Date of Approval: 11/20/2024 Questionnaire Number: 1697

# **Basic Information/Executive Summary**

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

Centralized Authorization File (CAF) Power of Attorney Authorization Automation

Acronym:

**Business Unit** 

**Taxpayer Services** 

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** 

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

This project aims to automate the handling of Power of Attorney (POA) or Taxpayer specific authorizations, which are received via Forms 2848 and 8821 and processed manually. These forms are received digitally via eFax and the online portal or through traditional mail. Once received, they must be manually verified by a Tax Examiner to ensure they are complete before being noted on the

taxpayers' account. The primary purpose of this automation is to Improve time efficiency by reducing manual processing of Forms 2848 and 8821.

# **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).

RPA

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

Address, Centralized Authorization File (CAF), Employer Identification Number, Federal Tax Information (FTI), Individual Taxpayer Identification Number (ITIN), Name, Social Security Number (including masked or last four digits), Tax ID Number, Telephone Numbers

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

PII for federal tax administration - generally IRC Sections 6001 6011 or 6012, SSN for tax returns and return information - IRC section 6109

### **Product Information (Questions)**

1 Is this PCLIA a result of the Inflation Reduction Act (IRA)?

Yes

1.1 What is the IRA Initiative Number?

4.3

3 Is this a new Robotic Process Automation (RPA) project?

Yes

3.1 Is there a Privacy and Civil Liberties Impact Assessment (PCLIA) for this project?

No

4 Identify the IRS IT systems, applications, projects, and/or databases this RPA is applied to; include the associated system name.

eGAIN Application, ECLAS, Centralized Authorization File (CAF)

5 Identify why the use of SBU/PII/FTI is required; include any type of Sensitive but Unclassified (SBU), Personally Identifiable Information (PII), or Federal Tax Information (FTI) that this project will create, collect, receive, use, process, maintain, access, inspect, display, store, disclose, disseminate, or dispose of.

Automation access eGAIN application to pull forms 2848/8821 to pull Taxpayers information which includes Taxpayer Name, Address, TIN/EIN, Representative Name and Address. This PII data is used to review and input the requested authorization into Taxpayers account in ECLAS. Forms are downloaded to processor machines and will be deleted once it's read under one minute.

6 Is your RPA Attended/Unattended?

Unattended

7 Is this RPA process converting from paper to electronic format or automating a process currently performed by a human?

Yes

7.1 Explain the process being replaced/automated.

Customer Account Services - Accounts Management (CAS-AM) receives Power of Attorney (POA Form 2848) or taxpayer specific authorizations (Form 8821) which are received via eFax and the online portal. Once received, each authorization needs to be verified manually by a Tax Examiner to make sure it is complete before being noted on the taxpayers' account. RPA will automate the process of forms review and input the requested authorization into the taxpayer's account.

8 Indicate what level of complexity the RPA is classified as and if you were required to register with OneSDLC or not or indicate if Information Technology's (ITs) Technical Insertion process was used for approval of this RPA.

High complexity project and registered with OneSDLC.

9 Will connections or interdependencies be established for this RPA?

Yes

9.1 Will the connection be encrypted?

Yes

9.2 Will authentication/credentials be required?

Yes

9.3 Please provide details for the connection/interdependency. Indicate if this occurs on the backend versus through the system/user interface.

The automation connects to eGAIN system to download forms through APIs. After retrieving the documents, it performs data validation by connecting to the database through Enterprise Consolidated Legacy Access System (ECLAS) using command codes such as ADDRS, CFREE, SCAPDI, where it cross-checks the information against the database. Once validation is complete, the automation will use ECLAS command code CFUPE to update CAF database. Please find the attached uploaded document named as 'CAF-ECLAS-DESIGN' for connection/interdependency details.

10 Indicate who has or will have permission to access the data and how users are authenticated.

This is an unattended automation, and users will not have access to bot. RPA team will provide daily reports with process details excluding PII.

11 Indicate if BEARS entitlements are required for access and if PUMAS (Privileged User Management Access System) control management is applied for granting access to the system(s)? If BEARS/PUMAS are not applied, indicate what access controls are in place.

PING (Packet Internet Groper) is a tool used to check if a device on a network is reachable and how long it takes for data to go back and forth. It provides system account access for ECLAS (Enterprise Consolidated Legacy Access System), eGAIN system will provide the login credentials to RPA team. Once this setup is complete, these credentials will enable us to proceed with automation tasks.

12 Identify the maintenance tasks or updates performed; state whether or not the maintenance tasks are inherited from the host (UiPath Platform), or you are using customized maintenance activities.

No customized maintenance activities. Uipath Platform will maintain the platform. Any maintenance i.e., security updates as per planned schedule along with perform platform upgrades that the automation will need to be completed by O&M team

13 Indicate if this product or system shares data outside of the United States or its territories.

No

14 Indicate if this system or Robotic Process Automation (RPA) is trained through the use algorithms; indicate if the algorithm used contains data with a sensitivity classification. (Sensitive but unclassified data might include algorithms, methods, system data, or PII/FTI that could be used to re-identify a person.)

RPA enables Form processing by using Machine Learning (ML)

15 Describe this system's (RPAs) audit trail process in detail; include location of supporting documents (SPLUNK). Note: Upload of this document is required.

UiPath provides the audit trails at the organization/tenant level and these logs are stored in mssql database. UiPath also provides an integration to external log products like SPLUNK. And managed service uses SPLUNK as the log aggregator, and all the UiPath logs are fed into Integrated Enterprise Portal (IEP) SPLUNK and IEP SPLUNK is connected to IRS SPLUNK. Any logs going to IEP SPLUNK will be forwarded to IRS SPLUNK. Location for Integrated Enterprise Portal (IEP) SPLUNK is as follows: Integrated Enterprise Portal (IEP) Splunk hostname: https://laco-irs.mgt.afsiep.net/ Index: service\_fabric\_prod Source: rancher:uipath:audit

### **Records Retention**

#### What is the Record Schedule System?

Record Control Schedule (RCS)

What is the retention series title?

TAX ADMINISTRATION - WAGE AND INVESTMENT (W&I) RECORDS

What is the GRS/RCS Item Number?

RCS 29, item 54

What type of Records is this for?

Electronic

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

Power of Attorney (POA)/Tax Information Authorization (TIA), Centralized Authorization File (CAF).

### What is the disposition schedule?

Retire to IRS C-Site one year after year of processing. Destroy after January 2 of the year following the purge year which is identified by the first 2 digits of the SDLN on the POA or TIA. (Job No. NC1-58-85-10, Item 54)