Date of Approval: **October 30, 2019**

PIA ID Number: **4479**

SYSTEM DESCRIPTION

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

Automated Liens System-Entity, ALS-ENTITY

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 Lien System-Entity, ALS-Entity, PCLIA 3733, Milestone O&M

What is the approval date of the most recent PCLIA?

12/18/2018

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.

The Automated Lien System (ALS) and ENTITY are Legacy applications owned by Small Business/Self-Employed (SBSE). The applications are in operations and maintenance and do not report to governance.

Current ELC (Enterprise Life Cycle) Milestones:

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

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.

ALS-ENTITY is an IRS National Standards Application consisting of two parts; the ALS part of the application and the ENTITY Case Management part of the application. ALS-ENTITY is currently operational in the Enterprise Computing Center-Memphis (ECC-MEM) and Enterprise Computing Center - Martinsburg (ECC-MTB). ALS-ENTITY runs on the GSS-24 System. ALS maintains a database of all open and released liens on file in thousands of local recording offices. ALS uses information derived from the Delinquent Inventory/Accounting Listing (DIAL) data extract from the Master File. Batched lien requests are received from Integrated Collections System (ICS) and Automated Collections System (ACS) to generate and process Notices of Federal Tax Liens. Weekly Individual Master File (IMF) and Business Master File (BMF) extracts from Master File of satisfied modules, (e.g., full paid, expired statutes, or situations where the lien is no longer valid), are processed against the ALS database to generate Releases of Federal Tax Liens. The purpose of a Notice of Federal Tax Lien is to put the public on notice that a lien has been placed on a taxpayer's property. Once the information is released to the state and county filing jurisdictions, it is public information and is not of a confidential nature. Once released to the filing jurisdictions, it is no longer under the control of the IRS. Tax lien information on property owned by taxpayers with overdue tax balances is retained in the ALS database. This information includes the taxpayer's name, address, taxpayer identification number (TIN) either the employer identification number (EIN) or redacted social security number (SSN), and balance due federal tax liabilities. ALS produces over one million documents per year; half of which are Federal Tax Liens and releases. ALS also generates mandatory Taxpayer Due Process notices as required by federal law. 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 Systems (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. Information, fed to ENTITY by ICS and the DIAL, includes open, closed and queue case information, assignment history, activities and time charges. Included in the database is information on cases such as statutes and overage indicators. The application is used by management for the prioritization, selection and assignment of collection QUEUE cases to revenue officers. Sophisticated reports allow for planning and adjustment of work priorities to meet organizational goals and benchmarks. Users design and run queries and reports to help meet work objectives. On a monthly basis Management Information System (MIS) information is compiled. From this compiled data, reports are generated on the group, territory, area and national level and time and inventory data is supplied to Collection Time Reporting System (CTRS).

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:

Legal/statutory basis (e.g. where collection is expressly required by statute)

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)

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. However, SSNs in this system are used in accordance with IRC 6103 for tax administration purposes.

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. However, SSNs in this system are used in accordance with IRC 6103 for tax administration purposes.

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

Standard Employee Identifier (SEID)

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

Are there other types of SBU/PII used in the system?

No

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.

Taxpayer ALS: 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 of the lien issuance ENTITY: Collection inventory is assigned to revenue officers via ENTITY. All open, closed, queue Collection field inventory information is located in ENTITY. Taxpayer name, Address, Taxpayer Identifying Number (TIN), Delinquency modules, Time and activity data Employee ALS: The following information appears on the notice of lien: Tsign number(this is for internal identification and has been in place for many years) Badge Number (this is required under Restructuring and Reform Act 98 §3705 for identification to the taxpayer), Name (or authorized pseudonym), Work Phone Number, Job Title ENTITY: Employee Name, Revenue Officer Identification Number (ROID), Standard Employee ID (SEID), Badge Number, Access Level, RO time and activity data and Job Title 7 Position (if available).

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

ALS uses the Oracle database audit utility and the Oracle administrators capture all activity in the database. The ENTITY application tracks the following critical information pertinent to user profiles. Each of these information items can be cross referenced and re-validated by ICS application. Organizational assignment number associated with each UNIX 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 SEID identification.

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 26.009   Lien Files

    IRS 36.003   General Personnel and Payroll Records

    IRS 34.037   Audit Trail and Security Records

    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 Account Files

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: Integrated Financial Systems-IFS

