SEP 17 2003

MEMORANDUM FOR   MARK E. PURSLEY
DIRECTOR
STAKEHOLDER PARTNERSHIP, EDUCATION AND
COMMUNICATION

FROM: Maya A. Bernstein
Privacy Advocate

SUBJECT: STARS Privacy Impact Assessment

The Office of the Privacy Advocate has reviewed the Privacy Impact Assessment
(PIA) for the SPEC Taxpayer Assistance Reporting System (STARS) application.
Based on the information provided in the PIA, as well as information provided by
Governmental Liaison and Disclosure (GLD), I have learned that the STARS
application requires a new System of Record Notice (SORN) in order for the
system to be in compliance with the Privacy Act.

I understand that you are working with GLD to obtain approval of a draft SORN.
Please forward a draft copy of the SORN to this office as soon as one is ready so
that we can continue our review of the PIA. If there is anything my office can do
to help speed the process along, please do not hesitate to let us know, and we
will assist in any way we are able. Once the SORN has received final approval
by the Office of Disclosure and Privacy Litigation, I will conclude review of the
PIA as quickly as possible.

If you have any questions, please contact me at 202-927-5170, or your staff may
contact Brian D. Townsend at 202-927-5162.

Attachment

cc: Samuel L. Perry, Wage & Investment, SPEC   W:CAR:SPEC:SPD
Eddie C. Souther, Wage & Investment, SPEC WI:SPEC
Lana Wimberley-Bowman, Certification Program Office M:I:SPO:S:C
Delena D. Bratton, Deputy Director, Communications & Liaison

Description of your program/project:

During development of the application software the name was changed from CPALS to STARS
STARS is an ACCESS database that provides relationship management tools for establishing Stakeholder/Partner relationships and identifying the business objectives supported by Stakeholders/Partners. It will also provide the ability for the SPEC organization to process VITA/TCE (Volunteer Income Tax Assistance/Tax Counseling for the Elderly) site information and volunteer profile and assistance statistics. It will also include the ability to process program activity data that will include employee time and outreach statistics.

Information in the System

Individuals who work in and provide administrative assistance to the Volunteer Income Tax Assistance and Tax Counseling for the Elderly programs and other IRS volunteer programs, including individual partners (persons who serve as intermediaries between IRS and taxpayers, such as return preparers and persons who disseminate tax information) and stakeholders (persons who have a vested interest in IRS business, including tax professionals and practitioners, and members of Congress).

Categories of Records in the System

Records contain information on qualifications of individuals who volunteer in IRS-administered taxpayer assistance programs, including names, addresses, phone numbers, available times to work, ability to deliver products and services, contact information, availability for delivery of products and services, geographical coverage, resources, services provided, and inventory of software/hardware provided to the volunteer.

Data In the System

1. Generally describe the information to be used in the system in each of the following categories: Taxpayer, Employee, and Other.	Taxpayer: None. Employee: User ID, Organization code, Pay Period Standard Hours, Standard Work Period, Holiday, Leave, Function Code, Organization Code. Users are required to identify themselves via password authentication. User passwords for STARS access have been enabled and consist of the user's LAN Logon and SEID with systemic warning of expiration in three-month intervals. SPEC Headquarters controls access to authentication data. Other: VITA/TCE site information: Site identification, location, hours of operation, days of operation volunteer profile, assistance statistics and Stakeholder/partner profile information. Volunteer profile data provided by volunteers consist of fields for names, addresses, phone numbers, e-mail address, web site address and dates available to work.
	SPEC uses this information solely for relationship management/site resource allocation to include contact, notice of site openings, and for correspondence to include letters of thanks and certificates for volunteer service. SPEC uses volunteers with and without tax law skills. SPEC must ensure it has the right combination of volunteers for site support and population assistance.
2. What are the sources of the information in the system?	Employee time information input by employees. VITA/TCE site information and statistics provided by stakeholders/partners and volunteers. Stakeholder/partner profile data provided by stakeholders/partners.

