A. SYSTEM DESCRIPTION

1.   Enter the full name and acronym for the system, project, application and/or database. Income and Family Size Verification, IFSV

2. Is this a new system? No

>   2a. If **no**, is there a PIA for this system?   Yes

>   If **yes**, enter the full name, acronym, PIA ID Number and milestone of the most recent PIA.

>   Income and Family Size Verification, IFSV

>   Next, enter the **date** of the most recent PIA.   6/5/2015

>   Indicate which of the following changes occurred to require this update (check all that apply).

No	Addition of PII
No	Conversions
No	Anonymous to Non-Anonymous
No	Significant System Management Changes
No	Significant Merging with Another System
No	New Access by IRS employees or Members of the Public
No	Addition of Commercial Data / Sources
No	New Interagency Use
No	Internal Flow or Collection

>   Were there other system changes not listed above?   No

3. Check the current ELC (Enterprise Life Cycle) Milestones (select all that apply)

No	Vision & Strategy/Milestone 0
No	Project Initiation/Milestone 1
No	Domain Architecture/Milestone 2
No	Preliminary Design/Milestone 3
No	Detailed Design/Milestone 4A
Yes	System Development/Milestone 4B
No	System Deployment/Milestone 5
No	Operations & Maintenance (i.e., system is currently operational)

4. Is this a Federal Information Security Management Act (FISMA) reportable system?   No

A.1 General Business Purpose

5. 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 IFSV system supports the Department of Health and Human Services (HHS)/Centers for Medicare and Medicaid Services (CMS) during the Affordable Care Act (ACA) Eligibility and Enrollment Income Verification process and is used to provide household income and family size for an applicant requesting an eligibility determination for advance payments of premium tax credits, cost-sharing reductions, Medicaid, Children's Health Insurance Program, and the Basic Health Program, where applicable. CMS sends a request to the Internal Revenue Service (IRS) through the IRS Portal to Enterprise Service Bus (ESB) that directs the request to the IFSV application. This request contains Taxpayer Identification Number (TIN), Name, and Applicant Status (Primary, Spouse, or Dependent) and an assembled data package of taxpayer information from ACA Coverage Data Repository (CDR) for each applicant within the request. IFSV processes the request and sends a response to ESB that is forwarded to CMS. 26 United States Code (USC) 6103 provides the general rule that tax returns and return information are confidential, except as provided by Title 26. 26 Internal Revenue Code (IRC) §6103 (l)(21) provides for Disclosure of Return Information to Carry Out Eligibility Requirements for Health Insurance Affordability Programs.

B. PII DETAIL

6. Does the system use, collect, receive, display, store, maintain, or disseminate IR Code 6103 taxpayer information; or any type of Sensitive but Unclassified (SBU) or Personally Identifiable Information (PII)? Yes

   6a. If **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

   If **yes**, check who the SSN (or tax identification number) is collected on.

   Yes   On Primary   Yes   On Spouse   Yes   On Dependent

   If **yes**, check all types SSN s (or tax identification numbers) that apply to this system:

   Yes   Social Security Number (SSN)
   No   Employer Identification Number (EIN)
   Yes   Individual Taxpayer Identification Number (ITIN)
   No   Taxpayer Identification Number for Pending U.S. Adoptions (ATIN)
   No   Practitioner Tax Identification Number (PTIN)

   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. The IFSV system requires the use of SSN's because no other identifier can be used to uniquely identify a taxpayer at this time. SSNs are permissible from IRC 6109, which requires individual taxpayers to include their SSNs on their income tax returns.

6b. Does this system contain other (non-SSN) PII that it uses, collects, receives, displays, stores, maintains, or disseminates? (i.e. Names, addresses, etc.) Yes

If **yes**, specify the information.

