

Date of Approval: 06/09/2025  
Questionnaire Number: 2142

## Basic Information/Executive Summary

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

IRS Customer Relationship Management - eCITE - Salesforce

Acronym:

IRSCRM

Business Unit

Chief Counsel

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 electronic Counsel Inventory Tracking Environment (eCITE) is a Counsel Inventory application system designed to support the Office of Chief Counsel in efficiently managing and tracking all business processes related to litigation and advisory services for the IRS. The system serves as a centralized platform to facilitate matter management, document tracking, workflow automation, reporting capabilities and document generation to ensure seamless coordination across legal proceedings. eCITE is deployed on the Customer Relationship Management (CRM) Platform, which is a managed Software-as-a-Service (SaaS) environment hosted in Amazon Web Services (AWS) GovCloud. The CRM Platform consists of Salesforce (application layer) and MuleSoft (integration layer) components. CRM Products are managed and configured by Platform tenants according to their business use cases. The CRM Platform provides reusable infrastructure and

foundational services for products, including single-sign-on enablement, audit and event logging, and pipeline management.

## 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).

Social Security Numbers (SSNs) are stored in IRSCRM and will be used to look-up taxpayer and case information (as identified in the IRS/Treasury System of Records Notices' (SORNs') routine uses); this allows for seamless integration with other IRS systems. The IRSCRM system requires the use of SSN's because no other identifier can be used to uniquely identify a taxpayer at this time. The use of SSNs is permissible from Internal Revenue Code (IRC) 6109. The system contains or will contain records that are covered under the General Records Schedule (GRS, IRS Document 12829), or has a National Archives and Records (NARA) archivist approved a Records Control Schedule (RCS, IRS Document 12990). The following information reflects the different records and the approved dispositions (retention and destruction of official agency records) for the records to be stored in this system. We will partner with business units and the Office of Record and Information Management to implement appropriate disposition authorities as new case uses and the different records are covered.

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

Employer Identification Number

Other

Social Security Number (including masked or last four digits)

Please explain the other type(s) of PII that this project uses.

Other Taxpayer Identification Numbers (differently formatted versions of Social Security Numbers (SSNs), Taxpayer Identification Numbers (TINs) and Electronic Transmitter Identification Numbers (ETINs)

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

PII about individuals for Bank Secrecy Act compliance - 31 USC

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 PCLIA a result of a specific initiative or a process improvement?

Yes

1.1 What is the name of the Business Unit (BU) or Agency initiative?

Chief Council, Office of Chief Council (OCC)

2 What type of project is this (system, project, application, database, pilot/proof of concept/prototype, power platform/visualization tool)?

System

3 What Tier designation has been applied to your system? (Number)

2

4 Is this a new system?

No

4.1 Is there a previous Privacy and Civil Liberties Impact Assessment (PCLIA) for this project?

No

4.2 You have indicated this is not a new system; explain what has or will change and why. (Expiring PCLIA, changes to the PII or use of the PII, etc.)

System Management Change: the addition of new integration with a new data source hosted by Tax Courts (PACER). It is a consume-only, one-way data request, populating records within the system.

5 Is this system considered a child system/application to another (parent) system?

Yes

5.1 Identify the parent system's approved PCLIA number.

8512

5.2 Identify the parent system's name as previously approved.

IRS Customer Relationship Management, IRSCRM

6 Indicate what OneSDLC State is the system in (Allocation, Readiness, Execution) or indicate if you go through Information Technology's (IT) Technical Insertion Process and what stage you have progressed to.

Execution

7 Is this a change resulting from the OneSDLC process?

No

8 Please provide the full name and acronym of the governance board or Executive Steering Committee (ESC) this system reports to.

Chief Counsel Governance board, IT Governance Boards, Enterprise Services Governance Board, and Infrastructure Executive Steering Committee.

9 If the system is on the As-Built-Architecture (ABA), what is the ABA ID number of the system? If this PCLIA covers multiple applications shown on the ABA, please indicate the ABA ID number(s) for each application covered separated by a comma. If the system is not in the ABA, then contact the ABA (<https://ea.web.irs.gov/aba/index.html>) for assistance.

211578

10 If this system discloses any PII to any third party outside the IRS, does the system have a process in place to account for such disclosures in compliance with IRC 6103(p)(3)(A) or Subsection c of the Privacy Act?

Yes

11 Does your project/system involve any use of artificial intelligence (AI), including virtual assistant, chat bot, and robotic process automation, as defined in Executive Order 13960 and 14110?

