

Date of Approval: **July 14, 2021**

PIA ID Number: **6229**

SYSTEM DESCRIPTION

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

Income Verification Express Service Automaton, COVID IVES RPA

Is this a new system?

Yes

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

Internal Management Domain Governance Board

Current ELC (Enterprise Life Cycle) Milestones:

Detailed Design/Milestone 4A

System Development/Milestone 4B

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.

The IVES automations will be used to automate 3 main business processes within IVES: 1) automate the pre-processing and intake of data from the requests which are sent by IVES-registered participants. The automation will access pdf requests, which are stored on a shared network drive currently used by the business; The pdf requests include information such as participant Identification (ID), name, address, fax number. The requests also include information about the taxpayers (individuals and/or businesses) for whom a transcript is requested (name, address, spouse's name, Tax Identification Number (TIN)). 2) automate the validation of data on each request, which includes access to the Integrated Automation Technologies (IAT) Verification Tool (iTV). The tool researches data from the Information Data Retrieval System (IDRS); and 3) automate the entry to validated request data into the Transcript Delivery System (TDS). The objectives of these automation include: decreased

time it takes to process the requests, ability to handle increased number of requests without increased backlog, reallocate freed up resources to other processes, and meet potential legislative mandates.

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:

When there is no reasonable alternative means for meeting business requirements

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

The IVES process enables easy access to income transcripts. SSNs and other PII are present on the actual IVES requests that are being submitted on behalf of taxpayers by the registered IVES Participant.

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

The Office of Management and Budget Circular A-130 requires that federal agencies develop a mitigation or elimination strategy for systems that use SSNs, which the Service continues to develop strategies to meet. An exception to that requirement is when the SSN is uniquely needed to identify a user's record. This system requires the use of SSN's because no other identifier can be used to uniquely identify a taxpayer at this time. SSNs are permissible from Internal Revenue Code (IRC) 6109, which requires individual taxpayers to include their SSNs on their income tax returns.

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
E-mail Address
Date of Birth
Protection Personal Identification Numbers (IP PIN)
Tax Account Information

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.

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.

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

Yes

Describe the other types of SBU/PII that are applicable to this system.

Participant ID Fax Number SOR Mailbox (Secure Object Repository) Spouse Name

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

PII about individuals for Bank Secrecy Act compliance 31 USC

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.

The Robotic Process Automation (RPA) requires the SBU/PII fields in order to validate both the IVES participant and the taxpayer associated with the income verification request. Both IVES Participants & taxpayers. Absence of the SBU/ PII would remove the secure layers of authorization the bot requires to compare the PII data fields against what rests in the IDRS database. SSNs provide a strong additional layer of validation that is not easily derived when compared to more publicly known fields such as address or date of birth.

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

SBU/PII is checked by the RPA using business rules to validate information warehoused in the Information Data Retrieval System (IDRS) to validate the taxpayer information. Once validated the transcript is provided Transcript Delivery System (TDS) back to the participant's registered mailbox. If info is inaccurate or incomplete the IVES Coordinator/Processor sends a rejection notice to the IVES Participant and taxpayer with the rejection reason(s).

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 00.001 Correspondence Files and Correspondence Control Files

IRS 24.030 Customer Account Data Engine Individual Master File

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: EEFAQ
Current PCLIA: Yes
Approval Date: 3/21/2019
SA&A: Yes
ATO/IATO Date: 3/11/2021

System Name: Transcript Delivery Service
Current PCLIA: Yes
Approval Date: 8/7/2019
SA&A: Yes
ATO/IATO Date: 1/7/2021

System Name: IDRS
Current PCLIA: Yes
Approval Date: 10/1/2018
SA&A: Yes
ATO/IATO Date: 1/27/2021

System Name: SOR Mailbox
Current PCLIA: Yes
Approval Date: 5/31/2019
SA&A: No

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?

Yes

Identify the full name and acronym of the IRS system(s) that receive SBU/PII from this system.

