

Date of Approval: 04/05/2025
Questionnaire Number: 1940

Basic Information/Executive Summary

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

Online Payment Agreement

Acronym:

OPA

Business Unit

Information Technology

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.

Online Payment Agreement (OPA) allows taxpayers to establish their own installment payment agreements, to satisfy delinquent tax liabilities, within certain pre-established parameters (dollar amount owed, monthly payment amount offered, length of term, etc.). The system permits the establishment of agreements without human IRS involvement, allowing taxpayers who wish to resolve their debts, to do so without direct interaction. This provides significant cost savings for the Government, through reduced payroll, and frees IRS personnel to address other customer needs. Information entered into the system by the applicant, is used to confirm the user's identity and create the installment payment agreement between the IRS and the customer.

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).

The Online Payment Agreement application 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 are permissible from Internal Revenue Code (IRC) 6109, which requires individual taxpayers to include their SSNs on their income tax returns. This application does truncate the Social Security Number (last four digits are masked). The application cannot mitigate the use of Social Security numbers until an alternate identifier has been adopted by the IRS to identify taxpayers.

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

Address

Federal Tax Information (FTI)

Name

Social Security Number (including masked or last four digits)

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

SSN for tax returns and return information - IRC section 6109

Product Information (Questions)

1 Is this PCLIA a result of the Inflation Reduction Act (IRA)?

No

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

Application

3 What Tier designation has been applied to your system?

2

4 Is this a new system?

No

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

Yes

4.11 What is the previous PCLIA number?

6734

4.12 What is the previous PCLIA title (system name)?

Online Payment Agreement, OPA

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.)

Expiring PCLIA

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

No

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.

Currently under decommissioning. Will be decommissioned by the end of FY25.

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.

Small Business / Self Employed (SBSE) Governance Board

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.

210831

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?

No

13 Does this system/application interact with the public?

Yes

13.1 If the system requires the user to authenticate, was a Digital Identity Risk Assessment (DIRA) conducted?

Yes

13.11 Please upload the approved DIRA report using the Attachments button. Select "Yes" to indicate that you have or will upload the signed DIRA form.

Yes

13.2 If individuals do not have the opportunity to give consent to collect their information for a particular use, why not?

OPA provides the taxpayer the opportunity to respond to any negative determinations. If the taxpayer does not qualify for the Online Payment Agreement, a phone number shall be provided to answer any questions.

13.3 If the individual was not notified of the following items prior to the collection of information, why not? 1) Authority to collect the information 2) If the collection is mandatory or voluntary 3) The purpose for which their information will be used 4) Who the information will be shared with 5) The effects, if any, if they don't provide the requested information.

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" We use their PII (SSN, name, etc. to uniquely identify a taxpayer to interface with any IRS system. The IRS has standardized on SSNs and legal name to identify a taxpayer as stated in IRS code 6001, 6011, 6012e(a) and 6109. We do have <https://www.irs.gov/taxpayer-bill-of-rights>.

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

OPA provides the taxpayer the opportunity to respond to any negative determinations. If the taxpayer does not qualify for the Online Payment Agreement, a phone number shall be provided to answer any questions. If the taxpayer needs to correct any errors with their information, we provide a number for them to call. The OPA application does not have the authority or capability to correct taxpayer information in IDRS.

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

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 Systems Admin Read only

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.

TBD <https://www.irs.gov/taxpayer-bill-of-rights> which has a link to <https://www.irs.gov/newsroom/taxpayer-bill-of-rights-7> (Taxpayer Bill of Rights 7: The Right to Privacy)

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".

Not applicable

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".

Not applicable

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".
100,000-1,000,000

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

Integrated Data Retrieval System (IDRS) Case File Online (CFOL) via Standard CFOL Access Protocol (SCAP) We get access to the system through the Security and Communication System (SACS) which provides user and application security validation for access to IDRS and CFOL. Access to the data by taxpayers is determined by the taxpayer entering valid shared secrets. Once they enter shared secrets and their data matches up with the IDRS/CFOL information to ensure that the information is correct, they are eligible to use the system. This is termed successful authentication. Employees can gain access to the system to request an installment agreement (only) the same as the public. OPA is an external system only.

