

Date of Approval: **August 28, 2020**

PIA ID Number: **5332**

## **SYSTEM DESCRIPTION**

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

Wage/Withholding Only, WOW

*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?*

Wage and Withholding Only, WOW, PIA # 2384

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

8/17/2017

*Changes that occurred to require this update:*

Addition of Personally Identifiable Information (PII)

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.*

The Wage & Investment (W&I) Risk Committee

*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?*

No

## 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 Wages/Withholding Only (WOW) Program is part of the Return Integrity & Compliance Services (RICS) under the purview of the Director of RICS, Wage and Investment (W&I). The WOW application is designed to protect revenue by covering cases that are currently untreated or undertreated by other available programs across the Internal Revenue Service (IRS). WOW is a program that the IRS introduced to protect significant additional revenue at a relatively low cost and response rate. The WOW application is for inventory management and reporting for those cases identified for WOW treatment by the Stakeholder Partnerships, Education and Communication (SPECTRM). RICS' main mission is to protect public interest by improving the IRS' ability to detect and prevent improper refunds.

## 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:*

- When there is no reasonable alternative means for meeting business requirements
- Statistical and other research purposes
- Delivery of governmental benefits, privileges, and services
- Law enforcement and intelligence purposes
- Another compelling reason for collecting the SSN

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

SSN collection is necessary for fraud and potential Identity Theft detection and prevention via tax returns.

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

There is no alternative to the use of the SSN. The SSN is the significant part of the data being processed.

Employer Identification Number

Other Taxpayer 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

Standard Employee Identifier (SEID)

Tax Account Information

*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*

Protected Information Information which if modified, destroyed or disclosed in an unauthorized manner could cause: loss of life, loss of property or funds by unlawful means, violation of personal privacy or civil rights, gaining of an unfair procurement advantage by contractors bidding on government contracts, or disclosure of proprietary information entrusted to the Government

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

Yes

*Describe the other types of SBU/PII that are applicable to this system.*

IRS employee first name -- IRS employee last name -- Document Locator Number (employer information) -- Name Control (A 4 digit/alpha character long identifier of the taxpayer, which is usually the first 4 letters in their Last Name) -- Employee Location Information (i.e., general address of the employee's workplace, name of employee's work team, etc., which could be traced to other PII based upon publicly-available company information).

*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

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.*

The case referrals received contain SBU/PII which includes taxpayer social security numbers (SSNs). The SSNs are necessary to search for the specific taxpayer accounts in the Integrated Data Retrieval System (IDRS) via the Integrated Automation Technologies (IAT) Tools Questionable Refund Program (QRP) tool, which is used for researching the tax account information and adjustments. The results of using SSN to retrieve data in WOW and IDRS provides for the ability to resolve cases and determine the final dollar protected information.

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

The PII maintained in the WOW database is provided directly from existing IRS systems and approved programs. Input of the data received is both systematically and manually entered into the WOW database. Assignment of WOW to tax examiners is manually entered by managers/administrators. Accuracy and completeness of data is inherited from the existing IRS systems.

## **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 42.021 Compliance Programs and Projects Files
- IRS 34.037 Audit Trail and Security Records
- IRS 24.030 Customer Account Data Engine Individual Master File
- IRS 24.046 Customer Account Data Engine Business Master File

## **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 Automation Technologies (IAT) Tools  
Current PCLIA: Yes  
Approval Date: 10/11/2019  
SA&A: No

System Name: Stakeholder Partnerships, Education and Communications (SPECTRM)  
Current PCLIA: Yes  
Approval Date: 2/27/2020  
SA&A: Yes  
ATO/IATO Date: 1/27/2020

System Name: Selections and Analytics Platform (SNAP)  
Current PCLIA: Yes  
Approval Date: 5/1/2020  
SA&A: No

System Name: Questionable Refund Program (QRP)  
Current PCLIA: Yes  
Approval Date: 1/10/2018  
SA&A: Yes  
ATO/IATO Date: 6/23/2017

*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?*

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: Questionable Refund Program (QRP)  
Current PCLIA: Yes  
Approval Date: 12/11/2013  
SA&A: No

System Name: Integrated Automation Technologies (IAT) Tools  
Current PCLIA: Yes  
Approval Date: 6/21/2016  
SA&A: No

*Identify the authority*

The WOW application uses tax information for tax administration purposes.

