

Date of Approval: **December 12, 2022**

PIA ID Number: **7449**

SYSTEM DESCRIPTION

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

Automated Contract Review Tool, ACRT

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?

Automated Contract Review Tool (ACRT), Project Initiation PIA#4771

What is the approval date of the most recent PCLIA?

8/21/2020

Changes that occurred to require this update:

Internal Flow or Collection

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.

Office of Procurement leadership governs the operation of the system. The Director, Procurement Policy sets IRS policies on the use of contract clauses. The Director, Data Analytics and Technology operates the Automated Contract Review Tool which checks contract documents for policy compliance. Executive governance is provided by the Deputy Chief Procurement Officer and Chief Procurement Officer.

Current ELC (Enterprise Life Cycle) Milestones:

Vision & Strategy/Milestone 0

Project Initiation/Milestone 1

Domain Architecture/Milestone 2

Preliminary Design/Milestone 3

Detailed Design/Milestone 4A

System Development/Milestone 4B

System Deployment/Milestone 5

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.

The IRS, Office of Procurement is responsible for drafting contract documents that comply with applicable regulations and agency policies. Approximately 10,000 contract documents are generated each year by the organization. These contract documents must comply with the Federal Acquisition Regulations (FAR) and Treasury/IRS policies. The content required in an individual contract document varies depending on a wide range of characteristics. Internal contract file reviews and oversight findings have shown frequent errors with contract clauses and other language in contract documents. The system examines the words in contract documents and identifies legal drafting efforts that need to be corrected. For example, ACRT would flag a contract that contained keywords suggesting a project with Personally Identifiable Information (PII) - that did not include the Privacy Act clauses. The system applies a text mining-based rules engine capability that examines contract documents for FAR compliance. Since the initial deployment of ACRT in 2017 (also known as the Contract Clause Review Tool) enhancements have been made to collect / aggregate / summarize data regarding regulatory and policy compliance / noncompliance for specific unique, boilerplate contract clauses.

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.)?

No

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
E-mail Address
Standard Employee Identifier (SEID)
Employment 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:

Procurement sensitive data - Contract proposals, bids, etc.

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.

ACRT ingests solicitation and contract documents which may contain names, Standard Employee Identifiers, work email addresses and phone numbers for IRS employees in the Office of Procurement. Also, the application ingests names, work email addresses and phone numbers for IRS contractors. PII is not stored / retained by the system. Instead, the system stores the clause review analysis reports that are produced when a document is sent through the clause logic rules engine. Authority for collecting SBU/PII is the Federal Acquisition Regulations (48 CFR).

Cite the authority for collecting SBU/PII (including SSN if relevant).

PII for personnel administration is 5 USC

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.

Contract Review Tool will contain procurement sensitive information and PII (names of IRS employees and contractors). SBU contract document data is essential to the operation of this system. The business purpose is to review contract document language for compliance with the statutes and executive orders implemented by the FAR (48 Code of Federal Regulations).

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

The purpose of this system is to help IRS employees draft government contract documents that comply with applicable regulations. The Contract Review Tool will not be used to make adverse determinations impacting the due process rights, benefits, or privileges of contractors/contractor employees.

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.

Treasury .009 - Treasury Financial Management Systems

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?

No

DISSEMINATION OF PII

Does this system disseminate SBU/PII?

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?

Yes

Is the cloud service provider (CSP) Federal Risk and Authorization Management Program (FedRAMP) certified?

Yes

Date Certified.

6/21/2016

Please identify the ownership of the CSP data.

IRS

Does the CSP allow auditing?

Yes

Who audits the CSP Data?

3rd Party

What is the background check level required for CSP?

Moderate

Is there a breach/incident plan on file?

Yes

Privacy laws (including access and ownership) can differ in other countries. This cloud will be Continental US (CONUS) only for:

Transmission

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?

Yes

How is notice provided? Was the individual notified about the authority to collect the information, whether disclosure is mandatory or voluntary, the purpose for which the information will be used, with whom the information may be shared, and the effects on the individual, if any, if they decide not to provide all or any of the requested information?

Contractors were notified that name and contact information will be stored in agency systems. Notification was provided as follows. System of Record Notice 00.009 Treasury Financial Management System OMB Paperwork Reduction Act Control Number 1505-0081 Solicitation of Proposal Information for Award of Public Contracts System information will be shared with agency employees. Contractors have a BEARS access request approved by their manager.

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

Yes

Describe the mechanism by which individuals indicate their consent choice(s):

Yes, pursuing contract awards from the IRS is a voluntary business decision.

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

Not applicable. No adverse determinations regarding outside entities will be made using this system.

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 Contractor Operated

The following people have access to the system with the specified rights:

IRS Employees

Users: Read Only

Managers: Read Only

System Administrators: Administrator

IRS Contractor Employees

Contractor Users: Read Only

Contractor Managers: Read Write

Contractor Developers: Administrator

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

Users are authorized by IRS, Office of Procurement management to access procurement sensitive data. This system will allow quality checks on documents (with SBU/PII) that are already in the custody of the IRS, Office of Procurement.

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.

ACRT is non-recordkeeping. Procurement records fall under General Records Schedule 1.1. Financial Management and Reporting Records, Item, 011. The Automated Contract Review

Tool is not a system of record. ACRT will only be used to conduct quality checks on procurement documents. Procurement records are retained, on an official, long-term basis in another system managed by the IRS Office of Procurement and Chief Financial Officer.

SA&A OR ASCA

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

Yes

What date was it completed?

5/20/2013

Describe the system's audit trail.

Security of the Amazon Web Services cloud infrastructure was approved on 05/20/2013. The clause tool cloud application complies with NIST 800-53 Security Controls which includes audit trail standards. The information system automatically audits account creation, modification, enabling, disabling, and removal actions, and provides notifications.

PRIVACY TESTING

Does the system require a System Test Plan?

Yes

Is the test plan completed?

Yes

Where are the test results stored (or documentation that validation has occurred confirming that requirements have been met)?

Test results are held by the General Services Administration's FEDRamp program.

Were all the Privacy Requirements successfully tested?

Yes

Are there any residual system privacy, civil liberties, and/or security risks identified that need to be resolved?

No

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 service provider defines tests and/or exercises in accordance with NIST Special Publication 800-61 (as amended).

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: Under 50,000

Contractors: Under 5,000

Members of the Public: Not Applicable

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