

## Electronic Civil Rights Division (e-trak CRD) – Privacy Impact Assessment

PIA Approval Date – Feb. 23, 2011

### **System Overview:**

The Electronic Civil Rights Division (e-trak CRD) provides the Equity, Diversity and Inclusion (EDI) organization with the ability to track complaint review processing from intake to closure. This process includes review of settlement agreements and decisions from the Equal Employment Opportunity Commission (EEOC) and Courts under Title VII, as well as taxpayer complaints received from Treasury or the individual Taxpayer. The EEOC requires that the agency maintains an automated system to track complaints, case information, and allows sharing of records between offices that EDI relies upon for coordination and reporting (i.e. Treasury Complaint Mega-Center, Workforce Relations–Employee Conduct and Compliance Office and Executive Misconduct Unit, General Legal Services and Department of Treasury).

### **Systems of Records Notice (SORN):**

- IRS 00.007--Employee Complaint and Allegation Referral Records
- IRS 34.037--Audit Trail and Security Records
- IRS 35.001--Reasonable Accommodation Request Records
- IRS 36.001--Appeals, Grievances and Complaints Records
- IRS 36.003--General Personnel and Payroll Records

### **Data in the System**

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

A. Taxpayer:

- Name (First, MI, Last)
- City, State

B. Employee:

- Name (First, MI, Last)
- Address
- City
- State
- Organization
- Work Phone
- Home Phone
- Mobile Phone
- Email Address
- Race
- Color
- National Origin
- Disability
- Age
- Gender
- Religion
- Other – unprotected basis/issue

C. Audit Trail:

- Audit Type
- Time
- Account Name
- Data Object
- Table Name
- Tracking ID
- Message
- The audit trail assures that those who use e-trak CRD Module only have permission to view and use the modules their role allows. The SA prepares and reviews monitoring reports based on Identity Theft Incident Mgmts (ITIM) established timeframes.

**2. Describe/identify which data elements are obtained from files, databases, individuals, or any other sources.**

- A. IRS – Upon receipt of case information from AWSS, GLS, TIGTA, or ECCO (Case files/investigative summary reports) data for issues of the case and contact information is entered into the database.
- B. Taxpayer – Taxpayer data is received from the taxpayer via written correspondence regarding the issues of the complaint. Contact information and names of the parties involved is included. Taxpayer information data is also received from Treasury when they are the Taxpayer's first initial contact.
- C. Employee – Only e-trak CRD users are authorized to access e-trak CRD system after being granted access using via OL5081. The users will log into the system using their SEID.

**3. Is each data item required for the business purpose of the system? Explain.**

Yes. Data elements are used to conduct a review of Taxpayer and Employee allegations, provide a tracking mechanism for trend analysis and assist in the preparation of required reports.

**4. How will each data item be verified for accuracy, timeliness, and completeness?**

Users access the e-trak CRD Module by authenticating at a login screen using their SEID and password. Users must enter accurate credentials before access is granted to the system. The SA prepares and reviews monitoring reports based on ITIMs established timeframes to validate/verify data.

**5. Is there another source for the data? Explain how that source is or is not used.**

No.

**6. Generally, how will data be retrieved by the user?**

Users access the e-trak CRD Module using Lightweight Directory Access Protocol (LDAP) authentication. Only authorized users can access e-trak CRD module and users can only retrieve or handle data based on their assigned user roles.

## 7. Is the data retrievable by a personal identifier such as name, SSN, or other unique identifier?

Yes. After logging into the e-trak CRD Module, users are able to access records from the following fields:

- Name (First, MI, Last)
- Address
- City
- State
- Organization
- Work Phone
- Home Phone
- Mobile Phone
- Email Address
- Race
- Color
- National Origin
- Disability
- Age
- Gender
- Religion

### Access to the Data

## 8. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Others)?

The primary users of etrak-CRD Module include Case Manager, Case Processor, Title VI and Title VII Specialists, and Administrator. This application does not allow access by the public. Only authorized users are granted authorization to e-trak CRD Module through the On-Line 5081 process. The only maintenance personnel authorized to perform maintenance on e-trak CRD Module are the Administrators.

System Level:

**Role:** System Administrator

**Permission:** View records, execute SQL queries, view audit data, add users Assigning permissions, review list of accounts

Application Level:

**Role:** Administrator

**Permission:** Administer System, DBA Access

**Role:** Case Manager

**Permission:** Generate User Reports, Create, Assign, Update, Search, Read cases.

**Role:** Read Only

**Permission:** Search, Read Cases

*Note: There are no contractor users of the system.*

**9. How is access to the data by a user determined and by whom?**

Access to e-trak CRD Module is determined by submitting an On-Line 5081 and receiving authorization from the user's approval manager.

**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.**

No.

**11. Have the IRS systems described in Item 10 received an approved Security Certification and Privacy Impact Assessment?**

No.

**12. Will other agencies provide, receive, or share data in any form with this system?**

No.

**Administrative Controls of Data**

**13. What are the procedures for eliminating the data at the end of the retention period?**

A request for records disposition authority for e-trak and associated records is currently being drafted with the assistance of the IRS Records and Information Management (RIM) Program Office. When approved by the National Archives and Records Administration (NARA), disposition instructions for e-trak CRD inputs, system data, outputs and system documentation will be published in IRM 1.15, exact Records Control Schedule and item number to be determined.

**14. Will this system use technology in a new way?**

No.

**15. Will this system be used to identify or locate individuals or groups? If so, describe the business purpose for this capability.**

No.

**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.**

No.

**17. Can use of the system allow IRS to treat taxpayers, employees, or others, differently?**

No.

**18. Does the system ensure "due process" by allowing affected parties to respond to any negative determination, prior to final action?**

No. e-trak CRD Module does not have the capability to make any negative determinations.

**19. If the system is web-based, does it use persistent cookies or other tracking devices to identify web visitors?**

No. Upon logging into e-trak a session cookie is created. The session cookie is eliminated once the web user ends his/her session and exits out of the web browser. Persistent cookies are not administered by this system.

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