

Date of Approval: 12/12/2025
Questionnaire Number: 2591

Basic Information/Executive Summary

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

Data Management International - Microfilm Publishing

Business Unit

Taxpayer Services

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 Archive Writer system is owned and operated by the contractor, Data Management Internationale, Inc. (DMI). Only IRS-cleared, DMI employees can operate the system or have access to the secured areas (storage, archive writing, or film development). DMI's use of the Archive Writer system benefits the IRS by converting digital Individual Master File and Business Master File (federal tax information) records onto microfilm, thereby creating a film medium that has a shelf life of over a century. Diazo microfilm copies are sent to, and stored at, three IRS Service Center Campuses. The Silver Master Microfilm cartridges/reels are sent to and stored with the National Archives and Records Administration (NARA) at the Federal Records Center. The goal for this contract is for the film to be converted and stored at the National Archives.

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).

Digital Data of expiring Tax Records are sent via a secured method from IRS to DMI. DMI converts digital data to microfilm. Microfilm is processed and Diazo copies are sent to the service centers. After 12 months the silver masters are sent to the NARA at the Federal Records Center.

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

Document Locator Number (DLN)

Federal Tax Information (FTI)

Individual Taxpayer Identification Number (ITIN)

Name

Preparer Taxpayer Identification Number (PTIN)

Social Security Number (including masked or last four digits)

Tax ID Number

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

PII for federal tax administration - generally IRC Sections 6001 6011 or 6012

SSN for tax returns and return information - IRC section 6109

Product Information (Questions)

1 Is this a new system?

Yes

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

No

1.11 Has the name changed since the prior PCLIA?

No

2 What is the name of the contractor?

Data Management Internationale, Inc. (DMI)

3 Please provide a contact person for the contractor.

XXXX

4 Please provide the phone number for the contractor.

XXXXXX

5 What is the email address for the contractor?

XXXXXX

6 What is the address for the contractor?

XXX

7 What is the location of the contractor?

Delaware

8 What is the contract number?

1491-S

9 What is the length of the contract?

Base year plus 4 option years.

10 What is the contract start date?

October 1, 2022

11 What is the contract end date?

September 30, 2026

12 What is the Contracting Officer (CO) name?

XXXX

13 What is the CO's email address?

XXX

14 What is the CO's phone number?

XXX

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

XXXX

16 What is the COR's email address?

XXXXXXX

17 What is the COR's phone number?

XXX

18 What is the IRS business unit procuring the contract?
Taxpayer Services - Media & Publication - Publishing

19 What is the business owner contact name?
XXXXXX

20 How is access to the SBU/PII determined and by whom?
Determined by IRS, Background Investigation Tier 2 mid-level investigation to be cleared to work with IRS SBU/PII data at the contractor's facility.

21 Are any authorized employees approved for telework?
No

22 Describe the work to be performed, how PII will be used, collected, received, displayed, stored, maintained, or disseminated.
Electronic data is transmitted via secured file transfer protocol from the IRS to the authorized contractor. Download the data via Secure File Transfer Protocol (sFTP) client on to two encrypted Solid State Drives (SSDs). One drive is taken to contractor secured fire safe and the second drive is taken into a secured room and the data is moved onto an encrypted work drive to convert data to archival media format. The converted data is then moved to four encrypted hard drives (one for each archive writer) and the images are written out to film. The film is then processed in contractor secured lab. Once processed, it goes through Quality Control and is then duplicated to DIAZO film. The silver masters get labeled and boxed and stored in contractor secured vault for one year and DIAZO copies get sent to service centers.

23 Provide a clear, concise reason why the contractor will use the PII, the benefit to IRS, and how the information will be used.
The contractor takes the PII and converts expiring data from digital onto microfilm. The microfilm is for long-term storage, both at local IRS campuses and with the National Archive and Records Administration (NARA) at the Federal Records Center. The contractor is transferring from one media type to another, so that it can be removed from IRS systems but still be available for long-term access and use by IRS employees who need access to the data.