No

12 Does this system use cloud computing?

Yes

12.1 Please identify the Cloud Service Provider (CSP), FedRAMP Package ID, and date of FedRAMP authorization.

Salesforce FedRAMP ID: FR2003061248 MuleSoft ID: FR1818161169

12.2 Does the CSP allow auditing?

Yes

12.21 Who has access to the CSP audit data (IRS or 3rd party)?

IRS

12.3 Please indicate the background check level required for the CSP (None, Low, Moderate or High).

Moderate (High for Salesforce.)

13 Does this system/application interact with the public?

No

14 Describe the business process allowing an individual to access or correct their information. (Due Process)

eCITE is not a public-facing Cloud Application and is used strictly within the OCC by IRS staff and the appropriate contractors. The IRS's existing public-facing channels to service individual access & correction requests are effected by teams outside of the OCC.

15 Is this system owned and/or operated by a contractor?

Salesforce, as the Cloud Services Provider “owns” the platform, however the configuration, customizations & data remains the IRS’s as it is a SaaS cloud application.

15.1 If a contractor owns or operates the system, does the contractor use subcontractors; or do you require multiple contractors to operate, test, and/or maintain this system?

No

16 Identify what role(s) the IRS and/or the contractor(s) performs; indicate what access level (to this system's PII data) each role is entitled to. (Include details about completion status and level of access of the contractor's background investigation was approved for.)

IRS Employees:

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Users: Read and Write

Managers: Read and Write

Sys. Administrators: Administrator

Developers: Administrator

Contractor Employees:

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Contractor Users: Read and Write, Background Invest. Level: Moderate

Contractor Managers: Read-Only, Background Invest. Level: Moderate

Contractor Sys. Admin.: Administrator, Background Invest. Level: Moderate

Contractor Developers: Administrator, Background Invest. Level: Moderate

17 The Privacy Act of 1974 (5 USC § 552a(e)(3)) requires each agency that maintains a system of records, to inform each individual requested to supply information about himself or herself. Please provide the Privacy Act Statement presented by your system or indicate a Privacy Act Statement is not used and individuals are not given the opportunity to consent to the collection of their PII.

The IRS notifies all individuals who file tax returns of such collection via the Privacy Act Notice which provides the legal right to ask for information under Internal Revenue Code sections 6001, 6011, and 6012(a), and their regulations. Under these sections, response is mandatory. Code section 6109 requires the individual provide an identifying number. The collection of case information is done from the US Tax Court docket.

18 How many records in the system are attributable to IRS Employees? Enter "Under 50,000", "50,000 to 100,000", "More than 100,000" or "Not Applicable".

More than 100,000

19 How many records in the system are attributable to contractors? Enter "Under 5,000", "5,000 to 10,000", "More than 10,000" or "Not Applicable".

More than 10,000

20 How many records in the system are attributable to members of the public? Enter "Under 100,000", "100,000 to 1,000,000", "More than 1,000,000" or "Not applicable".

100,000 to 1,000,000

21 Identify any "other" records categories not attributable to the categories listed above; identify the category and the number of corresponding records, to the nearest 10,000; if no other categories exist, enter "Not Applicable".

User administration records: Under 50,000

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

Access to the IRSCRM is requested using Business Entitlement Access Request System (BEARS). Data access is granted on a need-to-know basis. BEARS enrollment process requires that an authorized manager approve access requests on a case-by-case basis. Access approval is based on the Users role(s) and responsibilities. Users are given the minimum set of privileges required to perform their regular and recurring work assignments; they are restricted from changing the boundaries of their access without management approval. Write, Modify, Delete, and/or Print) are defined on BEARS and set (activated) by the System Administrator prior to the user being allowed access. User privileges and user roles determine the types of data that each user has access to. Management monitors system access and removes permissions when individuals no longer require access. The primary Cloud Service Provider (Salesforce) administrators have a High-level background investigation; the third-party contractor (MuleSoft) has less access privileges, so they have a Moderate-level background investigation.

23 Is there a data dictionary on file for this system? Note: Selecting "Yes" indicates an upload to the Attachment Section is required.

Yes

24 Explain any privacy and civil liberties risks related to privacy controls.

Court cases/legal matters may or may not have civil rights implications. The larger concern is as eCITE isn't public, and all interactions are within eCITE by IRS staff or appropriate contractors, there are some typical risks to cloud-based systems, related to known/approved users seeing more data than intended through

(1.) elevated permissions by having records shared directly with user by another user, and (2.) incorrect group membership by easily rectifiable mistakes by administrators.

