Date of Approval: February 14, 2018 PIA ID Number: 3245

A. SYSTEM DESCRIPTION

- 1. Enter the full name and acronym for the system, project, application and/or database. Correspondence Examination Automation Support, CEAS
- 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.

Correspondence Examination Automation Support (CEAS) Release 1.12.3/ Automated Case
Workload Manager (ACWM) 2.2.25 and Unattended Case Processing (UCP) 1.6.3

Next, enter the **date** of the most recent PIA. 4/17/2015

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

<u>Yes</u>	Addition of PII
<u>No</u>	Conversions

No Anonymous to Non-Anonymous

No Significant System Management Changes
Significant Merging with Another System

Yes 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)

<u>No</u>	Vision & Strategy/Milestone 0
<u>No</u>	Project Initiation/Milestone 1
<u>No</u>	Domain Architecture/Milestone 2
<u>No</u> No	Preliminary Design/Milestone 3 Detailed Design/Milestone 4A
<u>Yes</u>	System Development/Milestone 4B
<u>No</u> No	System Deployment/Milestone 5 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.

Correspondence Examination Automation Support (CEAS) is a suite of web-based applications, which also includes Unattended Case Processing (UCP) and Automated Case Workload Manager (ACWM). Report Generating Software (RGS) is also categorized as a sub-system of CEAS (see PCLIA #3205). CEAS provides for the centralized storage and services of electronic exam data, allowing for inventory control and management of examination cases (i.e. case assignment, case transfer, case file view, case storage & retrieval, management inventory reports, user administration, system support utilities, etc.) ACWM is an invoicing tool for ordering Campus Examination cases/inventories. UCP retrieves Masterfile and Tax Return data used for automated support.

B. PII DETAIL

- 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)

Yes Taxpayer Identification Number for Pending U.S. Adoptions (ATIN)

Yes 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 memorandum M-17-16 requires that federal agencies develop a mitigation or elimination strategy for systems that use SSNs. An exception to that requirement is when the SSN is uniquely needed to identify a user's record. The CEAS system requires the use of SSN's because no other identifier can be used to uniquely identify a taxpayer. SSNs are permissible from Internal Revenue Code (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.

Calaatad	DH Element	On Duine our	On Chausa	On Danandant
Selected	PII Element	On Primary	On Spouse	On Dependent
Yes	Name	Yes	Yes	Yes
Yes	Mailing address	No	No	No
Yes	Phone Numbers	No	No	No
Yes	E-mail Address	No	No	No
Yes	Date of Birth	Yes	Yes	Yes
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
Yes	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
Yes	Financial Account Numbers	No	No	No
No	Photographic Identifiers	No	No	No
No	Biometric Identifiers	No	No	No
Yes	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 which if improperly used or disclosed could adversely affect the
	Information	ability of the agency to accomplish its mission
No	Procurement sensitive data	Contract proposals, bids, etc.
No	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.
Yes	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? Yes

If **yes**, describe the other types of SBU/PII that are applicable to this system. <u>Joint Filer</u> Indicator: This indicates if the Taxpayers' marital status. IRS Employee Indicator: This indicates if the tax examination is on an IRS Employee. Activity Code: This indicates the dollar income grouping of the tax payer (i.e. high income) Filing Income/Adjusted Gross Income: Taxpayer's income NAICS Code: (North American Industry Classification System): This indicates the type of business the tax payer is involved in. http://www.naics.com/search/ Date of Death

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

Yes 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.

Use of PII data in CEAS can be categorized as the following: 1. Data needed for Tax Examination, Classification and Tax Computation (SSN, Income, Joint Filer, IRS Employee Indicator) 2. Data needed for Taxpayer correspondence and contact and identity verification (SSN, Name, Address, Phone number, Date of Birth, Date of Death) 3. Data needed for Reporting and Analysis (SSN, NAICS code, Activity Code) The SBU/PII collected is limited to what is relevant and necessary for tax administration and conducting a proper compliance examination.

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

<u>PII input by users is restricted and validated; information is matched against a database for accuracy and timeliness Messages are displayed when invalid data is entered. The taxpayer has appeal rights for any determinations made from the data."</u>

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.

SORNS Number SORNS Name

Treasury / IRS 34.037 IRS Audit Trail and Security Records System

Treasury / IRS 42.001 Examination Administrative File

Treasury / IRS 00.001 Correspondence Files and Correspondence Control Files

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 Approval	<u>SA &</u>	Authorization
	PIA?	<u>Date</u>	<u>A?</u>	<u>Date</u>
Dependent Database (DDB)	Yes	09/27/2017	Yes	03/02/2012
Audit Information Management System	Yes	12/15/2015	Yes	08/13/2017
(AIMS)				
Report Generation Software (RGS)	Yes	01/31/2017	Yes	03/16/2015
Legacy Access Provider (LAP)	Yes	04/10/2015	Yes	02/28/2015
Corporate Files On-Line (CFOL)	Yes	09/16/2016	Yes	02/28/2015

