



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

COMMUNICATIONS AND LIAISON

APR 21 2003

MEMORANDUM FOR Jimi Stricklin, Director
Web Services Program Office
M:I:W

FROM: *for Charlene W. Thomas*
Charlene W. Thomas
Acting Privacy Advocate CL:PA

SUBJECT: ELS-Treasury
Privacy Impact Assessment (PIA)

The Office of the Privacy Advocate has reviewed the Privacy Impact Assessment for the ELS-Treasury. Based on the information you provided, we do not have any privacy concerns that would preclude this system from operating. However, a revised PIA is required when considering any future upgrades or modifications to the system.

We will forward a copy of the PIA to the Information Technology Services Security and Certification Program Office to be included in the Security Accreditation Package for formal acceptance for operation. The Office of Security Evaluation and Oversight, which has security oversight responsibility, may request information concerning the statements contained in the PIA to ascertain compliance with applicable requirements.

If you have any questions, please contact me at 202-927-5170 or Priscilla Hopkins at 202-927-9758.

Attachment

cc: Director, Information Technology Services Security and Certification
Program Office M:S:C:C
Director, Office of Security Evaluation and Oversight M:S:S

MEMORANDUM FOR MARGARET ANN IRVING
PRIVACY ADVOCATE CL: PA

FROM: Jack Barry, Chief, E-Learning Services and Support (ELS) Austin
Campus; Web Services Program Office M:I:W:E
SUBJECT: Request for Privacy Impact Assessment (PIA) –
ELS-Treasury

Name of Request Contact:

Name: Linda Buckner
Organization Name & Symbols: E-Learning Services and Support (ELS), Austin
Campus, M:I:W:E
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 M:T:W
Mailing Address: 5000 Ellin Rd, New Carrollton, MD 02706
Phone Number (with area code): 202-283-0879

Requested Operational Date:

Category:

New: X
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: This Privacy Impact Assessment covers the server systems administration for the Treasury Intranet server from within IRS and Treasury firewalls. The purpose of this server is to give Intranet access to all Department of Treasury employees (all bureaus) so that they may access the SkillSoft UniverELSy and the E-Learning Services and Support (ELS) web based (on-line) courses.

Attachment: PIA

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. TaxpayerB. EmployeeC. Audit Trail Information (including employee log-in info)D. Other (Describe)	<p>A. No taxpayer data will be maintained.</p> <p>B. The Employee E-learning account consists of data elements and fields. In addition, course titles, dates enrolled, on-duty and off-duty hours used to complete course, and course completion dates are also collected to make up the whole employee E-learning account. Finally, there is a table of Course Launch Procedures that take effect when a course is opened. These procedural differences are based on how the vendor developed the course. For example, courses from "SVI" are Adobe Acrobat files that contain a whole textbook. When a student selects to take an SVI course, the Adobe Acrobat application is launched so the student can begin to read it, download it to a CD or their hard drive or print it.</p> <p>C. The Audit Trail information elements gathered are: Account Logon – Failed Attempts Logon – Failed Attempts</p> <p>D. The ELS Internet server will keep information on each student's progress through a course. This tracking feature is called a "bookmark" that a student selects to turn on so they can return to the course where they left off, if they had to interrupt their session.</p>
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<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. ELS-Treasury, within the IRS Firewall, will supply the database of existing Employee E-learning Accounts. The ELS-Treasury will contain its own database of SkillSoft and ELS course titles, launch procedures, course descriptions and course categories. The Course Administrators will update the "courses" database manually when new courses are added to or obsolete courses are deleted from the library of available courses on ELS-Web. B. None C. Employee SSN, email address, name of employee's manager, and manager's email address are provided by individual IRS & Treasury employees who access the Server to create a new account or enroll and take on-line courses. D. None E. None F. None
<p>3. Is each data item required for the business purpose of the system? Explain.</p>	<p>Title 5 of the Code of Federal Regulation, Section 410.311 requires agencies to maintain a record of training events. Every Treasury Bureau must receive a record of the training events their employees have completed. In order to meet this requirement, the minimum data elements identified in addition to course title, date completed, on/off duty hours used to complete the course are provided in a quarterly report that is retrieved from ELS-Treasury server.</p>
<p>4. How will each data item be verified for accuracy, timeliness, and completeness?</p>	<p>Whether or not a course is actually completed is an integrity issue. We have to depend on the integrity of employees that they will mark their course complete only when this is true.</p>
<p>5. Is there another source for the data? Explain how that source is or is not used.</p>	<p>No. Individuals from Treasury are responsible for the accuracy of their own data they use to create their ELS E-learning account.</p>
<p>6. Generally, how will data be retrieved by the user?</p>	<p>Each employee can only access their own E-learning account by SSN and PIN. Their account lists the on-line course titles they are enrolled in, completed and dropped. SA will capture the database file that contains the Employee E-learning accounts.</p>

