

Date of Approval: **May 23, 2023**

PIA ID Number: **7682**

SYSTEM DESCRIPTION

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

TEGE Process Automation, TEGE Auto

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?

TEGE Process Automation, TEGE Auto

What is the approval date of the most recent PCLIA?

4/13/2020

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.

Enterprise Services Governance Board (ESGB)

Current ELC (Enterprise Life Cycle) Milestones:

Project Initiation/Milestone 1

Domain Architecture/Milestone 2

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

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

Yes

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 IRS Robotics Process Automation (RPA) project will establish RPA capabilities for the IRS by creating/building platforms, processes and a Center of Excellence enabling execution of a federated operating model where business and functional operating divisions are empowered to lead automation of processes in their domain. The RPA Platform will make use of UiPath Software to support automation needs. The UiPath software does not have learning capabilities. The main outcomes for the RPA project will be improvements in taxpayer service through reduced processing time and errors, enhanced scalability, and compliance; free the employee to focus on higher priority / value functions where human intervention is indispensable; provide increased reporting capabilities and overall business process transparency for government customer service functions. The RPA IA Platform project will establish the platform so that RPA IA solutions can be developed. 7740 and 7741 Reporting Compliance Case Management System (RCMMS) Processing - Establish and close cases in 7740 status in RCCMS with automation. Email Referral Processing - The solution fulfills the intended design of 1) assessing the email subject line for internal routing terms to store the email referral (as .pdf) and attachments and 2) extracting the EIN and Organization Name from the Form 13909 and renaming its folder.

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:

Security Background Investigations

Interfaces with external entities that require the SSN

Legal/statutory basis (e.g., where collection is expressly required by statute)

When there is no reasonable alternative means for meeting business requirements

Statistical and other research purposes

Delivery of governmental benefits, privileges, and services

Law enforcement and intelligence purposes

Another compelling reason for collecting the SSN

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

The TEGE Process Automation system requires the use of SSNs because no other identifier can be used to uniquely identify a taxpayer. SSNs are permissible from Internal Revenue Code (IRC) 6109, which requires individual taxpayers to include their SSNs on their income tax returns.

Describe the planned mitigation strategy and forecasted implementation date to mitigate or eliminate the use of SSN's (or tax identification numbers).

The Office of Management and Budget Circular A-130 requires that federal agencies develop a mitigation or elimination strategy for systems that use SSNs, which the Service continues to develop strategies to meet. An exception to that requirement is when the SSN is uniquely needed to identify a user's record. TEGE Process Automation requires the use of SSN's because no other identifier can be used to uniquely identify a taxpayer at this time.

Employer Identification Number

Other Taxpayer 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

Mailing Address

Standard Employee Identifier (SEID)

Financial Account Numbers

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:

Agency Sensitive Information - Information which if improperly used or disclosed could adversely affect the ability of the agency to accomplish its mission.

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.

Proprietary Data - Business information that does not belong to the IRS.

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.

The RPA Project will deploy automation which automate repetitive manual process using Commercial Off the Shelf (COTs) tool. Automation will be programmed to access only what is relevant to complete the manual process. The bot will open the EO Classification Mailbox and check for any unread emails. The bot will scan the subject line of each unread email for specific keywords. If a keyword is recognized, the email is saved as a PDF into the prescribed folder, along with its attachments, and look for a form 13909 and extract the EIN,

if available, and append to the folder name. If no keyword is found, the bot will save the email as a PDF into the Scanned Referrals folder, along with its attachments. The bot will scan the attachments and look for a form 13909 and extract the EIN, if available, and append to the folder name. The bot will perform logging and create reports.

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

Audit log files will be generated by the BOT and limited scale operational business reports will be provided.

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 36.003 General Personnel and Payroll Records

IRS 00.001 Correspondence Files and Correspondence Control Files

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: Reporting Compliance Case Management System

Current PCLIA: Yes

Approval Date: 10/14/2020

SA&A: Yes

ATO/IATO Date: 11/8/2022

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?

Yes

Please identify the form number and name:

Form Number: 13909

Form Name: Tax-Exempt Organization Compliant (Referral)

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: Reporting Compliance Case Management System
Current PCLIA: Yes
Approval Date: 10/14/2020
SA&A: Yes
ATO/IATO Date: 11/8/2022

Identify the authority.

IRM 4.70.6 IRM 4.75.5 IRM 4.75.7 IRM 7.20.1 IRM 25.1.9 IRM 25.1.2 IRM 3.2.12 IRM 7.20.6 IRM 25.2

For what purpose?

In order to process incoming referral emails automation inputs SBU data into RCCMS

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.?

Yes

Briefly explain how the system uses the referenced technology.

The main outcomes for the RPA project will be Improvements in taxpayer service through reduced processing time and errors, enhanced scalability, and compliance; Free the employee to focus on higher priority / value functions where human intervention is indispensable; Provide increased reporting capabilities and overall business process transparency for government customer service functions. The RPA IA Platform project will establish the platform so that RPA IA solutions can be developed. 7740 and 7741 Reporting Compliance Case Management System (RCMMS) Processing - Establish and close cases in 7740 status in RCCMS with automation. Email Referral Processing - The solution fulfills the intended design of 1) assessing the email subject line for internal routing terms to store the email referral (as .pdf) and attachments and 2) extracting the EIN and Organization Name from the Form 13909 and renaming its folder.

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 in the tax forms instructions filed by the taxpayer, and 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):

Notice, consent, and due process are provided in the tax forms instructions filed by the taxpayer, and pursuant to 5 USC.

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 filed by the taxpayer, and 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: Administrator

System Administrators: Administrator

Developers: Administrator

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

A potential user will request access via the (Online) Business Entitlement Access Request System (BEARS). This request has to be approved by the potential user's manager based on a user's position and need-to-know.

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 TEGE referrals with merit are established in RCCMS. Files in RCCMS are maintained for 7 years per RCS 24 Item 79(B).

SA&A OR ASCA

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

No

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

Do not know.

Describe the system's audit trail.

Risk Based Decision (RBD) was submitted to mitigate the lack of audit trail. Limited scale local log-based auditing is in place. As confirmed by the Associate Director of Security Risk Management (SRM), the RBD is NOT necessary in order for this pilot to move forward but is awaiting approval in Cyber. Process automation projects will automate existing manual processes for existing business applications. As a result, automation will inherit existing system privacy and security capabilities.

PRIVACY TESTING

Does the system require a System Test Plan?

Yes

Is the test plan completed?

Yes

Where are the test results stored (or documentation that validation has occurred confirming that requirements have been met)?

The test results are stored on the RPA SharePoint

Were all the Privacy Requirements successfully tested?

Yes

Are there any residual system privacy, civil liberties, and/or security risks identified that need to be resolved?

No

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?

Test plans are generated and reviewed by process SMEs to verify and sign off that the automation only performs the same activities as the current process.

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: Under 100,000

Other: No

CIVIL LIBERTIES

Does the system maintain any information describing 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?

No