

Date of Approval: **October 25, 2019**

PIA ID Number: **4414**

SYSTEM DESCRIPTION

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

Modernized Internet Employer Identification Number, MOD-IEIN

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?

Modernized Internet Employer Identification Number, MOD-IEIN 2032

What is the approval date of the most recent PCLIA?

12/23/2016

Changes that occurred to require this update:

Expiring PCLIA

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.

SBSE Governance Board

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.

Modernized Internet Employer Identification Number (Mod IEIN) is part of the Integrated Customer Communications Environment Web Applications (ICCE Web Apps). Mod IEIN will help taxpayers, businesses, and their representatives complete the application for Employer Identification Number (EIN), Application for Employer Identification Number (Form SS-4), using a new interactive system which asks questions tailored to the type of entity the taxpayer is establishing. By providing full automation of the back-end processing of EIN assignment, the applet will eliminate the assignment of "provisional" EINs, resulting in improved ease of receiving valid and ready-to-use EINs. The Mod IEIN web application will also improve overall processing accuracy and timeliness, additionally allowing IRS telephone assistants to devote time to more productive activities. Currently, 80% of taxpayers who qualify for an EIN are able to secure EIN approval and initiation via IRS.gov. Due process is provided pursuant to 26 USC.

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:

Legal/statutory basis (e.g. where collection is expressly required by statute)

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

This application only displays the last 4 digits of Social Security Number (SSN) (first 5 digits are masked). The application cannot mitigate the use of SSNs until an alternate identifier has been adopted by the IRS to identify taxpayers.

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

The Office of Management and Budget Circular A-130 requires that federal agencies develop a mitigation or elimination strategy for systems that use SSNs, which the Service continues to develop strategies to meet. An exception to that requirement is when the SSN is uniquely needed to identify a user's record. MOD-IEIN requires the use of SSN's because no other identifier can be used to uniquely identify a taxpayer at this time.

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

No

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

No

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

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.

The Mod IEIN application provides Taxpayers, businesses, and their representatives with an option to complete the application for Employer Identification Number (EIN), Application for Employer Identification Number (Form SS-4), using a new interactive system which asks questions tailored to the type of entity the taxpayer is establishing. By providing full automation of the back-end processing of EIN assignment, the applet eliminates the assignment of "provisional" EINs, resulting in improved ease of receiving valid and ready-to-use EINs. The Mod IEIN web application improves overall processing accuracy and timeliness, additionally allowing IRS telephone assistants to devote time to more productive activities. All PII gathered in the course of the application is used to fulfill the requirements of the application for EIN. Treas. Reg. section 301.6109-1(d)(2) provides, "[a]ny person required to furnish an employer identification number must apply for one, if not done so previously on Form SS-4....The form, together with any supplementary statement, must be prepared and filed in accordance with the form, accompanying instructions, and relevant regulations, and must set forth fully and clearly the requested data."

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

The validation process will verify the accuracy and completeness of the information in accordance with the business rules. It is worth noting that the only validation Mod IEIN performs is a validation of the Taxpayer's TIN and name control (business or individual) against IRS records in Integrated Data Retrieval System (IDRS) to authenticate the applicant. Mod IEIN passes the TIN entered by the Taxpayer to IDRS. IDRS returns the individual's name control that is on file for the entered TIN, if found. Mod IEIN confirms that the individual name control provided by the taxpayer matches the name control returned from IDRS and that an existing EIN does not exist under said TIN. If the information matches IRS records and no duplicate EIN exists, the record will post to IDRS immediately. If the information does not match IRS records, the record will reject back to the taxpayer for correction and re-submission.

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 24.046 Customer Account Data Engine Business Master File

IRS 34.037 Audit Trail and Security Records

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: Integrated Data Retrieval

Current PCLIA: Yes

Approval Date: 10/1/2018

SA&A: Yes

ATO/IATO Date: 10/14/2018

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

No

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

No

Does the system receive SBU/PII from other sources?

No

Does the system receive SBU/PII from Taxpayer forms?

Yes

Please identify the form number and name:

Form Number: 1040 Form Name: U.S. Individual Income Tax Return

Form Number: SS4 Form Name: Application for Employer Identification Number

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

No

DISSEMINATION OF PII

Does this system disseminate SBU/PII?

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?

Yes

Was an electronic risk assessment (e-RA) conducted on the system/application?

Yes

When was the e-RA completed?

12/19/2017

What was the approved level of authentication?

Level 2: Some confidence in the asserted identity's validity
Confidence based on Knowledge Based Authentication (Out of Wallet)

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 information within MOD IEIN comes from various IRS Systems and forms. Those systems and forms provide the Privacy Act Notice to individuals. MOD IEIN does not directly provide individuals the opportunity to decline from providing information and/or from consenting to particular uses of the information. Notice, consent and due process are provided via the IRS systems and their related tax forms instructions, and pursuant to 5 USC.

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

Yes

Describe the mechanism by which individuals indicate their consent choice(s):

The information within MOD IEIN comes from various IRS Systems and forms. Those systems and forms provide the Privacy Act Notice to individuals. MOD IEIN does not directly provide individuals the opportunity to decline from providing information and/or from consenting to particular uses of the information. Notice, consent and due process are provided via the IRS systems and their related tax forms instructions, and pursuant to 5 USC. Published System of Records Notice in the Federal Register. The IRS has the legal right to ask for information per IRC sections 6001, 6011, and 6012(a), and their regulations.

The regulations state that "taxpayers must file a return or statement with IRS for any tax they are liable for". Their response is mandatory under these sections. The taxpayers failing to provide the required information renders them ineligible to use the system.

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

The information within MOD IEIN comes from various IRS Systems and forms. Those systems and forms provide the Privacy Act Notice to individuals. MOD IEIN does not directly provide individuals the opportunity to decline from providing information and/or from consenting to particular uses of the information. Notice, consent and due process are provided via the IRS systems and their related tax forms instructions, and 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 Operated

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

IRS Employees

System Administrators: Read Only

Developers: Read Only

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

A potential user will request access via the (Online) OL5081 system. This request has to be approved by the potential user's manager based on a user's position and need-to-know.

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.

All data relating to Applications for MOD IEIN will be retained in accordance with Records Control Schedule (RCS) 29, Item 70 (Employer's Application for Identification Number (EIN)). Data submitted on individual applications will not be retained for any period of time in Mod IEIN; the information will post directly to IDRS. However, invalid authentication attempts on the application will be stored in the Mod IEIN authentication database for the remainder of that day. The Mod IEIN application will execute a script that purges and overwrites the data to ensure its deletion. It should be noted that this database maintains invalid authentication attempts so that users are limited to a certain number of invalid authentication attempts per day. In addition to the Mod IEIN authentication database that retains invalid authentication attempts, the IRS will provide, store, and catalog the assignment of EINs posted to the Master File via ERAS. The Master File is the location where EIN information is stored for official IRS record-keeping purposes.

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?

5/29/2019

Describe the system's audit trail.

Mod IEIN audit data is captured by the Security Audit and Analysis System (SAAS). Audit trail logging for the applet is sent to SAAS via Application Messaging and Data Access Services (AMDAS) for each transaction that reaches the back-end. Mod IEIN 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)?

Documents are placed in DocIt (Documentum), online repository.

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?

No

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?

MOD IEIN is currently in the Operations and Maintenance phase of its lifecycle. Continuous Monitoring (now called Annual Security Control Assessment) occurs annually to ensure that controls remain in place to properly safeguard PII.

SBU DATA USE

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

No

NUMBER AND CATEGORY OF PII RECORDS

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

IRS Employees: Under 50,000

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?

No

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?

No