All applicable system assessments have been/will be performed, and risks mitigated accordingly/appropriately/to the extent possible.

25 Please upload all privacy risk finding documents identified for the system (Audit trail, RAFT, POA&M, Breach Plan, etc.); click "yes" to confirm upload(s) are complete.

No

26 Describe this system's audit trail in detail. Provide supporting documents.

Salesforce and MuleSoft have built-in auditing capabilities and ESAT auditing recommendations will be configured. Splunk will periodically pull platform and application audited events and process them. During upcoming phases, we will provide audit log information which will include trackable events and schedule of audits; for example, the SBU/PII elements contained in audit log(s), types of data, and tracking events for the system.

27 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

Enterprise Data Platform (EDP) (future state)

### Incoming/Outgoing

Both

### Transfer Method

IPSEC TUNNEL

### Interface Type

IRS Systems, file, or database

### Agency Name

Integrated Data Retrieval System

### Incoming/Outgoing

Incoming (Receiving)

### Transfer Method

IPSEC TUNNEL

**Interface Type**

IRS Systems, file, or database

Agency Name

TLCATS

Incoming/Outgoing

Incoming (Receiving)

Transfer Method

Other

Other Transfer Method

One-time data load, via Cross Border Security (CBS)/Endpoint

Protection Zone (EPZ) connection

**Interface Type**

IRS Systems, file, or database

Agency Name

PACER

Incoming/Outgoing

Incoming (Receiving)

Transfer Method

IPSEC TUNNEL

**Interface Type**

IRS Systems, file, or database

Agency Name

Enterprise Case Management (ECM) (future state)

Incoming/Outgoing

Both

Transfer Method

IPSEC TUNNEL

**Interface Type**

IRS Systems, file, or database

Agency Name

TIGTA

Incoming/Outgoing

Outgoing (Sending)

Transfer Method

Secure Data Transfer (SDT)

**Interface Type**

IRS Systems, file, or database

Agency Name

DAWSON

Incoming/Outgoing

Incoming (Receiving)

Transfer Method  
IPSEC TUNNEL

**Interface Type**

IRS Systems, file, or database

Agency Name

Splunk

Incoming/Outgoing

Outgoing (Sending)

Transfer Method

Other

Other Transfer Method

Outbound Proxy connection (Proxy Exclusion)

## Systems of Records Notices (SORNs)

**SORN Number & Name**

IRS 00.003 - Taxpayer Advocate Service and Customer Feedback and Survey Records

Describe the IRS use and relevance of this SORN.

This data is used for Tax Administration and case inventory and tracking purposes. (Legal advice determinations, storage and reference of case inventory statuses.)

**SORN Number & Name**

IRS 90.002 - Chief Counsel Litigation and Advice (Civil) Records

Describe the IRS use and relevance of this SORN.

This data is used for Tax Administration and case inventory and tracking purposes. (Legal advice determinations, storage and reference of case inventory statuses.)

**SORN Number & Name**

IRS 90.001 - Chief Counsel Management Information System Records

Describe the IRS use and relevance of this SORN.

This data is used for Tax Administration and case inventory and tracking purposes. (Legal advice determinations, storage and reference of case inventory statuses.)

**SORN Number & Name**

IRS 90.003 - Chief Counsel Litigation and Advice (Criminal) Records

Describe the IRS use and relevance of this SORN.

This data is used for Tax Administration and case inventory and tracking purposes. (Legal advice determinations, storage and reference of case inventory statuses.)

**SORN Number & Name**

IRS 90.006 - Chief Counsel Human Resources and Administrative Records

Describe the IRS use and relevance of this SORN.

This data is used for Tax Administration and case inventory and tracking purposes. (Legal advice determinations, storage and reference of case inventory statuses.)

**SORN Number & Name**

IRS 90.005 - Chief Counsel Library Records

Describe the IRS use and relevance of this SORN.

This data is used for Tax Administration and case inventory and tracking purposes. (Legal advice determinations, storage and reference of case inventory statuses.)

**SORN Number & Name**

IRS 90.004 - Chief Counsel Legal Processing Division Records

Describe the IRS use and relevance of this SORN.

This data is used for Tax Administration and case inventory and tracking purposes. (Legal advice determinations, storage and reference of case inventory statuses.)

## Records Retention

What is the Record Schedule System?

Record Control Schedule (RCS)

What is the retention series title?

Office of Chief Counsel

What is the GRS/RCS Item Number?

RCS 14 Item 19

What type of Records is this for?

