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**A. SYSTEM DESCRIPTION**

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Authority: Office of Management Budget (OMB) Memorandum (M) 03-22, OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002 & PVR #10- Privacy Accountability and #21-Privacy Risk Management

Date of Submission: August 11, 2015

PIA ID Number: **911**

1. What type of system is this? Legacy

1a. Is this a Federal Information Security Management Act (FISMA) reportable system? No

2. Full System Name, Acronym, and Release/Milestone (if appropriate):

Adoption Taxpayer Identification Number, ATIN

2a. Has the name of the system changed? No

3. Identify how many individuals the system contains information on

Number of Employees: Under 50,000

Number of Contractors: Not Applicable

Members of the Public: 100,000 - 1,000,000

**4. Responsible Parties: N/A**

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**5. General Business Purpose of System**

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The system assigns temporary identification numbers to children that aren't eligible for a SSN and who are in the process of being adopted.

6. Has a PIA for this system, application, or database been submitted previously to the Office of Privacy Compliance? (If you do not know, please contact \*Privacy and request a search) Yes

6a. If **Yes**, please indicate the date the latest PIA was approved: 10/20/2000

6b. If **Yes**, please indicate which of the following changes occurred to require this update.

- System Change (1 or more of the 9 examples listed in OMB 03-22 applies) (refer to PIA Training Reference Guide for the list of system changes) Yes
- System is undergoing Security Assessment and Authorization No

6c. State any changes that have occurred to the system since the last PIA

Updates are being made to some of the IRMs referenced and to the location at which the system operates.

7. If this system has an Exhibit 53 or Exhibit 300 please provide the Unique Project Identifier (UPI) number (XXX-XX-XX-XX-XX-XXXX-XX). Otherwise, enter the word 'none' or 'NA'. none

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**B. DATA CATEGORIZATION**

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Authority: OMB M 03-22 & PVR #23- PII Management

8. Does this system collect, display, store, maintain or disseminate Personally Identifiable Information (PII)? Yes

9. Indicate the category that best describes the source that provides or originates the PII collected, displayed, stored, maintained or disseminated by this system. Most common categories follow:

Taxpayers/Public/Tax Systems Yes  
 Employees/Personnel/HR Systems No

*Other Source:*

Other No

10. Indicate all of the types of PII collected, displayed, stored, maintained or disseminated by this system. Then state if the PII collected is on the Public and/or Employees. Most common fields follow:

TYPE OF PII	Collected?	On Public?	On IRS Employees or Contractors?
Name	Yes	No	No
Social Security Number (SSN)	Yes	No	No
Tax Payer ID Number (TIN)	Yes	No	No
Address	Yes	No	No
Date of Birth	Yes	No	No

**Additional Types of PII:** Yes

<u>PII Name</u>	<u>On Public?</u>	<u>On Employee?</u>
Employee Identification Number is captured via IDR	No	Yes
Adoption Taxpayer Identification Number	Yes	No
Applicant Name	Yes	No
Child's Birth Name and Child's Adoptive Name	Yes	No
Place of Birth	Yes	No
Child's Gender	Yes	No
Phone Number of Applicant	Yes	No
Placement Agency Information (Name, Address)	Yes	No
Placement Agency EIN	Yes	No
Power of Attorney (Name, Address), if applicable	Yes	No

10a. What is the business purpose for collecting and using the SSN ?

The SSN is provided by the person(s) submitting the Application for ATIN (Form W-7A). This data is used as an access key to the application data stored on the ATIN database. The data will allow the ATIN users to research and access all ATIN applications received from a specific individual or group of individuals. This is necessary to insure that the child, for which the W-7A was submitted, is assigned only one number.

If you answered **Yes** to Social Security Number (SSN) in question 10, answer **10b**, **10c**, and **10d**.

10b. Cite the authority that allows this system to contain SSN's? (e.g. specific regulations, statutes, etc.)

Treas. Reg. §301.6109-3 provides that an IRS adoption taxpayer identification number (ATIN) is a temporary identification number assigned by the IRS to a child who has been placed by an authorized placement agency in the household of a prospective adoptive parent for legal adoption. Prospective adoptive parents must have an ATIN in order to claim certain tax benefits such as the dependency exemption, Adoption Credit, Child Tax Credit and the Credit for Child and Dependent Care Expenses

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10c. What alternative solution to the use of the SSN has/or will be applied to this system? (e.g. masking, truncation, alternative identifier)

Masking the SSN would be counter-productive since the SSN is utilized for research.