2.a. What IRS files and databases are used?	VITA/TCE site information (locations, days and hours of operation, languages offered for individuals with Limited English Proficiency, and if State/Federal Electronic Return Filing is offered). This information is used to manually feed into QPID (Taxpayer Public Information Database) Statistics (site name, date, number of volunteers working at the site on this date, the outreach program (Teaching VITA; Bank, Post Office and Library, Outreach Media/Mailings E-Services; Earned Income Tax Credit (EITC) and the number of people reached during the program session, and the number of sessions held)) This information is used to manually feed into QIER (Taxpayer Information and Education Report). QPID and QIER are ITS staffed mainframe applications that reside at Detroit Computing Center.
2.b. What Federal Agencies are providing data for use in the system?	The military sponsors VITA sites that provide statistics to territory offices.
2.c. What State and Local Agencies are providing data for use in the system?	Those that will sponsor VITA Sites which includes City/County Governments, County Human Services, Faith Based Organizations, Chambers of Commerce, Housing Authorities, Local Federal Credit Unions, Community Services/Centers/Action Councils, Local Red Cross and United Ways, Rescue Missions, Salvation Army, Professional Societies (CPA/Legal), Local Utilities, Health & Human Services, Economic Growth Agencies, Local Veterans Administrations, etc.
2.d. From what other third party sources will data be collected?	Volunteer information is collected by Site Coordinators and delivered to SPEC.
2.e. What information will be collected from the taxpayer/employee?	No information will be collected from the taxpayer. Employees will input Login name and password for NT access. Employees will input SEID for STARS access. Employees will input statistics and time allocated to return preparation and outreach activities.

3.a. How will the data collected from sources other than IRS records and the taxpayers be verified for accuracy?	No data will be collected from the taxpayers. Outreach statistics will be collected on paper forms that will be reviewed and verified at the territory level prior to input. Clarifications are conducted with the source. Also, data field level edits are performed. The system will not save data entered into these fields. Data gathered from other sources will not be subjected to STARS verification for accuracy.
3.b. How will data be checked for completeness?	Data will be collected on paper forms that will be reviewed and verified at the territory level prior to input. Also, record level edits are performed. The system provides warning of incomplete records.
3.c. Is the data current? How do you know?	Data will be collected as per the current SPEC Data Dictionary and IRM 22.30.1 Data is verified at the territory office.
4. Are the data elements described in detail and documented? If yes, what is the name of the document?	Some data elements are described in SPEC's Data Dictionary.

Access to the Data

1. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Others)?	SPEC managers and employees working with the VITA project. Systems administrators will have access.
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	Access determination developed at SPEC Headquarters based on the need to know. Systems and application administrators will provide access permissions via directions from SPEC Headquarters.
3. Will users have access to all data on the system or will the user's access be restricted? Explain.	Initially territory employees will have read access to all territory folders. After training, territory employees will only have read/write access to their folder.

4. What controls are in place to prevent the misuse (e.g. browsing) of data by those having access?	UNAX Training and annual Computer Security Training is conducted. Users are required to have a valid NT password via Form 5081.
5.a Do other systems share data or have access to data in this system? If yes, explain.	No
5.b. Who will be responsible for protecting the privacy rights of the taxpayers and employees affected by the interface?	No taxpayer data will be in this system. No employee information except as indicated in Question #1 of page 2 will be in the system. Employee information in aggregate only. No individual employee information. Audit trail information has been enabled in STARS as per Treasury/IRS 34.037 safeguards and further defined in TD P 71-10. Database level auditing has not been enabled due to performance considerations. The system tracks user logons, logoffs and change of passwords. STARS Access levels and read/write capabilities have been enabled as per management's determination of need-to-know.
6.a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	No.
6.b. How will the data be used by the agency?	No other agencies will share the data.
6.c. Who is responsible for assuring proper use of the data?	SPEC Headquarters Management and System Administrators, Area Directors and Territory Managers.
6.d. How will the system ensure that agencies only get the information they are entitled to under IRC 6103?	No return or taxpayer information will be in the system.

