
A. SYSTEM DESCRIPTION

1. Enter the full name and acronym for the system, project, application and/or database. Individual Taxpayer Identification Number -Real Time System, ITIN-RTS

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.

ITIN-RTS, PIAMS #1244

Next, enter the **date** of the most recent PIA. 2/17/2015

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
- Yes Internal Flow or Collection

Were there other system changes not listed above? No

If yes, explain what changes were made.

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
- No System Development/Milestone 4B
- No System Deployment/Milestone 5
- Yes Operations & Maintenance (i.e., system is currently operational)

4. Is this a Federal Information Security Management Act (FISMA) reportable system? Yes

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 tax laws require individuals with U.S. income to pay U.S. taxes on that income and the IRS requires taxpayers to include their Tax Identification Number (TIN) as part of identifying information on tax forms. To assist those taxpayers who are ineligible for a Social Security Number (SSN) issued by the Social Security Administration (SSA) to comply with their obligations, regulations were issued in 1996 that introduced the IRS Individual Taxpayer Identification Number (ITIN). The ITIN is a tax processing number issued to identify alien individuals, whether resident or non-resident/international investor, who are required to furnish a TIN on a tax return or other tax document (e.g., claim tax treaty benefits). The ITIN is issued for the sole purpose of tax reporting and is only available to individuals who are not eligible for a SSN. The ITIN plays a vital role in assisting certain taxpayers to meet their requirement to file a U.S. tax return. The ITIN-RTS Project was initiated to develop an automated and fully integrated ITIN system solution to address the existing inadequacies of the current ITIN program. This solution provides the ability to systemically conduct many of the validations that currently are done manually. The system addresses national security concerns, conflicting processing priorities and inconsistent training/application of procedures between business operating divisions, and deters identity theft and other inappropriate ITIN usage.

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)
Yes 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 SSN, 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 Individual Taxpayer Identification Number-Real Time System (ITIN-RTS) requires the use of SSN/ITIN because no other identifier can be used to uniquely identify a taxpayer for intergovernmental communications. SSNs are permissible from Internal Revenue Code (IRC) 6109, which requires individual taxpayers to include their SSNs on their income tax returns. There is no known mitigation strategy planned to eliminate the use of SSNs/ITIN for the system. The SSN/ITIN are required for the use of this system. The SSN/ITIN numbers are needed to research and locate records in response to the request.

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.

| <u>Selected</u> | <u>PII Element</u> | <u>On Primary</u> | <u>On Spouse</u> | <u>On Dependent</u> |
|-----------------|---|-------------------|------------------|---------------------|
| Yes | Name | Yes | Yes | Yes |
| Yes | Mailing address | No | No | No |
| Yes | Phone Numbers | No | No | No |
| Yes | E-mail Address | No | No | No |
| No | Date of Birth | No | No | No |
| No | Place of Birth | No | No | No |
| Yes | 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 |
| Yes | 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 |
| No | Tax Account Information | No | No | No |

6c. Does this system contain SBU information that is not PII, it uses, collects, receives, displays, stores, maintains, or disseminates? No

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
- Yes 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.

Individual Taxpayer Identification Number-Real Time System (ITIN-RTS) supports the ITIN Processing Unit, located at the Austin Submissions Processing Center (AUSPC), by reducing

operational inefficiencies within ITIN submission processing procedures. Additionally, any IRS employee who conducts ITIN related work in organizations such as Field Assistance (e.g., Tax Assistance Centers (TAC) – (assist the ITIN applicant to submit a completed W-7) or Accounts Management (AM) – (assist ITIN applicants with application inquiries) benefits from the ITIN-RTS via a user-friendly system; which provides the ability to make updates to ITIN information, maintains a view of all ITIN applicant information, and provides the most current processing status.

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

All data collected from and displayed to the user will be verified against or displayed from existing IRS and Treasury information systems. In addition, there are field-level and form-level validations to ensure the taxpayer data is entered accurately and is complete.

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? Yes

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.

| <u>SORNS Number</u> | <u>SORNS Name</u> |
|---------------------|--|
| Treasury/IRS 34.037 | IRS Audit Trail and Security Records System |
| Treasury/IRS 22.034 | Individual Returns Files, Adjustments and Misc. Do |
| Treasury/DO .114 | Foreign Assets Control Enforcement Records |
| Treasury/DO .118 | Foreign Assets Control Licensing Records |
| Treasury/IRS 46.002 | Criminal Investigation Management Information System |
| Treasury/IRS46.009 | Centralized Evaluation and Processing of Information |
| Treasury/IRS 22.054 | Subsidiary Accounting Files |
| Treasury/IRS 24.030 | Individual Master File (IMF) |

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.

