

Date of Approval: **March 13, 2019**

PIA ID Number: **3816**

SYSTEM DESCRIPTION

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

Online Payment Agreement, OPA

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?

OPA PIA # 1626, 02/12/2016

What is the approval date of the most recent PCLIA?

2/12/2016

Changes that occurred to require this update:

Expiring PCLIA

Were there other system changes not listed above?

Yes

What were those changes?

All pieces of OPA were moved behind eAuthentication as of March 2018. Secondary filer access enhancements were added throughout 2018. Level of Assurance (LOA) level 2C was increased to LOA2 in January 2019.

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

Small Business / Self Employed (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.

OPA allows taxpayers to establish their own installment payment agreements, to satisfy delinquent tax liabilities, within certain pre-established parameters (dollar amount owed, monthly payment amount offered, length of term, etc.). The system permits the establishment of agreements without human IRS involvement, allowing taxpayers who wish to resolve their debts, to do so without direct interaction. This provides significant cost savings for the Government, through reduced payroll, and frees IRS personnel to address other customer needs. Information entered into the system by the applicant, is used to confirm the user's identity and create the installment payment agreement between the IRS and the customer.

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)

When there is no reasonable alternative means for meeting business requirements

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

The Office of Management and Budget memorandum M-17-12 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. OPA 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 Internal Revenue Code (IRC) 6109, which requires individual taxpayers to include their SSNs on their income tax returns.

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

NA

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

Date of Birth

Protection Personal Identification Numbers (IP PIN)

Internet Protocol Address (IP Address)

Financial Account Numbers

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

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.

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.

The system uses dollar amount owed, monthly payment amount offered and length of term to determine the viability of an installment agreement.

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.

All data items collected are for the specific business purpose of providing taxpayers, with delinquent federal tax obligations, the capability of establishing an installment payment agreement via the web interface offered by OPA.

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

OPA restricts user input through the use of scripts that notify the user if required sections of the form were left blank or have an invalid input not acceptable for a specific field. OPA pre-populates certain fields using drop-down arrows (ex. month, day, year, state, etc.). This adds control to the values that can be entered and processed by the system. Radio buttons or check boxes are also used to guide user responses to acceptable, application defined, answers. The system notifies the taxpayer through the use of on-screen text examples of acceptable inputs.

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 24.030 Customer Account Data Engine Individual 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 System (IDRS)

Current PCLIA: Yes

Approval Date: 10/1/2018

SA&A: Yes

ATO/IATO Date: 10/1/2018

System Name: Standard CFOL Access Protocol (SCAP)

Current PCLIA: Yes

Approval Date: 5/20/2016

SA&A: Yes

ATO/IATO Date: 6/14/2016

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: Individual Income Tax Return

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?

8/30/2018

What was the approved level of authentication?

Level 2: Some confidence in the asserted identity's validity
Confidence based on Single Factor Identity Validation

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?

Access to data by taxpayers is established through eAuthentication. Taxpayers must enter shared secrets that match IRS data. They (effective January 2019) now must also enter secondary information that matches financial data from third party sources (LoA2). Successful authentication permits them to use the system. Employees can gain access to the system to request an installment agreement (only) the same as the public. Notice, consent and due process are 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?

Yes

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

Taxpayers who decline to provide required information are informed that their declination renders them ineligible to use the system. They are provided alternative contact options to establish an installment agreement (phone numbers, addresses). Notice, consent and due process are provided pursuant to 5 USC.

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

The system provides the opportunity to respond to any negative finding, with corrected information. Taxpayers may opt out of providing information and pursue alternative means of establishing an installment agreement (direct contact). Notice, consent and due process are 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 Operated

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

IRS Employees

System Administrators: Read Only

Developers: Read Only

IRS Contractor Employees

Contractor Developers: Read Only

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

A potential user will request access via the Online 5081 (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.

The National Archives and Records Administration (NARA) approved disposition instructions for OPA inputs, system data, outputs and system documentation in July 2012, under Job No. N1-58-11-11. All completed OPA sessions are updated to the Master File for official recordkeeping purposes. OPA disposition instructions are published in IRS Document 12990 (Rev 11-2017), Records Control Schedule 28 for Collections, item 158. All data and audit information is sent to SAAS application. NARA approved a 7-year retention

of SAAS audit data under Job No. N1-58-10-22 (approved 4/5/2011). SAAS retention requirements are incorporated into OPA records requirements.

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?

6/27/2018

Describe the system's audit trail.

OPA collects Management Information System (MIS) data related to the taxpayer use of the application (e.g., number of hits, number of successfully submitted installment agreements and what links were followed). In addition to MIS, in the current production environment, OPA sends all of its business layer outbound responses to Security Audit and Analysis System (SAAS) through Application Messaging and Data Access Service (AMDAS) on the outbound queue. AMDAS provides a secure communication service between modernized components. The following OPA components are part of the Integrated Customer Communications Environment (ICCE) FISMA boundary: Online Payment Agreement Business Master File (OPA BMF) Online Payment Agreement Business Master File Power of Attorney (OPA BMF POA) OPA Information Returns Master File (OPA IMF) OPA IMF Power of Attorney (OPA IMF POA) The current ATO date for ICCE is 6/27/2018.

PRIVACY TESTING

Does the system require a System Test Plan?

No

Please explain why:

OPA 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: Not Applicable

Contractors: Not Applicable

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