<p>7. Is the data retrievable by a personal identifier such as name, SSN, or other unique identifier?</p>	<p>To access their E-learning account data, an employee must input their SSN, much like OPM's Employee Express system. Only Systems Administrators, Course Administrators and Web Administrators from ELS can access the Employee E-learning account database files. Our staff generates reports of training events sorted by Bureau and this report is sent to the Treasury Training Directors. Training Directors or Course Administrators from any Treasury bureau cannot access employee data on ELS-Treasury, ELS-Web or ELS-Treasury.</p>
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Access to the Data

<p>8. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Others)?</p>	<p>System Administrators, Course Administrators and Web Masters. They will have access to the date for corrections, installation and administering.</p> <p>Employees call us or send an email to the learning@irs.gov (literacy inbox) to ask us to make these corrections to their accounts, because they cannot).</p> <p>Only managers from IRS can access an IRS employee's training history record and they accomplish that from the ACES system of records.</p>
<p>9. How is access to the data by a user determined and by whom?</p>	<p>Users (students of the School of Information Technology (ELS)) 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. The Web Administrators are often called upon to correct employee accounts, because employees make mistakes. We have had the ELSuation where employees have selected the wrong button and marked a course complete, when they meant to withdraw from the course; or they selected the wrong version of the course they completed (i.e. they took the textbook or CD version and enrolled in the on-line version.) Employees call us or send an email to the learning@irs.gov (literacy inbox) to ask us to make these corrections to their accounts, because they cannot.</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>No</p>
<p>11. Have the IRS systems described in Item 10 received an approved Security Certification and Privacy Impact Assessment?</p>	<p>N/A</p>
<p>12. Will other agencies provide, receive, or share data in any form with this system?</p>	<p>Not directly. The ELS Systems Administrators will run quarterly reporting of data from the ELS-Treasury server. This data will be printed to an Excel spreadsheet. Title 5 of the Code of Federal Regulation, Section 410.311 requires agencies to maintain a record of training events. Every Treasury Bureau must receive a record of the training events their employees have completed. In order to meet this requirement, the minimum data elements identified in addition to course title, date completed, on/off duty hours used to complete the course are provided in a quarterly report that is retrieved from ELS-Treasury server.</p>

Administrative Controls of Data

<p>13. What are the procedures for eliminating the data at the end of the retention period?</p>	<p>ELS-Treasury server data containing enrollment data will be purged in three-year cycles. Student profile data will be maintained so long as the student is a Treasury employee since this is not the "official" training history record for employees.</p>
<p>14. Will this system use technology in a new way? If "YES" describe. If "NO" go to Question 15.</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. Treasury Bureau will sort the data in order to provide data to the participating Treasury bureaus. The Treasury Training Directors utilize this data to update their Employee Training Records on their individual Learning Management System in accordance with the Title 5 Code of Federal Regulations. Access to courses by Department of Treasury employees will be given only to employees of participating bureaus.</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 is the Bookmark Feature the employee activates if they choose to do so</p>
<p>17. Can use of the system allow IRS to treat taxpayers, employees, or others, differently? Explain.</p>	<p>No.</p>
<p>18. Does the system ensure "due process" by allowing affected parties to respond to any negative determination, prior to final action?</p>	<p>Not applicable.</p>
<p>19. If the system is web-based, does it use persistent cookies or other tracking devices to identify web visitors?</p>	<p>The Treasury 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.</p>