

Date of Approval: **September 16, 2020**

PIA ID Number: **5206**

## **SYSTEM DESCRIPTION**

*Enter the full name and acronym for the system, project, application and/or database.*

Compliance Data Warehouse, CDW

*Is this a new system?*

No

*Is there a PCLIA for this system?*

Yes

*What is the full name, acronym and milestone of the most recent PCLIA?*

Compliance Data Warehouse CDW PIA #3559

*What is the approval date of the most recent PCLIA?*

8/30/2018

*Changes that occurred to require this update:*

Significant Merging with Another System

*Were there other system changes not listed above?*

No

*What governance board or Executive Steering Committee (ESC) does this system report to? Full name and acronym.*

Research, Applied Analytics & Statistics (RAAS) internal management.

*Current ELC (Enterprise Life Cycle) Milestones:*

Operations & Maintenance (i.e. system is currently operational)

*Is this a Federal Information Security Management Act (FISMA) reportable system?*

Yes

## GENERAL BUSINESS PURPOSE

*What is the general business purpose of this system? Provide a clear, concise description of the system, application or database, the reason for the system, and the benefits to the IRS to use the information, and how the information will be used.*

The Compliance Data Warehouse (CDW) is specifically designed to meet the unique needs of research analysts throughout the IRS, and to units within Department of Treasury. CDW captures data from multiple production systems, migrating the data to the CDW environment, and organizing the data in a way that is conducive to analysis. Besides delivering data, CDW also provides software tools and computing services to support research projects, analysis, and longitudinal studies.

## PII DETAILS

*Does the system use, collect, receive, display, store, maintain, or disseminate IR Code 6103 taxpayer information; or any other type of Sensitive but Unclassified (SBU) information or PII such as information about IRS employees or outside stakeholders?*

Yes

*Does the system use, collect, receive, display, store, maintain, or disseminate Social Security Numbers (SSN's) or tax identification numbers (i.e. last 4 digits, etc.)?*

Yes

*What types of tax identification numbers (TIN) apply to this system?*

Social Security Number (SSN)

*List the approved Treasury uses of the SSN:*

Statistical and other research purposes

Law enforcement and intelligence purposes

*Explain why the authorized use(s) above support the new or continued use of SSNs (or tax identification numbers)*

CDW supports research and analytics within the IRS that are part of nominal data driven decision making initiatives. Data storage of this tax administration data support different customer service and enforcement related programs, all which in different ways require use of such information.

*Describe the planned mitigation strategy and forecasted implementation date to mitigate or eliminate the use of SSN's (or tax identification numbers).*

CDW requires several approvals to establish access ability that require business justifications for such real TIN information. CDW provides masked data of real TIN information for use where that is the viable option, and thus not requiring such real information for all analytics and research activities--only in cases where business justification identifies real TIN information is required as the minimally viable option.

Employer Identification Number

*Does this system use, collect, receive, display, store, maintain or disseminate other (non-SSN) PII (i.e. names, addresses, etc.)?*

Yes

*Specify the PII Elements:*

Name

Mailing address

Phone Numbers

E-mail Address

Date of Birth

Place of Birth

Standard Employee Identifier (SEID)

Mother's Maiden Name

Protection Personal Identification Numbers (IP PIN)

Internet Protocol Address (IP Address)

Certificate or License Numbers

Vehicle Identifiers

Passport Number

Financial Account Numbers

Employment Information

Tax Account Information

Centralized Authorization File (CAF)

*Does this system use, collect, receive, display, store, maintain, or disseminate SBU information that is not PII?*

Yes

*Specify the types of SBU from the SBU Types List*

Agency Sensitive Information Information which if improperly used or disclosed could adversely affect the ability of the agency to accomplish its mission

Official Use Only (OUO) or Limited Official Use (LOU) Information designated as OUO or LOU is information that: is exempt under one of the statutory Freedom of Information Act exemptions; is prohibited by other laws or regulations; would significantly impede the agency in carrying out a responsibility or function; or would constitute an unwarranted invasion of privacy.

