

Date of Approval: April 3, 2017

PIA ID Number: **2457**

A. SYSTEM DESCRIPTION

1. Enter the full name and acronym for the system, project, application and/or database. PDC - ConServes Collection Management System, PDC - CCMS

2. Is this a new system? No

2a. If **no**, is there a PIA for this system? No

3. Check the current ELC (Enterprise Life Cycle) Milestones (select all that apply)

<u>No</u>	Vision & Strategy/Milestone 0
<u>No</u>	Project Initiation/Milestone 1
<u>No</u>	Domain Architecture/Milestone 2
<u>No</u>	Preliminary Design/Milestone 3
<u>No</u>	Detailed Design/Milestone 4A
<u>No</u>	System Development/Milestone 4B
<u>No</u>	System Deployment/Milestone 5
<u>Yes</u>	Operations & Maintenance (i.e., system is currently operational)

4. Is this a Federal Information Security Management Act (FISMA) reportable system? No

A.1 General Business Purpose

5. 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 primary business of ConServe is debt collection. A Private Debt Collector, Conserve utilizes the Collection Management System (PCA-CCMS) which provides for the management of delinquent taxes throughout the collection process. PCA-CCMS provides a medium for the documentation of specific collection activities on taxpayers serviced by ConServe. PCA-CCMS is the major application that enables ConServe to conduct and manage its collection activities for the U.S. Department of the Treasury, Internal Revenue Service (IRS).

B. PII DETAIL

6. Does the system use, collect, receive, display, store, maintain, or disseminate IR Code 6103 taxpayer information; or any type of Sensitive but Unclassified (SBU) or Personally Identifiable Information (PII)? Yes

6a. If **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

If **yes**, check who the SSN (or tax identification number) is collected on.

Yes On Primary Yes On Spouse No On Dependent

If **yes**, check all types SSN s (or tax identification numbers) that apply to this system:

Yes	Social Security Number (SSN)
No	Employer Identification Number (EIN)
No	Individual Taxpayer Identification Number (ITIN)
No	Taxpayer Identification Number for Pending U.S. Adoptions (ATIN)
No	Practitioner Tax Identification Number (PTIN)

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

Per OMB-M-07-16 "mitigation strategy is currently not required. PDC-PRC requires the use of SSN because no other identifier can be used to uniquely identify the TP. SSN are permissible for ISC 6109 which requires individual TP to include their SSN on their income tax return.

6b. Does this system contain other (non-SSN) PII that it uses, collects, receives, displays, stores, maintains, or disseminates? (i.e. Names, addresses, etc.) Yes

If **yes**, specify the information.

Selected	PII Element	On Primary	On Spouse	On Dependent
Yes	Name	Yes	Yes	No
Yes	Mailing address	No	No	No
Yes	Phone Numbers	No	No	No
No	E-mail Address	No	No	No
Yes	Date of Birth	Yes	Yes	No
Yes	Place of Birth	No	No	No
No	SEID	No	No	No
No	Mother's Maiden Name	No	No	No
No	Protection Personal Identification Numbers (IP PIN)	No	No	No
No	Internet Protocol Address (IP Address)	No	No	No
No	Criminal History	No	No	No
No	Medical Information	No	No	No
No	Certificate or License Numbers	No	No	No
No	Vehicle Identifiers	No	No	No
No	Passport Number	No	No	No
No	Alien (A-) Number	No	No	No
Yes	Financial Account Numbers	No	No	No
No	Photographic Identifiers	No	No	No
No	Biometric Identifiers	No	No	No
Yes	Employment (HR) Information	No	No	No
Yes	Tax Account Information	Yes	Yes	No

6c. Does this system contain SBU information that is not PII, it uses, collects, receives, displays, stores, maintains, or disseminates? Yes

If **yes**, select the types of SBU

Selected	SBU Name	SBU Description
No	Agency Sensitive Information	Information which if improperly used or disclosed could adversely affect the ability of the agency to accomplish its mission

No	Procurement sensitive data	Contract proposals, bids, etc.
No	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.
Yes	Proprietary data	Business information that does not belong to the IRS
No	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
No	Physical Security Information	Security information containing details of serious weaknesses and vulnerabilities associated with specific systems and facilities
No	Criminal Investigation Information	Information concerning IRS criminal investigations or the agents conducting the investigations.

