Date of Approval: April 22, 2022

PIA ID Number: 6953

## SYSTEM DESCRIPTION

Enter the full name and acronym for the system, project, application and/or database.

Inventory and Classification Database, ICDB

*Is this a new system?* 

No

*Is there a PCLIA for this system?* 

Yes

What is the full name, acronym, and milestone of the most recent PCLIA?

Inventory and Classification Database, ICDB

What is the approval date of the most recent PCLIA?

3/14/2018

Changes that occurred to require this update:

**Expiring PCLIA** 

Were there other system changes not listed above?

No

What governance board or Executive Steering Committee (ESC) does this system report to? Full name and acronym.

Tax Exempt Government Entities Executive Steering Committee

Current ELC (Enterprise Life Cycle) Milestones:

Operations & Maintenance (i.e., system is currently operational)

Is this a Federal Information Security Management Act (FISMA) reportable system?

## GENERAL BUSINESS PURPOSE

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 Office of Indian Tribal Governments mission is to help Native American tribes deal with their federal tax matters. The Inventory and Classification database (ICDB) is extracted for analysis that can facilitate Internal Revenue Service (IRS) audit selections, analyze taxpayer filings and input audit closing information and provide reports for management.

#### PII DETAILS

Does the system use, collect, receive, display, store, maintain, or disseminate IR Code 6103 taxpayer information: or any other type of Sensitive but Unclassified (SBU) information or PII such as information about IRS employees or outside stakeholders?

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

What types of tax identification numbers (TIN) apply to this system?

Social Security Number (SSN)

*List the approved Treasury uses of the SSN:* 

When there is no reasonable alternative means for meeting business requirements

Explain why the authorized use(s) above support the new or continued use of SSNs (or tax identification numbers).

There is no alternative to the use of the SSNs and EINs. The SSNs and EINs are significant parts of the data being processed.

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 mitigation strategy for the use of the SSNs and EINs. The SSNs and EINs are significant parts of the data being processed.

Employer Identification Number

Does this system use, collect, receive, display, store, maintain or disseminate other (non-SSN) PII (i.e., names, addresses, etc.)?

Yes

Specify the PII Elements:

Name

Tax Account Information

Does this system use, collect, receive, display, store, maintain, or disseminate SBU information that is not PII?

Yes

Specify the types of SBU from the SBU Types List:

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.

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.

Are there other types of SBU/PII used in the system?

No

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

PII for federal tax administration is generally Internal Revenue Code Sections 6001, 6011, & 6012e(a)

SSN for tax returns and return information is Internal Revenue Code Section 6109

PII for personnel administration is 5 USC

*Has the authority been verified with the system owner?* 

Yes

## **BUSINESS NEEDS AND ACCURACY**

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.

SSNs, EINs and names are used to identify the link between the parent tribe and each of its entities. Tax account information is extracted for analysis that can facilitate IRS audit selections and analyze taxpayer filings.

How is the SBU/PII verified for accuracy, timeliness, and completion?

Information is extracted from the Reporting Compliance Case Management System (RCCMS) and Tax and Tribal databases (TTDB). Each has its own verification process for data accuracy, timeliness, and completeness; therefore, ICDB assumes that the data is accurate, timely, and complete when it is provided by either of these systems.

## PRIVACY ACT AND SYSTEM OF RECORDS

The Privacy Act requires Federal agencies that maintain a system of records to publish systems of records notices (SORNs) in the Federal Register for records from which information is retrieved by any personal identifier for an individual who is a US citizen, or an alien lawfully admitted for permanent residence. The Privacy Act also provides for criminal penalties for intentional noncompliance.

Does your application or this PCLIA system pertain to a group of any record from which information is retrieved by any personal identifier for an individual who is a US citizen, or an alien lawfully admitted for permanent residence? An identifier may be a symbol, voiceprint, SEID, or other personal identifier that is used to retrieve information.

Yes

*Identify the Privacy Act SORN(s) that cover these records.* 

IRS 50.222 Tax Exempt/Government Entities (TE/GE) Case Management Records

IRS 24.046 Customer Account Data Engine Business Master File

#### **RESPONSIBLE PARTIES**

*Identify the individuals for the following system roles:* 

## Official Use Only

# **INCOMING PII INTERFACES**

Does the system receive SBU/PII from other systems or agencies?
Yes
Does the system receive SBU/PII from IRS files and databases?
Yes
Enter the files and databases:
System Name: Tribal and Tax Database Current PCLIA: Yes Approval Date: 2/5/2021 SA&A: No
System Name: Reporting Compliance Case Management System (RCCMS) Current PCLIA: Yes Approval Date: 10/14/2020 SA&A: No
Does the system receive SBU/PII from other federal agency or agencies?
No
Does the system receive SBU/PII from State or local agency (-ies)?
No
Does the system receive SBU/PII from other sources?
No
Does the system receive SBU/PII from Taxpayer forms?
No
Does the system receive SBU/PII from Employee forms (e.g., the I-9)?
No

# **DISSEMINATION OF PII**

Does this system disseminate SBU/PII?

