



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

MAY 24 2004

MEMORANDUM FOR JAMES P. FALCONE  
DIRECTOR, REAL ESTATE AND FACILITIES  
MANAGEMENT

FROM:

Maya A. Bernstein  
Privacy Advocate

A handwritten signature in black ink, appearing to read "Maya A. Bernstein", written over the printed name.

SUBJECT:

Post of Duty Model  
Privacy Impact Assessment

The Office of the Privacy Advocate has reviewed the Privacy Impact Assessment (PIA) for the Post of Duty Model (POD). Based on the information you provided, our office does not have any privacy concerns that would preclude POD from operating. A revised PIA is required when considering any major modifications to the POD, 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 10 days.

If you have any questions or would like to discuss this PIA, please contact me at 202-927-5170. Our staff analyst is Priscilla Hopkins at 202-927-9758.

Attachment

cc: Director of Regulatory Compliance

04-05-2004

MEMORANDUM FOR MAYA A. BERNSTEIN  
PRIVACY ADVOCATE

FROM: Joseph Tezza, Project Manager, AWSS, OS:A:RE:SC

SUBJECT: Request for Privacy Impact Assessment (PIA) –  
Post of Duty (POD) Model

Purpose of the System: The Post of Duty (POD) Model evaluates an IRS facility's current location, or an area proposed for a new office, to determine whether it is an optimal location. It provides a consistent and objective approach to assess existing IRS field offices.

Name of Request Contact:

Name: Joseph Tezza  
Organization Name & Symbols: AWSS, REFM, OS: A: RE: SC  
Mailing Address: 400 North 8<sup>th</sup> Street, Room 1A-19, Richmond, Virginia 23240  
Phone Number (804)916-3860

Name of Business System Owner:

Name: Doug Capps, Director, Administration and Control  
Organization Name & Symbols: A: RE: A  
Mailing Address: 2221 South Clark Street, Arlington, VA 22202  
Phone Number (with area code): 202-283-9368

Requested Operational Date:

Category: (Reason PIA is required--enter "y" or "n" and applicable dates)

New System?: \_\_\_\_\_

Recertification? (if no change, enter date of last certification) \_\_\_\_\_

Modification of existing system?: has not had cert.

Is this a National Standard Application (NSA)?: \_\_\_\_\_

Is this a Modernization Project or System? \_\_\_\_\_

If yes, the current milestone?: \_\_\_\_\_ (Enter 1-5; explain if combining milestones)

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

The taxpayer counts source data is derived from IMF and BMF, therefore SORS 24.030 and 24.046 cover those records.

IRS 24.046 CADE business master file  
IRS24.030—CADE Individual Master File (IMF)

Attachment: PIA

**NOTE: The E-Government Act of 2002 requires that PIAs be posted on agencies' Internet sites. Please enter the pound sign "#" next to any line that contains sensitive information which should not be made public. The executive owner of this system, or designee, is required to concur by signing our approval memo.**

**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"> <li>A. Taxpayer</li> <li>B. Employee</li> <li>C. Audit Trail Information (including employee log-in info)</li> <li>D. Other (Describe)</li> </ul>	<ul style="list-style-type: none"> <li>A. There is no taxpayer/return data in the system, except counts of types of filer (e.g. counts of 1040 and 1065 filers) by zip code. No personally identifiable information is associated with those counts.</li> <li>B. There is no employee data except counts of employees in zip codes.</li> <li>C. Within the IRS, the project manager is the sole user.</li> <li>D. Data dictionary in the model Intranet site. <a href="http://awss.web.irs.gov/Facilities/POD/PODindex.htm">http://awss.web.irs.gov/Facilities/POD/PODindex.htm</a></li> </ul>
<p>2. Describe/identify which data elements are obtained from files, databases, individuals, or any other sources.</p> <ul style="list-style-type: none"> <li>A. IRS</li> <li>B. Taxpayer</li> <li>C. Employee</li> <li>D. Other Federal Agencies (List agency)</li> <li>E. State and Local Agencies (List agency)</li> <li>F. Other third party sources (Describe)</li> </ul>	<p>See the model website, the model has no personal identifiers of any type. No employee data (except aggregate counts of the # of employees that live in each zip code) and no data from any other Federal, State or local agencies.</p> <p>Demographic information (e.g. population counts are purchased from a private firm)</p> <p>See the model data dictionary for source information.</p>
<p>3. Is each data item required for the business purpose of the system? Explain.</p>	<p>The model uses counts of filers, demographic information and Business Unit (BU) workload to assess facilities and assist in facility site selection. That data is required for the business purpose of the system.</p>

4. How will each data item be verified for accuracy, timeliness, and completeness?	Standard data validation techniques (e.g. Max, Min, outlier reviews etc.) are utilized to verify the data. The BU data is updated about twice a year.
5. Is there another source for the data? Explain how that source is or is not used.	The BU filer information is secured from the Business Units. It is timely and consists of counts by zip code. There are no known alternate sources.
6. Generally, how will data be retrieved by the user?	There is one person that has access to the data sets within the IRS (the project manager) the data is housed on CD and a non-networked workstation. The data is collated, formatted and analyzed and placed in presentation format (maps) by Jacobs Consultancy under contract with the IRS.
7. Is the data retrievable by a personal identifier such as name, SSN, or other unique identifier?	NO. There are no personal identifiers of any kind. The data is summary counts by zip code.

**Access to the Data**

8. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Others)?	There is one person that has access to the data sets within the IRS (the project manager) the data is housed on CD and a non-networked workstation. The data is collated, formatted and analyzed and placed in presentation format (maps) by Jacobs Consultancy under contract with the IRS.
9. How is access to the data by a user determined and by whom?	Zip code level data access is limited to the project manager and the consultants. That determination was made by REFM Management.
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.	The data is not shared. For data sources see the website at the data dictionary.

11. Have the IRS systems described in Item 10 received an approved Security Certification and Privacy Impact Assessment?	N/A
12. Will other agencies provide, receive, or share data in any form with this system?	No

**Administrative Controls of Data**

<p>13. What are the procedures for eliminating the data at the end of the retention period?</p>	<p>The CDs are updated about every six months. The CDs will be destroyed according to standard records retention procedures for record series items located in Internal Revenue Manual 1.15 Chapters 8 through 62. Records are media neutral unless otherwise stated. Record holders are then responsible for retention of the records for the full life as stated.</p>
<p>14. Will this system use technology in a new way? If "YES" describe. If "NO" go to Question 15.</p>	<p>The system uses optimization software to indicate the optimal zip code for facility placement. This does not involve Artificial Intelligence.</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</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>N/A</p>
<p>19. If the system is web-based, does it use persistent cookies or other tracking devices to identify web visitors?</p>	<p>It is not web-based.</p>