Basic Information/Executive Summary

What is the name of your project (system, database, pilot, product, survey, social media site, etc.)?

Electronic Enterprise Fax

Acronym:

EEFAX

Business Unit

Information Technology

Preparer

For Official Use Only

Subject Matter Expert

For Official Use Only

Program Manager

For Official Use Only

Designated Executive Representative

For Official Use Only

Executive Sponsor

For Official Use Only

Executive Summary: Provide a clear and concise description of your project and how it will allow the IRS to achieve its mission.

The Electronic Enterprise Fax (EEFax) system acts as a "fax utility" or service and provides the fax handling infrastructure for the IRS. EEFax allows IRS employees, taxpayers and taxpayer representatives (referred to from here on as "TP") to send, receive, store, review and work a "fax document" from their computers. It handles faxes inbound to the IRS and outbound to TPs. EEFax may use a unique telephone number or barcode provided to the TP for electronic delivery to the correct IRS recipient. This service provides many benefits to the IRS, including +Increased employee efficiencies through eliminating: --the amount of time walking to and from physical printers and fax machines, -- eliminating an employee sorting through a pile of paper faxes at the physical fax machine, which will also reduce disclosure errors, and --reducing reliance on paper records. +More efficient use of technology by reducing --the unintentional

storage of faxes at the machine, --telecommunications costs, and --reliance on paper records. +EEFax is projected to provide services for the entire enterprise and handle approximately 20M million fax pages per month. This will provide a substantial cost savings by eliminating standalone fax hardware and its use of consumables such as paper, and ink/toner.

Personally Identifiable Information (PII)

Will this project use, collect, receive, display, store, maintain, or disseminate any type of Sensitive but Unclassified (SBU), Personally Identifiable Information (PII), or Federal Tax Information (FTI)?
> Yes

Please explain in detail how this project uses sensitive data from inception to destruction (data lifecycle).
> EEFax electronically sends and receives facsimiles using the same fax protocols as on a traditional facsimile machine. Fax documents are handled as image files, and no data is parsed or extracted from the fax files. On the IRS end, EEFax traffic is handled through the Microsoft Outlook Exchange environment. When faxes are received, they are delivered to 1) High-speed printer, 2) SharePoint Uniform Resource Locator (URL), 3) Universal Naming Convention (UNC) File Storage, 4) Individual or 5) Organizational mailbox. Inbound faxes are retained for one of two periods. First, faxes destined for a high-speed printer are retained for a period of five days so faxes may be reprinted in case there is a printer malfunction. Second, for the other four destinations, faxes are stored only long enough for the system to verify delivery. Outbound faxes are sent unencrypted without a digital signature and are also retained only long enough for the system to verify delivery. EEFax will maintain employee Standard Employer IDentifier (SEID) and e-mail address information in the activity logs to track provide audit trails on all fax activity. No TP PII or sensitive information is contained in the audit logs. They are stored in the JobTrack database within SQL servers in EEFax. Logs are available to be searched, analyzed and audited. Audit logs are also kept for users with administrator level access (Enterprise Operations) to EEFax Servers. All audit logs are sent to Splunk.

Please select all types of Sensitive but Unclassified data (SBU)/Personally Identifiable Information (PII)/Federal Tax Information (FTI) that this project uses.
> Address
> Bar Codes
> Centralized Authorization File (CAF)
> Citizenship or Migration Status
> Credit Card Number
> Document Locator Number (DLN)
> Driver's License Number

Education Information
Email Address
Employer Identification Number
Employment Information
Family Members
Federal Tax Information (FTI)
Financial Account Number
Geographical Indicators
Global Intermediary Identification Number (GIIN)
Individual Taxpayer Identification Number (ITIN)
Language
Medical History/Information
Name
Non-Tax Proprietary data
Official Use Only (OUO) or Limited Office Use (LOU)
Online Identifiers
Passport Number
Patient Number
Personal Characteristics
Photograph
Preparer Taxpayer Identification Number (PTIN)
Professional License Number
Protected Information
Social Security Number (including masked or last four digits)
Standard Employee Identifier (SEID)
Tax ID Number
Telephone Numbers
Universal Unique Identifier (UUID)
Vehicle Identification Number (VIN)