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10d. Describe the planned mitigation strategy and forecasted implementation date to mitigate or eliminate the use of Social Security Numbers on this system?

There is no mitigation strategy planned at the present time to eliminate the use of SSNs which are used to research to ensure multiple ATINs are not assigned.

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Describe the PII available in the system referred to in question 10 above.

Applicant provides the information necessary to apply for an Adoption Taxpayer Identification Number necessary per the law.

11. Describe in detail the system's audit trail. State what data elements and fields are collected. Include employee log-in information. If the system does not have audit capabilities, explain why an audit trail is not needed.

Standard audit trail information is captured per IRS security standards. Additional information provided includes Social Security Number and ATIN.

11a. Does the audit trail contain the audit trail elements as required in current IRM 10.8.3 *Audit Logging Security Standards*? Yes

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12. What are the sources of the PII in the system? Please indicate specific sources:

- a. IRS files and databases: No
- b. Other federal agency or agencies: No
- c. State and local agency or agencies: No
- d. Third party sources: No
- e. Taxpayers (such as the 1040): Yes
- f. Employees (such as the I-9): No
- g. Other: No If **Yes**, *specify*.

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### C. PURPOSE OF COLLECTION

*Authorities: OMB M 03-22 & Internal Revenue Manual (IRM) 10.8.8, IT Security, Live Data Protection Policy & PVR #16, Acceptable Use*

13. What is the business need for the collection of PII in this system? Be specific.

In order to process an ATIN application, the applicant must provide enough PII to process/authenticate.

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### D. PII USAGE

*Authority: OMB M 03-22 & PVR #16, Acceptable Use*

14. What is the specific use(s) of the PII?

To conduct tax administration	<u>Yes</u>
To provide taxpayer services	<u>Yes</u>
To collect demographic data	<u>No</u>
For employee purposes	<u>No</u>

Other: No

*If other, what is the use?*



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25. 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? No

If **No**, how long are you proposing to retain the records? Please note, if you answered no, you must contact the IRS Records and Information Management Program to initiate records retention scheduling before you dispose of any records in this system.

ATIN Database is unscheduled. System owners will work with the IRS Records Office to draft disposition instructions that meet business needs for approval by the National Archives and Records Administration (NARA). Data retention will likely model the 7-year approved retention for ITIN.

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26. Describe how the PII data in this system is secured, including appropriate administrative and technical controls utilized.  
Only employees who have been authorized/profiled for ATIN access are authorized to view/process this PII data.

26a. Next, explain how the data is protected in the system at rest, in flight, or in transition.

All PII data is secured per IRS security standards and procedures.

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27. Has a risk assessment (e.g., SA&A) been conducted on the system to ensure that appropriate security controls have been identified and implemented to protect against known risks to the confidentiality, integrity and availability of the PII? No

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28. Describe the monitoring/evaluating activities undertaken on a regular basis to ensure that controls continue to work properly in safeguarding the PII.

The PII information is monitored per IRS security standards.

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29. Is testing performed, in accordance with Internal Revenue Manual (IRM) 10.8.8 - *IT Security, Live Data Protection Policy*? Not Applicable

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## H. PRIVACY ACT & SYSTEM OF RECORDS

Under the statute, any employee who knowingly and willfully maintains a system of records without meeting the Privacy Act notice requirements is guilty of a misdemeanor and may be fined up to \$5000.

*Authority: OMB M 03-22 & Privacy Act, 5 U.S.C. 552a (e) (4) & PVR #13-Transparency*

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30. Are 10 or more records containing PII maintained/stored/transmitted through this system? Yes

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31. Are records on the system retrieved by any identifier for an individual? (Examples of identifiers include but are not limited to Name, SSN, Photograph, IP Address) Yes

31a. If **YES**, the System of Records Notice(s) (SORN) published in the Federal Register adequately describes the records as required by the Privacy Act? Enter the SORN number and the complete name of the SORN.

SORN Number	SORN Name
34.037	Treasury/IRS/34.037 IRS Audit Trail & Security Rec
24.030	Treas/IRS/24.030 IMF

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## I. ANALYSIS

*Authority: OMB M 03-22 & PVR #21- Privacy Risk Management*

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32. What choices were made or actions taken regarding this IT system or collection of information as a result of preparing the PIA?

Resulted in the removal of PII from the system (e.g., SSN use reduced/eliminated)	<u>No</u>
Provided viable alternatives to the use of PII within the system	<u>No</u>
New privacy measures have been considered/implemented	<u>No</u>
Other:	<u>No</u>