Both (Paper and Electronic)

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

Non-tax Cases

What is the disposition schedule?

a) Ethics Advisory Opinions, Ethics Program Records, and Public Financial Disclosure Reports. AUTHORIZED DISPOSITION See Employee Ethics Records, GRS 2.8 (Document 12829). (b) All other routine legal advice and assistance records (arranged in 1-

year blocks). (Job No. DAA-0058-2012-0005-0008)  
AUTHORIZED DISPOSITION Retire block to Records Center after 1 year. Space permitting, cases may be retained on premises. Destroy block after 5 years. (c) All other significant legal advice and assistance records as approved by a GS-15 or above (arranged in 1-year blocks). (Job No. DAA-0058-2012-0005-0009)  
AUTHORIZED DISPOSITION Retire block to Records Center after 1 year. Space permitting, cases may be retained on premises. Destroy block after 20 years. If National Office General Litigation Files are included the retention increases from 20 to 25 years.

What is the Record Schedule System?

Record Control Schedule (RCS)

What is the retention series title?

Taxpayer Advocate

What is the GRS/RCS Item Number?

RCS 16 Item 9a

What type of Records is this for?

Electronic

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

Records whether studies, analyses or correspondence, which established the policies, practices and programs for the management of the Taxpayer Advocate Service organization. Included are organizational changes, functional realignments and responsibilities, and long and short-range planning documents.

What is the disposition schedule?

PENDING DISPOSITION: PERMANENT Cut off correspondence annually; studies and case files upon completion of study or at appropriate phase. Retire to Records Center 5 years after cutoff, or when no longer needed. Transfer to NARA 15 years after cutoff.

What is the Record Schedule System?

Record Control Schedule (RCS)

What is the retention series title?

Customer Service

What is the GRS/RCS Item Number?

RCS 31 Item 94

What type of Records is this for?

Both (Paper and Electronic)

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

Taxpayer Advocate Management Information System (TAMIS). The Taxpayer Advocate Management Information System (TAMIS) is an automated, computerized application used to record, control, process, analyze, and report on Taxpayer Advocate

Service (TAS) case inventories. It also maintains a data repository for report generation.

What is the disposition schedule?

(A) Inputs: Taxpayer Advocate Service (TAS) staff input information into the Taxpayer Advocate Management Information System (TAMIS) derived from direct communication through the telephone, FAX, mail, e-mail, or walk-in/face-to-face contacts, and IR Form 911, Request for Taxpayer Assistance Order, or an E-911 (Electronic Form 911) from Accounts Management Services (AMS). (GRS 5.2, item 020; Job No. DAA-GRS-2017-0003-0002) AUTHORIZED DISPOSITION Delete/Destroy all cached records after successful entry and verification. (B) System Data: Contents of the Taxpayer Advocate Management Information System (TAMIS) include, but are not limited, to the following: Taxpayer Information (Social Security Number or other Taxpayer Identification Number, name, Address; The Executor's/Power of Attorney's name, address, phone number; tax issue, etc.), Employee Information (Staff Employee Identification Number, Post of Duty, Address, Telephone Number, etc.), Audit Trail Information, and Case Management Information. (Job No. N1-58-09-81) 1. Case Management Database. AUTHORIZED DISPOSITION Cut off at end of the fiscal year in which case is closed. Delete/Destroy 3 years after cutoff. 2. Audit Log Database. AUTHORIZED DISPOSITION Cut off at end of the fiscal year in which case is closed. Delete/Destroy 7 years after cutoff, or when no longer needed for operational purposes, whichever is later. (C) Outputs: Outputs from the Taxpayer Advocate Management Information System (TAMIS) include case management data which can be transmitted or viewed on the desktop, and reports that can be printed daily. In addition, the Business Performance Management System (BPMS) via Business Objects software extracts key statistical measures from TAMIS monthly. (GRS 5.2, item 020; Job No. DAA-GRS2017-0003-0002) AUTHORIZED DISPOSITION Delete/Destroy when no longer needed for operational purposes.

What is the Record Schedule System?

General Record Schedule (GRS)

What is the retention series title?

3.2 System Access Records

What is the GRS/RCS Item Number?

31

What type of Records is this for?

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. Includes records such as: • user profiles • log-in files • password files • audit trail files and extracts • system usage files • cost-back files used to assess charges for system use

Systems requiring special accountability for access. These are user identification records associated with systems which are highly sensitive and potentially vulnerable.

What is the disposition schedule?

Temporary. 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?

3.2 System access records

What is the GRS/RCS Item Number?

30

What type of Records is this for?