Cite the authority for collecting SBU/PII/FTI (including SSN if relevant).
PII for federal tax administration - generally IRC Sections 6001 6011 or 6012
PII for personnel administration - 5 USC
SSN for personnel administration IRS employees - 5 USC and Executive Order 9397
SSN for tax returns and return information - IRC section 6109

Product Information (Questions)

1 Is this PCLIA a result of the Inflation Reduction Act (IRA)?
No

2 What type of project is this (system, project, application, database, pilot/proof of concept/prototype, power platform/visualization tool)?
System

3 What Tier designation has been applied to your system?

    2

4 Is this a new system?

    No

4.1 Is there a previous Privacy and Civil Liberties Impact Assessment (PCLIA) for this project?

    Yes

4.11 What is the previous PCLIA number?

    6791

4.12 What is the previous PCLIA title (system name)?

    Electronic Enterprise Fax, EEFax, EEFAX

4.2 You have indicated this is not a new system; explain what has or will change and why. (Expiring PCLIA, changes to the PII or use of the PII, etc.)

    Expiring PCLIA

5 Is this system considered a child system/application to another (parent) system?

    No

6 Indicate what OneSDLC State is the system in (Allocation, Readiness, Execution) or indicate if you go through Information Technology's (IT) Technical Insertion Process and what stage you have progressed to.

    Execution

7 Is this a change resulting from the OneSDLC process?

    No

8 Please provide the full name and acronym of the governance board or Executive Steering Committee (ESC) this system reports to.

    User and Network Services (UNS) Executive Steering Committee

9 If the system is on the As-Built-Architecture (ABA), what is the ABA ID number of the system? If this PCLIA covers multiple applications shown on the ABA, please indicate the ABA ID number(s) for each application covered separated by a comma. If the system is not in the ABA, then contact the ABA (https://ea.web.irs.gov/aba/index.html) for assistance.

    211307

10 If this system discloses any PII to any third party outside the IRS, does the system have a process in place to account for such disclosures in compliance with IRC 6103(p)(3)(A) or Subsection c of the Privacy Act?

No

11 Does your project/system involve any use of artificial intelligence (AI), including virtual assistant, chat bot, and robotic process automation, as defined in Executive Order 13960 and 14110?

No

12 Does this system use cloud computing?

No

13 Does this system/application interact with the public?

Yes

13.1 If the system requires the user to authenticate, was a Digital Identity Risk Assessment (DIRA) conducted?

No

13.11 Please upload the approved DIRA report using the Attachments button. Select "Yes" to indicate that you have or will upload the signed DIRA form.

No

13.2 If individuals do not have the opportunity to give consent to collect their information for a particular use, why not?

Individuals have given consent to collection of their information when filing tax returns and/or during tax administration when EEFax would be used.

13.3 If the individual was not notified of the following items prior to the collection of information, why not? 1) Authority to collect the information 2) If the collection is mandatory or voluntary 3) The purpose for which their information will be used 4) Who the information will be shared with 5) The effects, if any, if they don't provide the requested information.

All facsimile data is transmitted (to IRS) to address specific taxpayer/entity requirements, whether in response to direct IRS request (which details authority, mandatory/voluntary nature, purpose, potential dissemination, and potential effects), or via IRS published forms and/or directives (also detailing the same).

14 Describe the business process allowing an individual to access or correct their information. (Due Process)

"Your Rights as a Taxpayer" explains the rights of the taxpayer, which includes the right to challenge the IRS position and be heard; and the right to appeal an IRS decision in an independent forum. EEFax is only a transmission method for a taxpayer to submit data as requested by the IRS so if they wanted to correct their

submission, they can re-send the corrected form to the IRS. If the taxpayer wants to correct this data, they would need to contact the requesting authority within the IRS or use the procedure as described within the original request.

15 Is this system owned and/or operated by a contractor?

Yes, the contractors maintain the system.

