

Date of Approval: **January 07, 2022**

PIA ID Number: **6670**

SYSTEM DESCRIPTION

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

First Time Home Buyers Credit Lookup Tool, FTHBC

Is this a new system?

No

Is there a PCLIA for this system?

Yes

What is the full name, acronym, and milestone of the most recent PCLIA?

First Time Home Buyers Credit Lookup Tool, FTHBC PCLIA #3879

What is the approval date of the most recent PCLIA?

3/11/2019

Changes that occurred to require this update:

Expiring PCLIA

Were there other system changes not listed above?

No

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

SBSE Governance Board

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?

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 First Time Home Buyers Credit (FTHBC) system is a web-based application under the Integrated Customer Communications Environment boundary. The FTHBC application is designed to provide taxpayers with the information related to their claiming of the FTHBC. Taxpayers who took this credit will be able to view their data related to this credit including any amounts to be paid back when applicable. Taxpayers will be able to go to irs.gov and retrieve their tax credit information for homes purchased in 2008, 2009, 2010 and 2011.

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:

Delivery of governmental benefits, privileges, and services

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

This application only displays the last 4 digits of the SSN (first 5 digits are masked). The application cannot mitigate the use of the SSN until an alternate identifier has been adopted by the IRS to identify taxpayers. FTHBC requires the use of SSN's because no other identifier can be used to uniquely identify a taxpayer. SSNs are permissible from Internal Revenue Code (IRC) 6109, which requires individual taxpayers to include their SSNs on their income tax returns.

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

The application cannot mitigate the use of the SSN until an alternate identifier has been adopted by the IRS to identify taxpayers. 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. FTHBC requires the use of SSN's because no other identifier can be used to uniquely identify a taxpayer at this time.

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:

Mailing address
Date of Birth
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:

Agency Sensitive Information Information which if improperly used or disclosed could adversely affect the ability of the agency to accomplish its mission.

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?

Yes

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

The account information screen will display annual repayment amount, total amount paid, and the total balance left to be paid.

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.

The SSN, mailing address, DOB is collected from the taxpayer to assist in the authentication, prior to providing them with FTHBC information.

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

The validation process will verify the accuracy and completeness of the information in accordance with the business rules. It just uses what the taxpayer enters to retrieve their tax credit status information, and to authenticate against what is stored on IRS legacy databases.

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 34.037 Audit Trail and Security Records

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: Standard CFOL Overnight Processing (SCOP)

Current PCLIA: Yes

Approval Date: 9/11/2019

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?

Yes

Please identify the form number and name:

Form Number: 1040

Form Name: U.S. Individual Income Tax Return

Does the system receive SBU/PII from Employee forms (e.g., the I-9)?

No

DISSEMINATION OF PII

Does this system disseminate SBU/PII?

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?

Yes

Was an electronic risk assessment (e-RA) conducted on the system/application?

Yes

When was the e-RA completed?

12/15/2010

What was the approved level of authentication?

Level 2: Some confidence in the asserted identity's validity
Confidence based on Single Factor Identity Validation

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 irs.gov has several methods of informing the taxpayer about these issues. The irs.gov website has a Privacy Policy statement which states "Using these services is voluntary and may require that you provide additional personal information to us. Providing the requested information implies your consent for us to use this data in order to respond to your specific request." Prior to using the FTHBC application, FTHBC has the required notice that this is a US Government system for authorized use only. The application requires that the taxpayer acknowledge that Internal Revenue Code Section 6109 authorizes the collection of the SSN in order to provide the service requested by the taxpayer. The application also informs the taxpayer of use of the System of Records 24.030 CADE Individual Master File.

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):

The taxpayer's use of the web application is voluntary. Authentication using Shared Secrets is required to have confidence in the identity of the web application user.

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

The FTHBC system does not make adverse determinations but instead supplies the taxpayer with their requested information as a service to the taxpayer. The system is designed to inform the taxpayer of the amount of credit that the taxpayer received.

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

System Administrators: Read Write

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

Access to the data by taxpayers is determined by the taxpayer entering valid shared secrets for the purpose of authentication. Once they enter shared secrets and their data matches up with the CFOL information to ensure that the information is correct, they are eligible to use the system. IRS System Administrators are provided access to the servers thru the Business Entitlement Access Request System (BEARS) system. This requires the supervisor to authorize the access to the server or servers.

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.

FTHBC is non-recordkeeping and does not require a NARA-approved records control schedule to affect data disposition. FTHBC is a web-based lookup application used for convenience of reference by taxpayers. It is not a data repository system. Recordkeeping copies of data accessed by this tool are disposed of in accordance with IRS Records Control Schedules. The FTHBC interface retains logs of all access of taxpayer records and passes this data and audit information to the Security Audit and Analysis System (SAAS) application where it will be maintained for seven years (in accordance with NARA Job No. N1-58-10-22, approved 4/5/2011). SAAS disposition instructions are published in IRS Document 12990, Records Control Schedule 19 for Enterprise Computing Center - Martinsburg, item 88.

SA&A OR ASCA

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

Yes

What date was it completed?

1/6/2017

Describe the system's audit trail.

The audit trail being sent to Security Audit and Analysis System (SAAS) identifies the FTHBC application, the tax filer type, the SSN, and the date time stamp. The Auditable events are authenticating (successful or unsuccessful) and whether the taxpayer has too many invalid attempts at authentication and is locked out.

PRIVACY TESTING

Does the system require a System Test Plan?

Yes

Is the test plan completed?

Yes

Where are the test results stored (or documentation that validation has occurred confirming that requirements have been met)?

The results are stored in DocIT (web-based electronic document management system).

Were all the Privacy Requirements successfully tested?

Yes

Are there any residual system privacy, civil liberties, and/or security risks identified that need to be resolved?

No

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?

Only the PII that is needed to authenticate is requested from the taxpayer. The validation process will verify the accuracy and completeness of the information in accordance with the business rules. Authentication is tested thoroughly to ensure security and confidentiality. An audit trail ensures that all users activities are being monitored. The results of the test cases are documented and analyzed for defects.

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: 100,000 to 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