Date of Approval: 02/23/2026
Questionnaire Number: 2829

Basic Information/Executive Summary

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

Title 31 NonBanking Financial Institution Database

Acronym:

Title 31

Business Unit

Small Business and Self Employed

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 Title 31 application is an on-line database containing the Non-Bank Financial Institution (NBFI) workload inventory that is defined and governed by the Bank Secrecy Act (BSA). The Title 31 Database provides an inventory management system that allows Bank Secrecy Act (BSA) managers to access cases assigned to their respective groups. Title 31 contains all the entities identified by BSA as being under IRS jurisdiction for Title 31 compliance. It is used by Small Business and Self-Employed (SBSE) Operating Division, BSA Exam Case Selection (ECS) Managers, and Coordinators to deliver examination inventory to the field groups. It is used by the field groups to update information and input examination results. Title 31 Examiners review these cases to determine if any case is not in compliance with financial regulations and make appropriate referrals to the Financial Crime Enforcement Network (FinCEN) and/or Criminal Investigation

(CI) for further review. It is also used to provide business results to BSA 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).

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

Address
Employer Identification Number
Internet Protocol Address (IP Address)
Name
Online Identifiers
Social Security Number (including masked or last four digits)
Standard Employee Identifier (SEID)
Telephone Numbers

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

PII about individuals for Bank Secrecy Act compliance - 31 USC
PII for personnel administration - 5 USC
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?
No

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)
3

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?
1716

4.12 What is the previous PCLIA title (system name)?
Title 31 NonBanking Financial Institution Database

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.)
Changes to PII. Also need to identify SPLUNK as a downstream Audit logging system.

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.
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.
IT's Compliance Domain ESC

9 Is this System listed on As-Built-Architecture (ABA)? If the system is not in the ABA, then contact the ABA (https://ea.web.irs.gov/aba/index.html) for assistance.

Yes

9.1 What is the ABA ID?

211086

10 Does this system disclose any PII to any third party outside the IRS?

No

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?

No

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

During the examination, the revenue agent obtains and/or verifies PII/SBU information relating to the entity. If information needs to be added and/or updated, the revenue agent provides this information to the group manager who will update the database. Updates to the Taxpayer Identification Number (TIN) and Legal Name need to be performed by the database administrator. This is to ensure prior examination history is preserved if applicable.

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.)

Only IRS employees with an approved SBSE BSA Database Business Entitlement Access Request System (BEARS) entitlement can access the system and its PII. Users with the administrator entitlement can read, add, delete, and update PII. All other users can read and update existing PII but cannot create or delete it.

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.

We are collecting your personal information to facilitate access to internal IRS systems or applications and allow IRS to track use of its information technology resources as authorized by 5 U.S.C. 301. The information may consist of:

- Name
- Email Address
- Username
- UserID
- Password
- PIV Credentials
- SEID Number
- Device ID

We may disclose this information in accordance with the applicable Routine Uses published in the Treasury/IRS 34.047 IRS Audit Trail and Security System and Treasury .015 General Information Technology Access Account Records System of Records Notices. Providing your personal information is voluntary and necessary to access IRS internal systems and applications. By giving us your information, you consent to its use for this purpose. If you choose not to provide your information your access may be denied.

Title 31 does not have system specific forms that collect information maintained in a Privacy Act system of records.

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".

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".

Not Applicable

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

Bank Secrecy Act (BSA) users apply for access to a user specific domain via the Business Entitlement Access Request System (BEARS) process. During the BEARS approval process, the BSA functional BEARS administrator determines appropriateness of user group. There are additional access controls within the user group table within the application. Data access is limited to the approved user group role.

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.

None

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.

The system collects information about auditable events into a table maintained on the database. Information collected includes user ID (employee SEID), description of auditable event, event type, event ID, TIN, user IP address, event status, error message (if applicable), time stamp, user device identifier, and user role. Records are pulled from this table by SPLUNK which serves as the downstream audit logging system. This is accomplished using a service account.

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

SPLUNK

Incoming/Outgoing

Outgoing (Sending)

Transfer Method

Other

Other Transfer Method

Audit log records are captured in a table on the Title 31 database. The records are pulled into SPLUNK via a service account. SPLUNK serves as the downstream audit logging system for the Title 31 database.

Interface Type

IRS Systems, file, or database

Agency Name

Microsoft Access

Incoming/Outgoing
Both
Transfer Method
Other
Other Transfer Method
Data is processed and added to a SQL Server; it is then available on the Microsoft Access Interfaces. The workstations used to access the Title 31 application contain a pre-configured Open Database Communication (ODBC) utility that connects the Title 31 application to the MS SQL database. This ODBC is a standard application program interface (API). It provides the front-end interfaces for Title 31.

Systems of Records Notices (SORNs)

SORN Number & Name
IRS 34.037 - Audit Trail and Security Records
Describe the IRS use and relevance of this SORN.
Audit Trail

SORN Number & Name
IRS 42.031 - Anti-Money Laundering/Bank Secrecy Act and Form 8300
Describe the IRS use and relevance of this SORN.
Money Laundering

Records Retention

What is the Record Schedule System?
Record Control Schedule (RCS)
What is the retention series title?
RCS 28 - Tax Administration Collection
What is the GRS/RCS Item Number?
255
What type of Records is this for?
Both (Paper and Electronic)
Please provide a brief description of the chosen GRS or RCS item.
Title 31 Non-Banking Financial Institution Database (Title 31). An on-line database containing non-banking financial institution (NBFI) workload inventory that is defined and governed by the Bank Secrecy Act (BSA).

What is the disposition schedule?

AUTHORIZED DISPOSITION Delete/Destroy data when 20 years old or when no longer needed for administrative, legal, audit, or other operational purposes, whichever is later.

Data Locations

What type of site is this?

System

What is the name of the System?

Title 31 NonBanking Financial Institution Database

What is the sensitivity of the System?

Federal Tax Information (FTI)

Please provide a brief description of the System.

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What are the incoming connections to this System?

The Title 31 database is not directly connected to other systems. Information is entered into the database manually by users through Microsoft Access interfaces. The interfaces are connected to the database via an ODBC string.

What are the outgoing connections from this System?

The Title 31 database is not directly connected to other systems. Information is pulled from the database manually by users through Microsoft Access interfaces. The interfaces are connected to the database via an ODBC string.