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. Includes records such as: • user profiles • log-in files • password files • audit trail files and extracts • system usage files • cost-back files used to assess charges for system use

Systems not requiring special accountability for access. These are user identification records generated according to preset requirements, typically system generated. A system may, for example, prompt users for new passwords every 90 days for all users.

What is the disposition schedule?

Temporary. Destroy when business use ceases.

What is the Record Schedule System?

Record Control Schedule (RCS)

What is the retention series title?

Office of Chief Counsel

What is the GRS/RCS Item Number?

RCS 14 Item 66

What type of Records is this for?

Both (Paper and Electronic)

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

Internal Audit Reports (GRS 5.1, Item 010; Job No. DAA-GRS-2016-0016-0001)

What is the disposition schedule?

AUTHORIZED DISPOSITION Destroy 3 years after completion of report.

What is the Record Schedule System?

Record Control Schedule (RCS)

What is the retention series title?

Office of Chief Counsel

What is the GRS/RCS Item Number?

RCS 14 Item 17

What type of Records is this for?

Both (Paper and Electronic)

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

Routine Cases (Tax) - Closed Legal Case Files Closed Legal Case Files. Pertaining to criminal tax matters and prosecutions for criminal violations of the Internal Revenue Laws. Supersedes RCS 13 Item 7, RCS 13 Item 8, RCS 14 Item 16, RCS 14 Item 22, RCS 15 Item 15, RCS 15 Item 29

What is the disposition schedule?

Retire block to Records Center after 1 year. Space permitting, cases may be retained on premises. Destroy block after 5 years.

What is the Record Schedule System?

Record Control Schedule (RCS)

What is the retention series title?

Office of Chief Counsel

What is the GRS/RCS Item Number?

RCS 14 Item 18

What type of Records is this for?

Both (Paper and Electronic)

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

Significant Cases (Tax) - Closed Legal Case File Closed Legal Case Files. Pertaining to criminal tax matters and prosecutions for criminal violations of the Internal Revenue Laws. Supersedes RCS 13 Item 7, RCS 13 Item 8, RCS 15 Item 29

What is the disposition schedule?

Retire block to Records Center after 1 year. Space permitting, cases may be retained on premises. Destroy block after 30 years.

# Data Locations

What type of site is this?

System

What is the name of the System?

IRSCRM

What is the sensitivity of the System?

Personally Identifiable Information (PII) including Linkable Data

What is the URL of the item, if applicable?

<https://ccirsgov.lightning.force.com/>

Please provide a brief description of the System

The electronic Counsel Inventory Tracking Environment (eCITE) is a Counsel Inventory application designed to support the Office of Chief Counsel, residing on the IRSCRM Platform. eCITE manages and tracks business processes related to litigation and advisory services for the IRS as a centralized platform to handle matter management, document tracking, workflow automation, data reporting and document generation to ensure coordination across legal proceedings. Hosted on the Amazon Web Services (AWS) GovCloud, eCITE is deployed on the Customer Relationship Management (IRSCRM) Platform as a managed Software-as-a-Service (SaaS) environment. The IRSCRM Platform consists of two parts: Salesforce (as the application layer) that handles the management and tracking of litigation and advisory services and MuleSoft (as the integration layer) that connects, prepares and imports external data into IRSCRM in general and eCITE in specific.

What are the incoming connections to this System

1. From MuleSoft, the integration layer of the IRSCRM and eCITE configuration, connects to several services, through a CSB/EPX connection: 1a. From DAWSON (Docket Access Within a Secure Online Network, the US Tax Court's electronic filing and case management system), saving case and document filing information 1b. From PACER (Public Access to Court Electronic Records, the Federal Court system's electronic filing and case management system), case and document filing details 1c. From Salesforce, listening to Platform events to process requests of data from PACER

What are the outgoing connections from this System?

1. To MuleSoft, the integration layer of the IRSCRM and eCITE configuration, connects to the following services via a VPN: 1a. To DAWSON (Docket Access Within a Secure Online Network, the US Tax Court's electronic filing and case management system), accessing DAWSON's case and document filing information.

1b. To PACER (Public Access to Court Electronic Records, the Federal Court system's electronic filing and case management system), accessing PACER's case and document filing details.

2. To MuleSoft, the integration layer of the IRSCRM and eCITE configuration, connects to the following services via an Outbound Proxy:

2a. To eCITE users (aka. OCC and IRS staff). The network settings require such connections be made from GFE hardware supplied by IRS's IT department.

2b. To MuleSoft users (aka. the MuleSoft admin users) to manage the MuleSoft configuration and Runtime Engine.