Attributes of the Data

1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?	Yes
2.a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?	Yes
2.b. Will the new data be placed in the individual's record (taxpayer or employee)?	No
2.c. Can the system make determinations about taxpayers or employees that would not be possible without the new data?	No. Only return preparation statistics, outreach activity statistics, and relationship management data will be housed in the system. Although the capability exists, STARS is not designed to make these determinations.
2.d. How will the data be verified for relevance and accuracy?	Data will be collected as per the current SPEC Data Dictionary and IRM 22.30.1 Territories verify data prior to input.
3.a If the data is being consolidated, what controls are in place to protect the data and prevent unauthorized access? Explain.	Access will be limited by permissions to SPEC employees working with the VITA Program with valid Form 5081 NT accounts.
3.b If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.	Permissions are handled from SPEC Headquarters.

4. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	Input data will be retrieved using Microsoft Access Query. Only SPEC employees will have access to the system.

5. What are the potential effects on the due process rights of taxpayers and employees of:
 	
    a. consolidation and linkage of files and systems;
 	
    b. derivation of data;
 	
    c. accelerated information processing and decision making;
 	
    d. use of new technologies;
 	
How are the effects to be mitigated?
	No taxpayer data or employee data will be housed by the application except for employee information listed in Question #1 of page 2.

Maintenance of Administrative Controls

1.a. Explain how the system and its use will ensure equitable treatment of taxpayers and employees.	No taxpayer data or employee data will be housed by the application except for employee information listed in Question #1 of page 2.
1.b. If the system is operated in more than one site, how will consistent use of the system be maintained at all sites.	Procedures established in SPEC IRM 22.30.1, SPEC's Data Dictionary and SPEC's Memorandums of Understanding.
1.c. Explain any possibility of disparate treatment of individuals or groups.	No codes/indicators for special processing are in the application.
2.a. What are the retention periods of data in this system?	Adopting 2 years after the reporting period as per IRM 1.15.2.24 Item#9(1)(a).

2.b. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	Procedures being developed for implementation from SPEC Headquarters based on reference at 2a.
2.c. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	Site/ volunteer/partner information undergoes a 100% verification prior to filing season and is updated as sites open/close. Statistical data is verified prior to input with amendments upon receipt. There is no taxpayer or employee information housed in the application except for employee information listed in question #1 of page 2.
3.a Is the system using technologies in ways that the IRS has not previously employed (e.g. Caller-ID)?	No.
3.b How does the use of this technology affect taxpayer/employee privacy?	N/A
4.a Will this system provides the capability to identify, locate, and monitor individuals? If yes, explain.	The application provides the ability to locate volunteers/partners for resource allocation and geographical coverage. SPEC needs to know if it has enough volunteers/partners to cover site operations and geographical areas. No monitoring is done.
4.b. Will this system provide the capability to identify, locate, and monitor groups of people? If yes, explain.	Same as 4a.

4.c. What controls will be used to prevent unauthorized monitoring?	Permissions will be administratively granted to SPEC employees having a valid NT access. No taxpayer data will be housed in the application. No monitoring is done.
5.a Under which Systems of Record notice (SOR) does the system operate? Provide number and name.	For records with personnel information about IRS employees operating in their capacity as IRS employees, the system of records is Treasury/IRS 36.003 General Personnel and Payroll records For records regarding volunteers' skills and related data, and stakeholders, the systems of records are 10.004 Stakeholder Relationship Management and Subject Files, and the new system that is proposed, STARS. The STARS new system of records is being proposed for records that detail volunteer skills and will perform management tracking functions for those skills. For the audit trails that track access to government records/databases, the system of records is Treasury/IRS 34.037, the IRS Audit Trail and Security Records System. Volunteers who are Electronic return originators, Electronic return providers, electronic return preparers, electronic return collectors, electronic return originators, electronic filing transmitters, and individual filing software developers may also be covered by Treasury/IRS 22.062, Electronic Filing Records.
5.b. If the system is being modified, will the SOR require amendment or revision? Explain>	The STARS new system of records is being proposed for records that detail volunteer skills and will perform management tracking functions for those skills.