

Date of Approval: 12/31/2025
Questionnaire Number: 2707

Basic Information/Executive Summary

What is the name of your project (system, database, pilot, product, survey, social media site, etc.)?

Contract Clause Review Tool

Acronym:

CCRT

Business Unit

Office of Chief Procurement Officer

Preparer

For Official Use Only

Subject Matter Expert

For Official Use Only

Program Manager

For Official Use Only

Designated Executive Representative

For Official Use Only

Executive Sponsor

For Official Use Only

Executive Summary: Provide a clear and concise description of your project and how it will allow the IRS to achieve its mission.

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, CCRT 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 CCRT in 2017 (formerly known as the Automated Contract Review Tool) enhancements have been made to collect / aggregate / summarize data regarding regulatory and policy compliance / noncompliance for specific unique, boilerplate contract clauses. As part of ongoing work on the contract, we expect to expand the rules engine capability with AI, though in a way that does not send data beyond the system's security boundary.

Personally Identifiable Information (PII)

Will this project use, collect, receive, display, store, maintain, or disseminate any type of Sensitive but Unclassified (SBU), Personally Identifiable Information (PII), or Federal Tax Information (FTI)?

Yes

Please explain in detail how this project uses sensitive data from inception to destruction (data lifecycle).

Users upload procurement sensitive solicitation and contract documents which are analyzed by the system to identify applicable clause language. Uploaded procurement documents are transitory records. Clause Tool is not system of record for contract files and in accordance with privacy principles uploaded documents are not saved or stored in the system.

Please select all types of Sensitive but Unclassified data (SBU)/Personally Identifiable Information (PII)/Federal Tax Information (FTI) that this project uses.

Address

Agency Sensitive Information

Email Address

Non-Tax Proprietary data

Procurement Sensitive Data

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

PII for personnel administration - 5 USC

Product Information (Questions)

1 Is this a new system?

No

1.1 Is there an approved Privacy and Civil Liberties Impact Assessment (PCLIA) for this system?

Yes

1.11 Has the name changed since the prior PCLIA?

Yes

1.12 What is the System Name on the most recent approved PCLIA?

Automated Contract Review Tool

1.13 What is the Acronym on the most recent approved PCLIA?

ACRT

1.2 What changes occurred to require this updated PCLIA?

Older PCLIA (PIA ID Number: 7449, approved 12/12/2022) is expiring

2 What is the name of the contractor?

Abeyon LLC

3 Please provide a contact person for the contractor.

XXXXX

4 Please provide the phone number for the contractor.

XXXXX

5 What is the email address for the contractor?

XXXXX

6 What is the address for the contractor?

XXXXX

7 What is the location of the contractor?

XXXXX

8 What is the contract number?

2032H825C00022

9 What is the length of the contract?

Base year and one option year (two years)

10 What is the contract start date?

09/29/2025

11 What is the contract end date?

09/28/2027

12 What is the Contracting Officer (CO) name?

XXXXX

13 What is the CO's email address?

XXXXX

14 What is the CO's phone number?

XXXXX

15 Who is the Contracting Officer's Representative (COR)?

XXXXX

16 What is the COR's email address?

XXXXX

17 What is the COR's phone number?

XXXXX

18 What is the IRS business unit procuring the contract?

Research, Applied Analytics, and Statistics (RAAS)

19 What is the business owner contact name?

XXXXX

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

Access is currently provisioned with a username and password. Integration with Business Entitlement Access Request System (BEARS) identity and access management system is in progress. Users can upload procurement documents with SBU/PII. However, since documents are rapidly analyzed automatically and not saved - access to system does not reveal any sensitive data. There is no way to use this system to view SBU/PII other than that which the user uploaded themselves within that session. Users must have a valid federal government email address to get access to the system at all.

21 Are any authorized employees approved for telework?

Yes

21.1 Is there an approved telework agreement/policy?

Yes

22 Describe the work to be performed, how PII will be used, collected, received, displayed, stored, maintained, or disseminated.

The application analyzes contract documents to ensure exactly the applicable contract clauses are used. These documents may contain PII, such as the names of the contractor or contracting officer. The PII is received (as part of the user's upload of the contract document) and may be used to determine which clauses are applicable. PII is not collected, displayed, stored, maintained, or disseminated.

