
A. SYSTEM DESCRIPTION

1. Enter the full name and acronym for the system, project, application and/or database. Automated Lien System - Entity, ALS-Entity

2. Is this a new system? No

2.a. If **no**, is there a Privacy Civil Liberties Impact Assessment (PCLIA) for this system? Yes

If **yes**, enter the full name, acronym, and milestone of the most recent PCLIA.

Automated Lien System - Entity, ALS-Entity, PCLIA 1937, Milestone O&M

Enter the approval **date** of the most recent PCLIA. 11/16/2016

If **yes** Indicate which of the following changes occurred to require this update (check all that apply).

- No Addition of Personally Identifiable Information (PII) (PII is any information that is linked or linkable).
- No Conversions
- No Anonymous to Non-Anonymous
- No Significant System Management Changes
- No Significant Merging with Another System
- Yes New Access by IRS employees or Members of the Public
- No Addition of Commercial Data / Sources
- No New Interagency Use
- No Internal Flow or Collection
- No Expiring PCLIA

Were there other system changes not listed above? Yes

If **yes**, explain what changes were made. Updates to the ALS Extranet Server used in Boston and Connecticut in the place of paper lien documents and TELNET was disabled.

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

Small Business/Self Employed (SB/SE) Information Technology (IT)Governance Board, Chair: SB/SE Commissioner.

3.a. Check the current Enterprise Life Cycle (ELC) 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
- No 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? Yes

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.

ALS-ENTITY is an IRS National Standards Application consisting of two parts; the ALS part of the application and the ENTITY part of the application. ALS-ENTITY is used as the legal Notice of Federal Tax Lien repository for liens filed only in two specific courts: Secretary of State, Hartford, CT and United States District Court (USDC) in Boston, MA. ALS maintains a database of all open and released liens on file in thousands of local recording offices. In some areas of the country, ALS files liens via electronic transmission of data to local recording authorities. ALS generates a flat invoice file that Integrated Financial System (IFS) retrieves to process electronic payments to the courts. ENTITY is a critical management information application tool that compiles data on open and closed cases worked by various segments of IRS Collection.

B. PII DETAIL

6. 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

6.a. 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 all types of tax identification numbers (TIN) that apply to this system:

<u>Yes</u>	Social Security Number (SSN)
<u>Yes</u>	Employer Identification Number (EIN)
No	Other Taxpayer Identification Number

If SSNs apply, which of the following approved Treasury uses of the SSNs applies:

<u>No</u>	Security background investigations
<u>No</u>	Interfaces with external entities that require the SSN
<u>Yes</u>	Legal/statutory basis (e.g. where collection is expressly required by statute)
<u>Yes</u>	When there is no reasonable alternative means for meeting business requirements
<u>No</u>	Statistical and other research purposes
<u>Yes</u>	Delivery of governmental benefits, privileges, and services
<u>No</u>	Law enforcement and intelligence purposes
<u>No</u>	Another compelling reason for collecting the SSN

Explain why one or more of the eight authorized uses above support the new or continued use of SSNs.

For filed lien documents, all taxpayer identification numbers except the last four numbers have been redacted. SSNs in accordance with IRC 6103 for tax administration purposes for the ALS mainframe. However, ALS Extranet is in accordance with IRC 6321 and 6323 allowing the filed notice of tax lien information released to the Agency as a public record.

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

ALS- for outgoing lien documents, all taxpayer identification numbers (TIN) except the last four numbers have been redacted. This system will also participate in any further service-wide initiatives to reduce or eliminate SSNs, as applicable. SSNs in this system are used in accordance with IRC 6103 for tax administration purposes.

6.b. Does this system use, collect, receive, display, store, maintain, or disseminate other (non-SSN) PII (i.e. Names, addresses, etc.)? Yes

If **yes**, specify the information.

