Taxpayer Advocate Service Integrated System (TASIS) – Privacy Impact Assessment

PIA Approval Date – Jul. 13, 2011

System Overview

The Taxpayer Advocate Service (TAS) Integrated System (TASIS) provides a unified system that enhances TAS' ability to help taxpayers resolve problems with the IRS and recommend changes to prevent the problems. TASIS establishes a common platform, leveraging existing database functionality and new IRS standards in electronic document management, data management, and portal strategies. In addition, TASIS reuses common services developed and provided by other IRS initiatives consistent with the overall IRS Service Oriented Architecture (SOA) strategy. TASIS replaces the Taxpayer Advocate Management Information System (TAMIS), Systemic Advocacy Management System II (SAMS II), and several MS–Access databases. TASIS also provides users the ability to generate reports. Administration and security responsibilities of Business Objects are provided by the Modernization & Information Technology Services (MITS)–18 General Support System (GSS) and are not considered part of the TASIS boundary.

Systems of Records Notice (SORN):

- IRS 00.003--Taxpayer Advocate Service and Customer Feedback and Survey Records
- IRS 34.037--IRS Audit Trail and Security Records System
- IRS 00.001--Correspondence Files and Correspondence Control Files

Data in the System

1. Describe the information (data elements and fields) available in the system in the following categories:

A. Taxpayer
- Taxpayer name
- Taxpayer identification number (TIN)
- Taxpayer address
- Temporary address
- Taxpayer email
- Power of attorney email
- Power of attorney name
- Primary & secondary telephones
- Best time to contact
- Fax number
- Specific tax account information extracted from filed tax return for example
- Adjusted gross income
- Taxable income
- Dependency exemption information
- Tax liability
- Withholding amount
- Social Security Number (SSN)
- Payroll information
- Earnings information

Temporary volunteer information to include:
- Age

- Gender
- Race
- Income
- Geographic area
- Practitioner number
- Ethnicity
- Background investigation results (pass/fail)
- Tax compliance investigation results (Pass/Fail)
- Tax Professional Preparer Tax Identification Number (PTIN)
- Employment status
- Occupation/position held
- Employer
- Language spoken/other Language

Also, other personal taxpayer information could be stored in open text fields to establish hardship, such as:
- Utility bill documents
- Mortgage payment
- Medical information
- Divorce decree or legal separation
- Other personal taxpayer supporting documents required to advocate on behalf of the taxpayer such as bank account statement information and credit card account information

B. Employee
- Employee badge number
- SSN
- Standard Employee Identification (SEID)
- Organization code
- Level of access
- Employee name
- Pseudonym
- Title
- Address
- Office location city and state
- Local phone
- Toll-free phone and fax number
- Hours and days available and time zone
- Training history
- Skill sets

C. Audit Trail Information – The audit function provides a record of the actions performed in TASIS and will collect data on everything viewed or changed while on the system. This data contains:
- Employee logon/logoff information
- Any action taken by the employee
- Date and time of the activity

D. Other – Various management information data relating to Taxpayer Advocate Service cases including:

- Case file number (systemically generated)
- Application of Taxpayer Assistance Order (ATAO)/ Taxpayer Assistance Order (TAO) code
- Subcode and relief date
- Received and closed dates
- Re-opened indicators by number of times and reason
- Organization codes
- Problem description
- Major issue codes
- Business operating division code
- Customer satisfaction and Integrated Case Processing (ICP) codes
- Project tracking, local use, and case complexity codes

2. Describe/identify which data elements are obtained from files, databases, individuals, or any other sources.
This information will not be available until TASIS has completed the design phase in Milestone (MS) 3 and 4.

3. Is each data item required for the business purpose of the system? Explain.
Yes. All data elements are required for effective resolution of an advocacy issue, for effective administration of Taxpayer Advocacy Panel (TAP) (Federal Advisory Commission (FACA)), and for effective grant administration.

4. How will each data item be verified for accuracy, timeliness, and completeness?
Some of this information will not be available until TASIS has completed the design phase in MS 3 and 4. Data received by other sources will be validated by those systems prior to being received and data input into TASIS by users will be validated upon entry.

5. Is there another source for the data? Explain how that source is or is not used.
No. There are no other sources of data beyond what has already been mentioned in this PIA.

6. Generally, how will data be retrieved by the user?
Data is retrieved via a web–based interface.

7. Is the data retrievable by a personal identifier such as name, SSN, or other unique identifier?
Yes, the data in the system can be queried by the Employee Name, SSN, and name of TASIS Specialist.