    Current PCLIA: Yes

    Approval Date: 9/10/2017

    SA&A: Yes

    ATO/IATO Date: 5/6/2018

System Name: Automated Collection System-ACS

Current PCLIA: Yes

Approval Date: 12/15/2015

SA&A: Yes

ATO/IATO Date: 1/13/2018

System Name: Automated Non Master File-ANMF

Current PCLIA: Yes

Approval Date: 4/17/2015

SA&A: Yes

ATO/IATO Date: 7/15/2018

System Name: Business Masterfile-BMF

Current PCLIA: Yes

Approval Date: 3/8/2018

SA&A: Yes

ATO/IATO Date: 2/27/2018

System Name: Standardized IDRS Access

Current PCLIA: Yes

Approval Date: 8/3/2018

SA&A: No

System Name: Integrated Data Retrieval System-IDRS

Current PCLIA: Yes

Approval Date: 8/3/2017

SA&A: Yes

ATO/IATO Date: 12/5/2017

System Name: Automated Insolvency System-AIS

Current PCLIA: Yes

Approval Date: 2/22/2017

SA&A: Yes

ATO/IATO Date: 8/16/2018

System Name: Collection Time Reporting System-CTRS

Current PCLIA: No

SA&A: No

System Name: Integrated Collection System-ICS

Current PCLIA: Yes

Approval Date: 5/5/2016

SA&A: Yes

ATO/IATO Date: 9/29/2016

System Name: Notice Delivery System

Current PCLIA: Yes

Approval Date: 10/2/2018

SA&A: Yes

ATO/IATO Date: 4/4/2019

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)?

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: Boston, MA

Transmission Method: Electronic Lien Filing

ISA/MOU: Yes

Organization Name: New York, NY

Transmission Method: Electronic Lien Filing

ISA/MOU: Yes

Organization Name: Hartford, CT

Transmission Method: Electronic Lien Filing

ISA/MOU: Yes

Organization Name: State of Minnesota

Transmission Method: Electronic Lien Filing

ISA/MOU: Yes

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?

No

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

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).

Organization Name: General Accounting Office (GAO)

Transmission Method: Mail

ISA/MOU: No

Organization Name: Treasury Inspector General Office (TIGTA)

Transmission Method: Mail

ISA/MOU: No

Identify the authority

> PII for tax administration is generally Internal Revenue Code Sections 6001, 6011 and 6012(e).

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?

> To identify those individuals on whom a Notice of Federal Tax Lien, Start Printed Page 54086 discharge, or subordination on lien attachment has been filed.

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

> 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).

> Organization Name: New York, NY

> Transmission Method: Electronic Lien Filing

> ISA/MOU: Yes

> Organization Name: State of Minnesota

> Transmission Method: Electronic Lien Filing

> ISA/MOU: Yes

> Organization Name: State of California

> Transmission Method: Electronic Lien Filing

> ISA/MOU: Yes

Organization Name: Connecticut Secretary of State

Transmission Method: Electronic Lien Filing

ISA/MOU: Yes

Organization Name: Boston, MA Courts

Transmission Method: Electronic Lien Filing

ISA/MOU: Yes

Identify the authority

IRC 6103(d) 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

Identify the Routine Use in the applicable SORN (or Privacy Act exception)

To identify those individuals on whom a Notice of Federal Tax Lien, Start Printed Page 54086discharge, or subordination on lien attachment has been filed.

For what purpose?

See above

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?

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?

At the time the federal tax lien is filed, Collection Due Process notices are sent providing the taxpayer with their appeal rights. Also, when a balance due notice is first sent to a taxpayer, the taxpayer is sent Notice 3172, Privacy Act Notice, Publication 594 The Collection Due Process, and Publication 1660 Collection Appeal Rights

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):

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.

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. Also, when a balance due notice is first sent to a taxpayer, the taxpayer is sent Notice 3172, Privacy Act Notice, Publication 594 The Collection Due Process, and Publication 1660 Collection Appeal Rights.

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 Write

Managers: Read Write

System Administrators: Administrator

Developers: Administrator

IRS Contractor Employees

Contractor Developers: Administrator

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. They must access the On-Line 5081 (OL5081) application and complete OL5081, Information System User Registration/Change Request, to request access to the application. Contractors are active as developers and hold approval for staff-like access.

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.

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 32â€to transition soon to Document 12990, under Records Control Schedule 35). The ALS database initiated purge procedures in 2008. These 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. This system supports IRS Collection activities and other program related records maintained in accordance with RCS 28 for Collection.

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?

10/20/2015

Describe the system's audit trail.

ALS uses the Oracle database audit utility and the Oracle administrators capture all activity in the database. The ENTITY application tracks the following critical information pertinent to user profiles. Each of these information items can be cross referenced and re-validated by the Integrated Collection System (ICS) application.

Organizational assignment number associated with each UNIX 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 SEID identification, Last date a profile was actively used, Historical information on adjustments made to an employee's inventory level. Entity keeps the following audit information : The ENTITY log contains the date, time, unique employee identification number and functions accessed.

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)?

Once the transmittal document is submitted, reviewed and placed into production, the confirmation email indicating that the code has been successfully placed, is saved on the Share Point site set up for the application.

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?

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 the 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 data on documents to ascertain that timely data is loaded.

Throughout the recovery process, record and processes that may not be functioning properly and provide documentation to the testing coordinator for dissemination to the programmers.

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.

11/7/2016

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: Under 50,000

Contractors: Under 5,000

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?

Yes

Does your matching meet the Privacy Act definition of a matching program?

Yes

Can the business owner certify that it meets requirements of IRM 11.3.39, Disclosure of Official Information, Computer Matching & Privacy Protection Act?

Yes

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