*Are there other types of SBU/PII used in the system?*

No

*Cite the authority for collecting SBU/PII (including SSN if relevant)*

PII for federal tax administration is generally Internal Revenue Code Sections 6001, 6011, & 6012e(a)

SSN for tax returns and return information is Internal Revenue Code Section 6109

SSN for personnel administration (IRS Employees) is 5 USC & Executive Order 9397

PII for personnel administration is 5 USC

*Has the authority been verified with the system owner?*

Yes

## **BUSINESS NEEDS AND ACCURACY**

*Explain the detailed business needs and uses for the SBU/ PII, and how the SBU / PII is limited only to that which is relevant and necessary to meet the mission requirements of the system. If SSNs (or tax identification numbers) are used, explicitly explain why use of SSNs meets this criteria. Be specific.*

By default, masked taxpayer information is used for general use; there is a business need to link masked record information with real taxpayer information (e.g., SSNs); this business requirement is handled by additional authorization based on business need and additional approvals.

*How is the SBU/PII verified for accuracy, timeliness and completion?*

CDW databases seek to provide the data "as-is" from those source systems; no alteration is done to the data being received into CDW. The masking of PII/SBU data is handled by CDW's Database Administrators (DBAs), and the accuracy of that masking is verified during the database Extraction, Transformation, and Loading (ETL) processes.

## **PRIVACY ACT AND SYSTEM OF RECORDS**

The Privacy Act requires Federal agencies that maintain a system of records to publish systems of records notices (SORNs) in the Federal Register for records from which information is retrieved by any personal identifier for an individual who is a US citizen or an alien lawfully admitted for permanent residence. The Privacy Act also provides for criminal penalties for intentional noncompliance.

*Does your application or this PCLIA system pertain to a group of any record from which information is retrieved by any personal identifier for an individual who is a US citizen, or an alien lawfully admitted for permanent residence? An identifier may be a symbol, voiceprint, SEID, or other personal identifier that is used to retrieve information.*

Yes

*Identify the Privacy Act SORN(s) that cover these records.*

IRS 22.054 Subsidiary Accounting Files

IRS 22.060 Automated Non-Master File

IRS 22.062 Electronic Filing Records

IRS 24.030 Customer Account Data Engine Individual Master File

IRS 24.046 Customer Account Data Engine Business Master File

IRS 26.020 Taxpayer Delinquency Investigation Files

IRS 34.037 Audit Trail and Security Records

IRS 42.008 Audit Information Management System

IRS 42.021 Compliance Programs and Projects Files

## **RESPONSIBLE PARTIES**

*Identify the individuals for the following system roles:*

## Official Use Only

## **INCOMING PII INTERFACES**

*Does the system receive SBU/PII from other systems or agencies?*

Yes

*Does the system receive SBU/PII from IRS files and databases?*

Yes

*Enter the files and databases:*

System Name: Employee Management Database (EMDB)  
Current PCLIA: No  
SA&A: No

System Name: Audit Information Management System (AIMS)  
Current PCLIA: Yes  
Approval Date: 9/19/2019  
SA&A: Yes  
ATO/IATO Date: 10/25/2019

System Name: Automated Underreporter (AUR)  
Current PCLIA: Yes  
Approval Date: 6/12/2019  
SA&A: Yes  
ATO/IATO Date: 12/20/2019

System Name: Business Master File (BMF)  
Current PCLIA: Yes  
Approval Date: 8/27/2018  
SA&A: Yes  
ATO/IATO Date: 2/24/2020

System Name: Individual Masterfile (IMF)  
Current PCLIA: Yes  
Approval Date: 3/4/2020  
SA&A: Yes  
ATO/IATO Date: 11/26/2019

System Name: Notice Delivery System (NDS)  
Current PCLIA: Yes  
Approval Date: 8/3/2020  
SA&A: Yes  
ATO/IATO Date: 12/23/2019

System Name: National Research Program (NRP)  
Current PCLIA: Yes  
Approval Date: 5/11/2020  
SA&A: Yes  
ATO/IATO Date: 11/12/2014

System Name: Automated Lien System (ALS)  
Current PCLIA: Yes  
Approval Date: 11/30/2019  
SA&A: Yes  
ATO/IATO Date: 9/22/2018

System Name: Business Return Transaction File (BRTF)  
Current PCLIA: Yes  
Approval Date: 3/8/2018  
SA&A: No

System Name: Centralized Authorization File (CAF)  
Current PCLIA: No  
SA&A: No

System Name: Collection Information (COLL)  
Current PCLIA: Yes  
Approval Date: 12/15/2015  
SA&A: No

