

Date of Approval: 07/17/2024
Questionnaire Number: 1339

Basic Information/Executive Summary

What is the name of your project (system, database, pilot, product, survey, social media site, etc.)?

Political Organization Filing and Disclosure and 527 Political Action Committee

Acronym:

PAC/POFD

Business Unit

Tax Exempt and Government Entities

Preparer

For Official Use Only

Subject Matter Expert

For Official Use Only

Program Manager

For Official Use Only

Designated Executive Representative

For Official Use Only

Executive Sponsor

For Official Use Only

Executive Summary: Provide a clear and concise description of your project and how it will allow the IRS to achieve its mission.

The IRS relies on its information technology systems, including the Political Organization Filing and Disclosure and 527 Political Action Committee (PAC/POFD), to accomplish its mission of providing cost-effective and reliable services to the IRS, other Federal agencies, and the public at large. PAC/POFD is an IRS system, managed under the Tax Exempt/Government Entities (TE/GE) Business Unit. The purpose of PAC/POFD is to collect, validate and store information from IRS forms 8871, 8872, and 990. The functionality of this system is required by law to provide Political Organizations the ability to identify their status and report contributions and expenditures. Information collected from Political Organizations is required to be made available to the public. This system consists of two functionalities: front-end and back-end applications. POFD is the front-end application of this system, available to the public on the IRS.gov

website - <http://www.irs.gov/Charities-&-Non-Profits/Political-Organizations/Political-Organization-Filing-and-Disclosure>). Political Organizations register for access to submit forms electronically (Initial Form 8871 submission does not require login). All data submitted to POFD is validated and then sent to PAC. PAC is the back-end application of this system. The primary responsibilities of PAC is to store a secondary copy of the electronic filings; exchange certain data with Business Master File (BMF); allow the Entity Research Group to make changes to the existing electronic filings; add, delete and reset Political Organization's login accounts, and initiate the issuance of the Letter 3406SC which allows Political Organizations to file electronic Form 8872s. PAC is located at Enterprise Computer Center-XXXXXXX and receives electronic forms from POFD. Paper forms 8872 and 990 are sent to the Entity Research Group where they are scanned and converted into Tagged Image File Format (TIFF). Western Development Center (WDC), also located in XXXXXX, XXXX, receives the scan images, converts them to Portable Document Format (PDF) images, and transmits them to the PAC application. PAC provides all PDF forms along with indexing information back to POFD so that the information can be made available to the public.

Personally Identifiable Information (PII)

Will this project use, collect, receive, display, store, maintain, or disseminate any type of Sensitive but Unclassified (SBU), Personally Identifiable Information (PII), or Federal Tax Information (FTI)?

Yes

Please explain in detail how this project uses sensitive data from inception to destruction (data lifecycle).

PAC and POFD transmit data using Secure File Transfer Protocol (SFTP). The data transfer uses the current Virtual Private Network (VPN) and Port 22 on the POFD FTP server. Forms 8871/8872/990 images and indexes are transferred from PAC to POFD. Logins are transferred from PAC to POFD. This is used by Political Organizations to log into POFD front-end application to file amended/final electronic 8871/8872. Corrections to electronic 8871/8872 are transferred from PAC to POFD. Form 8871 can be abbreviated or the full version. New electronic 8871/8872 submissions are picked up from POFD and transferred over to PAC by the PAC application. Miscellaneous control files are exchanged between systems to verify Checksums of files after transfers. The only data that is exchanged that is not available to the public via the Search POFD routine is the login information.

Please select all types of Sensitive but Unclassified data (SBU)/Personally Identifiable Information (PII)/Federal Tax Information (FTI) that this project uses.