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

No

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

No: OPA is currently in the Operations and Maintenance phase of its lifecycle. Continuous Monitoring (now called Annual Security Control Assessment) occurs annually to ensure that controls remain in place to properly safeguard PII. All the customer configurable security controls are implemented as intended and documented in the OPA System Security Plan (SSP).

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.

OPA will collect Management Information System (MIS) data related to the taxpayer's use of the application (e.g., how many hits encountered, how many taxpayers' successfully submitted an installment agreement and what links were followed). In addition to MIS, in the current production environment, OPA sends all its business layer outbound responses to Security Audit and Analysis System (SAAS) through Application Messaging and Data Access Service (AMDAS) on the outbound queue. AMDAS provides a secure communication service between modernized components.

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

Taxpayers

Incoming/Outgoing

Both

Transfer Method

Electronic File Transfer Utility (EFTU)

Interface Type

IRS Systems, file, or database

Agency Name

Correspondence Letter System (CORRESPONDEXCRX)

Incoming/Outgoing

Outgoing (Sending)

Transfer Method

Electronic File Transfer Utility (EFTU)

Interface Type

IRS Systems, file, or database

Agency Name

IDRS Miscellaneous Command Codes (IDRSMISCCC)

Incoming/Outgoing

Outgoing (Sending)

Transfer Method

Electronic File Transfer Utility (EFTU)

Interface Type

IRS Systems, file, or database

Agency Name

Enterprise Data Platform (EDP)

Incoming/Outgoing

Outgoing (Sending)

Transfer Method

Electronic File Transfer Utility (EFTU)

Interface Type

IRS Systems, file, or database

Agency Name

Installment Agreement Processing (IA)

Incoming/Outgoing

Outgoing (Sending)

Transfer Method

Electronic File Transfer Utility (EFTU)

Interface Type

IRS Systems, file, or database

Agency Name

Application Messaging and Data Access Service (AMDAS)

Incoming/Outgoing

Both

Transfer Method

Electronic File Transfer Utility (EFTU)

Interface Type

IRS Systems, file, or database

Agency Name

Management Information System (MIS)

Incoming/Outgoing

Both

Transfer Method

Electronic File Transfer Utility (EFTU)

Interface Type

IRS Systems, file, or database

Agency Name

IDRS Miscellaneous Command Codes (IDRSMISCCC)

Incoming/Outgoing

Incoming (Receiving)

Transfer Method

Electronic File Transfer Utility (EFTU)

Interface Type

IRS Systems, file, or database

Agency Name

ICCE Management Information System (ICCEMIS)

Incoming/Outgoing

Outgoing (Sending)

Transfer Method

Electronic File Transfer Utility (EFTU)

Interface Type

IRS Systems, file, or database

Agency Name

Security Audit and Analysis (SAAS)

Incoming/Outgoing

Both

Transfer Method

Electronic File Transfer Utility (EFTU)

Interface Type

IRS Systems, file, or database

Agency Name

Corporate Files Online (CFOL)

Incoming/Outgoing

Incoming (Receiving)

Transfer Method

Electronic File Transfer Utility (EFTU)

Interface Type

IRS Systems, file, or database

Agency Name

Secure Access Digital Identity (SADI)

Incoming/Outgoing

Incoming (Receiving)

Transfer Method

Electronic File Transfer Utility (EFTU)

Systems of Records Notices (SORNs)

SORN Number & Name

IRS 26.019 - Taxpayer Delinquent Account Files

Describe the IRS use and relevance of this SORN.
to allow for delinquent look up information.

SORN Number & Name

IRS 34.037 - Audit Trail and Security Records

Describe the IRS use and relevance of this SORN.
to allow for audit analysis.

SORN Number & Name

IRS 24.030 - Customer Account Data Engine Individual Master File

Describe the IRS use and relevance of this SORN.
This SORN is identified for the use of tax administration,
specifically for payment information.

Records Retention

What is the Record Schedule System?

Record Control Schedule (RCS)

What is the retention series title?

RCS 28

What is the GRS/RCS Item Number?

158

What type of Records is this for?

Electronic

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

OPA are non-recordkeeping and does not require a NARA-approved records control schedule to affect data disposition. OPA is a web-based application used for payment agreement 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 OPA 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

What is the disposition schedule?

(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