System Name: Correspondence Imaging System (CIS)  
Current PCLIA: Yes  
Approval Date: 10/19/2015  
SA&A: No

System Name: Earned Income Tax Credit (EITC)  
Current PCLIA: Yes  
Approval Date: 2/28/2017  
SA&A: No

System Name: Electronic Federal Payment Posting System (EFPPS)  
Current PCLIA: Yes  
Approval Date: 5/4/2018  
SA&A: Yes  
ATO/IATO Date: 1/16/2020

System Name: Electronic Federal Detection System (EFDS)  
Current PCLIA: Yes  
Approval Date: 1/10/2018  
SA&A: Yes  
ATO/IATO Date: 4/21/2020

System Name: Electronic Tax Administration Marketing Database (ETA MDB)  
Current PCLIA: Yes  
Approval Date: 2/20/2019  
SA&A: No

System Name: Electronic Tax Administration Research and Analysis System  
Current PCLIA: Yes  
Approval Date: 2/20/2019  
SA&A: No

System Name: Enforcement Revenue Information System (ERIS)  
Current PCLIA: Yes  
Approval Date: 2/8/2018  
SA&A: No

System Name: Exam Returns Control System (ERCS)  
Current PCLIA: Yes  
Approval Date: 1/22/2020  
SA&A: No

System Name: Examination Operational Automation Database (EOAD)  
Current PCLIA: Yes  
Approval Date: 9/19/2019  
SA&A: No



System Name: Foreign Account Tax Compliance Act (FATCA)  
Current PCLIA: Yes  
Approval Date: 2/8/2020  
SA&A: Yes  
ATO/IATO Date: 4/2/2020

System Name: Individual Returns Transaction File (IRTF)  
Current PCLIA: Yes  
Approval Date: 2/28/2017  
SA&A: No

System Name: Information Returns Database (IRDB)  
Current PCLIA: Yes  
Approval Date: 5/3/2018  
SA&A: No

System Name: Integrated Customer Communication Environment (ICCE)  
Current PCLIA: No  
SA&A: Yes  
ATO/IATO Date: 6/12/2020

System Name: National Account Profile (NAP)  
Current PCLIA: Yes  
Approval Date: 2/27/2020  
SA&A: No

System Name: Payer Master File (PMF)  
Current PCLIA: Yes  
Approval Date: 5/4/2020  
SA&A: Yes  
ATO/IATO Date: 12/4/2015

System Name: Reporting Agent File (RAF)  
Current PCLIA: No  
SA&A: No

System Name: Return Preparers and Providers (RRP)  
Current PCLIA: Yes  
Approval Date: 12/6/2019  
SA&A: Yes  
ATO/IATO Date: 6/25/2020

System Name: Modernized eFile (MeF)  
Current PCLIA: Yes  
Approval Date: 2/20/2019  
SA&A: Yes  
ATO/IATO Date: 5/22/2020

System Name: Excise Files Information Retrieval System (ExFIRS)  
Current PCLIA: Yes  
Approval Date: 1/23/2020  
SA&A: Yes  
ATO/IATO Date: 5/8/2020

System Name: Account Receivable Dollar Inventory (ARDI)  
Current PCLIA: Yes  
Approval Date: 2/24/2017  
SA&A: Yes  
ATO/IATO Date: 12/5/2012

System Name: Affordable Care Act (ACA)  
Current PCLIA: Yes  
Approval Date: 4/17/2020  
SA&A: Yes  
ATO/IATO Date: 4/29/2020

System Name: Country by Country (CbC)  
Current PCLIA: No  
SA&A: No

*Does the system receive SBU/PII from other federal agency or agencies?*

Yes

*For each federal interface, identify the organization that sends the SBU/PII, how the SBU/PII is transmitted and if there is an Inter-Agency Agreement (ISA) /Memorandum of Understanding (MOU).*

Name: Environmental Protection Agency (EPA)  
Transmission Method: electronic  
ISA/MOU: Yes

Name: Social Security Administration (SSA)  
Transmission Method: electronic  
ISA/MOU: Yes

Name: Bank Secrecy Act (BSA)  
Transmission Method: electronic  
ISA/MOU: Yes

Name: Financial Organization Master File (FOMF)  
Transmission Method: electronic  
ISA/MOU: Yes