System Name: Transcript Delivery Service (TDS)
Current PCLIA: Yes
Approval Date: 8/7/2019
SA&A: Yes
ATO/IATO Date: 1/7/2021

System Name: Secure Object Repository (SOR) Mailbox
Current PCLIA: Yes
Approval Date: 5/31/2019
SA&A: No

System Name: Integrated Data Retrieval System (IDRS)
Current PCLIA: Yes
Approval Date: 10/1/2018
SA&A: Yes
ATO/IATO Date: 1/27/2021

Identify the authority.

Internal Revenue Code 6109

For what purpose?

TDS (Transcript Delivery Service) for compiling validated IVES request and the SOR Mailbox for email delivery of transcript request.

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?

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.?

Yes

Briefly explain how the system uses the referenced technology.

The initial phase of the automation will utilize Optical Character Recognition (OCR) performed against the IVES Participant/IVES taxpayer. Running the OCR automation will be selected Enterprise Field Operations (EFO) employees' workstations. The automations will prompt the employee specialists to enter their SEID. The OCR bot will confirm that the relevant fields are populated. Once validated the OCR robot will push the OCR validated PII for further validation against the Integrated Data Retrieval System (IDRS) via the RPA automation engines. The RPA bot will also run on selected EFO workstations and the automation will also prompt employees to enter their SEID for validation. The RPA bot will prompt the Integration Automated Tool (IAT) to confirm whether the IVES participant and Taxpayer data within the form entries is valid against the data warehoused within IDRS. Once validated the RPA bots will forward the information to the approved requester. Output report data (encompassing log entries, success, errors etc.) will be produced in an Excel spreadsheet at all phases of the automations. The report will indicate which of the workstations in the report have been physically received, and the bot will process those entries accordingly. A report containing the robot operators Standard Employee Identifier (SEID) and received machine names will be saved to the operator's workstation/laptop.

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?

Individuals are notified via the IRS privacy policy statements. Notice, consent, and due process are provided via the IRS systems and their related tax forms instructions and pursuant to Title 5 USC.

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):

IVES Participants and taxpayers voluntarily request information, publications, refund status, or other information, an appropriate application-specific privacy statement is posted. Each statement informs the visitor of the information being requested; why it is being requested; how it will be used and maintained; and the impact if the information requested is not provided. Each page of IRS.gov provides a link to the IRS Web Privacy Policy as well as links to taxpayers' rights under the Privacy Act and other privacy protection statutes. Departure Notices are available for all viewers when leaving an IRS site.

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

Notice, consent, and due process are provided via the IRS systems and their related tax forms instructions and pursuant to Title 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 Write

Managers: Read Only

Developers: Read Write

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

IVES employees access SBU/PII only when reviewing the validity of an IVES transcript request. Access to SBU/PII and subsequent audit logs is restricted to only appropriate individuals to prevent unauthorized deletion transcript requests or change of audit events. Access to PII information for the entire IVES Process is based on least privilege and role that the user has on the project.

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.

In accordance with Document 12829, GRS 3.2 Item 31 IVES Requests. Destroy 65 business days after request is closed. IVES Acknowledgements, Destroy 65 business days after request is closed. a.Retaining paper documents, microfilm, or magnetic tape is acceptable, if verified. b.Keep records in "closed date, IVES batch number" order. c.Multiple processing dates can be combined into batches as long as they are labeled and easily researchable. d.Maintain a list of retired files, including volumes and processing dates, for every box of records. e.Label boxes of records with the volumes and processing dates.

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.

Once deployed the automated system will capture auditable events via the batch log file which records information throughout system processing. This is consistent with the current state IVES process.

PRIVACY TESTING

Does the system require a System Test Plan?

Yes

Is the test plan completed?

No

When is the test plan scheduled for completion?

8/31/2021

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?

The IVES Automation will assist the IVES analysts in validating and processing income verification requests on behalf of mortgage lenders (IVES Participants) and the relevant taxpayers. The IVES system test criteria will be conducted through 3 phases of automation. The first phase will test the optical character recognition (OCR) capabilities of the automation to extract from the Form 4506-C. The 2nd and 3rd phases of the automation will address the robotic process automation to streamline the validation of the participants/taxpayers and subsequent transcript validation and delivery of the requested IVES forms.

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: Under 50,000

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