24 Please indicate the location where the work will be performed, and how the data will be processed, stored, and secured.
Archive Writer room, film processing room and cold storage room. All three require an access badge. Only IRS approved contractor employees have access to these areas.

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.

If approved for travel, Subject Matter Expert will be onsite to oversee packaging and shipping of waste material to be sent an IRS facility for physical destruction (i.e. Burning). Contractor employees go through annual training for disclosure awareness.

27 If applicable, what is the IRS PCLIA Number for the system that is providing the information associated with this contract?

0

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

Yes

30 Do you have subcontractors who work on the contract?

No

31 Does this system use Artificial Intelligence (AI)?

No

32 Does the system use cloud computing?

No

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.

IT - Tier 2: Download and format data. Point of Contact (POC) - Tier 2: Oversees the entire project, handles all clearances and communicates with COR. Film Writer - Tier 2: Take data and write out to film. Film Processors - Tier 2: Process, QC, duplicate, package and ship all film. All roles have complete background investigations.

35 Describe the system's audit trail in detail.

Employees complete an IRS Background Clearance, Badge access into building, badge access into secure rooms. Strategically placed cameras that include focus on IRS approved secure rooms. Audit logs and camera recordings are reviewed monthly by the POC.

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

IMFOL - Individual Master File Online

Incoming/Outgoing

Outgoing (Sending)

Transfer Method

Axway

Interface Type

IRS or Treasury Contractor

Agency Name

Data Management Internationale (DMI)

Incoming/Outgoing

Incoming (Receiving)

Transfer Method

Axway

Interface Type

IRS Systems, file, or database

Agency Name

BMFOL - Business Master File Online

Incoming/Outgoing

Outgoing (Sending)

Transfer Method

Axway

Systems of Records Notices (SORNs)

SORN Number & Name

IRS 22.032 - Individual Microfilm Retention Register

Describe the IRS use and relevance of this SORN.

To archive individual tax account information after a certain period of inactivity on the master file in order not to overburden the computer system required for active accounts.

Records Retention

What is the Record Schedule System?

Record Control Schedule (RCS)

What is the retention series title?

Enterprise Computing Center Detroit

What is the GRS/RCS Item Number?

No. N1-58-93-3, Item 41

What type of Records is this for?

Both (Paper and Electronic)

Please provide a brief description of the chosen GRS or RCS item.

Contains all entity and tax modules archived from the master file

What is the disposition schedule?

Retire to the Records Center after 2 years. Destroy 75 years after the end of the processing year. Final disposition date is 2083.

What is the Record Schedule System?

General Record Schedule (GRS)

What is the retention series title?

IMF Retention Register

What is the GRS/RCS Item Number?

Job No. NN-170-16, Item 104

What type of Records is this for?

Both (Paper and Electronic)

Please provide a brief description of the chosen GRS or RCS item.

Contains all entity and tax modules removed from the master file.

What is the disposition schedule?

Destroy 30 years after end of processing year.

What is the Record Schedule System?

General Record Schedule (GRS)

What is the retention series title?

BMF Retention Register - Record copy

What is the GRS/RCS Item Number?

Job No. NC1-58-82-9, Item 210

What type of Records is this for?

Both (Paper and Electronic)

Please provide a brief description of the chosen GRS or RCS item.

Contains all entity and tax modules removed from the master file.

What is the disposition schedule?

Destroy 75 years after end of processing year.

What is the Record Schedule System?

General Record Schedule (GRS)

What is the retention series title?

Systems and data security records.

What is the GRS/RCS Item Number?

DAA-GRS- 2013-0006- 0001

What type of Records is this for?

Both (Paper and Electronic)

Please provide a brief description of the chosen GRS or RCS item.

These are records related to maintaining the security of information technology (IT) systems and data. Records outline official procedures for securing and maintaining IT infrastructure and relate to the specific systems for which they were written. This series also includes analysis of security policies, processes, and guidelines, as well as system risk management and vulnerability analyses.

What is the disposition schedule?