*Does the system receive SBU/PII from State or local agency (-ies)?*

Yes

*For each state and local interface identify the organization that sends the SBU/PII, how the SBU/PII is transmitted and if there is an Inter-Agency Agreement (ISA) /Memorandum of Understanding (MOU).*

Organization Name: State excise tax data  
Transmission Method: electronic  
ISA/MOU Yes

*Does the system receive SBU/PII from other sources?*

No

*Does the system receive SBU/PII from Taxpayer forms?*

No

*Does the system receive SBU/PII from Employee forms (e.g. the I-9)?*

No

## **DISSEMINATION OF PII**

*Does this system disseminate SBU/PII?*

Yes

*Does this system disseminate SBU/PII to other IRS Systems?*

Yes

*Identify the full name and acronym of the IRS system(s) that receive SBU/PII from this system.*

System Name: Treasury EDM Data Warehouse  
Current PCLIA: Yes  
Approval Date: 7/26/2011  
SA&A: Yes  
ATO/IATO Date: 4/13/2020

*Identify the authority*

A Memorandum of Understanding (MOU) has been agreed to between IRS and Treasury for the data transfer and use.

*For what purpose?*

The Employee Management Database (EMDB) data from CDW are used to project attrition at all levels of the IRS; strategize future hiring placements; and examine options for workload distributions on existing staffing. In addition to providing IRS-wide attrition projections to HCO Human Capital Office bi-weekly (for inclusion in HRRC Human Resources Reporting Center) and AWSS Agency Wide Shared Services weekly, and providing monthly attrition projections to SB/SE, and completing ad hoc attrition projections as well as HR data pulls.

*Does this system disseminate SBU/PII to other Federal agencies?*

No

*Does this system disseminate SBU/PII to State and local agencies?*

No

*Does this system disseminate SBU/PII to IRS or Treasury contractors?*

No

*Does this system disseminate SBU/PII to other Sources?*

No

## **PRIVACY SENSITIVE TECHNOLOGY**

*Does this system use social media channels?*

No

*Does this system use privacy-sensitive technologies such as mobile, global position system (GPS), biometrics, RFID, etc.?*

No

*Does the system use cloud computing?*

No

*Does this system/application interact with the public?*

No

## **INDIVIDUAL NOTICE AND CONSENT**

*Was/is notice provided to the individual prior to collection of information?*

Yes

*How is notice provided? Was the individual notified about the authority to collect the information, whether disclosure is mandatory or voluntary, the purpose for which the information will be used, with whom the information may be shared, and the effects on the individual, if any, if they decide not to provide all or any of the requested information?*

The data within CDW comes from multiple data sources from the IRS as well as other Federal agencies. Those data sources (and related forms) provide Privacy Act Notice, consent and due process to individuals. Due process is provided pursuant to 5 USC.

*Do individuals have the opportunity to decline from providing information and/or from consenting to particular uses of the information?*

No

*Why not?*

The legal right for tax information is Internal Revenue Code sections 6001, 6011, and 6012(a), and their regulations.

*How does the system or business process ensure 'due process' regarding information access, correction and redress?*

The data within CDW comes from multiple data sources from the IRS as well as other Federal agencies. Those data sources (and related forms) provide Privacy Act Notice, consent and due process to individuals. Due process is provided pursuant to 5 USC.

## **INFORMATION PROTECTION**

*Identify the owner and operator of the system (could be IRS owned and Operated; IRS owned, contractor operated; contractor owned and operated).*

IRS Owned and Contractor Operated

*The following people have access to the system with the specified rights:*

*IRS Employees*

Users: Read Only

Managers: Read Only

System Administrators: Read Write

Developers: Read Write

*IRS Contractor Employees*

Contractor Users: Read Write

Contractor System Administrators: Read Write

Contractor Developers: Read Write

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

CDW is not accessible by the public; therefore, requests for access are made only through internal (electronic Online 5081) or paper) channels with the applicable signatory requirements. All levels of data access are limited to what is specified on the approved request; and, by project parameters established through assigned rights and privileges. Once the employee meets all signatory (1st and 2nd level management approval) requirements via OL5081, the CDW system and database administrators will grant access to specified datasets.

