

VITA/TCE Security Plan

Purpose: Enhance and maintain the security of taxpayer information utilized at a VITA/TCE location by adhering to the security requirements outlined in Publication 4299, Privacy, Confidentiality, and Civil Rights – A Public Trust. Partners and site coordinators are responsible for protecting taxpayers' private information by following IRS security requirements. Publication 4299 was updated to explain how site coordinators should validate that requirements are followed.

Directions: The security plan must be completed for all sites, then signed by the site coordinator and partner. Each plan must be approved by the SPEC territory manager or designee prior to the opening of the site. Sites can use this form or a similar document that captures the same information. A copy of the approved security plan must be maintained at the site and by the territory office.

Site name FC Lifeworks	Site address 835 N Pleasant Valley Rd, Austin, TX 78702
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Type of software used
 IRS software - TaxSlayer
 Online
 Desktop
 Other (list name) TaxWise desktop software for tax years prior to 2016

Date completed 12/15/2020	Completed by Janet Herrgesell
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	Name	Telephone Number	Email Address
Partner	Janet Herrgesell	512-610-7378	janet.herrgesell@foundcom.org
Site Coordinator	Leticia Valadez	512-815-2153	leti.valadez@foundcom.org
Alternate Site Coordinator			

Site/Virtual location
 Virtual location, based out of
 Prosper Center South
 2900 S IH 35
 Austin, TX 78704

Complete equipment inventory log

	# IRS Owned	# Partner Owned	# Volunteer Owned
Laptops	0	31	327
Portable mass storage devices	0	0	0
Other	0	0	0

1. Are procedures being followed at the site to confirm all volunteers are aware of the security requirements in Yes No
 Publication 4299, *Privacy, Confidentiality, and Civil Rights (i.e., privacy during the interview, validating taxpayer identity and identification numbers)*? If no, explain

2. If using a wireless network at the site, are requirements being followed from Publication 4299 to restrict Yes No
 unauthorized access to the site's wireless network? If no, explain

3. Are software access privileges limited based on the volunteers assigned roles as outlined in Publication 4299 (i.e., *security templates for preparers, quality reviewers, super users, etc.*)? If no, explain Yes No

4. Are security requirements followed for protecting all equipment (*computers, printers, flash drives, thumb drives, external hard drives, etc.*) to ensure proper use, storage and disposal at the site during and after site operating hours? If no, explain Yes No

5. Are there site procedures to limit unauthorized access to taxpayer information (*i.e., positioning computer screens, protecting taxpayer documents and preventing others from hearing sensitive information*) and to ensure privacy? If no, explain Yes No

6. Does the site coordinator generally restrict volunteer access to the tax preparation software (*changing active to inactive*) after site operating hours as described in Publication 4299? If no, explain Yes No

It is not feasible for our tax program of our size to activate and inactivate large groups of volunteers and staff on a daily basis. The process of changing users' statuses in TaxSlayer is very much a manual process. In TaxSlayer, you can't select multiple users at once to flip their active status. As a result, an administrator would have to change users' statuses one-by-one. Each API request sent to the server takes about 10-15 seconds and it translates to a couple of hours for our organization. Due to the time commitment it takes to manually activate and deactivate users, our organization does not have the capacity to sustain these daily efforts.

7. Is the site coordinator aware of the process for reporting lost and/or stolen computer (*both IRS loaned and partner owned*) immediately but no later than the next business day after confirmation of the incident? If no, explain Yes No

8. Are you aware of the procedures for reporting a data breach to your SPEC Territory Office as described in Publication 4299? If no, explain Yes No

9. Is physical and/or electronic taxpayer Personally Identifiable Information (PII) in your possession properly secured and/or disposed of when no longer needed? If no, explain Yes No

10. Are you aware of how to report unethical violations as outlined in the Publication 4961, *Volunteer Standards of Conduct-Ethics Training*? If no, explain Yes No

11. At the end of the filing season, are the guidelines in Publication 1084, *VITA/TCE Site Coordinator Handbook*, followed for closing the site? If no, explain Yes No

12. If you operate a Virtual VITA/TCE site, was a written Virtual VITA/TCE plan created and submitted for approval to your SPEC Territory Office? If no, explain

Yes No N/A

Coordinator name	Signature	Date
Leticia Valadez	 <small>Leticia Valadez (Dec 23, 2020 16:52 CST)</small>	12/23/2020
Partner name	Signature	Date
Janet Herrgesell		12/23/2020
Relationship Manager's name	Signature	Date
Territory Manager's name	Signature	Date

F15272-FC Lifeworks

Final Audit Report

2020-12-23

Created:	2020-12-23
By:	Janet Herrgesell (janet.herrgesell@foundcom.org)
Status:	Signed
Transaction ID:	CBJCHBCAABAAe8V3nw6ClwP5k1Fy-Foo3nMPWNofql_i

"F15272-FC Lifeworks" History

-  Document created by Janet Herrgesell (janet.herrgesell@foundcom.org)
2020-12-23 - 9:55:48 PM GMT- IP address: 104.57.191.67
-  Document emailed to Leticia Valadez (leti.valadez@foundcom.org) for signature
2020-12-23 - 9:56:03 PM GMT
-  Email viewed by Leticia Valadez (leti.valadez@foundcom.org)
2020-12-23 - 10:51:42 PM GMT- IP address: 104.14.25.66
-  Document e-signed by Leticia Valadez (leti.valadez@foundcom.org)
Signature Date: 2020-12-23 - 10:52:30 PM GMT - Time Source: server- IP address: 104.14.25.66
-  Agreement completed.
2020-12-23 - 10:52:30 PM GMT