

Date of Approval: **March 27, 2020**

PIA ID Number: **4835**

SYSTEM DESCRIPTION

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

SBSE Process Automation, SBSE Auto

Is this a new system?

Yes

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

Enterprise Services Governance Board

Current ELC (Enterprise Life Cycle) Milestones:

Project Initiation/Milestone 1

Domain Architecture/Milestone 2

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.

Reason for system and benefits to IRS - Automating manual business processes will increase accuracy, improve productivity, higher consistency, better efficiency, easier scalability, allow employees to focus on more critical, analytical tasks while robot performs mundane repetitive processes. Current manual business processes being automated: * Aged 5M - Aged 5M is a term used for monitoring taxpayer's filing and payment compliance for 5 years after an offer has been accepted. This requires the taxpayer to file and pay any new liabilities that are assessed during each of the five tax years. The process should monitor filing compliance, update and close cleared accounts in Integrated Data Retrieval System (IDRS) and Automated Offer In Compromise (AOIC). It will also update uncleared accounts in IDRS and AOIC. * Payment Process - When a compromise is agreed upon, a Tax Examiner is

assigned to that record. Monitoring these offers in compromise (MOIC) entails accessing the Automated Offers In Compromise (AOIC) system and running a report for taxpayers that have open offers. The Tax Examiner then checks if any payments were received for that person. At that point, the process branches into 3 potential outcomes: 1. No payment was received 2. One portion of the total amount due was received 3. The total amount due/remaining was received. If a partial payment was received, the Tax Examiner will process the transaction and input a follow-up date in AOIC. If the received payment was for the remaining balance, a release of lien request is submitted, and their status is updated in the AOIC. If no payment is received 31 days past the date generated in AOIC, a potential default notification is sent to the taxpayer. If no payment has been received 45 days past the initial notification date, additional steps are taken to indicate that the individual is in default.

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:

When there is no reasonable alternative means for meeting business requirements

Another compelling reason for collecting the SSN

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

Robotic Process Automation (RPA) performs the same actions as an employee within the IRS. Resulting in automations being created that access systems that use SSN information to validate data throughout automated processes. The implemented SBSE MOIC processes require access to the SSN to verify information.

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

RPA cannot eliminate the use of SSN, since it replicates what employee does today as manual process. Also referencing OMB Circular A-130.

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

Phone Numbers

Date of Birth

Standard Employee Identifier (SEID)

Financial Account Numbers

Employment Information

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

Agency Sensitive Information Information which if improperly used or disclosed could adversely affect the ability of the agency to accomplish its mission

Criminal Investigation Information Information concerning IRS criminal investigations or the agents conducting the investigations.

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.

Document Location Number (DLN)

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.

The Robotics Process Automation (RPA) Project will deploy bots which automate repetitive manual process using Commercial Off the Shelf (COTS) tool. The BOT will be programmed to access only what is relevant to complete the manual process. The BOT will access enterprise systems such as IDRS, AOIC, Automated Lien System (ALS), Remittance Transaction Research System (RTR), Integrated Automation Technologies (IAT) to pull relevant records and perform updates (as needed), identical to what employee does today as part of the manual process. These processes will require the use of sensitive information such as SSN, TIN, DLN and SEID to meet the requirements of the automated process.

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

Audit log files will be generated by the BOT and limited scale operational business reports will be provided.

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 24.046 Customer Account Data Engine Business Master File

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: RTR Remittance Transaction Research

Current PCLIA: Yes

Approval Date: 5/3/2018

SA&A: Yes

ATO/IATO Date: 2/26/2020

System Name: ALS Automated Lien System
Current PCLIA: Yes
Approval Date: 10/30/2019
SA&A: Yes
ATO/IATO Date: 9/11/2018

System Name: IDRS Integrated Data Retrieved System
Current PCLIA: Yes
Approval Date: 10/1/2018
SA&A: Yes
ATO/IATO Date: 2/4/2019

System Name: IAT Integrated Automation Technologies
Current PCLIA: Yes
Approval Date: 10/11/2019
SA&A: No

System Name: AOC Automated Offers In Compromise
Current PCLIA: Yes
Approval Date: 2/28/2019
SA&A: Yes
ATO/IATO Date: 10/25/2019

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?

No

Does the system receive SBU/PII from Employee forms (e.g. the I-9)?

No

DISSEMINATION OF PII

Does this system disseminate SBU/PII?

Yes

Does this system disseminate SBU/PII to other IRS Systems?

Yes

Identify the full name and acronym of the IRS system(s) that receive SBU/PII from this system.

System Name: Integrated Automation Technologies (IAT) Letter Tool
Current PCLIA: No
SA&A: No

Identify the authority

Internal Revenue Manual (IRM) 5.19.7

For what purpose?

To generate potential default letters.

Does this system disseminate SBU/PII to other Federal agencies?

No

Does this system disseminate SBU/PII to State and local agencies?

No

Does this system disseminate SBU/PII to IRS or Treasury contractors?

No

Does this system disseminate SBU/PII to other Sources?

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.?

Yes

Briefly explain how the system uses the referenced technology.

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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?

Not Applicable

INDIVIDUAL NOTICE AND CONSENT

Was/is notice provided to the individual prior to collection of information?

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.

Process does not require collecting information from the taxpayer. Information is collected from existing IRS systems.

Do individuals have the opportunity to decline from providing information and/or from consenting to particular uses of the information?

No

Why not?

The tax payer has signed the form 656 that agrees to the terms of the offer and letters that are being sent to inform the taxpayer that the terms have not been met.

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

No process change has occurred, the currently approved process will remain the same when using the automation.

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

Users: Administrator

System Administrators: Administrator

Developers: Administrator

IRS Contractor Employees

Contractor Users: Administrator

Contractor Developers: Administrator

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

Existing approved tax examiners will run the automation on their laptop, with their prior approval to access PII and SBU data.

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.

Other than log files, no other data is stored. The log file retention period will be determined by the source systems policies and procedures.

SA&A OR ASCA

Has the system been through SA&A (Security Assessment and Authorization) or ASCA (Annual Security Control Assessment)?

No

Is the system secured in accordance with all applicable federal, treasury, and IRS security policy, procedures, and requirements?

Do not know

Describe the system's audit trail.

Risk Based Decision (RBD) was submitted to mitigate the lack of audit trail. Limited scale local log based auditing is in place. As confirmed by the Associate Director of SRM, the RBD is NOT necessary in order for this pilot to move forward but is awaiting approval in Cyber.

PRIVACY TESTING

Does the system require a System Test Plan?

Yes

Is the test plan completed?

No

When is the test plan scheduled for completion?

3/30/2020

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?

Test plans are generated and reviewed by process Subject Matter Expert (SME)s to verify and sign off that the automation only performs the same activities as the current tax examiner.

SBU DATA USE

Does this system use, or plan to use SBU Data in Testing?

Yes

Was permission granted per the requirements of Form 14664, SBU Data Use Questionnaire or Form 14665, SBU Data Use Request?

Yes

Provide the date the permission was granted.

3/4/2020

Was testing performed in conformance with IRM 10.8.8 Information Technology (IT) Security, Sensitive But Unclassified (SBU) Data Policy?

Yes

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: Under 100,000

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