

Date of Approval: **September 24, 2021**

PIA ID Number: **6457**

## **SYSTEM DESCRIPTION**

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

Robotic Process Automation Small Business Self Emp, UC44:Performance Planning

*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?*

SBSE Process Automation (SBSE Auto), PCLIA 6039

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

8/12/2021

*Changes that occurred to require this update:*

Addition of Personally Identifiable Information (PII)

New Access by IRS employees or Members of the Public

*Were there other system changes not listed above?*

Yes

*What were those changes?*

Inclusion of additional SBSE automation capabilities.

*What governance board or Executive Steering Committee (ESC) does this system report to? Full name and acronym.*

Enterprise Services Governance Board

*Current ELC (Enterprise Life Cycle) Milestones:*

Project Initiation/Milestone 1

Domain Architecture/Milestone 2

*Is this a Federal Information Security Management Act (FISMA) reportable system?*

Yes

## **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.*

Reason for system and benefits to IRS - Automating manual business processes will increase accuracy, improve productivity, higher consistency, better efficiency, easier scalability, allow employees to focus on more critical, analytical tasks while robot performs mundane repetitive processes. Current manual business processes being automated: \* Manual extraction of data from Automated Under Reporter (AUR) system. The process should monitor AUR weekly updates, extract data reports for each campus location and tax year (TY). The current manual process takes 1-2 days to extract the 168 reports used for AUR data analysis. The automation will: Elevate the level of consistency and quality of services and automate standardized business processes used to extract AUR report data for each campus, Shift time spent on labor-intensive activities to higher value-add activities, and Leverage technology as a resource to scale for increasing taxpayer demands, while reducing the cost of providing those services. \* Aged 5M - Aged 5M is a term used for monitoring taxpayer's filing and payment compliance for 5 years after an offer has been accepted. This requires the taxpayer to file and pay any new liabilities that are assessed during each of the five tax years. The process should monitor filing compliance, update, and close cleared accounts in Integrated Data Retrieval System (IDRS) and Automated Offer In Compromise (AOIC). It will also update uncleared accounts in IDRS and AOIC. \* Payment Process - When a compromise is agreed upon, a Tax Examiner is assigned to that record. Monitoring these offers in compromise (MOIC) entails accessing the Automated Offers In Compromise (AOIC) system and running a report for taxpayers that have open offers. The Tax Examiner then checks if any payments were received for that person. At that point, the process branches into 3 potential outcomes: 1. No payment was received 2. One portion of the total amount due was received 3. The total amount due/remaining was received. If a partial payment was received, the Tax Examiner will process the transaction and input a follow-up date in AOIC. If the received payment was for the remaining balance, a release of lien request is submitted, and their status is updated in the AOIC. If no payment is received 31 days past the date generated in AOIC, a potential default notification is sent to the taxpayer. If no payment has been received 45 days past the initial notification date, additional steps are taken to indicate that the individual is in default. \* Certified Professional Employer Organization (CPEO) Automated Tax Compliance Check (CPEO ATCC) - The CPEO

Automated Tax Compliance Check (CPEO ATCC) is an automated routine that is run using Consumer Off the Shelf (COTS) software called UiPath. The CPEO ATCC automated routine performs a financial compliance checks on businesses and individuals. The automated routine uses a .csv to access the list of CPEOs or related entities. The automated routine uses the Integrated Automation Technologies (IAT) tool to read IDRS data. The routine reads bankruptcy and lien data in Accurint. The automated routine fills out a worksheet in Excel to record findings for CPEO employees. The routine also maintains a process log. No PII or passwords are retained by the UiPath RPA automated routine after the session ends. \* A6020(b) Automated Status 001 Nonfiler Check (A6020b AS001NC) - The A6020(b) Automated Status 001 Nonfiler Check (A6020b AS001NC) is an automated routine that is run using COTS software called UiPath. The A6020b AS001NC automated routine determines in a nonfiler has a filing requirement and estimate the basis for assessment. The automated routine uses the A6020(b) database to access the list of nonfiler cases. The automated routine uses the IAT tool to read IDRS data and then calculates an assessment amount. The routine places cases with an estimated assessment into a process status and closes cases with no assessment amount in the A60209(b) database. The automated routine uses the IAT tool to also close out nonfiler cases in IDRS. The automated routine takes notes of actions in Accounts Management System (AMS) to indicate which cases it changed process status or closed. The routine also records actions in a log. No PII or passwords are retained by the UiPath Robotic Process Automation (RPA) automated routine after the session ends. \* A6020(b) Automated Nonfiler Expedited CAWR (A6020b ANECA) - The A6020(b) Automated Nonfiler Expedited CAWR (A6020b ANECA) is an automated routine that is run using COTS software called UiPath. The A6020b ANECA automated routine identifies A6020(b) nonfiler cases to advance because they are predicted to be productive or to close-out because they are predicted to be non-productive. The automated routine uses the A6020(b) database to access the list of nonfiler cases. The routine uses Compliance Data Warehouse Data (CDW) to identify 'favorable cases' and 'unfavorable cases'. The routine then places 'favorable cases' into a process status and closes 'unfavorable cases' in the A60209(b) database. The automated routine uses the IAT tool to also close out nonfiler cases in IDRS. The automated routine takes notes of actions in AMS to indicate which cases it changed process status or closed. The automation also records actions in an Excel spreadsheet log. The automated routine uses decision logic to identify cases to close or process. No PII or passwords are retained by the UiPath RPA automated routine after the session ends.