6d. Are there other types of SBU/PII used in the system? No

6e. Cite the authority for collecting SBU/PII (including SSN if relevant)

Yes	PII for federal tax administration is generally Internal Revenue Code Sections 6001, 6011, 6012e(a)
Yes	SSN for tax returns and return information is Internal Revenue Code Section 6109
No	SSN for personnel administration (IRS Employees) is 5 USC & Executive Order 9397
No	PII for personnel administration is 5 USC
No	PII about individuals for Bank Secrecy Act compliance 31 USC
No	Information by CI for certain money laundering cases may be 18 USC

6f. Has the authority been verified with the system owner? Yes

B.1 BUSINESS NEEDS AND ACCURACY

7. 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.

All information received from the IRS is used for the sole purpose of contacting the taxpayer or responsible party and collecting owed funds on behalf of the IRS. ConServe will utilize the information to (1) facilitate the payment of the delinquent taxes, (2) identify the current status of the taxpayer, and/or (3) qualify the taxpayer for an administrative resolution.

8. How is the SBU/PII verified for accuracy, timeliness, and completeness? Explain how steps are taken to ensure that all information maintained by the system that is used by IRS to make any adverse determination about an individual's rights, benefits, and/or privileges is maintained with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual in the determination

The ConServe Collection Management System (CCMS) utilizes multiple data feeds with the IRS to ensure the accuracy, timeliness, and completeness of records within the CCMS system. Weekly files received from the IRS's System of Record include new and updated information on primary taxpayers, secondary taxpayers, Power of Attorneys, transactional payment information, and account status information (i.e. account holds). The data files from the IRS are verified against the current records within CCMS and updates to CCMS are applied accordingly. CCMS sends daily updates to the IRS for processing on the IRS System of Record. These updates include payment agreement initiations, payment agreement terminations, notification of deceased taxpayers, and account returns.

C. PRIVACY ACT AND SYSTEM OF RECORDS

9. Are 10 or more records containing SBU/PII maintained, stored, and/or transmitted by or through this system? Yes

9a. If **yes**, are records in the system retrieved by any personal identifier (e.g., name, SSN, Photograph, IP Address) for an individual? Yes

If **yes**, is there a System of Records Notice(s) or SORNs that addresses the PII records in this system? Yes

If **yes**, enter the SORN number(s) and the complete the name of the SORN.

<u>SORNS Number</u>	<u>SORNS Name</u>
Treasury/IRS 26.019	Tax Delinquent Account (TDA) file
Treasury/IRS 26.016	Returns Compliance Program (RCP)
Treasury/IRS 26.019	Taxpayer Delinquent Accounts (TDA)
Treasury/IRS 34.037	IRS Audit Trail and Security Records System

If **yes**, does the System of Records Notice(s) (SORN) published in the Federal Register adequately describe the records as required by the Privacy Act? Yes

D. RESPONSIBLE PARTIES

10. Identify the individuals for the following system roles. ## Official Use Only

E. INCOMING PII INTERFACES

11. Does the system receive SBU/PII from other system or agencies? Yes

11a. If **yes**, does the system receive SBU/PII from IRS files and databases? Yes

If **yes**, enter the files and databases.

<u>System Name</u>	<u>Current PIA?</u>	<u>PIA Approval Date</u>	<u>SA & A?</u>	<u>Authorization Date</u>
Private Debt Collection Data Transfer Component (PDTC)	Yes	01/27/2017	No	

11b. Does the system receive SBU/PII from other federal agency or agencies? No

11c. Does the system receive SBU/PII from State or local agency (-ies)? No

11d. Does the system receive SBU/PII from other sources? Yes

If **yes**, identify the source that sends the SBU/PII, how the SBU/PII is transmitted and if there is an Inter-Agency Agreement (ISA) /Memorandum of Understanding (MOU).