15.1 If a contractor owns or operates the system, does the contractor use subcontractors; or do you require multiple contractors to operate, test, and/or maintain this system?

No

16 Identify what role(s) the IRS and/or the contractor(s) performs; indicate what access level (to this system's PII data) each role is entitled to. (Include details about completion status and level of access of the contractor's background investigation was approved for.)

Users - Read Managers - Read
Administrators - Read & Write
Contractors - Read & Write / Access level - input Low / Background
Investigation Complete

17 The Privacy Act of 1974 (5 USC § 552a(e)(3)) requires each agency that maintains a system of records, to inform each individual requested to supply information about himself or herself. Please provide the Privacy Act Statement presented by your system or indicate a Privacy Act Statement is not used and individuals are not given the opportunity to consent to the collection of their PII.

The legal right to ask for information is Internal Revenue Code sections 6001, 6011, and 6012(a), and their regulations. These sections state that individuals must file a return or statement with IRS for any tax for which they are liable, and response is mandatory. Any privacy statements would be provided by the IRS entity that is requesting the information on the applicable tax form.

18 How many records in the system are attributable to IRS Employees? Enter "Under 50,000", "50,000 to 100,000", "More than 100,000" or "Not Applicable".

More than 100,000

19 How many records in the system are attributable to contractors? Enter "Under 5,000", "5,000 to 10,000", "More than 10,000" or "Not Applicable".

Not Applicable

20 How many records in the system are attributable to members of the public? Enter "Under 100,000", "100,000 to 1,000,000", "More than 1,000,000" or "Not applicable".

More than 1,000,000

22 How is access to SBU/PII determined and by whom?

Users are provided access to the EEFax system through use of the Business Entitlement Access Request System (BEARS) process. User requests are

approved by their managers, which are then routed to the EEFax Project Management Office (PMO) queue for approval. The EEFax PMO determines what resources the user needs access to and is annotated in the BEARS request. Once approved by the EEFax PMO, the request is then routed to the EEFax System Administrators, who in turn add the user's domain account information to the EEFax system. Once a user no longer requires access to the system, the user performs a BEARS DELETE request which is approved by the EEFax PMO and routed to the EEFax System Administrators and the user's access privileges are removed. EEFax PMO employees and contractors have access to the EEFax system database tables for running reports. EEFax PMO employees and contractors obtain access by using the BEARS process. Employee and contractor requests are approved by the EEFax PMO and then by their managers. When access to the database tables is no longer needed, EEFax PMO employees and contractors submit a BEARS DELETE request and access rights to the database are removed.

23 Is there a data dictionary on file for this system? Note: Selecting "Yes" indicates an upload to the Attachment Section is required.
    Yes

24 Explain any privacy and civil liberties risks related to privacy controls.
    There are no privacy and civil liberties risks related to privacy controls.

25 Please upload all privacy risk finding documents identified for the system (Audit trail, RAFT, POA&M, Breach Plan, etc.); click "yes" to confirm upload(s) are complete.
    No

26 Describe this system's audit trail in detail. Provide supporting documents.
    There are advanced audit logs that are saved for each outgoing and incoming fax. These audit logs are stored with the Job Track data base that is stored within Structured Query Language (SQL) servers on the EEFax infrastructure. This data is available to be searched, analyzed and audited but these logs do not contain any PII or other sensitive information that would be subject to any other external auditing systems as the data is not identifiable. There are user logs for users with admin level access for Enterprise Operations (EOps) to the EEFax Servers that are sent to Splunk.
    The Job Track data captures all metadata associated with receiving the fax:
    - Job ID - Unique key for the system
    - Computer Name - ID of the Faxcom Server that received the fax
    - Creation Date - The Greenwich Mean Time (GMT) date and time the fax was received
    - Status Value - The result of the fax reception
    - Transmitting Station Identifier (TSI) - Phone number passed by the sending fax
    - Caller ID - Phone number from Caller ID service
    - Connect Time - Length of time the call is connected while the fax is sent
    - Transfer Rate - Data transfer rate in baud, or symbols per second

- Fall Back - Boolean value, a logical data type having one or two values, true if the final transfer rate is lower than the one originally negotiated
- Pages - Number of pages (including the cover) received as part of the fax
- Fax Port - Port number on which the fax is received
- Direct Inward Dial (DID) - Dial number that the fax sender dialed
- bActive - Boolean value, true until the fax has been delivered to its destination
- bError - Boolean value, true if any route were to fail.

