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**A. SYSTEM DESCRIPTION**

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1. Enter the full name and acronym for the system, project, application and/or database. Examination Operational Automation Database , EOAD

2. Is this a new system? No

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

If **yes**, enter the full name, acronym, PIA ID Number and milestone of the most recent PIA.

Examination Operational Automation Database (EOAD), PIA # 212

Next, enter the **date** of the most recent PIA. 9/25/2012

Indicate which of the following changes occurred to require this update (check all that apply).

- No Addition of PII
- No Conversions
- No Anonymous to Non-Anonymous
- No Significant System Management Changes
- No Significant Merging with Another System
- No New Access by IRS employees or Members of the Public
- No Addition of Commercial Data / Sources
- No New Interagency Use
- No Internal Flow or Collection

Were there other system changes not listed above? No

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

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

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

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**A.1 General Business Purpose**

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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.

EOAD captures examination results by issue. This data is used to enhance the ability to identify specific areas of non-compliance based on examination results and track the effectiveness of the examination classification process. EOAD used to track examination results for National Research Project (NRP) examinations. In addition, EOAD data is used to fulfill disclosure of examination results under agreements with state and local taxation agencies. Data is captured by Small Business/Self-Employed (SB/SE), Large Business & International (LB&I), and Wage & Investment (W&I) examiners for examinations of all Forms 1040, 1120, 1120S, and 1065 using Report Generation Software (RGS) and Issue Management System (IMS) software.

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**B. PII DETAIL**

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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:

<u>Yes</u>	Social Security Number (SSN)
<u>Yes</u>	Employer Identification Number (EIN)
<u>No</u>	Individual Taxpayer Identification Number (ITIN)
<u>No</u>	Taxpayer Identification Number for Pending U.S. Adoptions (ATIN)
<u>Yes</u>	Preparer Taxpayer 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).

There is no planned mitigation strategy or forecasted implementation date to mitigate or eliminate the use of SSNs. The SSN is needed to uniquely identify a user's record. No alternative solutions have/or will be applied to the system.

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.

<u>Selected</u>	<u>PII Element</u>	<u>On Primary</u>	<u>On Spouse</u>	<u>On Dependent</u>
Yes	Name	Yes	Yes	No
Yes	Mailing address	No	No	No
Yes	Phone Numbers	No	No	No
No	E-mail Address	No	No	No
No	Date of Birth	No	No	No
No	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

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

<u>Selected</u>	<u>SBU Name</u>	<u>SBU Description</u>
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
Yes	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? Yes

If **yes**, describe the other types of SBU/PII that are applicable to this system. EOAD contains taxpayers' SSNs (primary & secondary), EINs, names, addresses, phone numbers, return preparer identification (name, identification number, firm name, and address), and return information.

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

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

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

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## **B.1 BUSINESS NEEDS AND ACCURACY**

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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 variations) are used, explicitly explain why use of SSNs meets this criteria. Be specific.

It is necessary to capture PII in order to identify the examined taxpayers. The specific identification of taxpayers is necessary to provide audit results to state and local tax agencies and to link the records to other IRS databases to validate certain fields on the data file. No alternative solutions have/or will be applied to the system. Access to data is limited to least privileges.

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

EOAD electronically extracts data from RGS and IMS at the time the cases are closed electronically. There is no opportunity for manipulation of the data collected from RGS, IMS, CEAS, and AIMS. After the monthly data download, the EOAD SA performs additional processing to overwrite various data fields (e.g. – Source Code, Project Code, Post of Duty Code) with AIMS data because the AIMS data is considered more reliable. The data collection process from RGS is tested on an annual basis. The closed cases on EOAD are matched against closed cases on AIMS each month to determine the rate of collection of EOAD data. Collection rates below 95% are investigated further to determine if systemic issues are preventing data collection.

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### C. PRIVACY ACT AND SYSTEM OF RECORDS

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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 **other**, explain your answer.

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

**SORNS Number**

**SORNS Name**

Treasury/IRS 42.021 Compliance Returns and Project Files

Treasury/IRS 34.037 IRS Audit Trail and Security Records System

Treasury/IRS 42.001 Exam Administrative Files

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

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### D. RESPONSIBLE PARTIES

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10. Identify the individuals for the following system roles. N/A

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### E. INCOMING PII INTERFACES

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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 &amp; A?</u>	<u>Authorization Date</u>
AIMS Related Reports	Yes	05/12/2015	Yes	05/22/2012
Correspondence Examination Automation Support (CEAS)	Yes	09/17/2012	Yes	12/06/2012
Issue Management System	Yes	09/12/2013	No	12/06/2012

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? No

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

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### F. PII SENT TO EXTERNAL ORGANIZATIONS

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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 &amp; A?</u>	<u>Authorization Date</u>
Compliance Data Warehouse	Yes	12/14/2012	No	

Identify the authority and for what purpose? Authority and purpose is 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. SSNs are permissible from Internal Revenue Code (IRC) 6109, which requires individual taxpayers to include their SSNs on their income tax returns.

12b. Does this system disseminate SBU/PII to other Federal agencies? Yes

If **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)

<u>Organization Name</u>	<u>Transmission method</u>	<u>ISA/MOU</u>
GAO	EFTU	Yes

Identify the authority and for what purpose? Authority and purpose is 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.

12c. Does this system disseminate SBU/PII to State and local agencies? Yes

If **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).