Address

Email Address
Employer Identification Number
Federal Tax Information (FTI)
Name
Social Security Number (including masked or last four digits)

Cite the authority for collecting SBU/PII/FTI (including SSN if relevant).
PII for federal tax administration - generally IRC Sections 6001 6011 or 6012

Product Information (Questions)

1.1 Is this PCLIA a result of the Inflation Reduction Act (IRA)?
No

1.3 What type of project is this (system, project, application, database, pilot/proof of concept, power platform/visualization tool)?
System

1.35 Is there a data dictionary for this system?
No

1.36 Explain in detail how PII and SBU data flow into, through and out of this system.
POFD is the public facing front-end application of this system, available on the IRS.GOV website <http://www.irs.gov/Charities-&-Non-Profits/Political-Organizations/Political-Organization-Filing-and-Disclosure>). Political Organizations register for access to submit forms electronically (Initial Form 8871 submission does not require login). Form 8872 requires authentication and login for submission. The data is validated and sent to the PAC system which is the back end of the process. PAC is the back-end application of this system. The primary responsibility of PAC is to store a secondary copy of the electronic filings and exchange certain data with Business Master File (BMF) and the Entity Research Group. The Entity Research Group makes changes to the existing electronic filings; add, delete and reset Political Organization's login accounts, and initiate the issuance of the Letter 3406SC which provides Political Organizations a password to file electronic Form 8872s. Paper forms 8872 and 990 are sent to the Entity Research Group where they are scanned and converted into Tagged Image File Format (TIFF). Western Development Center (WDC), also located in XXXXX, XXXX, receives the scan images, converts them to Portable Document Format (PDF) images. PAC transmits all PDF forms along with indexing information back to POFD. The information is available to the public on the POFD disclosure page Basic Search (IRS.gov) per IRC 6103.

1.4 Is this a new system?
No

1.5 Is there a Privacy and Civil Liberties Impact Assessment (PCLIA) for this system?
Yes

1.6 What is the PCLIA number?
527 PAC/POFD #5867

1.7 What are the changes and why?
Expiring PCLIA

1.8 If the system is on the As-Built-Architecture, what is the ABA ID of the system? If this PCLIA covers multiple applications shown on the ABA, please indicate the ABA ID for each application covered separated by a comma.
PAC - 210006 POFD 210859

1.9 What OneSDLC State is the system in (Allocation, Readiness, Execution)?
Execution

2.1 If this system discloses any PII to any third party outside the IRS, does the system have a process in place to account for such disclosures in compliance with IRC 6103(p)(3)(A) or Subsection c of the Privacy Act? Contact Disclosure to determine if an accounting is required. Enter "Yes" or "No". If Exempt, type "Exempt".
Yes

2.2 Please provide the full name of and acronym of the governance board or Executive Steering Committee (ESC) this system reports to.
Tax Exempt & Government Entities (TE/GE) Investment Executive Steering Committee (IESC)

3.1 Does your project/system involve any use of artificial intelligence (AI), including virtual assistant, chat bot, and robotic process automation, as defined in Executive Order 13960?
No

3.3 Does this system use cloud computing?
No

3.6 Does this system interact with the public through a web interface?
Yes

3.61 If the system requires the user to authenticate, was a Digital Identity Risk Assessment (DIRA) conducted?
Yes

3.62 Please upload the approved DIRA report using the Attachments button.

Approved DIRA report uploaded.

3.63 If individuals do not have the opportunity to give consent to collect their information for a particular use, why not?

Applicants must access the IRS.gov website to submit the POFD application.

Notice, consent and due process are provided in the application instructions filed by the taxpayer, and pursuant to 5 United State Code (USC).

3.64 If the individual was not notified of the following items prior to the collection of information, why not? 1) Authority to collect the information 2) If the collection is mandatory or voluntary 3) The purpose for which their information will be used 4) Who the information will be shared with 5) The effects, if any, if they don't provide the requested information.

Applicants must access the IRS.gov website to submit the POFD application.

Notice, consent and due process are provided in the application instructions filed by the taxpayer, and pursuant to 5 United State Code (USC).

4.1 Who owns and operates the system (IRS Owned and Operated, IRS Owned and Contractor Operated, Contractor Owned and Operated)?