## **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:*

Interfaces with external entities that require the SSN

When there is no reasonable alternative means for meeting business requirements

Another compelling reason for collecting the SSN

*Explain why the authorized use(s) above support the new or continued use of SSNs (or tax identification numbers).*

The Robotic Process Automation Small Business Self Emp, UC44:PPA\_Reports requires the use of SSN's because no other identifier can be used to uniquely identify a taxpayer. SSNs are permissible from Internal Revenue Code (IRC) 6109, which requires individual taxpayers to include their SSNs on their income tax returns. \*Robotic Process Automation (RPA) performs the same actions as an employee within the IRS. Resulting in automations being created that access systems that use SSN information to validate data throughout automated processes. The implemented SBSE MOIC processes require access to the SSN to verify information. CPEO ATCC uses the IRS Accurint system which retrieves bankruptcy and lien data from Accurint based on SSN.

*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. RS-PCC requires the use of SSN's because no other identifier can be used to uniquely identify a taxpayer at this time. \*RPA cannot eliminate the use of SSN, since it replicates what employee does today as manual process. 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. SBSE Auto requires the use of SSN's because no other identifier can be used to uniquely identify a taxpayer at this time.

Employer Identification Number

Other Taxpayer Identification Number

*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:*

Name  
Mailing address  
Phone Numbers  
Date of Birth  
Standard Employee Identifier (SEID)  
Financial Account Numbers  
Employment Information  
Tax Account Information  
Centralized Authorization File (CAF)

*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:*

Agency Sensitive Information Information which if improperly used or disclosed could adversely affect the ability of the agency to accomplish its mission.

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.

*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 automation is pulling count reports which does not contain PII. However, the count reports come from the AUR database which contains detailed case information which is PII. The level of permissions needed for the robot could access the underlying PII/case

information. The robotic process is limited to the summary counts reports provided by the AUR system. \*Document Location Number (DLN) For the CPEO Program, the business process and thus the automation the business process uses: - name, address, and license number for CPEO or Related Entity Business or Responsible Individual Name.

*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.*

The Robotics Process Automation (RPA) Project will deploy bots which automate repetitive manual process using Commercial Off the Shelf (COTS) tool. The BOT will be programmed to access only what is relevant to complete the manual process. The BOT will access AUR system to pull relevant records and perform updates (as needed), identical to what employee does today as part of the manual process. \*The Robotics Process Automation (RPA) Project will deploy bots which automate repetitive manual process using Commercial Off the Shelf (COTS) tool. The BOT will be programmed to access only what is relevant to complete the manual process. The BOT will access enterprise systems such as IDRS, AOIC, Automated Lien System (ALS), Remittance Transaction Research System (RTR), Integrated Automation Technologies (IAT), Accounts Management System AMS), A6020(b) system, and ReferenceNet (Accurint) to pull relevant records and perform updates (as needed), identical to what employee does today as part of the manual process. These processes will require the use of sensitive information such as SSN, TIN, DLN and SEID to meet the requirements of the automated process.

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

Regarding accuracy, the automations have scripted tasking limiting them to only access information that are already listed in the business program area's authoritative data. The automation's actions are verified through the use audit log and summary business report. The audit log file specifically lists the data used by the SBSE automations. In addition, the automation has logic to record errors encountered during its processing into the log. Where indicated in the business process, some of the automations also record 'process updates' in the

program office database and AMS; which is also reviewed by the program office. Regarding timeliness, the audit log records the time the access began, the machine, the user, and the duration. The automations reduce the time data is being accessed compared to the existing manual human processing. Regarding completeness, the automations record actions during the entire process and record whether processing was completed, as well a record any errors encountered. \*Regarding accuracy, the automations have scripted tasking limiting them to only access SBU/PII related to the SSN or Taxpayer Identification Number that are already listed in the business program area's authoritative data. The automation's actions are verified through the use audit log and summary business report. The audit log file specifically lists the data used by the SBSE automations. In addition, the automation has logic to record errors encountered during its processing into the log. Where indicated in the business process, some of the automations also record 'process updates' in the program office database and AMS; which is also reviewed by the program office. Regarding timeliness, the audit log records the time the SBU/PII access began, the machine, the user, and the duration. The automations reduce the time SBU/PII is being accessed compared to the existing manual human processing. Regarding completeness, the automations record actions during the entire process and record whether processing was completed, as well a record any errors encountered.