<u>Selected</u>	<u>PII Element</u>
Yes	Name
Yes	Mailing address
No	Phone Numbers
No	E-mail Address
No	Date of Birth
No	Place of Birth
Yes	Standard Employee Identifier (SEID)
No	Mother's Maiden Name
No	Protection Personal Identification Numbers (IP PIN)
No	Internet Protocol Address (IP Address)
No	Criminal History
No	Medical Information
No	Certificate or License Numbers
No	Vehicle Identifiers
No	Passport Number
No	Alien Number
No	Financial Account Numbers
No	Photographic Identifiers
No	Biometric Identifiers
No	Employment Information
Yes	Tax Account Information
No	Centralized Authorization File (CAF)

6.c. 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

<u>Selected</u>	<u>SBU Name</u>	<u>SBU Description</u>
Yes	Agency Sensitive Information	Information which if improperly used or disclosed could adversely affect the ability of the agency to accomplish its mission
No	Procurement sensitive data	Contract proposals, bids, etc.
No	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.

6.d. Are there other types of SBU/PII used in the system? No

6.e. 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

6.f. 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.

The business need is to store and maintain tax lien information on taxpayers. Lien information for taxpayers with overdue tax balances includes: Taxpayer name, Address, Social Security Number SSN type, year and amount of the tax liability at the time the lien issued. The system assists revenue officers with collection inventory cases information.

8. How is the SBU/PII verified for accuracy, timeliness, and completeness?

The system uses a database audit utility. The administrators capture all activity in the database. The application tracks user profile information. This information can be cross referenced and re-validated by the application.

C. 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.

9. 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

If **yes**, enter the SORN number(s) and the complete the name of the SORN(s).

<u>SORNS Number</u>	<u>SORNS Name</u>
IRS 26.009	Lien Files
IRS 36.003	General Personnel and Payroll Records
IRS 34.037	Audit Trail and Security Records System
IRS 24.030	Customer Account Data Engine Individual Master File
IRS 24.046	Customer Account Data Engine Business Master File
IRS 26.019	Taxpayer Delinquent Accounts Files

*IRS is required to have a published Privacy Act system of records in the Federal Register. Please identify the Privacy Act SORN(s) that cover these records. If you need additional assistance identifying the correct SORNS please email *Privacy.*

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

- 11.a. If **yes**, does the system receive SBU/PII from IRS files and databases? Yes

If **yes**, enter the files and databases.

<u>System Name</u>	<u>Current PCLIA</u>	<u>Approval Date</u>	<u>SA&A?</u>	<u>Authorization Date</u>
Integrated Financial System - IFS	Yes	09/10/2017	Yes	05/06/2018
Standardized IDRS Access	Yes	08/03/2018	No	
Integrated Data Retrieval System - IDRS	Yes	08/03/2017	Yes	12/05/2017
Automated Collection System - ACS	Yes	12/15/2015	Yes	01/13/2018
Automated NonMaster File - ANMF	Yes	12/15/2015	Yes	07/15/2018
Business Masterfile - BMF	Yes	03/08/2018	Yes	02/27/2018
Automated Insolvency System - AIS	Yes	02/22/2017	Yes	08/16/2018
Collection Time Reporting System - CTRS	No		No	
Integrated Collection System - ICS	Yes	05/05/2016	Yes	09/29/2018

11.b. Does the system receive SBU/PII from other federal agency or agencies? No

11.c. Does the system receive SBU/PII from State or local agencies? Yes

If **yes**, for each state and local interface identify the organization that sends the SBU/PII, how the SBU/PII is transmitted and if there is an Inter-Agency Agreement (ISA) /Memorandum of Understanding (MOU).

Organization Name Transmission method ISA/MOU

Boston, MA	Electronic Lien Filing	Yes
State of Minnesota	Electronic Lien Filing	Yes
New York, NY	Electronic Lien Filing	Yes
Los Angeles, CA	Electronic Lien Filing	Yes
Hartford, CT	Electronic Lien Filing	Yes

11.d. Does the system receive SBU/PII from other sources? No

11.e. Does the system receive SBU/PII from **Taxpayer** forms? No

11.f. Does the system receive SBU/PII from **Employee** forms (such as the I-9)? No

F. DISSEMINATION OF PII

12. Does this system disseminate SBU/PII? Yes

12.a. Does this system disseminate SBU/PII to other IRS Systems? No

12.b. Does this system disseminate SBU/PII to other Federal agencies? Yes

If **yes** identify the full names of the federal agency(s) that receive SBU/PII from this system, and if there is an Inter-Agency Agreement (ISA) / Memorandum of Understanding (MOU)

<u>Organization Name</u>	<u>Transmission method</u>	<u>ISA/MOU</u>
Treasury Inspector General Office (TIGTA)	Mail	No
General Accounting Office (GAO)	Mail	No

Identify the authority. PII for federal tax administration is generally Internal Revenue Code Sections 6001, 6011, 6012e(a)

Identify the routine use in the applicable SORN (or Privacy Act exception). ALS-ENTITY provides data to GAO and TIGTA per their request for audit purposes.