IRS Owned and Contractor Operated

4.2 If a contractor owns or operates the system, does the contractor use subcontractors?

No

4.5 Identify the roles and their access level to the PII data. For contractors, indicate whether their background investigation is complete or not.

Contractor Users - No Access

Contractor Managers - No Access

Contractor System Administrator - Read and Write - Background investigation completed.

Contractor Developers - Read and Write - Background investigation completed.

4.51 How many records in the system are attributable to IRS Employees? Enter "Under 50,000", "50,000 to 100,000", "More than 100,000" or "Not Applicable".

Not Applicable

4.52 How many records in the system are attributable to contractors? Enter "Under 5,000", "5,000 to 10,000", "More than 10,000" or "Not Applicable".

Not Applicable

4.53 How many records in the system are attributable to members of the public? Enter "Under 5,000", "5,000 to 10,000", "More than 10,000" or "Not applicable".

More than 10,000

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

For PAC, the approximate number of internal users varies between two and five. For POFD, the number of external users is in the thousands. The table below identifies the component, interface, authentication type, user group, organization, and whether the interface is external or internal to the IRS.

There are five types of users with access to PAC/POFD:

- ☐ PAC Developers. The developer manages application code changes, performs maintenance, and processes form transmittals for PAC. The developers have access to DEV only when performing these functions.
- ☐ POFD Developers. The developer manages application code changes, performs maintenance, and processes form transmittals for POFD. The developers have access to DEV only when performing these functions.
- ☐ PAC Entity Research Group is responsible for the creation and management of Political Organization accounts and can make updates/changes to submitted forms. All PAC users have access to the application through the local IRS LAN or WAN.
- ☐ POFD Filers. POFD filers are organizations who utilize the application to submit and update Forms 8871 and 8872.
- ☐ POFD General Public. The public has view only access to forms.

IRS utilizes the BEARS process to streamline the request process for adding authorized IRS employees, vendors, and contractors, as users on IRS computer systems and applications. Users access the BEARS application via a web site on the IRS Intranet. The user enters their Standard Employee Identifier (SEID), which is crosschecked against identity data received from the authoritative source, HRConnect, via the IRS PDS Hub (Web Service). Approval for access to an IRS application is a multi-step process. Once the request has been submitted by the user or their manager, BEARS sends e-mail notifications, in turn, as needed to the user's Manager, Unit Security Representative (USR), and Approval Groups as specified for that application. Once the request has been approved, the user is notified via an e-mail of their logon ID and initial password, if any. BEARS provides the following capabilities for system administrators (approvers), as part of request processing: assigning initial passwords, password reset, deleting for non-action, supporting ERAP user registration, documenting the assignment of privileged access to IRS workstations, servers, etc. Other BEARS functionality includes generating delete requests for separated employees, notifying managers gaining new employees, utilizing special features for furloughed and return-to-duty employees, documenting annual and semi-annual re-certifications, and validating existing application access.

5.11 Is there a Risk Assessment Form and Tool (RAFT) associated with this system on file with your organization or the IRS Risk Office.

No

5.2 Does this system use or plan to use SBU data in a non-production environment?

No

Interfaces

Interface Type

IRS Systems, file, or database

Agency Name

Political Organization Filing & Disclosure (POFD)

Incoming/Outgoing

Both

Transfer Method

Secure File Transfer Protocol (SFTP)

Interface Type

IRS Systems, file, or database

Agency Name

Business Master File (BMF)

Incoming/Outgoing

Incoming (Receiving)

Transfer Method

Electronic File Transfer Utility (EFTU)

Interface Type

IRS Systems, file, or database

Agency Name

Statistics of Income Distributed Processing System (SOI DPS)

Incoming/Outgoing

Incoming (Receiving)

Transfer Method

Secure File Transfer Protocol (SFTP)

Interface Type

IRS Systems, file, or database

Agency Name

Print Automation (PRINT)

Incoming/Outgoing

Outgoing (Sending)

Transfer Method

Electronic File Transfer Utility (EFTU)