<u>Organization Name</u>	<u>Transmission method</u>	<u>ISA/MOU</u>
National Credit Bureau	Interconnection Security Agreement	Yes
Skip Trace Vendors	Professional Practices Management System	Yes

11e. Does the system receive SBU/PII from **Taxpayer** forms? No

11f. Does the system receive SBU/PII from **Employee** forms (such as the I-9)? No

F. PII SENT TO EXTERNAL ORGANIZATIONS

12. Does this system disseminate SBU/PII? Yes

12a. Does this system disseminate SBU/PII to other IRS Systems? Yes

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

<u>System Name</u>	<u>Current PIA?</u>	<u>PIA Approval Date</u>	<u>SA & A?</u>	<u>Authorization Date</u>
Privat Debt Collection DataTransfer Component	Yes	01/27/2017	No	

Identify the authority and for what purpose? Federal legislation titled Fixing America's Surface Transportation (FAST) Act was enacted in December 2015 and requires the U.S. Department of the Treasury, Internal Revenue Service (IRS) to proceed with a Private Debt Collection initiative. The IRS intends to implement this initiative in a phased approach beginning in Fiscal Year 2017. Pursuant to section 6103(h)(1) of the Internal Revenue Code (IRC). IRC 6103(h)(1) provides for disclosure of returns and return information to officers and employees of the Department of the Treasury (including IRS) whose official duties require access for tax administration.

12b . Does this system disseminate SBU/PII to other Federal agencies? No

12c. Does this system disseminate SBU/PII to State and local agencies? No

12d. Does this system disseminate SBU/PII to IRS or Treasury contractors? No

12e. Does this system disseminate SBU/PII to other Sources? Yes

If **yes**, identify the other source(s) that receive SBU/PII from this system, and if there is an Inter-Agency Agreement (ISA) /Memorandum of Understanding (MOU).

Organization Name	Transmission method	ISA/MOU
Credit Bureau	HTTPS and SFTP	No
Skip Trace Vendor	HTTPS and SFTP	No
Skip Trace Vendor	Subscription Service	No

Identify the authority and for what purpose? Federal legislation titled Fixing America's Surface Transportation (FAST) Act was enacted in December 2015 and requires the U.S. Department of the Treasury, Internal Revenue Service (IRS) to proceed with a Private Debt Collection initiative. The IRS intends to implement this initiative in a phased approach beginning in Fiscal Year 2017. Pursuant to section 6103(h)(1) of the Internal Revenue Code (IRC). IRC 6103(h)(1) provides for disclosure of returns and return information to officers and employees of the Department of the Treasury (including IRS) whose official duties require access for tax administration.

G. PRIVACY SENSITIVE TECHNOLOGY

13. Does this system use social media channels? No
14. Does this system use privacy-sensitive technologies such as mobile, cloud, global position system (GPS), biometrics, RFID, etc.? No
15. Does the system use cloud computing? No
16. Does this system/application interact with the public? No

H. INDIVIDUAL NOTICE AND CONSENT

17. Was/is notice provided to the individual prior to collection of information? Yes

17a. If **yes**, how is notice provided? Was the individual notified about the authority to collect the information, whether such is mandatory or voluntary, the purpose for which the information will be used, with whom the information may be shared, and the effects, if any, if they decide not to provide any of the requested information?

Notice 17a is provided to individuals by other IRS applications or through forms (e.g., 1040 forms) that interact directly with the taxpayer at the time of collection. Due Process is provided pursuant to 5 USC. Also IRS sends Notice CP40 to the taxpayer advising that their case is being worked by a Private Collection Agency (ConServe) and they may be contacted directly by that agency.

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

18a. If **yes**, describe the mechanism by which individuals indicate their consent choice(s): Taxpayers assigned to the Private Collection Agency to collect taxes owed will be provided an option to opt-out of the PCA process. Cases will be recalled and worked by IRS if taxpayer exercises their right to opt-out.

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

Conserve's Collection Management System is only a repository of taxpayer information submitted directly to the IRS through other IRS applications. The CCMS System does not interact with taxpayers directly and thus "due process" is addressed by other IRS applications that directly

interact with taxpayers. Any issues that are identified by these other means will submit changes to ConServe through automated methods so an auditable record may be maintained. Due Process is provided to 5 USC Title 26.

