS
Mailing Address: 1111 Const Ave NW; Washington, DC, 20224
Phone Number (with area code): 202-283-2643

Requested Operational Date: June 15, 2004

Category: *(Reason PIA is required--enter "y" or "n" and applicable dates)*
New System?: ____N_____
Recertification? (if no change, enter date of last certification) ____N_______
Modification of existing system?: ____Y___

Is this a National Standard Application (NSA)?: __N_____
Is this a Modernization Project or System? ___N_____
If yes, the current milestone?: __N__ *(Enter 1-5; explain if combining milestones)*

System of Records Number(s) (SORN) #: 36.009 Retirement, Life Insurance and Health Benefits Records Systems (as amended in August/2003)

Attachment: PIA

Data in the System

1. Describe the information (data elements and fields) available in the system in the following categories: A. Taxpayer B. Employee C. Audit Trail Information (including employee log-in info) D. Other (Describe)	A – None B – From TIMIS / FOCUS Report • Social Security Number • Name • Date of Birth • Salary • Retirement Code • Service Connect Date • Enter on Duty Date • Tour of Duty • Retired military indicator • Military service duration • Re-employed Annuitant indicator • Sick leave balance • Annual leave balance • Current Health Benefit • Current Life Insurance • Thrift Savings Plan contribution • Pay period ending date • Work schedule • Type of appointment C – Firewall activity, web server activity, and database activity are logged, reviewed and maintained by the Systems administrator/ vendor. The Systems administrator will notify the contracting officer or agency designated POC about any questionable activity. D – None
2. Describe/identify which data elements are obtained from files, databases, individuals, or any other sources. 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)	• IRS -- All data elements listed above are obtained from IRS though TIMIS / FOCUS reports. • Employee -- The user / Employee has the ability to overwrite data to create what-if calculations.

3. Is each data item required for the business purpose of the system? Explain.	Yes. The data elements being shared have been approved by the Service's Lead Program Analyst for the Retirement Program as necessary to accurately calculate retirement scenarios.
4. How will each data item be verified for accuracy, timeliness, and completeness?	The data elements come from a FOCUS report which is reviewed by IRS analysts and the FOCUS report writer for accuracy. When the vendor uploads the information reconciliation of the data will be based on record count and is performed upon data import function. All discrepancies are logged and resolved. This process will repeat on a pay period basis (bi-weekly) and is subject to accuracy of the TIMIS system. Before the calculator goes live, it will be tested by the Lead Analyst for Retirement Program and a cadre of human resource specialists for accuracy and completeness.
5. Is there another source for the data? Explain how that source is or is not used.	None
6. Generally, how will data be retrieved by the user?	The user will interact with the EBIS system via Internet connection.
7. Is the data retrievable by a personal identifier such as name, SSN, or other unique identifier?	Individual users will gain access to the system through the use of a Social Security number and a PIN number. Initially users will log in with identifying data which the system will verify from information provided by the Service. After verification, the system will establish a user account and supply a password. Users will be encouraged to immediately change this password. Only the data pertaining to the specific user will be retrievable via a combination of a Social Security number and a password/PIN.

Access to the Data

8. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Others)?	Individual employees seeking their own data or IRS employees who are assisting them in their retirement review. Systems administrators at the Contractor for purposes of fulfilling the contract, security, and data verification. Developers at GRB. GRP Personnel with access to the EBIS data and/or database server have received a background check. Under certain circumstances, personnel are permitted limited access to the EBIS database prior to completing a background screening. All access in these circumstances is performed under supervision of the Contractor's Chief Security Officer. IRS personnel (Focus Report writer, Benefits and Services Team Analysts). Once the data is in GRB's system only specified GRB employees and the IRS employee that the data pertains to are allowed access to the data
9. How is access to the data by a user determined and by whom?	• For users, access is granted via the login process explained in item 7. • For System Administrators/Developers at GRB access is granted based on our Security plan. • For IRS, determination based on Business Need and approved by Chief, Benefits and Services Team.

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.	• TIMIS provides data via a CDROM. A FOCUS report is sent biweekly with all data elements described in Question 1. • Access, the software used by IRS Benefits Specialists, is able to send and receive data (See Question 8 for description of this use.)
11. Have the IRS systems described in Item 10 received an approved Security Certification and Privacy Impact Assessment?	TIMIS has both. The Access program is hosted on an IRS Secured LAN server which also has both.
12. Will other agencies provide, receive, or share data in any form with this system?	No.

Administrative Controls of Data

13. What are the procedures for eliminating the data at the end of the retention period?	New data from TIMIS replaces outdated data each pay period. At the end of the contract the vendor purges all database records and removes the IRS' schema from their system. Any backups of data from the client on disk or tape are re-formatted and disposed of.
14. Will this system use technology in a new way? If "YES" describe. If "NO" go to Question 15.	No
15. Will this system be used to identify or locate individuals or groups? If so, describe the business purpose for this capability.	No
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.	No

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?	The system is a calculator for the use and convenience of employees. IRS makes no decisions based on data from this calculator.
19. If the system is web-based, does it use persistent cookies or other tracking devices to identify web visitors?	Persistent cookies are not used by the system. Cookies are used on a per session basis. When the user logs off the system or times out the cookie is no longer valid and can not be used to gain access to data.