For what purpose? ALS-ENTITY provides data to GAO and TIGTA per their request for audit purposes.

12.c. Does this system disseminate SBU/PII to State and local agencies? Yes
 If **yes**, identify the full names of the state and local agency(s) that receive SBU/PII from this system, and if there is an Inter-Agency Agreement (ISA) /Memorandum of Understanding (MOU).

<u>Organization Name</u>	<u>Transmission method</u>	<u>ISA/MOU</u>
New York, NY	Electronic Lien Filing	Yes
Los Angeles, CA	Electronic Lien Filing	Yes
State of Minnesota	Electronic Lien Filing	Yes
State of California	Electronic Lien Filing	Yes
Boston US District Court, MA	Workstation Desktop	Yes
Connecticut Secretary of State	Workstation Desktop	Yes

Identify the authority. Internal Revenue Code(IRC)6103(d)

Identify the routine use in the applicable SORN (or Privacy Act exception.) Provides for disclosure of returns and return information to any state agency, body or commission, or its legal representative charged under the laws of the state with the responsibility for administration of any state tax law. Sharing improves the efficiency of State and local agency tax administration and will generate revenue for the State and local agencies with limited expenditures of resources.

For what purpose? Provides for disclosure of returns and return information to any state agency, body or commission, or its legal representative charged under the laws of the state with the responsibility for administration of any state tax law. Sharing improves the efficiency of State and local agency tax administration and will generate revenue for the State and local agencies with limited expenditures of resources.

12.d. Does this system disseminate SBU/PII to IRS or Treasury contractors? No

12.e. 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, Radio Frequency Identification (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 (or is) notice provided to the individual prior to collection of information? Yes

17.a. 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?

At the time the federal tax lien is filed, Collection Due Process notices are sent providing the taxpayer with their appeal rights. When a return is selected for Collection, the taxpayer is sent Notice 3172, Privacy Act Notice, Publication 594 The Collection Due Process, and Publication 1660 Collection Appeal Rights.

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

18.a. If **yes**, describe the mechanism by which individuals indicate their consent choice(s): All individuals have the right to decline to provide information. However, they may be subject to Examination or Deficiency procedures, at which time they are provided applicable notices, such as Your Appeals Rights and How to Prepare a Protest.

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

At the time the federal tax lien is filed, Collection Due Process notices are sent providing the taxpayer with their appeal rights. When a return is selected for Collection, the taxpayer is sent Notice 3172, Privacy Act Notice, Publication 594 The Collection Due Process, and Publication 1660 Collection Appeal Rights.

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

<u>IRS Employees?</u>	<u>Yes/No</u>	<u>Access Level (Read Only/Read Write/Administrator)</u>
Users	Yes	Read and Write
Managers	Yes	Read and Write
Sys. Administrators	Yes	Administrator
Developers	Yes	Administrator

Contractor Employees? Yes

<u>Contractor Employees?</u>	<u>Yes/No</u>	<u>Access Level</u>	<u>Background Invest. Level</u>
Contractor Users	No		
Contractor Managers	No		
Contractor Sys. Admin.	No		
Contractor Developers	Yes	Administrator	Moderate

21.a. How is access to SBU/PII determined and by whom? Access to the data is determined by the manager based on a user's position and need-to-know. The manager will request a user be added. A user's access to the data terminates when it is no longer required. Criteria, procedures, controls, and responsibilities regarding access are documented in the Information Systems Security Rules. Contractors are active as developers and hold approval for staff-like access.

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

22.a. 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.