- 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 Approval	<u>SA & </u>	Authorization
	PIA?	<u>Date</u>	<u>A?</u>	<u>Date</u>
Dependent Database (DDB)	Yes	09/26/2017	No	
Report Generation Software (RGS)	Yes	01/31/2018	Yes	03/16/2015
Audit Information Management System	Yes	12/15/2015	Yes	08/15/2015
(AIMS)				
Corporate Files On-Line (CFOL)	Yes	09/19/2016	Yes	02/28/2015
Legacy Access Provider (LAP)	Yes	04/10/2015	Yes	02/28/2015

Identify the authority and for what purpose? <u>Authority: As enacted by Internal Revenue Code</u> <u>Section 6201 Assessment of Taxes</u>

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
TIGTA	Web Page	Yes

Identify the authority and for what purpose? INTERCONNECTION SECURITY AGREEMENT between Treasury Inspector General for Tax Administration (TIGTA) and Internal Revenue Service (IRS) In Support of Network Integration dated 8/2014 and MEMORANDUM OF AGREEMENT between Treasury Inspector General for Tax Administration (TIGTA) and Internal Revenue Service (IRS) In Support of Network Integration dated 8/2014.

- 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? Yes

17a. If **yes**, how is notice provided? Was the individual notified about the authority to collect the information, whether such is mandatory or voluntary, the purpose for which the information will be used, with whom the information may be shared, and the effects, if any, if they decide not to provide any of the requested information?

The IRS notifies all individuals who file tax returns of such collection via the Privacy Act Notice in tax return instructions. When a return is selected for examination the taxpayer is sent Notice 609, Privacy Act Notice, Pub 3498, The Examination Process, Pub 5, Your Appeals Rights and How to Prepare a Protest Publication 4227, Overview of the Appeals Process.

- 18. Do individuals have the opportunity to decline from providing information and/or from consenting to particular uses of the information? No
- 19. How does the system or business process ensure due process regarding information access, correction and redress?

The entire examination process and procedures are dictated by the Internal Revenue Manual guidelines - IRM Part 4 IRS policy allows affected parties the opportunity to clarify or dispute negative determinations per the examination process and examination appeals process. When a return is selected for examination the taxpayer is sent Notice 609, Privacy Act Notice, Pub 3498, The Examination Process, Pub 5, Your Appeals Rights and How to Prepare a Protest Publication 4227, Overview of the Appeals Process.

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

Yes/No	Access Level (Read Only/Read Write/
	Administrator)
Yes	Read and Write
Yes	Read and Write
Yes	Administrator
Yes	Administrator
	Yes Yes Yes

Contractor Employees? Yes

Contractor Employees?	Yes/No	Access Level	Background Invest. Level
Contractor Users	No		
Contractor Managers	No		
Contractor Sys. Admin.	No		
Contractor Developers	Yes	Administrator	Moderate

- 21a. How is access to SBU/PII determined and by whom? Access to the CEAS system is established through the IRS On–Line application 5081 (OL5081). Each employee must be granted access to the CEAS application or Application server in writing. Specific permissions (Read, Write, Modify, Delete, and/or Print) are defined on the OL5081 form and set (activated) by the System Administrator (SA) upon manager approval prior to the employee being allowed network and CEAS access. The IRS online application is maintained within the IRS ol5081 system. Developer(s) access to development systems is temporal admin. Developer(s) have no access to production systems.
- 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? 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 CEAS system will be erased or purged from the system in accordance with approved retention periods. It is the official repository for data and documents and has National Archives approval to affect data disposition. Any records generated and maintained by the system will be managed according to requirements under IRM 1.15.1 and 1.15.6, and will be destroyed using Records Control Schedule 29 for Tax Administration - Wage and Investment Records, Items 56 or 58. Case materials are attached to the LY. Most cases have a 6-year retention as covered under RCS 29, Item 56 for Individual Cases, except exempted case types as listed in the IRM. RCS 23, Records Control Schedule for Tax Administration - Examination, Item 42,a-c for 10-15 years from date of closing.

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? 11/9/2017
- 23.1 Describe in detail the system's audit trail. The Audit Trail data elements are provided below: a. Date time stamp (e.g., date and time of the event); b. Unique identifier (e.g., username, SEID), c. Application name, or application initiating the event; d. Type of event; e. Origin of the request (e.g., terminal ID) for identification/authentication of events; f. Name of object introduced, accessed, or deleted from a user's address space; g. Role of user when creating the event; and, h. Success/Failure of the event.

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?

Acceptability Testing is conducted for all system modifications using standard security parameters regarding IRS privacy laws.

- 24b.1. If **completed**, where are the test results stored (or documentation that validation has occurred confirming that requirements have been met)? <u>Both the End of Test Completion Reports and the test plan are stored in the IRS Technical Documentation Repository.</u>
- 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? Yes 25a. If yes, was permission granted per the requirements of Form 14664, SBU Data Use Questionnaire or Form 14665, SBU Data Use Request? Yes

If **yes**, provide the date the permission was granted. $\underline{11/6/2015}$

25b. If **yes**, was testing performed in conformance with IRM 10.5.8, Sensitive But Unclassified (SBU) Data Policy: Protecting SBU in Non-Production Environments? Yes

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: 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,	3/11
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