
A. SYSTEM DESCRIPTION

1. Enter the full name and acronym for the system, project, application and/or database. Private Debt Collection Data Transfer Component , PDC-PDTC

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>No</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.

In December of 2015, Congress adopted legislation requiring the IRS to supplement collection of outstanding taxpayer debt with Private Collection Agencies (PCA). As a result, an Information Technology solution is required to securely share taxpayer information between these agencies and the service. This requires changes to existing systems and the creation of a new end-to-end solution. The PDTC update service will provide the capability to receive data as files from PCAs, perform validation checks on data from PCAs, programmatically post updates to Current Product Environment (CPE) systems of record, and send acknowledgements to PCAs. PDC Data Transfer Component (PDTC) is a part of the Information Exchange capability to support the Private Debt Collection program. IRS will be assigning collection cases to external Private Collection Agencies (PCAs) and will be requiring the external PCAs to periodically send taxpayer record updates to the IRS – 1=Installment Agreement Initiated, 2= Deceased, 3=Return, 4=Installment Agreement Terminated, and 5=Installment Agreement Error. PDTC provides the capabilities to receive taxpayer record update data as XML files, and programmatically send updates to Integrated Data Retrieval System (IDRS), which would then be posted to Master File (MF).

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 No On Dependent

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

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

The PDTC system will follow IRM 10.5.1.2 (see IRM for IRS strategy compliance with the OMB – Safeguarding IRM 10.5.1.2), Privacy, Information Protection & Data Security (PIPDS) Policy and Guidance in handling the use of SSN from taxpayers.

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
No	Mailing address	No	No	No
No	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
No	Internet Protocol Address (IP Address)	No	No	No
No	Criminal History	No	No	No
No	Medical Information	No	No	No
No	Certificate or License Numbers	No	No	No
No	Vehicle Identifiers	No	No	No
No	Passport Number	No	No	No
No	Alien (A-) Number	No	No	No
No	Financial Account Numbers	No	No	No
No	Photographic Identifiers	No	No	No
No	Biometric Identifiers	No	No	No
No	Employment (HR) Information	No	No	No
Yes	Tax Account Information	Yes	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

Selected	SBU Name	SBU Description
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.
No	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? No

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

No	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.

Without the PII data (Social Security Number (SSN)), PDTC would not be able to transfer the taxpayer updates reported by the Private Collection Agencies (PCAs) to the IRS CPE systems.

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

Accuracy: PDTC will ensure data is received in the prescribed format and meet a variety of validation criteria that ensure proper validation before being passed through to CPE systems.

Timeliness: PDTC will respond in a timely manner based on the required intervals outlined in the business requirements. Completeness: PDTC will validate data is received in the required format.

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>
Treas/IRS 24.030	IMF
Treas/IRS 24.036	BMF
Treas/IRS 26.019	Taxpayer Delinquent Accounts 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

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? 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>
CBE Group	AXWAY/Secure File Transfer (SFT) system. An internal IRS file transfer utility (EFTU) will transfer the files from the AXWAY/SFT system to the PDTC system	No
ConServe	AXWAY/Secure File Transfer (SFT) system. An internal IRS file transfer utility (EFTU) will transfer the files from the AXWAY/SFT system to the PDTC system	No
Pioneer	AXWAY/Secure File Transfer (SFT) system. An internal IRS file transfer utility (EFTU) will transfer the files from the AXWAY/SFT system to the PDTC system	No
Performant	AXWAY/Secure File Transfer (SFT) system. An internal IRS file transfer utility (EFTU) will transfer the files from the AXWAY/SFT system to the PDTC system	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

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>
IDRS	Yes	08/13/2015	Yes	08/26/2016

Identify the authority and for what purpose? In December 2015, Congress adopted legislation requiring the IRS to supplement collection of outstanding taxpayer debt with Private Collection Agencies (PCA). As a result, an Information Technology solution is required to securely share taxpayer information between these agencies and the service. As a result, an Information Technology solution is required to securely share taxpayer information between these agencies and the service. This requires changes to existing systems, such as IDRS and the creation of a new end-to-end solution. The PDTC update service will provide the capability to receive data as files from PCAs, perform validation checks on data from PCAs, programmatically post updates to Current Product Environment (CPE) systems of record, and send acknowledgements to PCAs.

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? Yes

If **yes**, identify the contractor source(s) that receive SBU/PII from this system, and if there is an Inter-Agency Agreement (ISA) /Memorandum of Understanding (MOU).

Organization Name	Transmission method	ISA/MOU
ConServe = TIRNO-16-K-00397	AXWAY/SFT	No
The CBE Group = TIRNO-16-K-00313	AXWAY/SFT	No
Performant = TIRNO-16-K-00396	AXWAY/SFT	No
Navient – Pioneer = TIRNO-16-K-00395	AXWAY/SFT	No

Identify the authority and for what purpose? Legislation: Fixing America's Surface Transportation (FAST) Act (Pub. L. No. 114-94) Section 32102

Did the contract include the appropriate 6103(n) clauses for tax return and return information, and Federal Acquisition Regulations privacy clauses?

Yes

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

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?

The Private Collection Agencies (PCAs) are expected to contact the taxpayers and notify the taxpayers about the authority to collect the information. The PCAs are required to report the taxpayer updates to the IRS. Also, the IRS will provide a letter notifying the taxpayer of the assignment of their case to the PCAs.

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): Notice, consent, and due process are provided in the tax forms instructions, and pursuant to 5 USC. The taxpayer has the option to opt-out of using the PCA.

19. 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, and pursuant to 5 USC.

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)

IRS Owned and Operated

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

IRS Employees? Yes

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

Contractor Employees? No

21a. How is access to SBU/PII determined and by whom? SBI/PII access is determined by the needs of the Business. IRS Managers approve the list of individuals that have access to SBU/PII information via OL5081 application requests. The individuals attend mandatory Access to Sensitive but Unclassified (SBU) Information and IT Systems Security Awareness Training (SAT).

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? No

22b. 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.

All records housed in the system will be erased or purged from the system at the conclusion of their retention period(s) as required under IRM 1.15.6. Information ages off (is deleted from) the database at varying intervals. All records housed in the PDC-PDTC 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 General

Records Schedule (GRS) 4.3, Item 020 for input records, GRS 4.3, Item 031 for output files, GRS 3.1, Item 020, 051 for audit logs and system documentation records. Private Debt Collection Records are schedules in IRS Records Control Schedule 28, Part VII, Items 200-234. Any new records generated by the system will be scheduled 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? 3/10/2017

23.1 Describe in detail the system s audit trail. This section will be updated once the SA&A assessment is complete.

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? 2/17/2017

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?

PDTC complies with the requirements of IRM 10.8.1.3.4.6 in regards to developer security testing. This means that a work request (WR) or change request (CR) must be in place before a piece of code can be associated with it. Once development is completed the code is then checked back in for testing. There is a team staffed to accomplish independent testing before the code is promoted to production. A final review is accomplished by an in house staff leader. PDTC WR/CR tickets can be Knowledge Incident/Problem Service Asset Management tickets related to production issues; they can be issues discovered during testing; or they can be user change requests.

K. SBU Data Use

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. 10/14/2016

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

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: More than 1,000,000
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? No

End of Report