## **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 24.030 Customer Account Data Engine Individual Master File

IRS 24.046 Customer Account Data Engine Business Master File

IRS 24.047 Audit Underreporter Case Files

## **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: A6020(b) Database

Current PCLIA: Yes

Approval Date: 9/17/2018

SA&A: Yes

ATO/IATO Date: 5/23/2021

System Name: RTR Remittance Transaction Research

Current PCLIA: Yes

Approval Date: 4/30/2021

SA&A: Yes

ATO/IATO Date: 2/26/2020

System Name: ALS Automated Lien System

Current PCLIA: Yes

Approval Date: 10/30/2019

SA&A: Yes

ATO/IATO Date: 9/11/2018

System Name: AUR Automated Underreporter

Current PCLIA: Yes

Approval Date: 6/12/2019

SA&A: Yes

ATO/IATO Date: 11/1/2018

System Name: IRS Integrated Data Retrieved System

Current PCLIA: Yes

Approval Date: 10/1/2018

SA&A: Yes

ATO/IATO Date: 2/4/2019

System Name: IAT Integrated Automation Technologies

Current PCLIA: Yes

Approval Date: 10/11/2019

SA&A: No

System Name: AOC Automated Offers In Compromise  
Current PCLIA: Yes  
Approval Date: 5/3/2021  
SA&A: Yes  
ATO/IATO Date: 10/25/2019

System Name: AMS Accounts Management System  
Current PCLIA: Yes  
Approval Date: 11/20/2020  
SA&A: Yes  
ATO/IATO Date: 6/9/2020

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

No

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

No

*Does the system receive SBU/PII from other sources?*

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).*

Organization Name: ReferenceNet (Accurint)  
Transmission Method: IRS Paid Reference Data Service Provider  
ISA/MOU: Yes

*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?*

Yes

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

System Name: IAT Tool - Integrated Automation Technology

Current PCLIA: Yes

Approval Date: 10/11/2019

SA&A: No

System Name: Compliance Data Warehouse

Current PCLIA: Yes

Approval Date: 9/16/2020

SA&A: No

*Identify the authority.*

Identify the authority. MOIC- Internal Revenue Manual (IRM)5.19.7 A6020(b) - Internal Revenue Manual (IRM)5.18.2 A6020(b) - Internal Revenue Code A6020(b)

*For what purpose?*

To generate potential default letters. To identify if a business nonfiler should not receive a default letter.

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

No

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

No

*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.?*

Yes

*Briefly explain how the system uses the referenced technology.*

Reason for system and benefits to IRS - Automating manual business processes will increase accuracy, improve productivity, higher consistency, better efficiency, easier scalability, allow employees to focus on more critical, analytical tasks while robot performs mundane repetitive processes. Current manual business processes being automated: \* Aged 5M - Aged 5M is a term used for monitoring taxpayer's filing and payment compliance for 5 years after an offer has been accepted. This requires the taxpayer to file and pay any new liabilities that are assessed during each of the five tax years. The process should monitor filing compliance, update, and close cleared accounts in Integrated Data Retrieval System (IDRS) and Automated Offer In Compromise (AOIC). It will also update uncleared accounts in IDRS and AOIC. \*\*\*\*\* \* Payment Process - When a compromise is agreed upon, a Tax Examiner is assigned to that record. Monitoring these offers in compromise (MOIC) entails accessing the Automated Offers In Compromise (AOIC) system and running a report for taxpayers that have open offers. The Tax Examiner then checks if any payments were received for that person. At that point, the process branches into 3 potential outcomes: 1. No payment was received 2. One portion of the total amount due was received 3. The total amount due/remaining was received. If a partial payment was received, the Tax Examiner will process the transaction and input a follow-up date in AOIC. If the received payment was for the remaining balance, a release of lien request is submitted, and their status is updated in the AOIC. If no payment is received 31 days past the date generated in AOIC, a potential default notification is sent to the taxpayer. If no payment has been received 45 days past the initial notification date, additional steps are taken to indicate that the individual is in default. \*\*\*\*\* \* This is not an IT system; but rather an automated routine (robotic process automation - RPA) that is built and run using COTS software (called UiPath). The A6020(b) Automated Status 001 Nonfiler Check (A6020b AS001NC) is an automated routine that is run using COTS software called UiPath. The A6020b AS001NC automated routine determines in a nonfiler has a filing requirement and estimate the basis for assessment. There are no design or functionality changes to existing IRS systems. This UiPath automated routine replicates the typical end-user actions (e.g., point and clicks) that the employee performs on their computers. The automated routine interacts with limited IRS software applications (when user-prompted passwords are provided and encrypted), runs on the IRS employee's computer, and is supervised by the IRS employee. Automated Routine Overview: This process is only kicked off when prompted by the end-user and when the end-user has submitted the correct end-user credentials for IRS systems into a .net SecureString.

