
A. SYSTEM DESCRIPTION

1. Enter the full name and acronym for the system, project, application and/or database. PDC-Performant Recovery Collections, PDC-PRC

2. Is this a new system? Yes

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>Yes</u>	System Development/Milestone 4B
<u>Yes</u>	System Deployment/Milestone 5
<u>No</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 Performant Recovery Inc is debt recovery. They contact borrowers and collect on defaulted tax amounts. A Private Debt Collector, Performant Recovery Collections(PDC-PRC) provides a portfolio of debt collection functions to support Performant debt collection operations. This system includes both debt collections and debt accounting. PDC-PRC is a general purpose, multi-user system used throughout four regional locations. It provides electronic services such as: Debt Collection, Debt Accounting, Electronic forms, Databases, Call recording services and letter processing services through a third party-letter vendor.

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 Yes On Dependent

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

Yes	Social Security Number (SSN)
Yes	Employer Identification Number (EIN)
Yes	Individual Taxpayer Identification Number (ITIN)
Yes	Taxpayer Identification Number for Pending U.S. Adoptions (ATIN)
Yes	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 Social Security Number's (SSN) because no other identifier can be used to uniquely identify the taxpayer. SSN's are permissible from Internal Revenue Code (IRC) 6109, which requires individual taxpayers to include their SSNs on their income tax returns.

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	Yes
Yes	Mailing address	No	No	No
Yes	Phone Numbers	No	No	No
Yes	E-mail Address	No	No	No
Yes	Date of Birth	Yes	Yes	Yes
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
Yes	Medical Information	No	No	No
No	Certificate or License Numbers	No	No	No
Yes	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	Yes

6c. Does this system contain SBU information that is not PII, it uses, collects, receives, displays, stores, maintains, or disseminates? No

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.

Social Security Numbers (SSN) are required to identify individual accounts and meet the needs of the mission and relevant to cases worked by Private Collection Agencies.

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 Performant collections system is designed with logic checks to ensure data accuracy and integrity. Data from third party vendor is used to verify and enrich the client's data. In addition, protection of the integrity and availability of Personally Identifiable Information is reviewed at least every quarter by a series of automated and manual review processes. Databases are updated and validated and are redundant allowing for the availability of the information. The security controls for the database is constantly reviewed to ensure safeguards are in place to protect the data.

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>
26.019	Treasury/IRS Tax Delinquent Account (TDA) File
26.016	Treasury/IRS Returns Compliance Program (RCP)
26.019	Treasury/IRS Tax Delinquent Account subsystems inc
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>
4 Skip Tracing Vendors	SFTP	Yes
Skip Tracing Vendor	Secure Web Portal	No
Skip Tracing Vendor	Encrypted Email	No
Skip Tracing Vendor	Connected SFTP	No
Print Vendor	SFTP	Yes
Skip Tracing Vendor	Secure Web Portal on Vendor Side	No
3 Skip Tracing Vendors	SFTP	No

11e. Does the system receive SBU/PII from **Taxpayer** forms? Yes

If **yes**, identify the forms

<u>Form Number</u>	<u>Form Name</u>
1040	Individual Income Tax Form

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>
PDTC	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).

<u>Organization Name</u>	<u>Transmission method</u>	<u>ISA/MOU</u>
4 Skip Tracing Vendors	SFTP	Yes
3 Skip Tracing Vendors	SFTP	No
Skip Tracing Vendor	Secure Web Portal	No
Skip Tracing Vendor	Secure Web Portal on Vendor Side	No
Skip Tracing Vendor	Encrypted Email	No
Skip Tracing Vendor	Connected SFTP	No
Print Vendor	SFTP	Yes

Identify the authority and for what purpose? There will be Inter-Agency Agreements (ISA) and Memorandum of Understanding (MOU) in place where possible and as needed for the contract. 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 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 (Performant) 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 this Private Collection Agency to collect taxes owed will be provided an option to opt-out of the Private Debt Collection Private Collection Agency process. If taxpayer exercises their right to opt-out the case(s) will be recalled and worked by IRS.

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

The entire Performant- Private Collection Agency process and procedures are dictated by the Internal Revenue Service and outlined in the Private Collection Agency Policy and Procedures guide. This guide directs the Private Collection Agency to allow the taxpayer due process to file a tax return, the right to opt-out of working with the Private Collection Agency, directs the Private Collection Agency to offer the taxpayer right to appeal, offers guidance to accept disputes to allow appropriate determinations to be made and covers privacy and policy statements to ensure due process for the taxpayer.

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? Yes

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

21a. How is access to SBU/PII determined and by whom? Non privileged access is based off the user's role and responsibility. This access is then verified by the user's manager and sent to the Help Desk to implement access. If the access requested is privileged based, then a ticket is submitted to security for review and approval. Once the approval has been accepted a ticket is generated to the Help Desk for implementation. Access is reviewed on a monthly basis.

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.

Records and Information Management will perform Private Collection Agency site visit for assessment at a later date to be determined. The system will be checked with NARA to determine if policy is followed and data storage is secure. Information ages off (is deleted from) the database 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-Collection, PART VII - PRIVATE DEBT COLLECTION (PDC) PROGRAM RECORD; and as coordinated with the IRS Records and Information Management (RIM) Program and IRS Records Officer.

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)? In-process

23b. If **in process**, when is the anticipated date of the SA&A or ECM-R completion? 2/17/2017 1

23.1 Describe in detail the system s audit trail. All system audit logs are sent to a centralized auditing system this is a Security Events and Information Monitoring (SEIM) system at the PCA location. This system logs correlates, monitors and alerts on all activity across all platforms that have any connectivity received IRS data files. All access audit logs connected to information received from the IRS data file information will be monitored and sent to PCA's centralized audit log system. This system can show all activity from when the PCA user or IRS PDC employee accessed data or a system and what was done with said data or access. Additionally administrative access to the audit system is only allowed for authorized PCA individuals. This helps to ensure proper separation of duties and no collusion between individuals or groups.

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.

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? No

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