*For what purpose?*

Integrated Automation Technologies (IAT) designs, builds, tests, and deploys desktop productivity enhancing tools to automate tax account research and adjustments. IAT QRP is a tool used to access the key systems used by IRS employees to service taxpayer accounts, IDRS. IDRS contains individual taxpayer account records that are updated daily with tax processing and transaction information. When taxpayers work with Customer Service Representatives (CSR), IDRS is the system the CSR uses to reference taxpayer account information, and it is also used to make account adjustments and generate taxpayer correspondence and QRP is the tool used. The WOW application is used to extract tax information from IDRS via QRP. The WOW application uses tax information for tax administration purposes.

*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 IRS notifies all individuals who file tax returns of such collection via the Privacy Act Notice which provides the legal right to ask for information under Internal Revenue Code (IRC) sections 6001, 6011, and 6012(a), and their regulations. Under these sections, response is mandatory. Code section 6109 requires the individual provide an identifying number.

*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 to ask for information is IRC sections 6001, 6011, and 6012(a), and their regulations. They say that you must file a return or statement with IRS for any tax you are liable for. Your response is mandatory under these sections. Code section 6109 requires you to provide your identifying number on the return.



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

The system will allow affected parties the opportunity to clarify or dispute negative information that could be used against them. Due process is provided pursuant to 5 United States Code.

## **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*

Users: Read Only

Managers: Read Only

System Administrators: Administrator

Developers: Read Write

*IRS Contractor Employees*

Contractor System Administrators: Read Write

Contractor Developers: Read Write

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

In order to obtain access to the WOW database, all prospective users must adhere to the RICS permissions portal process. The permission portal is used for controlling access, managing (create, modify, disable, delete) user accounts, and providing administrative rights to users. All requests are handled by the RICS Service Desk and stored for auditing purposes. All standard access requests must be authorized by the user's manager as well as a WOW administrator. All application administrator access requests must be authorized by the user's manager as well as a WOW administrator and system administrator. All approved database accounts will be logged. Access permissions are automatically configured to the database server after all approvals are received.

## **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?*

No

*You must work with the IRS Records and Information Management (RIM) Program Office to address records retention requirements before you dispose of any records in this system.*

## **SA&A OR ASCA**

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

No

*Is the system secured in accordance with all applicable federal, treasury, and IRS security policy, procedures, and requirements?*

Yes

*Describe the system's audit trail.*

To prevent unauthorized access to the WOW application, the frontline of security is the RICS Application Permissions Portal (RAPP) application. This web application portal is similar to the Online 5081 (OL5081) system, where a user must request access to any application and its supporting technologies (SQL database access, report access, file level access) and be approved by multiple approvers. All requests and approvals in RAPP are logged for historical purposes. No users can access WOW without complete approval from direct managers and application product owners. This applies to all technologies underlying the WOW application (database access, file access, etc).

## **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)?*

All test results are stored in RICS project management software. RICS .Net and Microsoft Access applications have a development (Dev) environment which is used for development and testing activities. This environment does not contain any PII data. All development and testing efforts are completed using simulated data. The development process involves developers releasing new functionality, enhancements, and defect fixes to the development environment. Each release is reviewed by the quality assurance team to ensure that both the business and technical requirements are met. All business requirement verification, functional testing, regression testing, and Section 508 testing is completed in the (Dev) environment. Issues found are remedied and subsequently released to the (Dev) environment for further testing and verification. All defects are tracked via project management software where team members can track the defects from opening to closure. The quality assurance team uses automated test scripts for regression and load testing on a secure intranet testing site for the (Dev) environment to further identify defects and verify against previous builds. Once defects are remedied, the latest code is released to the development environment. Once development is completed, User Acceptability Testing (UAT) is conducted. Upon completion of UAT, the application is released into Production Environment. The quality assurance team conducts preliminary testing in the Production environment to make sure the release meets the desired results and upon confirmation the application users are notified of the new release.

*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?*

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## **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: Not Applicable

Members of the Public: Under 100,000

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