

NOTE: The following reflects the information entered in the PIAMS Website.

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## A. SYSTEM DESCRIPTION

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Authority: Office of Management Budget (OMB) Memorandum (M) 03-22, OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002 & PVR #10- Privacy Accountability and #21-Privacy Risk Management

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Date of Approval: 09/10/2013 PIA ID Number: 586

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1. What type of system is this? Legacy

1a. Is this a Federal Information Security Management Act (FISMA) reportable system? Yes

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2. Full System Name, Acronym, and Release/Milestone (if appropriate):

CFO ARDI Management System, CAMS

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2a. Has the name of the system changed? No

If yes, please state the previous system name, acronym, and release/milestone (if appropriate):

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3. Identify how many individuals the system contains information on

Number of Employees: Under 50,000

Number of Contractors: Under 5,000

Members of the Public: Not Applicable

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4. Responsible Parties:

N/A

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5. General Business Purpose of System

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CAMS provides the data necessary to run the Business Performance Management System (BPMS) application and houses the data and scripts which quickly summarize up-to-date, pre-aggregated output for data analysis through various macros. Additionally, the "Over \$10 Million Dollar" data files are downloaded through file sharing into CAMS which are used to perform monthly updates to the summary level Unpaid Assessment (UA) data. The annual Government Accounting Office (GAO) sample and all supporting data files are placed on CAMS to perform the IRS Financial Audit

6. Has a PIA for this system, application, or database been submitted previously to the Office of Privacy Compliance? (If you do not know, please contact \*Privacy and request a search) Yes

6a. If Yes, please indicate the date the latest PIA was approved: 10/22/2010

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6b. If Yes, please indicate which of the following changes occurred to require this update.

- System Change (1 or more of the 9 examples listed in OMB 03-22 applies) (refer to PIA Training Reference Guide for the list of system changes) No
  - System is undergoing Security Assessment and Authorization Yes
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6c. State any changes that have occurred to the system since the last PIA

The system is going through eCM-R.

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7. If this system has an Exhibit 53 or Exhibit 300 please provide the Unique Project Identifier (UPI) number (XXX-XX-XX-XX-XX-XXXX-XX). Otherwise, enter the word 'none' or 'NA'. NA

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## B. DATA CATEGORIZATION

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Authority: OMB M 03-22 & PVR #23- PII Management

8. Does this system collect, display, store, maintain or disseminate Personally Identifiable Information (PII)? Yes

8a. If No, what types of information does the system collect, display, store, maintain or disseminate?

9. Indicate the category that best describes the source that provides or originates the PII collected, displayed, stored, maintained or disseminated by this system. Most common categories follow:

Taxpayers/Public/Tax Systems Yes  
 Employees/Personnel/HR Systems No

Other Source: \_\_\_\_\_

Other No

10. Indicate all of the types of PII collected, displayed, stored, maintained or disseminated by this system. Then state if the PII collected is on the Public and/or Employees. Most common fields follow:

TYPE OF PII	Collected?	On Public?	On IRS Employees or Contractors?
Name	Yes	Yes	No
Social Security Number (SSN)	Yes	Yes	No
Tax Payer ID Number (TIN)	Yes	Yes	No
Address	No	No	No
Date of Birth	No	No	No

Additional Types of PII: No

PII Name On Public? On Employee?

No No

10a. Briefly describe the PII available in the system referred to in question 10 above.

The PII data is in the form of Summary Level Data extracted from the Masterfile via pulling sample with distinct strata.

If you answered Yes to Social Security Number (SSN) in question 10, answer 10b, 10c, and 10d.

10b. Cite the authority that allows this system to contain SSN's? (e.g. specific regulations, statutes, etc.)

The Custodial Financial Statement Audit.

10c. What alternative solution to the use of the SSN has/or will be applied to this system? (e.g. masking, truncation, alternative identifier)

TINS.

10d. Describe the planned mitigation strategy and forecasted implementation date to mitigate or eliminate the use of Social Security Numbers on this system?

None as yet.

11. Describe in detail the system's audit trail. State what data elements and fields are collected. Include employee log-in information. If the system does not have audit capabilities, explain why an audit trail is not needed.

There are no Audit trails produced at this time. However, the ESAT has taken responsibility and ownership of the CAMS Audit Plan's implementation.

11a. Does the audit trail contain the audit trail elements as required in current IRM 10.8.3 Audit Logging Security Standards? No

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12. What are the sources of the PII in the system? Please indicate specific sources:

a. IRS files and databases: Yes

If Yes, the system(s) are listed below:

No System Records found.

b. Other federal agency or agencies: No

If Yes, please list the agency (or agencies) below:

c. State and local agency or agencies: No

If Yes, please list the agency (or agencies) below:

d. Third party sources: No

If yes, the third party sources that were used are:

e. Taxpayers (such as the 1040): Yes

f. Employees (such as the I-9): No

g. Other: No If Yes, specify:

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### C. PURPOSE OF COLLECTION

Authorities: OMB M 03-22 & Internal Revenue Manual (IRM) 10.8.8, IT Security, Live Data Protection Policy & PVR #16, Acceptable Use

13. What is the business need for the collection of PII in this system? Be specific.

The information is collected to use in the Audit of the IRS Custodial Financial Statement.

