Date of Approval: September 11, 2019

PIA ID Number: 4219

### SYSTEM DESCRIPTION

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

Standard CFOL Overnight Processing, SCOP

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?

Standard CFOL Overnight Processing #1743- MS4B

What is the approval date of the most recent PCLIA?

9/19/2016

Changes that occurred to require this update:

**Expiring PCLIA** 

Were there other system changes not listed above?

No

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

Corporate Data Domain Governance Board (CPDGB)

*Current ELC (Enterprise Life Cycle) Milestones:* 

System Development/Milestone 4B

Operations & Maintenance (i.e. system is currently operational)

Is this a Federal Information Security Management Act (FISMA) reportable system?

No

#### **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.

Standard Corporate Files On-Line (CFOL) Overnight Processing (SCOP): SCOP is a companion application to Standard CFOL Access Protocol (SCAP) that allows a customer to batch their SCOP requests in a file and transfer the file via File Transfer Protocol (FTP) or Enterprise File Transfer Utility (EFTU) for SCAP processing. SCOP uses batch front-end programs to determine if the data is on the CFOL files and then calls the SCAP programs to access and convert the data to character format. The SCOP response file is returned to the customer via FTP or EFTU.

#### **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:

Interfaces with external entities that require 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

Statistical and other research purposes

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)* 

The SCOP 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.

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 Circular A-130 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 SCOP 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

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

Place of Birth

**Financial Account Numbers** 

Tax Account Information

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 (SBUList)

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.

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.

Name, Phone Number, Spouse's Name, Dependent's Name, Filing Status, Spouse's Address, Spouse's Phone Number, Designee's Phone Number, Employer's Address, Employer's Phone Number, Spouse's SSN, Bank Routing Number, Bank Account Number, Fiduciary's Name, Fiduciary's Address, Beneficiary's Identification Number, Beneficiary's Address, Business Partner's Name, Business Partner's Address, Partnership Identifying Number, Bank Name, Bank Address, Spouse's Phone Number, Date of Death, Current Tax Return Info, Previous Tax Return Info, Citizenship Indicators.

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.

Standard CFOL Overnight Processing (SCOP) does not collect or store any PII information. PII information is contained in the CFOL files that are accessed by the SCOPD Command issued by various IRS projects in Wage and Investment (W&I) and Small Business/Self Employed (SB/SE). The Social Security Number/Taxpayer Identification Number/Employer Identification Number (SSN/TIN/EIN) are used to retrieve the information for a specific taxpayer. How is the SBU/PII verified for accuracy, timeliness and completion?

No verification of the PII data elements is done through the SCOP programs. SCOP only reads the data on the CFOL files.

## 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 24.046 Customer Account Data Engine Business Master File

IRS 34.037 Audit Trail and Security Records System

### **RESPONSIBLE PARTIES**

Identify the individuals for the following system roles:

## For 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: National Account Profile (NAP)

Current PCLIA: Yes

Approval Date: 3/21/2017

SA&A: No

System Name: Business Master File (BMF)

Current PCLIA: Yes

Approval Date: 3/8/2018

SA&A: Yes

ATO/IATO Date: 3/12/2019

System Name: Individual Master File (IMF)

Current PCLIA: Yes

Approval Date: 3/6/2017

SA&A: Yes

ATO/IATO Date: 9/22/2018

System Name: Information Returns Processing (IRP)

Current PCLIA: Yes

Approval Date: 3/9/2017

SA&A: Yes

ATO/IATO Date: 11/18/2016

System Name: Returns Transaction File (RTFOL)

Current PCLIA: Yes

Approval Date: 10/24/2016

```
SA&A: No
```

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: CT1	Form Name: Employers Annual Railroad Retirement Tax Return
Form Number: 720	Form Name: Quarterly Federal Excise Tax Return
Form Number: 730	Form Name: Monthly Tax Return for Wagers
Form Number: 940 (Family)	Form Name: Employers Annual Federal Unemployment Tax Return
Form Number: 941	Form Name: Employers Quarterly Federal Tax Return
Form Number: 943	Form Name: Employers Annual Federal Tax Return for Agricultural Employees
Form Number: 944	Form Name: Employers Annual Federal Employment Tax Return
Form Number: 945	Form Name: Annual Return of Withheld Federal Income Tax
Form Number: 990 (Family)	Form Name: Return of Organization Exempt for Income Tax
Form Number: 1042	Form Name: Annual Withholding Return for US Source Income of Foreign Persons