I. INFORMATION PROTECTION

20. Identify the owner and operator of the system (could be IRS owned and Operated; IRS owned, contractor operated; contractor owned and operated)

Contractor Owned and Operated

21. The following people have access to the system with the specified rights:

IRS Employees? No

Contractor Employees? Yes

<u>Contractor Employees?</u>	<u>Yes/No</u>	<u>Access Level</u>	<u>Background Invest. Level</u>
Contractor Users	Yes	Read and Write	Moderate
Contractor Managers	Yes	Read and Write	Moderate
Contractor Sys. Admin.	Yes	Administrator	Moderate
Contractor Developers	Yes	Administrator	Moderate

21a. How is access to SBU/PII determined and by whom? Vendor's employees go through a moderate risk level background check and is not allowed to work on work related to the contract until they have received interim access and have completed all required training. This is determined by ConServe management

21b. If computer matching occurs, can the business owner certify that it meets requirements of IRM 11.3.39 Disclosure of Official Information, Computer Matching & Privacy Protection Act ? Not Applicable

I.1 RECORDS RETENTION SCHEDULE

22. Are these records covered under the General Records Schedule (GRS), or have a National Archives and Records Administration (NARA) archivist approved a Record Control Schedule (RCS) for the retention and destruction of official agency records stored in this system? Yes

22a. If **yes**, how long are the records required to be held under the corresponding RCS and how are they disposed of? In your response, please include the complete IRM number 1.15.XX and specific item number and title.

Record retention has been discussed with the PCA. Records are to be held and not destroyed until PDC provides additional guidance. Information ages off (is deleted from) the system at varying intervals. All records housed in the PDC system will be erased or purged from the system in accordance with approved retention periods. It is the official repository for data and documents and has National Archives approval to affect data disposition. Any records generated and maintained by the system will be managed according to requirements under IRM 1.15.1 and 1.15.6, and will be destroyed using IRS Records Control Schedule (RCS) 28 for Tax Administration-

I.2 SA&A OR ECM-R

23. Has the system been through SA&A (Security Assessment and Authorization) or ECM-R (Enterprise Continuous Monitoring Reauthorization)? No

23c. If **no**, is the system secured in accordance with all applicable federal, treasury, and IRS security policy, procedures, and requirements? Yes

23.1 Describe in detail the system's audit trail. ConServe's CCMS utilizes FICO's Debt Manager system to maintain account information. Debt Manager tracks audit information at the request level and the data instance level to provide robust auditing and traceability throughout the system. As requests are made to the Debt Manager mid-tier, upsert (update and insert) information is captured and bound for the life of the request to the thread of execution. This information includes the user Id of the requestor, the date and time at which the request was made, the software component that the request was made through, and a version sequence (in the case of an update) used for optimistic locking. An interceptor captures this information in an application audit table that persists the requests that are made by every user on the system over time. Another interceptor is responsible for stamping this upsert information on every entity data modification or addition within the system, just before the call to persist is made. Upsert columns capture this information on every table within the database, providing the ability to see when, how, and by whom all changes were made. In addition, Debt Manager has a registry of tables to maintain complete histories on over time.

J. PRIVACY TESTING

24. Does the system require a System Test Plan? Yes

24b. If **yes**, is the test plan in process or completed: In Process

If **in process**, when is the test plan scheduled for completion? 2/28/2017

24.3 If **completed/ or in process**, 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? In process and will include all applicable privacy requirements laid out by Publication 4812, working with Contractor Security Assessment Team to establish.

K. SBU Data Use

25. Does this system use, or plan to use SBU Data in Testing? No

L. NUMBER AND CATEGORY OF PII RECORDS

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

26a. IRS Employees: Not Applicable

26b. Contractors: Not Applicable

26c. Members of the Public: Under 100,000

26d. Other: No

M. CIVIL LIBERTIES

27. Does the system maintain any information describing how any individual exercises their rights guaranteed by the First Amendment? No

28. Is the system information used to conduct data-mining as defined in the *Implementing the 9/11 Commission Recommendations Act of 2007, Public Law 110-53, Section 804*? No

29. Will this system have the capability to identify, locate, and monitor individuals or groups of people? Yes

If **yes**, describe the type of information derived from these efforts and the technical (e.g., audit trails) or other processes used to limit unauthorized monitoring. The CCMS system has the ability to identify, locate, and monitor individuals for the purpose of conducting collection activities of delinquent tax debt from taxpayers on behalf of the IRS.

N. ACCOUNTING OF DISCLOSURES

30. 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

End of Report