Interface Type

IRS Systems, file, or database

Agency Name

SPUNK

Incoming/Outgoing

Outgoing (Sending)

Transfer Method
Secure File Transfer Protocol (SFTP)

Interface Type

IRS Systems, file, or database

Agency Name

Generalized Master File (GMF)

Incoming/Outgoing

Outgoing (Sending)

Transfer Method

Electronic File Transfer Utility (EFTU)

Systems of Records Notices (SORNs)

SORN Number & Name

IRS 50.001 - Tax Exempt & Government Entities (TE/GE)

Correspondence Control Records

Describe the IRS use and relevance of this SORN.

Requesters of letter rulings and determination letters, and subjects of field office requests for technical advice and assistance and other correspondence, including correspondence associated with section 527 organizations

SORN Number & Name

IRS 42.001 - Examination Administrative Files

Describe the IRS use and relevance of this SORN.

To document the examinations of tax returns or other determinations as to a taxpayer's tax liability; to document determinations whether to examine a taxpayer; and to analyze trends in taxpayer compliance

SORN Number & Name

IRS 24.046 - Customer Account Data Engine Business Master File

Describe the IRS use and relevance of this SORN.

The PAC/POFD system maintain records of Form 8871/8872 and 990 filings and sends transactions of filing to the Business Master File.

SORN Number & Name

IRS 00.001 - Correspondence Files and Correspondence Control Files

Describe the IRS use and relevance of this SORN.

Correspondence concerning political filings & Letter 3406SC is received and sent with respect to matters under the jurisdiction of

the IRS. Correspondence includes letters, telegrams, memoranda of telephone calls, email, and other forms of communication. Correspondence may be included in other systems of records described by specific notices.

SORN Number & Name

IRS 34.037 - Audit Trail and Security Records

Describe the IRS use and relevance of this SORN.

Records concerning the use of IRS computing equipment or other resources by employees, contractors, or other individuals to access IRS information; records concerning individuals whose information was accessed using IRS computing equipment/resources; records identifying what information accessed; records concerned the use of IRS computer equipment and other resources to send electronic communications.

Records Retention

What is the Record Schedule System?

Record Control Schedule (RCS)

What is the retention series title?

Political Action Committee/Political Organization Filing and Disclosure (PAC/POFD)

What is the GRS/RCS Item Number?

RCS 24 Item 84

What type of Records is this for?

Both (Paper and Electronic)

Please provide a brief description of the chosen GRS or RCS item.

Includes all applications that are stored on this system, and all documents that are made available to the public, such as the Form 8871 and 8872, and including the complete filing of all Political Organization Reports. PENDING DISPOSITION Note: System records descriptions/dispositions are pending final NARA approvals. This is a placeholder. The IRS Records Office and TEGE are working together to evaluate and update RCS 24 to better reflect current business practices and records maintenance needs, including the movement to more electronic-based recordkeeping systems. TEGE's use of 527 PAC/POFD and other electronic systems may result in updated disposition authorities for traditional TEGE-related records series. Paper-based retentions for recordkeeping copies of IR Forms 990, 8871 and 8872 are covered under Records Control Schedule (RCS) 29 for Submissions Processing Campus Records, item 66 (published in Document 12990). Records are disposed of in accordance with prescribed

IRM Records Control Schedules and Law Enforcement Manual procedures. Media protection policy and procedures are formally documented in IRM 10.8.1 and IRM 1.15.2, Types of Records and Their Life Cycle. TEGE must develop a plan to purge 527 PAC/POFD records eligible for destruction in accordance with IRS Records Management Requirements in IRMs 1.15.3 Disposing of Records and 1.15.6 Managing Electronic Records. TEGE and IRS Records Office staff will coordinate the scheduling of any system records identified as unscheduled or in need of updated disposition approvals. Prior to the disposal or transfer of a system, sensitive data and software is removed/eliminated from the memory and external storage devices.

What is the disposition schedule?

Pending final approval from NARA.