

Date of Approval: **August 12, 2022**

PIA ID Number: **7212**

## **SYSTEM DESCRIPTION**

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

Integrated Automation Technologies, IAT

*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?*

Integrated Automation Technologies, IAT.4072

*What is the approval date of the most recent PCLIA?*

10/11/2019

*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.*

Enterprise Computing Center Change Control Board, ECC CCB

*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.*

IAT tools are a collection of approximately 90 desktop applications and macros that interact with tax systems (primarily IDRS) through the INFOConnect Workspace terminal software to provide end users with a graphical user interface and automate actions related to their assigned work. These tools access taxpayer data through the terminal software, process the data, display the data, make decisions, and input actions on taxpayer accounts. All of these actions are based upon the users' profile and access level on the systems being accessed and tools cannot perform any actions that beyond those that a user could complete manually. Several tools maintain data on the employee's workstation in encrypted folders for the purpose of completing actions on numerous taxpayer accounts (batch runs) or providing automated means of completing forms, which the employee can print for use in their daily case processing duties. IAT also maintains a set of servers comprising a system, which provide web applications that are utilized to manage and distribute these tools to users based upon their work areas, communicate with customers, track usage of the client-side tools, and provide internal support to employees within IAT. These servers, applications and their databases do not process or store taxpayer data and only maintain minimal employee data used for the purposes stated.

## 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

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

This application primarily interacts with the Integrated Data Retrieval System (IDRS). Until such a time that IDRS chooses to use an alternative method, other than SSNs, to access taxpayer data, IAT will be required to use SSNs.

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

IAT tools require the use of taxpayer identification numbers, including SSNs, because no other identifier can be used to uniquely identify a taxpayer and the underlying systems require taxpayer identification numbers for account access. 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

Other Taxpayer 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  
Place of Birth  
Standard Employee Identifier (SEID)  
Internet Protocol Address (IP Address)  
Financial Account Numbers  
Tax Account Information  
Centralized Authorization File (CAF)

*Does this system use, collect, receive, display, store, maintain, or disseminate SBU information that is not PII?*

No

*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

PII for personnel administration is 5 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.*

IAT tools are desktop software used to research and manage taxpayer accounts on tax systems (e.g., IDRS); the display, processing, storage, and hardcopy prints are required for the employees utilizing the tools to complete their job duties. The taxpayer information, including Taxpayer Identification Numbers (including SSNs), is utilized in a manner that is the same as if the employee were completing the actions manually on the tax systems themselves. No taxpayer data is stored on servers; however, small amounts of employee PII - such as SEIDs, IAT employee names and emails - are stored for reference, statistical, and operational purposes tied to the management, maintenance, and deployment of IAT tools. IAT servers also use standard logging and auditing which may include employee PII.

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

The data that IAT tools receive is from internal IRS systems which are deemed reliable, and the data is validated for accuracy by the system sending the data as described in that system's PCLIA. Data input by users is validated to meet programmatic requirements by both IAT tools and by the system to which it is being transmitted to. Any determinations made by the tools, or the user follow standard work processing guidelines and IRMs and all taxpayer appeal rights for the determinations are applicable.

## **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 24.030 Customer Account Data Engine Individual Master File

IRS 24.046 Customer Account Data Engine Business Master File

IRS 36.003 General Personnel and Payroll 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: Integrated Data Retrieval System (IDRS)

Current PCLIA: Yes

Approval Date: 10/26/2021

SA&A: Yes

ATO/IATO Date: 10/14/2021

System Name: Corporate Authoritative Directory Service (CADS)  
Current PCLIA: Yes  
Approval Date: 9/18/2020  
SA&A: Yes  
ATO/IATO Date: 1/3/2020

System Name: Withholding Compliance System (WHCS)  
Current PCLIA: Yes  
Approval Date: 4/8/2021  
SA&A: Yes  
ATO/IATO Date: 8/21/2021

System Name: Examination Returns Control System (ERCS)  
Current PCLIA: Yes  
Approval Date: 1/22/2020  
SA&A: Yes  
ATO/IATO Date: 12/16/2021

*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?*

Yes

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

System Name: Integrated Data Retrieval System (IDRS)  
Current PCLIA: Yes  
Approval Date: 10/26/2021  
SA&A: Yes  
ATO/IATO Date: 10/14/2021