23 Provide a clear, concise reason why the contractor will use the PII, the benefit to IRS, and how the information will be used.

PII is analyzed by the Clause Tool and used to make inferences about the applicability of certain required contract clauses. For example, email addresses indicate which Treasury Bureau has funded a contract enabling inference about the need for IRS or other bureau-specific policies to be inserted in a contract. Also, PII is used to infer the location of contract work such as performance inside the United States or overseas (note: IRS employees may use Clause Tool to generate clauses for an international contract such as a personal services contract pursuant to the Foreign Assistance Act).

24 Please indicate the location where the work will be performed, and how the data will be processed, stored, and secured.

Work on this contract and data will be processed in the United States on FedRAMP sovereign cloud infrastructure.

25 Is any data accessed, processed and/or stored outside the United States or US Territories?

No

26 Describe the procedures for agency oversight on contractor, access, storage, and destruction of PII, disclosure awareness training and incident reporting.

Contractor has system security and incident management plans.

28 Are you receiving only the data that is needed to accomplish the task?

Yes

29 From what sources are you obtaining data (other than the IRS) to fulfill this contract?

System receives federal regulations from General Services Administration Acquisition.gov application programming interface (SAP). Agency employees upload solicitation and contract documents to the system from their laptops.

30 Do you have subcontractors who work on the contract?

Yes

30.1 What is the subcontractor's name(s)?

Fercent LLC

30.2 Who is the subcontractor point(s) of contact?

XXXXXX

30.3 What is the subcontractor email address(es)?

XXXX

30.4 What is the subcontractor phone number?

XXXXXX

30.5 What are the services provided by the subcontractor(s)?

Running and maintaining the Clause Tool cloud application.

30.6 What PII/SBU data is shared with the subcontractor?

All PII/SBU uploaded by users into the Clause Tool because subcontractor is running the system.

30.7 Are you sending only the data that is needed to accomplish the task?

Yes

31 Does this system use Artificial Intelligence (AI)?

Yes

32 Does the system use cloud computing?

Yes

32.1 Please identify the Cloud Service Provider (CSP).

Amazon Web Services

32.2 Is the CSP FedRAMP Authorized?

Yes

32.3 Privacy laws (including access and ownership) can differ in other countries. Does the data physically reside in systems located in the United States and its territories and is all access and support of this system performed from within the United States and its territories?

Yes

33 Who owns and operates the system (IRS Owned and Contractor Operated, Contractor Owned and Operated)?

Contractor Owned and Operated

34 Identify the roles and their access level to the PII data. Indicate whether background investigations are complete or not.

Agency employees upload solicitation and contract documents with name, email, phone, and address information for employees and vendors. Uploaded documents are briefly analyzed by the system but are not permanently stored. Other employees and the contractor cannot access PII from uploaded documents. Some contractor background investigations are complete and investigations for new contractors employees are in progress.

35 Describe the system's audit trail in detail.

Audit logging data on user login is collected. This data includes internet addresses, usernames, and date stamps from user logins. Amazon GuardDuty is used to monitor audit logs and alert the agency of potential security incidents.

36 Does this system use, or plan to use SBU Data in a non-production environment?

No

Interfaces

Interface Type

IRS Systems, file, or database

Agency Name

Microsoft Office

Incoming/Outgoing

Incoming (Receiving)

Transfer Method

Application to Application (A2A)

Systems of Records Notices (SORNs)

SORN Number & Name

Treasury .009 - Treasury Financial Management Systems

Describe the IRS use and relevance of this SORN.

Falls under the general allowance in 5 USC 522a(b)(1), as reviewing contract information is part of the regular duties of contracting officers

Records Retention

What is the Record Schedule System?

Non-Record

Data Locations

What type of site is this?

System

What is the name of the System?

DocScout

What is the sensitivity of the System?

Personally Identifiable Information (PII) including Linkable Data

What is the URL of the item, if applicable?

<https://fercent.com/gov/>

Please provide a brief description of the System.

DocScout, a tool for verifying contract clauses.

What are the incoming connections to this System?

A user uploads contract documents into the system through the web interface.

What are the outgoing connections from this System?

A user can view an analysis of contract clauses for only the contract they just entered.