

Date of Approval: **October 08, 2020**

PIA ID Number: **5522**

## **SYSTEM DESCRIPTION**

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

Lead Management - Offset Reversal Leads, OSRL

*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?*

Lead Management - Offset Reversal Leads, OSRL, #2882, Operations & Maintenance

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

10/11/2017

*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.*

Wage and Investment Division Risk Committee (W&I RC)

*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.*

The Offset Reversal Lead (OSRL) program manages questionable federal tax refunds and offset leads from Office of Child Support and State Tax Divisions. The OSRL Application stores submissions from these external stakeholders, received through the [efleads@irs.gov](mailto:efleads@irs.gov) mailbox. This allows users to monitor the inventory assigned to each tax examiner in order to mitigate inventory receipts and closures. The exchange of data between the IRS and the Office of Child Support and State Tax Divisions is documented in a binding mutual arrangement, within IRC 6103(d) federal-state information sharing provisions, but not under a Memo of Understanding (MOU).

## 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).*

The SSN is only field that uniquely identifies the account. 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 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. The OSLR system requires the use of SSN's because no other identifier can be used to uniquely identify a taxpayer for intergovernmental communications. SSNs are permissible from Internal Revenue Code (IRC) 6109, which requires individual taxpayers to include their SSNs on their income tax returns.

*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:*

Tax Account Information

Name

Standard Employee Identifier (SEID)

*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:*

Protected Information Information which if modified, destroyed or disclosed in an unauthorized manner could cause: loss of life, loss of property or funds by unlawful means, violation of personal privacy or civil rights, gaining of an unfair procurement advantage by contractors bidding on government contracts, or disclosure of proprietary information entrusted to the Government

*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 database maintains for each employee: SEID, first name, last name, Integrated Data Retrieval System (IDRS) ID, and a last updated by field. The last updated by field will contain additional IRS SEIDS of employees associated with that lead as it goes through the research process.

*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.*

Return Integrity and Compliance Services (RICS) work is part of an overall IRS revenue protection strategy. RICS' main mission is to protect public interest by improving IRS' ability to detect and prevent improper refunds. The OSRL application is required to maintain SSNs in the database due to the types of lead cases it manages in order to have the ability to research the leads to detect improper activity by managing questionable federal tax refunds or offsets reported by the Office of Child Support Enforcement and State Tax Divisions.

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

The PII information maintained in the OSRL database is provided directly from State Tax Divisions and the Office of Child Support Enforcement. Input of the data received is entered either manually or automated into the OSRL database. Assignment of OSRL cases to tax examiners is manually entered by managers/administrators. Accuracy and completeness of data is inherited from the States in order for OSRL tax examiners to research cases provided.

## **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 42.021    Compliance Programs and Projects Files

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: 10/1/2018  
SA&A: Yes  
ATO/IATO Date: 6/18/2020

*Does the system receive SBU/PII from other federal agency or agencies?*

Yes

*For each federal interface, identify the organization that sends the SBU/PII, how the SBU/PII is transmitted and if there is an Inter-Agency Agreement (ISA) /Memorandum of Understanding (MOU).*

Name: Health and Human Services  
Transmission Method: Manual via leads to mailbox & HHH portal  
ISA/MOU: Yes

*Does the system receive SBU/PII from State or local agency (-ies)?*

Yes

*For each state and local interface identify the organization that sends the SBU/PII, how the SBU/PII is transmitted and if there is an Inter-Agency Agreement (ISA) /Memorandum of Understanding (MOU).*

Organization Name: State Tax Divisions  
Transmission Method: Manual via leads mailbox & portal  
ISA/MOU: Yes

*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?*

No

*Does this system disseminate SBU/PII to other Federal agencies?*

Yes

*Identify the full names of the federal agency(s) that receive SBU/PII from this system, and if there is an Inter-Agency Agreement (ISA) / Memorandum of Understanding (MOU).*

Organization Name: Health and Human Services (HHH)  
Transmission Method: Manual via leads to HHH web portal  
ISA/MOU: Yes

Organization Name: Bureau of the Fiscal Service  
Transmission Method: SDT  
ISA/MOU: Yes

*Identify the authority*

Title 26, United States Code (U.S.C.), Section 6103

*Identify the Routine Use in the applicable SORN (or Privacy Act exception)*

Treasury/IRS 42.021 - Compliance Programs and Projects Files

*For what purpose?*

OSRL manages requests for offsets from the Office of Child Support that are against federal tax refunds that are questionable. OSRL provides a response back to the Office of Child Support Enforcement on the specific cases they submitted with a determination of yes, no or partial offset. IRS will reverse offset, not reverse offset or reverse a partial amount of the offset. IRS does not disclose amounts of refunds or filing information.

