Date of Approval: November 1, 2016 PIA ID Number: **1884**

A. SYSTEM DESCRIPTION

- 1. Enter the full name and acronym for the system, project, application and/or database. <u>Notice</u> Conversion, NC
- 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. Notice Conversion, NC, 524

Next, enter the **date** of the most recent PIA. <u>11/12/2013</u>

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
<u>No</u>	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
No	System Development/Milestone 4B
<u>No</u>	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? 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 Notice Conversion Project is a non-major project system sponsored by Wage and Investment. This system was initially deployed in 2008 and was chartered to meet the Internal Revenue Service's (IRS) ongoing need to modernize its tax administration processes, applications, and technologies to improve the level of service provided to the nation's taxpayers. The ability to provide IRS employees across multiple Business Operating Divisions (BODs) with immediate access to integrated account data, enable real-time transaction processing and daily account settlement is critical to improving customer service and business results. The Notice Conversion project capability will deliver enhanced notice processing, notice management, and taxpayer services. This project provides the Internal Revenue System (IRS) a modernized notice composition system to process notice data via a single composition tool. Notice Conversion will receive taxpayer notice data through various IRS applications which generate taxpayer notices/correspondence data. The data will be composed into the specified business owner formats and distributed for print/mail to the taxpayer. Additionally statistical data is provided to the Notice Gatekeeper. The Notice Conversion systems is powered by x86/Linux/JBoss/Oracle architecture.

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 No 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).

Notice Conversion collaborates with the Office of Taxpayer Correspondence and various Business Notice Owners to eliminate the use of SSN, and EIN where possible.

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	<u>On</u>	<u>On</u>	<u>On</u>
		<u>Primary</u>	Spouse	Dependent
Yes	Name	Yes	Yes	No
Yes	Mailing address	No	No	No
No	Phone Numbers	No	No	No
No	E-mail Address	No	No	No

Yes	Date of Birth	Yes	Yes	No
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	No

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

Notice Conversion (NC) delivers improved customer support and functionality by leverging existing IRS applications and new technologies to bridge the gap between modernization and legacy systems. Notice Conversion enables Notice Projects to support and manage taxpayer accounts that require generation of notices to be composed with the use of PII.

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

The data items used in NC have gone through IRS submission processing where accuracy, timeliness, and completeness have been verified. The application thus does not have the capability to modify the data that is received. The NC system receives data from multiple internal IRS systems which have their own verification process for data accuracy, timeliness, completeness, and therefore NC assumes that the data is accurate, timely, and complete when it is provided by these internal IRS systems.

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 00.001	Correspondence Files
Treasury/IRS 24.030	CADE Individual Master File
Treasury/IRS 24.046	CADE Business Master File
Treasury/IRS 22.054	Subsidiary Accounting Files
Treasury/IRS 26.019	Taxpayer Delinquent Account Files
Treasury/IRS 34.037	IRS Audit Trail and Security Records System
Treasury/IRS 00.002	Correspondence Files: Inquiries about Enforcement
Treasury/IRS 26.020	Taxpayer Delinquency Investigation 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?

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>
ACS	Yes	12/18/2015	Yes	08/20/2015
CADE2/IMF	Yes	11/06/2015	Yes	10/02/2015
BMF	Yes	04/24/2015	Yes	02/25/2016
ITIN	Yes	02/17/2015	Yes	05/26/2016
ASFR	Yes	01/29/2014	Yes	02/01/2016
ATIN (Non Fisma Reportable	Yes	08/11/2015	No	02/01/2016
Application)				
e-Authentication	Yes	10/07/2015	Yes	07/12/2016

- 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 agency (-ies)? 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
CPS (NDS)	Yes	05/27/2016	Yes	11/12/2015

Identify the authority and for what purpose? <u>Correspondence Production Services (CPS) East</u> and West

- 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, cloud, 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.

 The Notice Conversion (NC) system received data from other upstream sources/systems and does not interact nor is it responsible for the collection or notification of data prior to receipt.
- 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? The Notice Conversion (NC) system received data from other upstream sources/systems and does not interact nor is it responsible for the collection or notification of data prior to receipt.
- 19. How does the system or business process ensure due process regarding information access, correction and redress? The notice contains verbage that identifies due process when applicable.

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	Read and Write
Developers	No	

Contractor Employees? No

21a. How is access to SBU/PII determined and by whom? The Enterprise Operations (EOps)
Submission Processing & Corporate Data Systems Support Unit 1 branch has been assigned to provide Systems Administration and support for the NC servers. They also control access and/or PII.

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.

NC records are scheduled and approved for destruction under NARA Job No. N1-58-09-76 (signed 2/2/10). These instructions are published in IRS Document 12990 (formerly IRMs 1.15.8-37), under Records Control Schedule (RCS) 29, Item 429. System data (batch files of taxpayer data reformatted for use in composed settlement notices) is approved for destruction 14 days after receipt.

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? 5/13/2013
- 23.1 Describe in detail the system's audit trail. Notice Conversion is a batch processing system with no end users. The control status is inherited to reflect the results and guidelines of the Linux and Oracle Audit Plans with items categorized as Moderate. Application-level audit trails monitor and log user activities. At a minimum, an event record shall specify the following: Data files opened and closed; Specific actions, such as reading, editing; and Deleting records or fields, and printing reports.

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?

Production Live Data was used for test. Live and/or sensitive data is handled in accordance with IRM 10.5.8 Privacy and Information Protection, Sensitive But Unclassified (SBU) Data Policy: Protecting SBU in Non-Production Environments. Privacy Requirements were met when system was established and given an Authorization to Operate (ATO).

- 24b.1. If **completed**, where are the test results stored (or documentation that validation has occurred confirming that requirements have been met)? FS2016 NC System Test Plan is currently stored on Docit.
- 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. 12/9/2014

25b. **If yes**, was testing performed in conformance with IRM 10.8.8 Information Technology (IT) Security, Sensitive But Unclassified (SBU) Data Policy? Yes

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
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? No

End of Report