Yes

Does this system disseminate SBU/PII to other IRS Systems?

Yes

Identify the full name and acronym of the IRS system(s) that receive SBU/PII from this system.

System Name: Tip Database

Current PCLIA: Yes Approval Date: 2/25/2021

SA&A: No

*Identify the authority.* 

Federal tax administration - Internal Revenue Code Sections 6001, 6011, 6012e(a)

For what purpose?

To assist with Federal Tax administration

Does this system disseminate SBU/PII to other Federal agencies?

No

Does this system disseminate SBU/PII to State and local agencies?

No

Does this system disseminate SBU/PII to IRS or Treasury contractors?

No

Does this system disseminate SBU/PII to other Sources?

No

## PRIVACY SENSITIVE TECHNOLOGY

Does this system use social media channels?

No

Does this system use privacy-sensitive technologies such as mobile, global position system (GPS), biometrics, RFID, etc.?

Does the system use cloud computing?

No

Does this system/application interact with the public?

No

## INDIVIDUAL NOTICE AND CONSENT

Was/is notice provided to the individual prior to collection of information?

Yes

How is notice provided? Was the individual notified about the authority to collect the information, whether disclosure is mandatory or voluntary, the purpose for which the information will be used, with whom the information may be shared, and the effects on the individual, if any, if they decide not to provide all or any of the requested information?

Notice, consent, and due process are provided pursuant to 5 USC.

Do individuals have the opportunity to decline from providing information and/or from consenting to particular uses of the information?

Yes

Describe the mechanism by which individuals indicate their consent choice(s):

The IRS has the legal right to ask for information per IRC sections 6001, 6011, and 6012(a), and their regulations. The regulations state that "taxpayers must file a return or statement with IRS for any tax they are liable for. Their response is mandatory under these sections."

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

Notice, consent, and due process are provided pursuant to 5 USC.

## INFORMATION PROTECTION

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

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

IRS Employees

Users: Read Write

Managers: Read Write

System Administrators: Read Write

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

Access to the server folder is approved by the System Administrator and controlled/maintained by Information Technology (IT) through the OS GetServices system. Only the Database Administrator and the employee assigned to update the database have access.

## RECORDS RETENTION SCHEDULE

Are these records covered under a General Records Schedule (GRS, IRS Document 12829), or has the National Archives and Records Administration (NARA) approved a Records Control Schedule (RCS, IRS Document 12990) for the retention and destruction of official agency records stored in this system?

Yes

How long are the records required to be held under the corresponding GRS or RCS, and how are they disposed of? In your response, please provide the GRS or RCS chapter number, the specific item number, and records series title.

All records housed in the ICDB 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 and Records Administration approval to affect data disposition. Any records generated and maintained by the system will be managed according to requirements under Internal Revenue Manual 1.15.1 and 1.15.6, and will be destroyed using IRS Records Control Schedule 24, Item 82 and as coordinated with the IRS Records and Information Management Program and IRS Records Officer.

## SA&A OR ASCA

Has the system been through SA&A (Security Assessment and Authorization) or ASCA (Annual Security Control Assessment)?

Is the system secured in accordance with all applicable federal, treasury, and IRS security policy, procedures, and requirements?

Yes

Describe the system's audit trail.

The audit trail is maintained by IT and access is granted through the OS GetServices. IT maintains records of individuals who have access to the shared server folder. ICDB is following the appropriate audit trail elements pursuant to current Audit Logging Security Standards.

## PRIVACY TESTING

Does the system require a System Test Plan?

No

Please explain why:

This is an internally created Access database that did not follow an IT or Business System Planning (BSP) path in development. The BSP office is now in the process of analyzing the current state and considering options for either improving the existing tool or transitioning to an enterprise solution.

## SBU DATA USE

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

No

#### NUMBER AND CATEGORY OF PII RECORDS

*Identify the number of individual records in the system for each category:* 

IRS Employees: Not Applicable

Contractors: Not Applicable

Members of the Public: Not Applicable

Other: Yes

*Identify the category of records and the number of corresponding records (to the nearest 10,000).* 

10,000 Tribal Entities

## **CIVIL LIBERTIES**

Does the system maintain any information	describing h	how any	individual	exercises	their	rights
guaranteed by the First Amendment?						

No

Is the system information used to conduct 'data-mining' as defined in the Implementing Recommendations of the 9/11 Commission Act of 2007, Public Law 110-53, Section 804?

No

Will this system have the capability to identify, locate, and monitor individuals or groups of people?

No

Does computer matching occur?

No

# **ACCOUNTING OF DISCLOSURES**

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?