*Does this system disseminate SBU/PII to State and local agencies?*

Yes

*Identify the full names of the state and local agency(s) that receive SBU/PII from this system, and if there is an Inter-Agency Agreement (ISA) /Memorandum of Understanding (MOU).*

Organization Name: State Tax Divisions  
Transmission Method: Manual via leads mailbox  
ISA/MOU: No

*Identify the authority*

Title 26, United States Code (U.S.C.), Section 6103(d)

*Identify the Routine Use in the applicable SORN (or Privacy Act exception)*

IRS 42.021 - Compliance Programs and Projects Files

*For what purpose?*

OSRL manages requests for offsets from State Tax Divisions that are against federal tax refunds that are questionable. OSRL provides a response back to the State Tax Divisions on the specific cases they submitted with a determination of yes, no or partial offset. IRS will reverse offset, not reverse offset or reverse a partial amount of the offset. IRS does not disclose amounts of refunds or filing information.

*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?*

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 (IRC) 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.

*Do individuals have the opportunity to decline from providing information and/or from consenting to particular uses of the information?*

No

*Why not?*

The legal right to ask for information is IRC sections 6001, 6011, and 6012(a), and their regulations. They say that you must file a return or statement with IRS for any tax you are liable for. Your response is mandatory under these sections. Code section 6109 requires you to provide your identifying number on the return.

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

The system will allow affected parties the opportunity to clarify or dispute negative information that could be used against them. Due process is provided pursuant to 5 USC.

## 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 Write

*IRS Contractor Employees*

Contractor System Administrators: Administrator

Contractor Developers: Read Write

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

In order to obtain access to the OSRL database, all prospective users must adhere to the RICS permissions portal process. The permission portal is used for controlling access, managing (create, modify, disable, delete) user accounts, and providing administrative rights to users. All requests are handled by the RICS Administrators and stored for auditing purposes. Additionally, all users are authenticated against the Active Directory validating their Standard Employee Identifier Number (SEID). All access requests must be authorized by the user's manager based on a user's position and need-to-know basis. Then the request must be approved at the OSRL administrator level. All application administrator access requests must be authorized by the user's manager as well as an OSRL administrator and system administrator. All approved database accounts will be logged. Access permissions are automatically configured to the database server after all approvals are received.

## **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?*

No

*You must work with the IRS Records and Information Management (RIM) Program Office to address records retention requirements before you dispose of any records in this system.*

## **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.*

OSRL was developed by a vendor and the system audit trails have been put in place by the vendor as the requirements were specified. OSRL does contain all the audit trail elements as required by Internal Revenue Manual.

## **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)?*

All test results are stored in RICS project management software. RICS .Net and Microsoft Access applications have a development (Dev) environment which is used for development and testing activities. This environment does not contain any PII data. All development and testing efforts are completed using simulated data. The development process involves developers releasing new functionality, enhancements, and defect fixes to the development environment. Each release is reviewed by the quality assurance team to ensure that both the business and technical requirements are met. All business requirement verification, functional testing, regression testing, and Section 508 testing is completed in the (Dev) environment. Issues found are remedied and subsequently released to the (Dev) environment for further testing and verification. All defects are tracked via project management software where team members can track the defects from opening to closure. The quality assurance team uses automated test scripts for regression and load testing on a secure intranet testing site for the (Dev) environment to further identify defects and verify against previous builds. Once defects are remedied, the latest code is released to the development environment. Once development is completed, User Acceptability Testing (UAT) is conducted. Upon completion of UAT, the application is released into Production Environment. The quality assurance team conducts preliminary testing in the Production environment to make sure the release meets the desired results and upon confirmation the application users are notified of the new release.

*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?*

The PII maintained in the OSRL database is provided from the Office of Child Support and State Tax Divisions. Input of the data received is both systematically and manually entered into the OSRL database. Assignment of OSRL to tax examiners is manually entered by managers/administrators. Accuracy and completeness of data is inherited from the Federal Agency and State Tax Divisions providing the offset leads.

## **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: Under 50,000

Contractors: Not Applicable

Members of the Public: Under 100,000

Other: Yes

*Identify the category of records and the number of corresponding records (to the nearest 10,000).*

State Tax Division and Office of Child Support information less than 10,000.

## **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?*

Yes

*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? Contact Disclosure to determine if an accounting is required.*

Yes