

NOTE: The following reflects the information entered in the PIAMS Website.

A. SYSTEM DESCRIPTION

Authority: Office of Management Budget (OMB) Memorandum (M) 03-22, OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002 & PVR #10- Privacy Accountability and #21-Privacy Risk Management

Date of Approval: 09/30/2013 PIA ID Number: 611

1. What type of system is this? Legacy

1a. Is this a Federal Information Security Management Act (FISMA) reportable system? Yes

2. Full System Name, Acronym, and Release/Milestone (if appropriate):

Automated Lien System-ENTITY, ALS-ENTITY

2a. Has the name of the system changed? No

If yes, please state the previous system name, acronym, and release/milestone (if appropriate):

3. Identify how many individuals the system contains information on

Number of Employees: Under 50,000

Number of Contractors: Not Applicable

Members of the Public: Over 1,000,000

4. Responsible Parties:

N/A

5. General Business Purpose of System

The Automated Lien System (ALS) portion of the ALS-ENTITY application is used to generate Notices and Releases of Federal Tax Liens, as well as Certificates of Revocation and Withdrawal using information derived from the Delinquent Inventory/Accounting Listing (DIAL) data extract from the Integrated Data Retrieval System (IDRS). The purpose of a tax lien is to put the public on notice that a lien has been placed on a taxpayer's property. Once the information is released to the state recording offices and the District of Columbia Recorder of Deeds, it is public information and is not of a confidential nature. The ALS-ENTITY also generates lien Collection Due Process notices to taxpayers based on the generation of the Notice of Federal Tax Lien. The ENTITY portion of the ALS-ENTITY application is a management information tool that compiles data on open and closed Collection inventory as the cases are worked by various segments of IRS Collection. The application is used by management for the prioritization, selection, and assignment of collection cases to revenue officers. The application includes sophisticated reports that are used for planning and adjustment of work priorities to meet organizational goals and benchmarks. Users can design and run queries and reports to compile and analyze data in meeting business plan priorities and objectives. The data is compiled into reports that are generated on the group, territory, area, and national level. Time and inventory data from ENTITY is also supplied monthly to the Collection Time Reporting System (CTRS).

6. Has a PIA for this system, application, or database been submitted previously to the Office of Privacy Compliance? (If you do not know, please contact *Privacy and request a search) Yes

6a. If Yes, please indicate the date the latest PIA was approved: 11/17/2010

6b. If Yes, please indicate which of the following changes occurred to require this update.

- System Change (1 or more of the 9 examples listed in OMB 03-22 applies) (refer to PIA Training Reference Guide for the list of system changes) No
- System is undergoing Security Assessment and Authorization Yes

6c. State any changes that have occurred to the system since the last PIA

None

7. If this system has an Exhibit 53 or Exhibit 300 please provide the Unique Project Identifier (UPI) number (XXX-XX-XX-XX-XX-XXXX-XX). Otherwise, enter the word 'none' or 'NA'. NA

B. DATA CATEGORIZATION

8. Does this system collect, display, store, maintain or disseminate Personally Identifiable Information (PII)? Yes

8a. If No, what types of information does the system collect, display, store, maintain or disseminate?

9. Indicate the category that best describes the source that provides or originates the PII collected, displayed, stored, maintained or disseminated by this system. Most common categories follow:

Taxpayers/Public/Tax Systems Yes
 Employees/Personnel/HR Systems Yes

Other Yes

Other Source:
OTHER FEDERAL, STATE, LOCAL AGENCIES

10. Indicate all of the types of PII collected, displayed, stored, maintained or disseminated by this system. Then state if the PII collected is on the Public and/or Employees. Most common fields follow:

TYPE OF PII	Collected?	On Public?	On IRS Employees or Contractors?
Name	Yes	Yes	Yes
Social Security Number (SSN)	Yes	Yes	No
Tax Payer ID Number (TIN)	Yes	Yes	No
Address	Yes	Yes	Yes
Date of Birth	No	No	No

Additional Types of PII: No

PII Name On Public? On Employee?

No No

10a. Briefly describe the PII available in the system referred to in question 10 above.

