Date of Approval: July 5, 2018 PIA ID Number: 3441

### A. SYSTEM DESCRIPTION

- 1. Enter the full name and acronym for the system, project, application and/or database. <u>Notice Review</u> Processing System, NRPS
- 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 Review Processing System, NRPS, PCLIA ID# 1393, Milestone 4b

Next, enter the **date** of the most recent PIA. 07/21/2015

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
  Significant Merging with Another System
- No New Access by IRS employees or Members of the Public
- No Addition of Commercial Data / Sources
- New Interagency Use
- No Internal Flow or Collection

Were there other system changes not listed above? Yes

If yes, explain what changes were made. 
<u>Our current PCLIA will soon expire and needs</u> updating.

- 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.
  - Analyzes master file notice records to identify potential errors or necessary last-minute updates, with the goal of increasing the accuracy of correspondence. Examines information on Individual Master File (IMF) and Business Master File (BMF) settlement, adjustment, and levy notices, along with corresponding information on tax modules, pending transactions, electronic data from tax returns, calculations based on feedback of error rates from previous cycles, etc. Flags a notice record for review and creates edited information which is passed to the On-Line Notice Review (OLNR), enabling the Tax Examiner (TE) to determine if the notice should be mailed as is, modified and mailed, or destroyed. Also extracts the information necessary to retype notice information, and when needed, perfects the notice record based upon the TE's intent mailed to taxpayers. Electronically transfers disposition and notice corrected data to the campus servers where OLNR provides a user-friendly interface which allows TEs to make necessary modifications. At the end of the weekly review cycle, the mainframe retrieves the perfected notice data, modifies the notice records as directed, and passes the data to the programs responsible for editing the taxpayer notices.

#### **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.)? <u>Yes</u>

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)

No Individual Taxpaver 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 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. The NRPS System requires the use of SSNs 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.

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

If **yes**, specify the information.

<u>On</u>	On Spouse	<u>On</u>	Selected	<u>PII</u>
<b>Primary</b>		<u>Dependent</u>		<b>Element</b>
Yes	Name	Yes	Yes	No
Yes	Mailing address	No	No	No
No	Phone Numbers	No	No	No
No	E-mail Address	No	No	No
No	Date of Birth	No	No	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	No	No	No
	(IP PIN)			
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? Yes

If yes, select the types of SBU

Selected Yes	SBU Name Agency Sensitive	SBU Description 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.
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
No	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.

NRPS analyzes potential error patterns and pending transactions to determine if a notice record should be reviewed by a Notice Review Tax Examiner (TE) for possible correction or deletion. NRPS passes selected notice data to Online Notice Review (OLNR) System, which is the user interface that TEs use to correct notice data. In addition, NRPS provides a formatted report with supporting data (such as tax modules, pending transactions, etc.) on ControlD/Web, that TEs analyze to determine any actions they need to take. Various NRPS selection criteria analyzes not only the notice records, but also tax modules, return transactions, pending transactions, and other data. NRPS uses SSNs to match the data. TEs use the SSNs on the Integrated Data Retrieval System (IDRS) to do further research or make adjustments to accounts. Sometimes taxpayers' names and addresses need to be updated on the notice record and/or IDRS. Agency efforts to create a viable sanitized data repository have failed due to the extreme complexity of data. NRPS programs take in a huge variety of data in many different formats and if programmers do not have access to live data for development and testing, they will fail to deliver correct program updates. Further, any debugging of program problems in production will be impossible without access to live data.

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

NRPS contains Personally Identifiable Information (PII). NRPS's main goal is to increase the accuracy of correspondence mailed to taxpayers. When NRPS flags a notice record for review, the programs create edited information which is passed to OLNR, enabling the TE to determine if the notice should be mailed as is, modified and mailed, or destroyed. The TEs must make sure correct notices with the most up-to-date information are available within the IRS before notices are mailed out to the taxpayers.

### 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	<u>SORNS Name</u>
IRS 00.001	Correspondence Files and Correspondence Control Files
IRS 24.030	Customer Account Data Engine Individual Master File
IRS 24.046	Customer Account Data Engine Business Master File

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 PCLIA	Approval Date	SA&A?	Authorization Date
Individual Master File (IMF)	Yes	03/06/2017	Yes	11/14/2016
Business Master File (BMF)	Yes	03/08/2018	Yes	01/29/2018

- 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	<u>Approval</u>	SA&A?	<b>Authorization</b>
	<b>PCLIA</b>	<u>Date</u>		<u>Date</u>
Business Master File/Individual Master File	Yes	10/17/2016	No	
(BMFIMFNOT)				

Identify the authority and for what purpose? <u>Tax Administration authority. Systems are authorized to develop and distribute taxpayer notices. After notice information is verified/corrected/deleted as appropriate, we forward that information to the BMFIMFNOT section's programs that produce the actual notices that are mailed to taxpayers.</u>

- 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

Did the contract include the appropriate 6103(n) clauses for tax return and return information, and Federal Acquisition Regulations privacy clauses?

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 system uses data entered from tax returns filed by taxpayers. They are notified of such collection by the Privacy Act Notice in the tax return instructions.

- 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? <u>Tax returns filed by taxpayers are the source of data input into the system.</u>
    The information is received from the Master File. Information is only used to generate notice.
- 19. How does the system or business process ensure due process regarding information access, correction and redress?

Notice, consent and due process are provided in the tax forms instructions, and pursuant to 5 United States Code.

### 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	Yes	Read and Write		
Managers	No			
Sys. Administrators	Yes	Administrator		
Developers	Yes	Read and Write		

Contractor Employees? No

- 21a. How is access to SBU/PII determined and by whom? The developer must submit an Online (OL) 5081 request to receive access to the NRPS. OL-5081 gives access to NRPS mainframe. Form 104 gives access for Resource Access Control Facility access that must be approved by the manager based upon a user's position and need-to-know.
- 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.

NRPS records are scheduled under Records Control Schedule (RCS) 19 for the Enterprise Computing Center - Martinsburg (ECC-MTB), Item 71 (National Archives and Records Administration Job No. N1-58-09-83, approved 12/1/09). System data is approved for destruction 2 weeks after printing notice or when no longer needed for operational purposes, whichever is later. These instructions are published in IRS Document 12990 under RCS 19.

## 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
- 23.1 Describe in detail the system's audit trail. The system does not have audit capability. There is no audit trail. NRPS is a batch processing system. It's application to application via flat files. The trail would be the files processed. As noted in the Records Control. NRPS is a non-recordkeeping process.

## J. PRIVACY TESTING

- 24. Does the system require a **System Test Plan?** Yes
  - 24b. If yes, Is the test plan in process or completed: In Process

If in process, when is the test plan scheduled for completion? 11/30/2018

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 Planned Maintenance Requirements Engineering Self-Certification for Projects was approved upon the Milestone Exit Review.

#### 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. 04/18/2017

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:Not Applicable26b. Contractors:Not Applicable26c. Members of the Public:Not Applicable

26d. Other: Yes

If **other**, identify the category of records and the number of corresponding records (to the nearest 10.000).

NRPS does not maintain records in the system, we process the records we receive then pass them to another system. NRPS is a batch processing system, and it is application to application processing via flat files.

### 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**