Form Number: 1066 Return	Form Name: Real Estate Mortgage Conduit Income Tax
Form Number: 1120 (Family)	Form Name: US Corporation Income Tax Return
Form Number: 1139	Form Name: Corporation Application for Tentative Refund
Form Number: 2290	Form Name: Heavy Highway Vehicle Use Tax Form
Form Number: 5227	Form Name: Split Interest Trust Information Return
Form Number: 5330	Form Name: Return of Initial Excise Taxes Related to Employee Benefit Plans
Form Number: 8038 (Family	Form Name: Information Return for Tax Exempt Private Activity Bond Issues
Form Number: 8703	Form Name: Annual Certification of Residential Rental Property
Form Number: 8752	Form Name: Required Payment or Refund Under Section 7519
Form Number: 8804	Form Name: Annual Return for Partnership Withholding Tax (Section 1446)
Form Number: 8871	Form Name: Political Organization Notice of Section 527
Form Number: 1040 (Family)	Form Name: US Individual Income Tax Return
Form Number: 706 (Family)	Form Name: US Estate Tax Return
Form Number: 709 (Family)	Form Name: US Gift Tax Return
Form Number: 1041 (Family)	Form Name: US Income Tax Return (For Estates and Trusts)
Form Number: 1065 (Family)	Form Name: US Return of Partnership Income
Form Number: 3520 (Family)	Form Name: Annual Return to Report Transactions With Foreign Trusts
Form Number: 4720 (Family)	Form Name: Return of Certain Excise Taxes

Form Number: 8288 (Family) Form Name: US Withholding Tax Return for Disposition by Foreign Persons of US Real Property Interests

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: Automated Collection System

Current PCLIA: Yes

Approval Date: 10/12/2018

SA&A: Yes

ATO/IATO Date: 11/20/2018

System Name: Automated Substitute For Return

Current PCLIA: Yes

Approval Date: 12/6/2016

SA&A: Yes

ATO/IATO Date: 2/18/2019

System Name: Inventory Delivery System

Current PCLIA: Yes

Approval Date: 12/5/2016

SA&A: Yes

#### ATO/IATO Date: 9/12/2016

#### *Identify the authority*

1) PII for federal tax administration is generally Internal Revenue Code Sections 6001, 6011, 6012e(a) 2) SSN for tax returns and return information is Internal Revenue Code Section 6109 The purpose is for tax administration activities.

#### *For what purpose?*

1) PII for federal tax administration is generally Internal Revenue Code Sections 6001, 6011, 6012e(a) 2) SSN for tax returns and return information is Internal Revenue Code Section 6109 The purpose is for tax administration activities.

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.?

No

Does the system use cloud computing?

No

Does this system/application interact with the public?

No

### 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.

Notice is provided to individuals by other IRS applications or through forms (e.g., 1040 forms) that interact directly with the taxpayer at the time of collection.

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

No

Why not?

This system does not collect any information directly from taxpayers. All information used in this system comes from the submission of tax returns submitted directly to the IRS through other IRS systems. Information from the tax returns is subsequently shared from the other applications to this system. The Tax return form provides taxpayers information regarding the opportunity to decline or consent to providing the information.

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

This system is not a repository of taxpayer information. SCOP passes data that is submitted directly to the IRS through other IRS applications. This System does not interact with taxpayers directly and thus "due process" is addressed by other IRS applications that directly interact with taxpayers. Any issues that are identified by these other means will submit changes to this system through automated methods so an auditable record may be maintained. Due Process is provided 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

Users: Read Only

Managers: Read Only

System Administrators: Read Only

Developers: Read Only

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

Employees request access to SCOP by submitting an OL5081 which must be approved by their manager. When an employee is terminated or transferred from the IRS, their manager submits an OL5081 request to remove their access to the system.

## **RECORDS SCHEDULE**

Are these records covered under a General Records Schedule (GRS, IRS Document 12829), or has the National Archives and Records Administration (NARA) archivist approved a Records Control Schedule (RCS, IRS Document 12990) for the retention and destruction of official agency records stored in this system?

No

You must work with the IRS Records and Information Management (RIM) Program Office to address records retention requirements before you dispose of any records in this system.

### 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?

Yes

Describe the system's audit trail.

Individual users cannot be profiled for the SCOP Command Code. Only devices that have been defined as Multi Functional Equipment (MFE) are profiled for SCOP. The SCAPD Command Code is registered/configured on the Security and Communications System (SACS) as a Multi-Functional Equipment (MFE) command code. The Computing Center's data communication staff for the SACS system must update the fileserver(device) Terminal Vector Record to identify the device as an MFE type. SCOP responses may consist of several blocks of data so the system must be configured to allow multiple blocks of data. Enterprise Operations (EOPS) is responsible for maintaining the infrastructure for the SCOP applications. Audit trail functionality is provided by the host platform (e.g. Integrated Data Retrieval System (IDRS). SCOP updates the following fields in the government trailer record provided by IDRS. Project ID, Core Storage Terminal Table (CSTT) Update Indicator (Ind), IDRS Hit No Hit Ind, Processing Error Type, Format Ind, Command Code (Cd), Command Cd Definer, Taxpayer Identification Number (TIN), TIN Type, Master File Tax (MFT) Code, Tax Period and Error Cd. SCOP is an application that is accessed through other applications. Those applications are responsible for ensuring an appropriate audit trail is maintained.

### **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?

9/11/2019 12:00:00 AM

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?

SCOP is a non-FEDERAL INFORMATION SECURITY MANAGEMENT ACT (FISMA) reportable system. It relies on NATIONAL INSTITUTE OF STANDARDS & TECHNOLOGY (NIST) controls from the parent information system -- General Support System (GSS) No 21. Tests and validation activities are conducted on GSS-21 management, technical and operational controls to verify and validate that the applicable Privacy Requirements have been met.

### **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: More than 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