## **RECORDS RETENTION SCHEDULE**

*Are these records covered under a General Records Schedule (GRS, IRS Document 12829), or has the National Archives and Records Administration (NARA) approved a Records Control Schedule (RCS, IRS Document 12990) for the retention and destruction of official agency records stored in this system?*

Yes

*How long are the records required to be held under the corresponding GRS or RCS, and how are they disposed of? In your response, please provide the GRS or RCS chapter number, the specific item number, and records series title.*

CDW data is approved for destruction 10 years after end of the Processing Year or when no longer needed for operational purposes, which-ever is later (Job No. N1-058-10-007). All CDW records will be erased or purged from the system in accordance with approved retention periods. Records generated will be managed according to requirements under IRM 1.15.1 and 1.15.6 and will be destroyed using IRS Records Control Schedules (RCS) 27, item 54 and as coordinated with the IRS Records and Information Management (RIM) Program and IRS Records Officer.

## **SA&A OR ASCA**

*Has the system been through SA&A (Security Assessment and Authorization) or ASCA (Annual Security Control Assessment)?*

Yes

*What date was it completed?*

5/29/2018

*Describe the system's audit trail.*

CDW sends security audit records to Security Audit and Analysis System (SAAS) and Enterprise Security Audit Trails (ESAT) on a continuous basis. Audit trails sent on a continuous basis and meets or exceed IRS & FISMA requirements for security. CDW is following the appropriate audit trail elements pursuant to current Audit Logging Security Standards.

## PRIVACY TESTING

*Does the system require a System Test Plan?*

Yes

*Is the test plan completed?*

Yes

*Where are the test results stored (or documentation that validation has occurred confirming that requirements have been met)?*

Treasury FISMA Inventory Management System (TFIMS).

*Were all the Privacy Requirements successfully tested?*

Yes

*Are there any residual system privacy, civil liberties, and/or security risks identified that need to be resolved?*

Yes

*Please describe the outstanding issues:*

CDW received findings that resulted in Plans of Action and Milestones (POA&Ms). CDW has an additional POA&Ms open from earlier assessments. None of these POA&Ms are specific to privacy but rather relate to various aspects of security for the application and its environment.

*Describe what testing and validation activities have been conducted or are in progress to verify and validate that the applicable Privacy Requirements (listed in header) have been met?*

CDW management and administrators hold change management activities to evaluate privacy risk, and also provide audit logs for evaluation as needed.



## **SBU DATA USE**

*Does this system use, or plan to use SBU Data in Testing?*

Yes

*Was permission granted per the requirements of Form 14664, SBU Data Use Questionnaire or Form 14665, SBU Data Use Request?*

No

*Explain why not:*

In CDW, for all intents and purposes, all machines are production machines. There is no true "test" environment isolated from production. For example, the staging server is "swapped" into production at intervals, and regardless is used for production queries.

## **NUMBER AND CATEGORY OF PII RECORDS**

*Identify the number of individual records in the system for each category:*

IRS Employees: 50,000 to 100,000

Contractors: Under 5,000

Members of the Public: 100,000 to 1,000,000

Other: No

## **CIVIL LIBERTIES**

*Does the system maintain any information describing how any individual exercises their rights guaranteed by the First Amendment?*

No

*Is the system information used to conduct 'data-mining' as defined in the Implementing Recommendations of the 9/11 Commission Act of 2007, Public Law 110-53, Section 804?*

No

*Will this system have the capability to identify, locate, and monitor individuals or groups of people?*

Yes

*Describe the type of information derived from these efforts and the technical (e.g., audit trails) or other processes used to limit unauthorized monitoring.*

CDW is used to perform research studies that may identify or predict taxpayer's non-compliance; to evaluate the impact of program or policy changes; or, to develop workload models that optimize the use of resources. Other identified groupings may include locating and identifying taxpayers; for example, those affected by Hurricane Katrina, Tsunami's, et al - by geographical location.

*Does computer matching occur?*

No

## **ACCOUNTING OF DISCLOSURES**

*Does the system include or require disclosure of tax or employee information to anyone other than IRS employees in the performance of their duties, or to the person to whom the information pertains or to a 3rd party pursuant to a Power of Attorney, tax or Privacy Act consent?*

Yes

*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? Contact Disclosure to determine if an accounting is required.*

Not Applicable