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### D. PII USAGE

Authority: OMB M 03-22 & PVR #16, Acceptable Use

14. What is the specific use(s) of the PII?

To conduct Tax Administration	<u>No</u>
To provide Taxpayer Services	<u>No</u>
To collect Demographic Data	<u>No</u>
For employee purposes	<u>No</u>

Other: Yes

If other, what is the use?

The sample drawn that includes PII data is used to ensure the GAO that the IRS has control over it's Tax system.

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**E. INFORMATION DISSEMINATION**

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Authority: OMB M 03-22 & PVR #14- Privacy Notice and #19- Authorizations

15. Will the information be shared outside the IRS? (for purposes such as computer matching, statistical purposes, etc.) Yes

15a. If yes, with whom will the information be shared? The specific parties are listed below:

	Yes/No	Who?	ISA OR MOU**?
Other federal agency (-ies)	Yes	The GAO	Yes
State and local agency (-ies)	No		
Third party sources	No		
Other:	No		

\*\* Inter-agency agreement (ISA) or Memorandum of Understanding (MOU)

16. Does this system host a website for purposes of interacting with the public? No

17. Does the website use any means to track visitors' activity on the Internet?

If yes, please indicate means:

	YES/NO	AUTHORITY
Persistent Cookies	_____	_____
Web Beacons	_____	_____
Session Cookies	_____	_____
Other:	_____	_____

*If other, specify:*

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**F. INDIVIDUAL CONSENT**

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Authority: OMB M 03-22 & PVR #15- Consent and #18- Individual Rights

18. Do individuals have the opportunity to decline to provide information or to consent to particular uses of the information? Yes

18a. If Yes, how is their permission granted?

19. Does the system ensure "due process" by allowing affected parties to respond to any negative determination, prior to final action? Not Applicable

19a. If Yes, how does the system ensure "due process"?

20. Did any of the PII provided to this system originate from any IRS issued forms? No

20a. If Yes, please provide the corresponding form(s) number and name of the form.

No forms found.

20b. If No, how was consent granted?

Written consent

Website Opt In or Out option

Published System of Records Notice in the Federal Register

Other: This is a part of an InterAgency Agreement with the IRS and the GAO.

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Yes

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**G. INFORMATION PROTECTIONS**

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Authority: OMB M 03-22 & PVR #9- Privacy as Part of the Development Life Cycle, #11- Privacy Assurance, #12- Privacy Education and Training, #17- PII Data Quality, #20- Safeguards and #22- Security Measures

21. Identify the owner and operator of the system: IRS Owned and Operated

21a. If Contractor operated, has the business unit provided appropriate notification to execute the annual security review of the contractors, when required?



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27. Has a risk assessment (e.g., SA&A) been conducted on the system to ensure that appropriate security controls have been identified and implemented to protect against known risks to the confidentiality, integrity and availability of the PII? Yes

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28. Describe the monitoring/evaluating activities undertaken on a regular basis to ensure that controls continue to work properly in safeguarding the PII.

The system undergoes Enterprise Continuous Monitoring every year.

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29. Is testing performed, in accordance with Internal Revenue Manual (IRM) 10.8.8 - *IT Security, Live Data Protection Policy*? Not Applicable

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29a. Has approval been received from the Office of Privacy Compliance to use Live Data in testing (*if appropriate*)?

29b. If you have received permission from the Office of Privacy Compliance to use Live Data, when was the approval granted?

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#### H. PRIVACY ACT & SYSTEM OF RECORDS

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Under the statute, any employee who knowingly and willfully maintains a system of records without meeting the Privacy Act notice requirements is guilty of a misdemeanor and may be fined up to \$5000.

*Authority: OMB M 03-22 & Privacy Act, 5 U.S.C. 552a (e) (4) & PVR #13-Transparency*

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30. Are 10 or more records containing PII maintained/stored/transmitted through this system? No

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31. Are records on the system retrieved by any identifier for an individual? (Examples of identifiers include but are not limited to Name, SSN, Photograph, IP Address) Yes

31a. If YES, the System of Records Notice(s) (SORN) published in the Federal Register adequately describes the records as required by the Privacy Act? Enter the SORN number and the complete name of the SORN.

**SORNS Number**

**SORNS Name**

22.060	Automated Non-Master File (ANMF)
22.061	Individual Return Master File (IRMF)
24.030	CADE Individual Master File (IMF), (Formerly: Indi
24.046	CADE Business Master File (BMF) (Formerly: Busin
26.016	Returns Compliance Programs (RCP)
26.019	Taxpayer Delinquent Accounts (TDA) Files
26.020	Taxpayer Delinquency Investigation (TDI) Files
34.037	IRS Audit Trail and Security Records System
00.009	Treasury Financial Management System (formerly Tre

**Comments**

**I. ANALYSIS**

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*Authority: OMB M 03-22 & PVR #21- Privacy Risk Management*

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**32. What choices were made or actions taken regarding this IT system or collection of information as a result of preparing the PIA?**

Resulted in the removal of PII from the system (e.g., SSN use reduced/eliminated)	<u>No</u>
Provided viable alternatives to the use of PII within the system	<u>No</u>
New privacy measures have been considered/implemented	<u>No</u>
Other:	<u>No</u>

**32a. If Yes to any of the above, please describe:**

NA

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