Access to the Data

8. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Others)?
Some of this information will not be available until TASIS has completed the design phase in MS 3 and 4.

Role: Business System Owner Administrators, Operations Support System Administrators
Permission: Access to all data, system files and functions.

Role: Contractors
Permission: Access allows review of TAS work on non–sensitive but unclassified (SBU) advocacy efforts such as process improvement analysis.

Access permissions for all users are based on work responsibilities and/or job assignments via OL5081.

Limited view access to specified work objects is open to anyone authorized to be on the IRS network. Additional permissions are available based on work responsibilities and/or job assignments via On–Line 5081 (OL5081). All IRS personnel who have additional access to TASIS have filled out OL5081 and are only granted access when their jobs require it. Additional access will be revoked if not needed, following an OL5081 review or separation from service, or if the user does not access the system for more than 45 days. Additional permissions will generally be reserved for:

- TAS Intake Advocates
- Case Advocates
- Lead Case Advocates
- Senior Associate Advocates
- Group Managers
- Program Analysts and Taxpayer Advocates and their support staff at the local, area and national levels
- IRS personnel in other business units with a business need–to–know such as Operating Division liaisons and other personnel who respond to Operations Assistance Requests, Taxpayer Advocate Directives, or other Recommendations

Users perform assignment based activities: creating cases, projects, and other work objects, entering action plans, assigning tasks, contact information, notes, and attaching reference materials to manage the resolution of case and systemic issues, creation of management reports, creation of documents; grant program management; TAP (FACA) program support; and other tasks supporting advocacy. Only the Business System Owner Administrators, and Operations Support System Administrators have access to all data, system files, and functions required to carry out their assigned tasks and responsibilities in support of the TAS business practices.

Contractors must complete a background investigation. Access is restricted to development environment. Contractors may view user contact data imported from the Corporate Authoritative Directory Service and similarly available to them on the Global Address List with network access in order to confirm working interfaces with those data sources.

9. How is access to the data by a user determined and by whom?
Access to the data is determined by the manager based on a user's position and need–to–know. The manager will request a user be added. They must fill out OL5081, Information System User Registration/Change Request, to request access to the application. A user's access to the data terminates when it is no longer required. Criteria, procedures, controls, and responsibilities regarding access are documented in the Information Systems Security Rules on OL5081. TASIS will exercise authorities granted via Internal Revenue Code (IRC) 7803.

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.
This information will not be available until TASIS has completed the design phase in MS 3 and 4.

11. Have the IRS systems described in Item 10 received an approved Security Certification and Privacy Impact Assessment?
This information will not be available until TASIS has completed the design phase in MS 3 and 4

12. Will other agencies provide, receive, or share data in any form with this system?
TASIS will receive and share data with the Treasury Inspector General for Tax Administration (TIGTA), FMS, and Congress.

Administrative Controls of Data

13. What are the procedures for eliminating the data at the end of the retention period?
TASIS is a new IRS TAS application in development. It will replace the Taxpayer Advocate Management Information System (TAMIS), the Systemic Advocacy Management System II (SAMS II), and several MS-Access databases.

In advance of its 2013 operational date, TAS and the IRS Records Office are working together to draft and submit to the National Archives and Records Administration (NARA) a request for records disposition authority that will provide mandatory retentions for TASIS inputs, system data, outputs and system documentation.

System data is proposed for destruction 10 years after assessment, similar to the retention of Automated Underreporter data for individual returns. When approved by NARA, TASIS disposition instructions will be published in IRM 1.15.9 (Records Control Schedule for Taxpayer Advocate), item number to be determined.

14. Will this system use technology in a new way?
No. TASIS does not use technology in a new way.

15. Will this system be used to identify or locate individuals or groups? If so, describe the business purpose for this capability.
Yes, the system will identify individuals and groups for trend analysis and demographic coverage. Additional information will not be available until TASIS has completed the design phase in MS 3 and 4

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.
Yes, to apply appropriate advocacy to caseloads. Only authorized TASIS users assigned to a case would have access to the data and it is based on a need–to–know.

17. Can use of the system allow IRS to treat taxpayers, employees, or others, differently? Explain.
No, each taxpayer case is handled independently. IRS Guidelines are established with oversight to ensure taxpayers are treated according to established policy.

18. Does the system ensure "due process" by allowing affected parties to respond to any negative determination, prior to final action?
No formal "due process" exists to address a negative determination; however, the affected parties are allowed to introduce additional information in response to the negative determination.

19. If the system is web–based, does it use persistent cookies or other tracking devices to identify web visitors?
No, TASIS does not use persistent cookies or other tracking devices to identify web visitors.

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