The automated routine uses the A6020(b) database to access the list of nonfiler cases. The automated routine uses the IAT tool to read IDRS data and then calculates an assessment amount. The routine places cases with an estimated assessment into a process status and closes cases with no assessment amount in the A60209(b) database. The automated routine uses the IAT tool to also close out nonfiler cases in IDRS. The automated routine takes notes of actions in AMS to indicate which cases it changed process status or closed. The routine also records actions in an Excel spreadsheet log. No PII or passwords are retained by the UiPath RPA automated routine after the session ends. Authorities and Guidelines include: A6020(b) - Internal Revenue Code A6020(b) A6020(b) - Internal Revenue Manual (IRM)5.18.2 \*\*\*\*\* \*This is not an IT system; but rather an automated routine (robotic process automation - RPA) that is built and run using COTS software (called UiPath). The A6020(b) Automated Nonfiler Expedited CAWR (A6020b ANECA) is an automated routine that is run using COTS software called UiPath. The A6020b ANECA automated routine identifies A6020(b) nonfiler cases to advance because they are predicted to be productive or to close-out because they are predicted to be non-productive. There are no design or functionality changes to existing IRS systems. This UiPath automated routine replicates the typical end-user actions (e.g., point and clicks) that the employee performs on their computers. The automated routine interacts with limited IRS software applications (when user-prompted passwords are provided and encrypted), runs on the IRS employee's computer, and is supervised by the IRS employee. Automated Routine Overview: This process is only kicked off when prompted by the end-user and when the End-user has submitted the correct credentials for IRS systems into a .net SecureString. The automated routine uses the A6020(b) database to access the list of nonfiler cases. The routine places 'favorable cases' into a process status and closes 'unfavorable cases' in the A60209(b) database. The automated routine uses the IAT tool to also close out nonfiler cases in IDRS. The automated routine takes notes of actions in AMS to indicate which cases it changed process status or closed. The automation also records actions in an Excel spreadsheet log. The automated routine uses a RAAS scoring model within the Compliance Data Warehouse (CDW) Environment to produce results which indicate cases to close or process. No PII or passwords are retained by the UiPath RPA automated routine after the session ends. \*\*\*\*\* \*This is not an IT system; but rather an automated routine (robotic process automation - RPA) that is built and run using COTS software (called UiPath). The CPEO Automated Tax Compliance Check (CPEO ATCC) is an automated routine that is run using COTS software called UiPath. The CPEO ATCC automated routine performs a financial compliance checks on businesses and individuals. There are no design or functionality changes to existing IRS systems. This UiPath automated routine replicates the typical tasks (e.g., point and clicks) that the employee performs on their computers. The automated routine interacts with limited IRS software applications (when user-prompted passwords are provided and encrypted), runs on the IRS employee's computer, and is supervised by the IRS employee. Automated Routine Overview: This process is only kicked off when prompted by the end-user and when the end-user has submitted the correct end-user credentials for IRS systems into a .net SecureString. The automated routine uses a .csv to access the list of CPEOs or related entities. The automated routine uses the IAT tool to read IDRS data. The routine reads bankruptcy and lien data in ReferenceNet (Accurint). The automated routine fills out an excel worksheet to record findings for the supervising employee. The routine also maintains a process log in Excel. No PII or passwords are retained by the UiPath RPA

automated routine after the session ends. Authorities and Guidelines include: CPEO - Revenue Procedure 2016-33 CPEO - Revenue Procedure 2017-14 CPEO - Internal Revenue Code 3511 CPEO - Internal Revenue Code 7705 CPEO - Internal Revenue Manual (IRM)4.23.5.13.4

*Does the system use cloud computing?*

No

*Does this system/application interact with the public?*

Yes

*Was an electronic risk assessment (e-RA) conducted on the system/application?*

Not Applicable

*Please explain.*

MOIC - Potential default letter is sent out to taxpayers as per IRM 5.19.7.

