



COMMUNICATIONS AND LIAISON

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

APR 22 2003

MEMORANDUM FOR Jack Barry, Chief
E-Learning Service and Support
M:I:W:E

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

SUBJECT: ELS-Web 1
Privacy Impact Assessment (PIA)

The Office of the Privacy Advocate has reviewed the Privacy Impact Assessment for the ELS-Web 1. 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 Service and Support Staff (ELS),
Austin Campus, Web Services Program Office M:I:W:E

SUBJECT: Request for Privacy Impact Assessment (PIA) –
ELS-Web 1

Name of Request Contact:

Name: Linda Buckner
Organization Name & Symbols: E-Learning Service and Support (ELS)
Mailing Address: IRS, 3651 South IH 35, Stop 6211 AUSC, Austin, TX 78741
Phone Number (with area code): 512-460-7206

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

Name: Jimi Stricklin
Organization Name & Symbols: Web Services Program Office M:I:W
Mailing Address: 5000 Ellin Rd, New Carrollton, MD 20706
Phone Number (with area code): 202-283-02706

Requested Operational Date: 4-1-2003

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 system is to give intranet access to all Treasury/IRS employees so they may have access to web-based (on-line) courses and access to Skillsoft University for the purpose of continued education in current jobs or developmental skill in line with employees IDP. This server is the main server for the E-Learning Services and Support. It contains the master student profiles for all the servers. It is a portal to ELS-Host, ELS-Conference, ELS-WEB1, ELS-DB, and ELS-LDS.

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. No taxpayer data 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 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.

C. The Audit Trail information elements gathered are:
Account Logon – Failed Attempts
Logon – Failed Attempts

D. The ELS Web 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>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. Employee SSN, email address, name of employee's manager, and manager's email address are provided by individual IRS & Treasury employees who access the Internet Server website 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>Yes, Title 5 of the Code of Federal Regulation, Section 410.311 requires agencies to maintain a record of training events. 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 ACES system.</p>
<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. Whether or not a course is actually completed is an integrity issues. We depend on the integrity of employees that they will mark the course as completely 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.</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 all course titles they are enrolled in, completed and dropped. SA will have access database file that contains the Employee E-learning accounts. Student account data automatically uploads 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, for an employee to access their e-learning account data, employee must input their SSN and PIN. System Administrators, Course and Web Administrators from ELS can access employee accounts for the purpose of correcting records. Training Directors or Course Administrators from any Treasury bureau cannot access employee data on ELS-internet, 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>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>Managers from IRS can access an IRS employee's training history records from 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 E-Learning Service and Support Staff (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.</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, Once an employee has completed a course it is automatically uploaded to the ACES system where all employee history files are kept.</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>
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Administrative Controls of Data

<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>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.</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>NA</p>

<p>19. If the system is web-based, does it use persistent cookies or other tracking devices to identify web visitors?</p>	<p>No. The Server only makes "per session" cookies, while the students browser is open. Nothing is saved or written to the hard drive of the user's/student's system.</p>
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