27 Does this system use or plan to use SBU data in a non-production environment?
No

Interfaces

Interface Type
Forms
Agency Name
Analog Telephony System
Incoming/Outgoing
Both
Transfer Method
Enterprise Fax (eFax)

Interface Type
IRS Systems, file, or database
Agency Name
Enterprise File Storage (EFS)
Incoming/Outgoing
Outgoing (Sending)
Transfer Method
Electronic File Transfer Utility (EFTU)

Systems of Records Notices (SORNs)

SORN Number & Name
IRS 00.001 - Correspondence Files and Correspondence Control Files
Describe the IRS use and relevance of this SORN.
The legal right to ask for information is Internal Revenue Code sections 6001, 6011, and 6012(a), and their regulations. These sections state that individuals must file a return or statement with IRS for any tax for which they are liable, and response is mandatory.

Records Retention

What is the Record Schedule System?
> Non-Record

What type of Records is this for?
> Electronic

Please provide a brief description of the chosen GRS or RCS item.
> The system does not retain records

What is the disposition schedule?
> Information is only (temporarily) stored for the purpose of transmission and receipt.

Data Locations

What type of site is this?
> System

What is the name of the System?
> Splunk

Please provide a brief description of the System.
> Splunk is an IRS system that pulls audit logs as it relates to server operations.

What are the incoming connections to this System?
> Splunk can pull audit logs further analysis

What are the outgoing connections from this System?
> None

What type of site is this?
> System

What is the name of the System?
> JobTrack Database

Please provide a brief description of the System.
> The JobTrack database collects and stores metadata from fax transmissions but does not store any PII

What are the incoming connections to this System?
> The EEFax system sends fax transmission and receipt metadata to this system.

What type of site is this?
> System

What is the name of the System?
> Enterprise Electronic Fax

What is the sensitivity of the System?
> Federal Tax Information (FTI)

Please provide a brief description of the System.

EEFax electronically sends and receives facsimiles. The information that comes in sent and received on a traditional facsimile machine is the same information that comes into EEFax (i.e. the same fax protocols). No data is parsed or extracted from the fax files. Possible information could include (but not limited to) taxpayer information in the form of signature documents, tax returns, and income verification requests. The files fax messages are stored only long enough for the system to verify delivery to the final destination. The only exceptions to this rule are faxes sent to high-speed printers. Faxes destined for printing are retained for a period of five days so faxes can be reprinted in case there is a printer malfunction. When faxes are received, they are delivered to High-Speed Printer(s), SharePoint Uniform Resource Locator (URL), Universal Naming Convention (UNC) File Storage, Individual or Organizational Mailbox. The majority of the EEFax traffic is to and from the Exchange email environment. EEFax messages delivered to Individual or Organizational mailboxes are unencrypted. EEFax messages sent from Outlook clients are unencrypted and without a digital signature. EEFax is projected to provide services for the entire enterprise and handle approximately 20M fax pages per month. EEFax will maintain employee standard employer identifier (SEID) and employee e-mail address information in the activity logs to track audit trails on fax activity. These audit logs are stored in the JobTrack data base that is stored within SQL servers in EEFax. This data is available to be searched, analyzed and audited but these logs do not contain any PII or other sensitive information that would be subject to any other external auditing systems as the data is not identifiable. There are user logs for users with admin level access (EOPS) to the EEFax Servers that are sent to SPLUNK.

What are the incoming connections to this System?

Analog Phone (via Public Switch Telephone Network (PSTN))

What are the outgoing connections from this System?

Analog Phone, VoIP, FoIP via PSTN