ALS data is approved for destruction one year after lien is paid in full (Job No. N1-58-97-13, item 32, and published under IRM 1.15.35, item 32...to transition soon to Document 12990, under Records Control Schedule 35). The ALS database initiated purge procedures in 2008. These current procedures eliminate all released liens over five (5) years old. The elimination of additional records would create delays and complications to taxpayer service. Frequently taxpayers and title companies contact IRS looking for copies of liens released in prior years in order to pave the way for real estate closings involving properties that are encumbered by Notices of Federal Tax Liens. Although the law does not require IRS to issue a release of a lien that has time expired and although IRS has the legal right to rely on wording in the notice that makes the notice of lien a "self-releasing" document, title companies in many places in the country insist on receipt of a separate release before agreeing to proceed with a real estate closing. Purging these records would result in significant problems. ALS-ENTITY: This system supports IRS Collection activities and other program related records maintained in accordance with RCS 28 for Collection.

I.2 SA&A OR ASCA

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

23.a. If **yes**, what date was it completed? 08/27/2018

23.1. Describe in detail the system's audit trail. The system uses a database audit utility and the administrators capture all activity in the database. The system captures user login, captures date of last access for profiled users, Court Screen on Research Programs: Name of initiator, User that input lien, User that approved electronic lien filing, Date approved Correct (Create, Re-file, Amend, etc.): Date of the action, User that completed the action, General nature of the change Release/Withdrawal: Date requested, Tsign - (Taxpayer Delinquent Account (TDA) & Taxpayer Delinquency Investigation (TDI) Assign Codes) and name of requestor, User inputting release request, Tsign and name of user approving release request, Login of person approving request Revocation: User inputting revocation, login of approver, Tsign of requestor, Date revoked Removal of Lien (log. Removal), login of user removing lien, Date of action, General lien information Systemic Histories are saved for these actions: Date/login of user inputting history, Date/login of user actions on billing support vouchers, Date/login of user marking periods satisfied, Date/login of user inputting recording information, Date/login of user revoking a lien release, Date/login of user withdrawing a lien This information is part of the lien data in the database and is kept as long as the lien record remains in the database. The application tracks the following critical information pertinent to user profiles. Each of these information items can be cross referenced and re-validated. Organizational assignment number associated with each logon account allowed access to the application. Historical information on organizational assignment numbers. Organizational privileges for each account (e.g. area manager, territory manager, group manager, etc.), Geographic access appropriate for each account, Related employee identification, Last date a profile was actively used, Historical information on adjustments made to an employee's inventory level.

J. PRIVACY TESTING

24. Does the system require a System Test Plan? Yes

24.a. If **yes**, If yes, was the test plan completed? Yes

24.a.1. If **yes**, where are test results stored (or documentation that validation has occurred confirming that requirements have been met)? The test results are stored on a SharePoint site.

24.a.2. If **yes**, were all the Privacy Requirements successfully tested? Yes

24.a.3. If **yes**, are there any residual system privacy, civil liberties, and/or security risks identified that need to be resolved? No

24.1. Describe what testing and validation activities which have been conducted or are in process to verify and validate that the applicable Privacy Requirements (listed in header) have been met? Testing and validation ensures that data checked and tested; verify and validate software by executing application programs using attachments, run and select each program to make sure they start up. Complete all testing steps and make sure that data is consistent with the level accessed. Check reports and data to ensure that it is formatted correctly. Check for duplicate records. Run queries to ensure the appropriate records are returned on the query response screen. Review reports and dates on documents to ascertain that timely data is loaded. Throughout the recovery process, record any processes that may not be functioning correctly and provide documentation to the testing coordinator for dissemination to the programmers.

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. 11/07/2016

25.b. 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:

26.a. IRS Employees: Under 50,000

26.b. Contractors: Under 5,000

26.c. Members of the Public: More than 1,000,000

26.d. 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 Recommendations of the 9/11 Commission 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

30. Does Computer matching occur? No

N. ACCOUNTING OF DISCLOSURES

31. 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? Yes

31.a. does the system have a process in place to account for such disclosures in compliance with IRC 6103 (p) (3) (A) or Subsection (c) of the Privacy Act? Contact Disclosure to determine if an accounting is required. Yes

End of Report