Selected	PII Element	On Primary	On Spouse	On Dependent
Yes	Name	Yes	Yes	Yes
No	Mailing address	No	No	No
No	Phone Numbers	No	No	No
No	E-mail Address	No	No	No
Yes	Date of Birth	No	No	Yes
No	Place of Birth	No	No	No
No	SEID	No	No	No
No	Mother's Maiden Name	No	No	No
No	Protection Personal Identification Numbers (IP PIN)	No	No	No
No	Internet Protocol Address (IP Address)	No	No	No
No	Criminal History	No	No	No
No	Medical Information	No	No	No
No	Certificate or License Numbers	No	No	No
No	Vehicle Identifiers	No	No	No
No	Passport Number	No	No	No
No	Alien (A-) Number	No	No	No
No	Financial Account Numbers	No	No	No
No	Photographic Identifiers	No	No	No
No	Biometric Identifiers	No	No	No
No	Employment (HR) Information	No	No	No
Yes	Tax Account Information	Yes	Yes	Yes

6c. Does this system contain SBU information that is not PII, it uses, collects, receives, displays, stores, maintains, or disseminates?   Yes

If **yes**, select the types of SBU

Selected	SBU Name	SBU Description
No	Agency Sensitive Information	Information which if improperly used or disclosed could adversely affect the ability of the agency to accomplish its mission
No	Procurement sensitive data	Contract proposals, bids, etc.
Yes	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.
No	Proprietary data	Business information that does not belong to the IRS
Yes	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
No	Physical Security Information	Security information containing details of serious weaknesses and vulnerabilities associated with specific systems and facilities
No	Criminal Investigation Information	Information concerning IRS criminal investigations or the agents conducting the investigations.

.

6d. Are there other types of SBU/PII used in the system?   No

6e. Cite the authority for collecting SBU/PII (including SSN if relevant)

Yes	PII for federal tax administration is generally Internal Revenue Code Sections 6001, 6011, 6012e(a)
Yes	SSN for tax returns and return information is Internal Revenue Code Section 6109
No	SSN for personnel administration (IRS Employees) is 5 USC & Executive Order 9397
No	PII for personnel administration is 5 USC
No	PII about individuals for Bank Secrecy Act compliance 31 USC
No	Information by CI for certain money laundering cases may be 18 USC

6f. Has the authority been verified with the system owner?   Yes

---

B.1 BUSINESS NEEDS AND ACCURACY

7. 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.

   IFSV supports HHS/CMS with the verification of household income and family size for an applicant requesting an eligibility determination for insurance affordability programs during the ACA Open Enrollment period. IFSV is an Application-to-Application solution that processes requests from HHS/CMS using taxpayer information from the ACA CDR via the ESB to determine household income and number of exemptions. IFSV responds to HHS/CMS requests with resulting taxpayer information via the ESB. IFSV requires the minimum necessary SBU/PII to complete the requirements of the system.

8. How is the SBU/PII verified for accuracy, timeliness, and completeness? Explain how steps are taken to ensure that all information maintained by the system that is used by IRS to make any adverse determination about an individual's rights, benefits, and/or privileges is maintained with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual in the determination

   IFSV validates all TINs and Names in the HHS/CMS request against the National Account Profile (NAP) SSN Name Control that is provided by CDR. There is no tax information provided for invalid TINs. IFSV performs identification (ID) Theft checks on valid TINs. If ID Theft is identified for any of the applicants in the request, tax information is not provided in the response for any of the applicants. If any applicant in a request has a Date of Death present on the NAP record provided by CDR, IFSV does not provide tax data information for any applicant listed on the request. IFSV performs data validation checks on the tax information data provided to ensure the proper tax record type is passed to the system for processing. In addition, all necessary tax income amounts must be present in order to provide individual and household income information in the response to HHS/CMS. IFSV performs a spousal match for applicants in the request when appropriate. If the spouses do not match, IFSV only returns partial tax data information (no income) in response to HHS/CMS.