System Name: Withholding Compliance System (WHCS)  
Current PCLIA: Yes  
Approval Date: 4/8/2021  
SA&A: Yes  
ATO/IATO Date: 8/21/2021

System Name: Examination Returns Control System (ERCS)  
Current PCLIA: Yes  
Approval Date: 1/22/2020  
SA&A: Yes  
ATO/IATO Date: 12/16/2021

*Identify the authority.*

IAT tools automate business processes and perform input to systems just as a user would. The authority to make said inputs lies with the business unit and employees utilizing the systems and the Internal Revenue Manuals which govern the processing of their work.

*For what purpose?*

Automation of manual work processes.

*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.?*

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?*

Any information collected through the processing of incoming taxpayer calls, inventory, etc. is not retained by our desktop applications beyond the lifetime of that application instance and is passed into the system which a user would have previously input the data manually. The information that is retained by a limited number of tools (such as that in the user's encrypted SBU folder) is data that has come from other IRS systems, usually through existing reports, not the taxpayer directly. Information collected by web applications/system from employees is covered by the site privacy statement. Statistical records regarding tool usage are collected under the Privacy Act, Section 3(a)(6) and there is no mechanism for consent. Individual-level records are used within IAT for monitoring appropriate usage during development lifecycle. Organizational-level records (down to team level only) are available to IRS employees for statistical reporting purposes of tool usage within their organization or the service.

*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):*

Any information collected through the processing of incoming taxpayer calls, inventory, etc. is not retained by our desktop applications beyond the lifetime of that application instance and is passed into the system which a user would have previously input the data manually. The information that is retained by a limited number of tools (such as that in the user's encrypted SBU folder) is data that has come from other IRS systems, usually through existing reports, not the taxpayer directly. Information provided by employees in web applications on the system is voluntary.

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

IAT tools obtain data from other Internal Revenue Service systems and do not own any of the data and any corrections or due process is handled by the systems that maintain and own the data. For employee data, users provide data voluntarily, with the exception of general statistics, which can be viewed, and corrections requested from the IAT organization if necessary.

## **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 Write

System Administrators: Administrator

Developers: Read Only

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

Access is granted via the Business Entitlement Access Request System (BEARS), providing membership to a permissions group. Level of access is determined by user role (employee, manager, admins) and is reviewed by internal approvers before being granted.

## **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.*

GRS 5.2 Item 020 & GRS 3.2 Item 030 & 031.

## **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.*

Standard Enterprise-compliant auditing is performed at the operating system, database management system, and web server levels. These standards are defined and managed by Information Technologies and handled at the general support system (GSS) level; with elements such as, but not limited to, Internet Protocol address, username, and requested query being logged.

## **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)?*

Test results are stored with the Enterprise Life Cycle (ELC) documentation package on SharePoint.

*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?*

Testing for each piece of client-side software (tools) is conducted per Enterprise Life Cycle (ELC) detailed with the W&I Tools Development & Maintenance Guidance. Each server application is also tested through the ELC process and privacy concerns are identified and addressed during the design and development phases. All attempts are made to minimize the data collected during the design phase. Each application is tested during development, pre-production, and final integrated testing to ensure that security controls are in place operating appropriately. Privacy Awareness and Training is completed each year by employees through their mandatory briefings.

## **SBU DATA USE**

*Does this system use, or plan to use SBU Data in Testing?*

Yes

*Was permission granted per the requirements of Form 14664, SBU Data Use Questionnaire or Form 14665, SBU Data Use Request?*

No

*Explain why not:*

Tools that process taxpayer data are client-side, falling under (General Support System) GSS-32, and the systems are accessed via client-side terminal emulation software. IAT does not have its own SBU Data Use agreement, since employees are maintained under the Security and Communications System, Final Integration Testing (SACS-FIT) SBU Data Use agreement and Integrated Data Retrieval System (IDRS) SBU Data Use agreement and certify compliance with the organization responsible for maintaining those agreements.

## NUMBER AND CATEGORY OF PII RECORDS

*Identify the number of individual records in the system for each category:*

IRS Employees: More than 100,000

Contractors: Not Applicable

Members of the Public: Not Applicable

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