Destroy 1 year(s) after system is superseded by a new iteration or when no longer needed for agency/IT administrative purposes to ensure a continuity of security controls throughout the life of the system.

What is the Record Schedule System?

General Record Schedule (GRS)

What is the retention series title?

System backups and tape library records - Incremental backup files

What is the GRS/RCS Item Number?

DAA-GRS- 2013-0006- 0005

What type of Records is this for?

Both (Paper and Electronic)

Please provide a brief description of the chosen GRS or RCS item.

Backup files maintained for potential system restoration in the event of a system failure or other unintentional loss of data.

What is the disposition schedule?

Destroy when superseded by a full backup, or when no longer needed for system restoration, whichever is later.

What is the Record Schedule System?

General Record Schedule (GRS)

What is the retention series title?

IMF Retention Register - Record copy

What is the GRS/RCS Item Number?

Job No. N1-58-93-3, Item 45)

What type of Records is this for?

Both (Paper and Electronic)

Please provide a brief description of the chosen GRS or RCS item.
Containing all entity and tax modules archived from the master file.

What is the disposition schedule?

Retire to the Records Center after 2 years. Destroy 30 years after the end of the processing year. Final disposition date is 2038.

What is the Record Schedule System?

General Record Schedule (GRS)

What is the retention series title?

IMF Retention Register - Copies required for research

What is the GRS/RCS Item Number?

Job No. NC1-58-80-6, Item 203

What type of Records is this for?

Both (Paper and Electronic)

Please provide a brief description of the chosen GRS or RCS item.

Contains all entity and tax modules removed from the master file.

What is the disposition schedule?

Destroy 2 years after end of processing year, or when no longer needed in current operations.

What is the Record Schedule System?

Record Control Schedule (RCS)

What is the retention series title?

Taxpayer Services - 29

What is the GRS/RCS Item Number?

210 (2)

What type of Records is this for?

Both (Paper and Electronic)

Please provide a brief description of the chosen GRS or RCS item.

Copies required for research.

What is the disposition schedule?

Destroy 3 years after end of processing year, or when no longer needed in current operations.

What is the Record Schedule System?

General Record Schedule (GRS)

What is the retention series title?

System access records.

What is the GRS/RCS Item Number?

DAA-GRS- 2013-0006- 0003

What type of Records is this for?

Both (Paper and Electronic)

Please provide a brief description of the chosen GRS or RCS item.
These records are created as part of the user identification and authorization process to gain access to systems. Records are used to monitor inappropriate systems access by users.

What is the disposition schedule?
Destroy when business use ceases.

What is the Record Schedule System?
General Record Schedule (GRS)

What is the retention series title?
System access records.

What is the GRS/RCS Item Number?
DAA-GRS- 2013-0006- 0004

What type of Records is this for?
Both (Paper and Electronic)

Please provide a brief description of the chosen GRS or RCS item.
These records are created as part of the user identification and authorization process to gain access to systems. Records are used to monitor inappropriate systems access by users

What is the disposition schedule?
Destroy 6 years after password is altered or user account is terminated, but longer retention is authorized if required for business use.

What is the Record Schedule System?
General Record Schedule (GRS)

What is the retention series title?
System backups and tape library records - Full backup files

What is the GRS/RCS Item Number?
DAA-GRS- 2013-0006- 0006

What type of Records is this for?
Both (Paper and Electronic)

Please provide a brief description of the chosen GRS or RCS item.
Backup files maintained for potential system restoration in the event of a system failure or other unintentional loss of data.

What is the disposition schedule?
Destroy when second subsequent backup is verified as successful or when no longer needed for system restoration, whichever is later.

Data Locations

What type of site is this?
System

What is the name of the System?

Data Management Internationale

What is the sensitivity of the System?

Federal Tax Information (FTI)

Please provide a brief description of the System.

Computer used to receive digital data from IRS to be converted to microfilm.

What are the incoming connections to this System?

Connected via internet to Axway and retrieves data from IRS system.