C. PRIVACY ACT AND SYSTEM OF RECORDS

9. Are 10 or more records containing SBU/PII maintained, stored, and/or transmitted by or through this system?   Yes

    9a. If **yes**, are records in the system retrieved by any personal identifier (e.g., name, SSN, Photograph, IP Address) for an individual?   No

        If **yes**, is there a System of Records Notice(s) or SORNs that addresses the PII records in this system? Yes

        If **yes**, enter the SORN number(s) and the complete the name of the SORN.

SORNS Number	SORNS Name
Treasury/IRS 24.030	Customer Account Data Engine Individual Master File
Treasury/IRS 34.037	IRS Audit Trail and Security Records System

            If **yes**, does the System of Records Notice(s) (SORN) published in the Federal Register adequately describe the records as required by the Privacy Act? Yes

D. RESPONSIBLE PARTIES

10. Identify the individuals for the following system roles. ## Official Use Only

E. INCOMING PII INTERFACES

11. Does the system receive SBU/PII from other system or agencies?   Yes

    11a. If **yes**, does the system receive SBU/PII from IRS files and databases?   Yes

        If **yes**, enter the files and databases.

System Name	Current PIA?	PIA Approval Date	SA & A?	Authorization Date
Affordable Care Act (ACA) 6.1, Coverage Data Repository (CDR) R4.0	Yes	08/18/2015	Yes	04/23/2015

    11b. Does the system receive SBU/PII from other federal agency or agencies?   No

    11c. Does the system receive SBU/PII from State or local agencies?   No

    11d. Does the system receive SBU/PII from other sources?   No

    11e. Does the system receive SBU/PII from **Taxpayer** forms?   No

11f. Does the system receive SBU/PII from **Employee** forms (such as the I-9)?   No

---

F. PII SENT TO EXTERNAL ORGANIZATIONS

---

12. Does this system disseminate SBU/PII?   Yes

    12a. Does this system disseminate SBU/PII to other IRS Systems?   Yes

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

System Name	Current PIA?	PIA Approval Date	SA & A?	Authorization Date
ACA ISR - Sharing, Release 7.0 (ISR-S)	Yes	12/04/2015	Yes	01/15/2016

    Identify the authority and for what purpose?   26 USC 6103: §1401 – define Household Income (HHI), Family Size, and Income §1411 – describes verification of HHI and Family Size §1412 – discusses advance determination §1414 – disclosure of info to be shared at verification

    12b. Does this system disseminate SBU/PII to other Federal agencies?   Yes

    If **yes** identify the full names of the federal agency(s) that receive SBU/PII from this system, and if there is an Inter-Agency Agreement (ISA) / Memorandum of Understanding (MOU)

Organization Name	Transmission method	ISA/MOU
Center for Medicare and Medicaid Services (CMS)	Response sent via ESB to CMS	Yes

    Identify the authority and for what purpose?   26 USC 6103: §1401 – define Household Income (HHI), Family Size, and Income §1411 – describes verification of HHI and Family Size §1412 – discusses advance determination §1414 – disclosure of info to be shared at verification

    12c. Does this system disseminate SBU/PII to State and local agencies?   No

    12d. Does this system disseminate SBU/PII to IRS or Treasury contractors?   No

    12e. Does this system disseminate SBU/PII to other Sources?   No

---

G. PRIVACY SENSITIVE TECHNOLOGY

---

13. Does this system use social media channels?   No

14. Does this system use privacy-sensitive technologies such as mobile, global position system (GPS), biometrics, RFID, etc.?   No

15. Does the system use cloud computing?   No

16. Does this system/application interact with the public?   No

H. INDIVIDUAL NOTICE AND CONSENT

17. Was/is notice provided to the individual prior to collection of information?   No

18. Do individuals have the opportunity to decline from providing information and/or from consenting to particular uses of the information?   No

    18b. If no, why not?   TINs are sent by applicants from HHS/CMS to request the verification of household income and family size information from IRS. Any notices are provided by HHS/CMS and consent given by applicants via HHS/CMS prior to the transmission of the request to IRS.