## **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?*

Notice, consent, and due process are provided in the tax forms instructions filed by the taxpayer, and pursuant to 5 USC. Information is collected from existing IRS systems; some of which was submitted previously by the taxpayer. For the CPEO program, Certified Professional Employer Organizations elect to apply to the IRS and pay to undergo IRS review to become and maintain status as certified PEOs. For the A6020(b) program, the Treasury and IRS is authorized by IRC 6020(b) to create a substitute for return on behalf of employers.

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

Yes

*Describe the mechanism by which individuals indicate their consent choice(s):*

Notice, consent, and due process are provided in the tax forms instructions filed by the taxpayer, and pursuant to 5 USC. For MOIC, the taxpayer has signed the Form 656 that agrees to the terms of the offer and letters that are being sent to inform the taxpayer that the terms have not been met. For the CPEO program, Certified Professional Employer Organizations elect to apply to the IRS and pay to undergo IRS review to become and maintain status as certified PEOs.

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

Notice, consent, and due process are provided in the tax forms instructions filed by the taxpayer, and pursuant to 5 USC. The automations are robotic process automations, which means that the automations follow a prescribed script of IRS processing steps and business rules in a repeatable, consistent manner.

## **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 Contractor Operated

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

*IRS Employees*

Users: Administrator

System Administrators: Administrator

Developers: Administrator

*IRS Contractor Employees*

Contractor Users: Administrator

Contractor Developers: Administrator

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

Pre-identified tax analysts will run the automation on their laptop, with their prior system access approval to access data. This data approval is granted through the OL5081 process

and is approved by the employee's manager. \*Pre-identified tax examiners will run the automation on their laptop, with their prior system access approval to access PII and SBU data. This PII and SBU approval is granted through the OL5081 process and is approved by the employee's manager.

## **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?*

Yes

*How long are the records required to be held under the corresponding GRS or RCS, and how are they disposed of? In your response, please provide the GRS or RCS chapter number, the specific item number, and records series title.*

All data meeting end of retention period requirements will be eliminated, overwritten, degaussed, and/or destroyed in accordance with approved National Archives and Records Administration (NARA)-approved disposition authorities for the systems containing the data and done so in the most appropriate method based upon the type of storage media used for: Integrated Data Retrieval System (IDRS) RCS 29, item 236, and Accounts Management Services (AMS) RCS 29, item 425. RCS 32 Item 31-Automated Underreporter (AUR). AUR assists tax examiners in working underreporter cases, i.e., controls and tracks cases throughout the underreporter process, plus generates notices and letters to taxpayers. The database contains taxpayer account data, information return data, and bad payer data. AUTHORIZED DISPOSITION Delete 10 years after assessment.

## **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?*

Do not know

*Describe the system's audit trail.*

\*For UC44: PPA Reports: Limited scale local log-based auditing is in place. The automations maintain a local execution log and a functional log of the activities of the robotic process automation. \* For MOIC and Payment Process Automations: Risk Based

Decision (RBD) was submitted to mitigate the lack of audit trail. Limited scale local log-based auditing is in place. As confirmed by the Associate Director of Security Risk Management (SRM), the RBD is NOT necessary in order for this pilot to move forward but is awaiting approval in Cyber. \* For CPEO and A6020(b) Automations: The automations maintain a local execution log and a functional log of the activities of the robotic process automation.

## **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)?*

Information Technology (IT) RPA Sharepoint Site - Contact the RPA PMO for documentation

*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?*

For UC44: PPA Reports: System is in development. Once it is developed, contact the RPA (Program Management Office) PMO for documentation. Documentation should be available on the IT RPA SharePoint Site. \*Test plans are generated and reviewed by process Subject Matter Expert (SME)s to verify and sign off that the automation only performs the same activities as the current tax examiner. For CPEO and A6020(b)automations testing was completed June 2021.

## **SBU DATA USE**

*Does this system use, or plan to use SBU Data in Testing?*

Yes

*Was permission granted per the requirements of Form 14664, SBU Data Use Questionnaire or Form 14665, SBU Data Use Request?*

Yes

*Provide the date the permission was granted.*

3/4/2020

*Was testing performed in conformance with IRM 10.8.8 Information Technology (IT) Security, Sensitive But Unclassified (SBU) Data Policy?*

Yes

## **NUMBER AND CATEGORY OF PII RECORDS**

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

IRS Employees: Not Applicable

Contractors: Not Applicable

Members of the Public: Under 100,000

Other: No

## **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?*

No