

Date of Approval: **September 23, 2021**

PIA ID Number: **6150**

## **SYSTEM DESCRIPTION**

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

CDW Knowledge Graph Environment, CKGE

*Is this a new system?*

Yes

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

Research, Applied Analytics & Statistics (RAAS) internal management & RAAS Directors

*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?*

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.*

CDW Knowledge Graph Environment (CKGE) is a system that provides compliance support capabilities for approved users about connections (relationships) between entities drawn from tax administration data in the Compliance Data Warehouse (CDW). The compliance case and applied tax science related capabilities are primarily for filing and post-filing administration operations and support an ability to more efficiently and effectively identify relevant connections related to the business objectives of the users. The business requires a cost-efficient manner in which to connect information that is already latent in the underlying tabular data sources. Given the high value in fully understanding relevant relationships, the CKGE can speed up the ability of users to research relationships and identify observations that provide quicker decision-making for subsequent actions, and higher confidence that relevant relationships for their business objectives are identified. Such actions improve overall cost-effectiveness towards filing and post-filing tax administration and applied science. CKGE has essential benefit for users from Small Business/Self Employed (SBSE), RAAS, Large Business & International (LB&I), Wage & Investment (W&I), and Criminal Investigation (CI).

## 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

Statistical and other research purposes

Law enforcement and intelligence purposes

*Explain why the authorized use(s) above support the new or continued use of SSNs (or tax identification numbers).*

The IRS collects tax returns of individuals (AKA taxpayers). As such, the identification of taxpayers is done with the user of SSNs.

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

There is no alternative to the use of the SSN. The SSN is the significant part of the data being processed. There is no planned mitigation strategy to mitigate or eliminate the use of the SSN on the system.

Employer 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  
Phone Numbers  
Date of Birth  
Internet Protocol Address (IP Address)  
Criminal History  
Passport Number  
Financial Account Numbers  
Employment Information  
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:*

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.

*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.*

Examination of tax entities relationships is the primary goal of users of this application. Because taxpayer data within compliance activities naturally has Social Security Numbers (SSNs), Employer Identification Numbers (EINs), Individual Taxpayer Identification Number (ITINs), etc. as the means of identifying and relating entities, it is necessary for the application to uses these tax identification numbers. Also, these tax identification numbers are used as primary keys to relate back to the Compliance Data Warehouse (CDW) from where this information is used for recall and analysis.

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

CKGE does not verify extracts of tax data received for accuracy, timeliness, and completeness beyond ensuring the data mirrors information found within its sources-e.g., Compliance Data Warehouse (CDW) databases-and primarily transforms this data into a graph-related representation of the data. Data is left as-is otherwise to ensure conformity to CDW data. Given that CKGE is not a system of record, users will ensure data represents data found in systems of record as part of their workflows.

## **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 42.021 Compliance Programs and Projects 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: Compliance Data Warehouse (CDW)

Current PCLIA: Yes

Approval Date: 9/16/2020

SA&A: Yes

ATO/IATO Date: 4/15/2021

*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)?*

No

*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?*

No

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

No

*Does this system disseminate SBU/PII to IRS or Treasury contractors?*

Yes

*Identify the contractor source(s) that receive SBU/PII from this system, and if there is an Inter-Agency Agreement (ISA) /Memorandum of Understanding (MOU).*

Organization Name: Any contractor passing valid checks

Transmission Method: Application Access

ISA/MOU: No

*Identify the authority.*

IRS contractors working on projects requiring access to CKGE are granted access if all of the following conditions are met: a. A completed background investigation b. Submission of Moderate Risk Background Investigation (MBI) report c. Request from contractor's manager justifying reason(s) for access d. Completion of online 5081 request e. Statement indicating specific term and id of contract under which access is requested.

*For what purpose?*

Job requirements are deemed of relevant business purpose by their management.

*Did the contract include the appropriate 6103(n) clauses for tax return and return information, and Federal Acquisition Regulations privacy clauses?*

Yes

*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?*

The information is not collected directly from individuals. The information collected as part of the application is the information obtained from various IRS databases and files, which in turn are tax forms filed by tax entities. Notice, consent, and due process are provided in the tax forms instructions, and pursuant to 5 USC.

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

No

*Why not?*

The legal right for tax information is Internal Revenue Code sections 6001, 6011, and 6012(a), and their regulations. The information is provided voluntarily by entities

(individuals and businesses) as part of their tax returns' reporting and filing requirement. Notice, consent, and due process are provided in the tax forms instructions, and pursuant to 5 USC.

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

The information is not collected directly from individuals. The information collected as part of the application is the information obtained from various IRS databases and files, which in turn are tax form filed by tax entities. Those data sources (and related forms) provide Privacy Act Notice, consent, and due process to individuals. Due process is provided pursuant to 5 USC.

## **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 Only

Managers: Read Only

System Administrators: Administrator

Developers: Read Write

*IRS Contractor Employees*

Contractor Users: Read Only

Contractor Managers: Read Only

Contractor System Administrators: Read Write

Contractor Developers: Read Write

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

CKGE is not accessible by the public. Request for access is made only via the Online (OL) 5081 system. This request has to be approved by the potential user's manager based on a user's position and need-to-know. If approved, the request is then forwarded to the



administrators of the system for second approval and creation of a new user id and password. Managers of employees with OL5081 approved access are provided access to a CKGE Manager Audit Module (CMAM), and which allows managers ability--through self-service--review the use activities of the employees whenever desired. CMAM is implemented as part of UNAX mitigation to help review activities by employees are appropriate to their business needs.

## **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.*

CKGE data is approved for destruction 16 years after processing year or when no longer needed for operational purposes, whichever is later (Job No. N1-58-09-86, approved 4/22/10). These disposition instructions will be included in IRS Document 12990 under Records Control Schedule 27 for Compliance Research, item 53 when next updated/published. Records are retained for this long to capture any recycling of tax evasion strategies for flow through-based tax schemes. Periodically, untoward actors will recycle schemes and we have found that keeping past evidence assists in new investigations/audits. Often, the same individuals are involved.

## **SA&A OR ASCA**

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

No

*Is the system secured in accordance with all applicable federal, treasury, and IRS security policy, procedures, and requirements?*

Yes

*Describe the system's audit trail.*

The system logs capture all activities done through on the system from an access control layer and individual components, where each sends logs to an ELK (Elastic Search, Logstash, Kibana) service within CKGE for retaining and access by approved staff for monitoring. Besides retrieval capability of all user activities, a specific module is available to

managers of OL5081 approved employees, which is the CKGE Manager Audit Module (CMAM). CMAM provides managers with self-service and as-needed access of activities by their employees to ensure appropriate use of CKGE based on their business need.

## **PRIVACY TESTING**

*Does the system require a System Test Plan?*

No

*Please explain why:*

Internal Revenue Manual (IRM) applies to Information Technology (IT) organizations only.

## **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: Not Applicable

Contractors: Not Applicable

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?*

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