<u>Organization Name</u>	<u>Transmission method</u>	<u>ISA/MOU</u>
Alabama Department of Revenue	EFTU	Yes
California Franchise Tax Board	EFTU	Yes
District of Columbia Office of Tax and Revenue	EFTU	Yes
Louisiana Department of Revenue	EFTU	Yes
Montana Department of Revenue	EFTU	Yes
Oklahoma Tax Commission	EFTU	Yes
South Carolina Department of Revenue	EFTU	Yes
Detroit Finance Department	EFTU	Yes
City of Portland Revenue Bureau	EFTU	Yes
Maine Department of Labor	EFTU	Yes

Identify the authority and for what purpose? Authority and purpose is 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. Data is sent via EFTU to 104 state and local taxation agencies. Dissemination of EOAD data to state and local taxation agencies is done through the Enterprise File Transfer Utility (EFTU). The participation of the agencies is incorporated into the annual Governmental Liaison Data Exchange Program (GLDEP) enrollment and coordinated by the Office of Governmental Liaison & Disclosure.

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

12e. Does this system disseminate SBU/PII to other Sources? No

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## **G. PRIVACY SENSITIVE TECHNOLOGY**

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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

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## H. INDIVIDUAL NOTICE AND CONSENT

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17. Was/is notice provided to the individual prior to collection of information? No

17b. If **no**, why not? If information is not collected directly from an individual, please discuss the factors considered in deciding to collect information from third party sources.

The IRS notifies all individuals who file tax returns of such collection via the Privacy Act Notice in tax return instructions. See TDP 25-07 Section 4.4 for further details on notice. When a return is selected for examination the taxpayer is sent Notice 609, Privacy Act Notice, Pub 3498, The Examination Process, Pub 5, Your Appeals Rights and How to Prepare a Protest Publication 4227, Overview of the Appeals Process.

18. Do individuals have the opportunity to decline from providing information and/or from consenting to particular uses of the information? No

18b. If no, why not? Information is collected from returns filed, procedural fields, and examination results. The IRS notifies all individuals who file tax returns of such collection via the Privacy Act Notice in tax return instructions. See TDP 25-07 Section 4.4 for further details on notice.

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

The EOAD Database does NOT make determinations. All determinations are completed through the Examination process with no direct correlation to the A-CIS system. IRS policy allows affected parties the opportunity to clarify or dispute negative determinations per the examination appeals process.

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## I. INFORMATION PROTECTION

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20. 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

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

IRS Employees? Yes

<u>IRS Employees?</u>	<u>Yes/No</u>	<u>Access Level(Read Only/Read Write/Administrator)</u>
Users	Yes	Read-Only
Managers	No	
Sys. Administrators	Yes	Read-Only
Developers	Yes	Read And Write

Contractor Employees? No

21a. How is access to SBU/PII determined and by whom? EOAD relies on the GSS common controls associated with the IRS Enterprise Active Directory domain structure to uniquely identify and verify the identity of each user. Direct access to the server is currently limited to

the EOAD System Administrator. Other access approval determined by the Program Manager.

- 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

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## **I.1 RECORDS RETENTION SCHEDULE**

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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.

EOAD data is approved for destruction after 25 years in accordance with Document 12990. INTERNAL REVENUE SERVICE RECORDS CONTROL SCHEDULE (RCS) 23 TAX ADMINISTRATION - ADMINISTRATIVE RECORD item 1, Examination Subject Files.

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## **I.2 SA&A OR ECM-R**

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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. EOAD electronically extracts data from RGS and IMS at the time the cases are closed electronically. The EOAD data from RGS is stored in the Correspondence Examination Automation Support (CEAS) database server and then downloaded on a monthly basis via the EOADLoader subprocess by the EOAD database administrator. The combined EOAD data is stored on an IT controlled server. The only non-Information Technology (IT), IRS employee with access to the server is the EOAD System Administrator (SA). Certain data fields in EOAD are overwritten with AIMS data during the monthly data processing. Numerous MS Access databases are then populated for various internal and external customers based on the customers' data needs. Dissemination of EOAD data to state and local taxation agencies is done through the Enterprise File Transfer Utility (EFTU). The participation of the agencies is incorporated into the annual Governmental Liaison Data Exchange Program (GLDEP) enrollment and coordinated by the Office of Governmental Liaison & Disclosure. Dissemination of EOAD data to internal customers is done via a share drive controlled by IT. Password-protected data files for respective Areas/BODs are placed in separate folders on the share drive. Each data file has a unique password. Requests to access the data are submitted to the EOAD POC for approval. Upon approval, the EOAD POC submits an IT ticket to allow the employee to map to the drive. Once IT grants access, the mapping instructions and password are shared with the customer. There is no audit trail documenting the details of when customers access the share drive. Data files are also provided to the Compliance Data Warehouse (CDW) for analysis by Research, Analysis, and Statistics (RAS).

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## **J. PRIVACY TESTING**

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24. Does the system require a System Test Plan? No

24c. If **no**, please explain why. All software is tested by IT.

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#### **K. SBU Data Use**

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25. Does this system use, or plan to use SBU Data in Testing? Yes

25a. If **yes**, was permission granted per the requirements of Form 14664, SBU Data Use Questionnaire or Form 14665, SBU Data Use Request? Yes

If **yes**, provide the date the permission was granted. 6/12/2015

25b. If **yes**, was testing performed in conformance with IRM 10.8.8 Information Technology (IT) Security, Sensitive But Unclassified (SBU) Data Policy? Yes

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

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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: More than 1,000,000  
26d. Other: No

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#### **M. CIVIL LIBERTIES**

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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? No

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#### **N. ACCOUNTING OF DISCLOSURES**

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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? No

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**End of Report**

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