19. How does the system or business process ensure due process regarding information access, correction and redress?
IFSV only requires the minimum necessary SBU/PII within the system to complete the requirements of the system. Any notices provided comes from HHS/CMS. Once IFSV receives a request from HHS/CMS it is assumed that the individual was provided prior notice.

I. INFORMATION PROTECTION

20. 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

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

    IRS Employees?   Yes

IRS Employees?	Yes/No	Access Level (Read Only/Read Write/ Administrator)
Users	No	
Managers	No	
Sys. Administrators	Yes	Administrator
Developers	No	

    Contractor Employees?   No

    21a. How is access to SBU/PII determined and by whom? IFSV receives data from CDR via ESB based upon the requests and is transmitted to HHS/CMS as a response. Our system does not provide any access to SBU/PII data.

    21b. If computer matching occurs, can the business owner certify that it meets requirements of IRM 11.3.39 Disclosure of Official Information, Computer Matching & Privacy Protection Act?

        Not Applicable

I.1 RECORDS RETENTION SCHEDULE

22. Are these records covered under the General Records Schedule (GRS), or have a National Archives and Records Administration (NARA) archivist approved a Record Control Schedule (RCS) for the retention and destruction of official agency records stored in this system?   No

    22b. If **no**, how long are you proposing to retain the records? Please note, if you answered no, you must contact the IRS Records and Information Management Program to initiate records retention scheduling before you dispose of any records in this system.

        IFSV is non-recordkeeping. It is not the official repository for any data or documents and does not require a National Archives and Records Administration (NARA)-approved records control schedule to affect data disposition. IFSV is a web-based tool to facilitate the CMS assessment of taxpayer data for determining eligibility for health insurance affordability programs. A script is needed to identify what is to be scrubbed after each successful data transfer, but a records control schedule for IFSV is not required. Data retention requirements will be defined in accordance with the recordkeeping system from which the data is obtained and this is the ACA, CDR. The IRS Records Office is aware of this system's development and will be working with the system owner to draft a request for records disposition authority for submission to/approval by NARA.

I.2 SA&A OR ECM-R

23. Has the system been through SA&A (Security Assessment and Authorization) or ECM-R (Enterprise Continuous Monitoring Reauthorization)?   Yes

    23a. If **yes**, what date was it completed?   4/18/2018

23.1 Describe in detail the system s audit trail.   1. Access to the IFSV service shall be mediated, instead of direct access, through the use of an ESB capability to enable security and audit capabilities. 2. The at-receiving request (i.e., payload for the incoming Web Service request) for IFSV verification will be recorded as audit data to be forwarded to Enterprise System Acceptability Test for non-repudiation purposes and for the purpose of correlating the response with the original request archived earlier. 3. All ACA-related data that originates from parties external to the IRS (HHS/CMS Hub etc.) shall be stored in the CDR database through bulk uploads or individual transactions. All data responses generated by the IFSV application and sent to parties external to the IRS (HHS/CMS Hub etc.) shall be stored in the CDR database either from bulk processing or individual transactions.

J. PRIVACY TESTING

24. Does the system require a System Test Plan? No

    24c. If **no**, please explain why. Integration & Testing provides a System Test Plan for all ACA Releases.

K. SBU Data Use

25. Does this system use, or plan to use SBU Data in Testing?   No

L. NUMBER AND CATEGORY OF PII RECORDS

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

    26a. IRS Employees: Not Applicable
    26b. Contractors: Not Applicable
    26c. Members of the Public: More than 1,000,000
    26d. Other: No

M. CIVIL LIBERTIES

27. Does the system maintain any information describing how any individual exercises their rights guaranteed by the First Amendment?   No

28. Is the system information used to conduct data-mining as defined in the *Implementing the 9/11 Commission Recommendations Act of 2007, Public Law 110-53, Section 804?* No

29. Will this system have the capability to identify, locate, and monitor individuals or groups of people? No

N. ACCOUNTING OF DISCLOSURES

30. 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

If **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. Yes

End of Report