| <u>System Name</u> | <u>Current PIA?</u> | <u>PIA Approval Date</u> | <u>SA & A?</u> | <u>Authorization Date</u> |
|---|---------------------|--------------------------|--------------------|---------------------------|
| Notice Conversion | Yes | 11/01/2016 | Yes | 05/13/2013 |
| Security Audit and Analysis System (SAAS) | Yes | 07/14/2017 | Yes | 05/12/2015 |
| Integrated Data Retrieval System (IDRS) | Yes | 08/29/2017 | Yes | 12/21/2016 |

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? Yes

If **yes**, identify the forms

| <u>Form Number</u> | <u>Form Name</u> |
|--------------------|--|
| Form W-7 | Application for IRS Individual Taxpayer Identification Number (ITIN) |

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.

| <u>System Name</u> | <u>Current PIA?</u> | <u>PIA Approval Date</u> | <u>SA & A?</u> | <u>Authorization Date</u> |
|---|---------------------|--------------------------|--------------------|---------------------------|
| Integrated Data Retrieval System (IDRS) | Yes | 08/29/2017 | No | |
| Notice Conversion | Yes | 11/01/2016 | No | |
| Security Audit and Analysis System | Yes | 07/14/2015 | No | |
| Office of Foreign Asset Control | No | | No | |

Identify the authority and for what purpose? Internal Revenue Code (IRC) Section 6109 and Section 6103, Privacy and Disclosure.

12b. Does this system disseminate SBU/PII to other Federal agencies? No

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

17b. If **no**, why not? If information is not collected directly from an individual, please discuss the factors considered in deciding to collect information from third party sources.

ITIN/RTS 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 tax forms referenced in this PCLIA, and pursuant to 5 USC.

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? ITIN/RTS 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 tax forms referenced in this PCLIA, and pursuant to 5 USC.

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

ITIN/RTS 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 tax forms referenced in this PCLIA, and pursuant to 5 USC.

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

| <u>IRS Employees?</u> | Yes/No | Access Level (Read Only/Read Write/ Administrator) |
|-----------------------|--------|---|
| Users | Yes | Read and Write |
| Managers | Yes | Read and Write |
| Sys. Administrators | Yes | Read and Write |
| Developers | No | |

Contractor Employees? No

21a. How is access to SBU/PII determined and by whom? System/Data Access Control for users is via Online 5081 and the Employee User Portal access control mechanisms (fully documented in EUP documentation). Users are granted access to Individual Taxpayer Identification Number-Real Time System (ITIN-RTS) according to their role as configured in SiteMinder.

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? No

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? Yes

22a. If **yes**, how long are the records required to be held under the corresponding RCS and how are they disposed of? In your response, please include the complete IRM number 1.15.XX and specific item number and title.

All records housed in the system will be erased or purged from the system at the conclusion of their retention period(s) as required under IRM 1.15.6. The Individual Taxpayer Identification Number-Real Time System (ITIN-RTS) Data Store is approved for deletion/destruction 7 years after end of processing year. The National Archives and Records Administration (NARA) approved these disposition instructions under Job No. N1-58-97-13 (approved 2/9/1998). These instructions are published under Records Control Schedule for Electronic Tax Administration - 32, Item 1.

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)? No

23c. If **no**, is the system secured in accordance with all applicable federal, treasury, and IRS security policy, procedures, and requirements? Yes

23.1 Describe in detail the system s audit trail. Session events are collected for user transactions in the application. In addition, a History table maintains a record level history. The events collected include: Timestamp, User Identifier, Source Address, System, Application Event Identifier, Tax Filer Taxpayer Individual Number (TIN), Return Code, Error Message, User Type, Standard Employee Identifier (SEID),

Area, Territory, Division, Branch, Section, Group, Social Security Number Indicator, First Name, Last Name, Cycle Year, Last Cycle, and Update Date. Individual Taxpayer Identification Number-Real Time System (ITIN-RTS) is following the appropriate audit trail elements pursuant to current Audit Logging Security Standards.

J. PRIVACY TESTING

24. Does the system require a System Test Plan? Yes

24b. If **yes**, Is the test plan in process or completed: Completed

24.3 If **completed/ or in process**, 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?

The CSM/CAM meeting was held on 3/3/17. The Stakeholders outbrief was held on 4/4/2017 and the application SAR was signed on 4/17/17.

24b.1. If **completed**, where are the test results stored (or documentation that validation has occurred confirming that requirements have been met)? The results of the testing are housed in the Treasury FISMA Inventory Management System (TFIMS) repository. Confirmation that requirements have been met were confirmed with the issuance of the Assessment final package which included the test results in an assessment plan, and documented in the Security Assessment Report(SAR).

24b.2. If **completed**, were all the Privacy Requirements successfully tested? Yes

24.2 If **completed**, are there any residual system privacy, civil liberties, and/or security risks identified that need to be resolved? No

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: Under 50,000
26b. Contractors: Under 5,000
26c. Members of the Public: Under 100,000
26d. Other: Yes

If **other**, identify the category of records and the number of corresponding records (to the nearest 10,000).

The number of individual records provided above is only an estimate, the specific amount is not available.

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? No

End of Report