A. Taxpayer ALS: Lien information for taxpayers with overdue tax balances includes: 0 Taxpayer name 1 Address 2 Social Security Number (SSN) 3 Type, year and amount of the tax liability at the time of the lien issuance ENTITY: Collection inventory is assigned to revenue officers via ENTITY. All open, closed, queue Collection field inventory information is located in ENTITY. 0 Taxpayer name 1 Address 2 Taxpayer Identifying Number (TIN) 3 Delinquency modules 4 Time and activity data B. Employee ALS: The following information appears on the notice of lien: 0 Tsign number(this is for internal identification and has been in place for many years) 1 Badge Number (this is required under Restructuring and Reform Act 98§3705 for identification to the taxpayer) 2 Name (or authorized pseudonym) 3 Work Phone Number 4 Job Title ENTITY: 0 Employee Name 1 Revenue Officer Identification Number (ROID) 2 Standard Employee ID (SEID) 3 Badge Number 4 Access Level 5 RO time and activity data 6 Job Title 7 Position (if available)

If you answered Yes to Social Security Number (SSN) in question 10, answer 10b, 10c, and 10d.

10b. Cite the authority that allows this system to contain SSN's? (e.g. specific regulations, statutes, etc.)

IRC 6321 and 6331, and other regulations

10c. What alternative solution to the use of the SSN has/or will be applied to this system? (e.g. masking, truncation, alternative identifier)

For ALS, only the last four digits of the SSN appear on the paper (public) lien document.

10d. Describe the planned mitigation strategy and forecasted implementation date to mitigate or eliminate the use of Social Security Numbers on this system?

None

11. Describe in detail the system's audit trail. State what data elements and fields are collected. Include employee log-in information. If the system does not have audit capabilities, explain why an audit trail is not needed.

C. Audit Trail Information ALS: ALS uses the Oracle database audit utility and the Oracle administrators capture all activity in the database. Login: 0 Captures user login 1 Captures date of last access for profiled users 1 Court Screen on Research Programs: 0 Name of initiator 1 User that input lien 2 User that approved electronic lien filing 3 Date approved Correct (Create, Refile, Amend, etc.): 0 Date of the action 1 User that completed the action 2 General nature of the change Release/Withdrawal: 0 Date requested 1 Tsign and name of requestor 2 User inputting release request 3 Tsign and name of user approving release request 4 Login of person approving request Revocation: 0 User inputting revocation(Unix login) 1 Unix login of approver 2 Tsign of requestor 3 Date revoked Removal of Lien (log.removal) 0 Unix login of user removing lien 1 Date of action 2 General lien information Systemic Histories are saved for these action: 0 Date/ UNIX login of user inputting history 1 Date/ UNIX login of user actions on billing support vouchers 2 Date/ UNIX login of user marking periods satisfied 3 Date/ UNIX login of user inputting recording information 4 Date/ UNIX login of user revoking a lien release 5 Date/ UNIX login of user withdrawing a lien This information is part of the lien data in the database and is kept as long as the lien record remains in the database. ENTITY: The ENTITY application tracks the following critical information pertinent to user profiles. Each of these information items can be cross referenced and re-validated by ICS application. Organizational assignment number associated with each UNIX logon account allowed access to the application. 0 Historical information on organizational assignment numbers. 1 Organizational privileges for each account (e.g. area manager, territory manager, group manager, etc). 2 Geographic access appropriate for each account. 3 Related employee SEID identification. 4 Last date a profile was actively used. 5 Historical information on adjustments made to an employee's inventory level. Entity keeps the following audit information : Entity_query.log: 0 Date/time/unix/ROID/query run Invapp.log:0 Date/time/SEID/unix login/e-level/module (application functions, reports, etc.)

11a. Does the audit trail contain the audit trail elements as required in current IRM 10.8.3 Audit Logging Security Standards? Yes

12. What are the sources of the PII in the system? Please indicate specific sources:

a. IRS files and databases: Yes

If Yes, the system(s) are listed below:

No System Records found.

b. Other federal agency or agencies: Yes

If Yes, please list the agency (or agencies) below:

Other Federal Agencies ALS: Integrated Financial System (IFS) provides confirmation files of automated payments to State and Local Courts for lien filings. ENTITY: No federal agencies provide data.

c. State and local agency or agencies: Yes

If Yes, please list the agency (or agencies) below:

State and Local Agencies ALS: ALS receives lien recording data from four (4) boroughs of New York City, Secretary of State in CA, all filing jurisdictions in Minnesota, and LA County. ENTITY: No state and local agencies provide data.

d. Third party sources: No

If yes, the third party sources that were used are:

e. Taxpayers (such as the 1040): No

f. Employees (such as the I-9): Yes

g. Other: Yes If Yes, specify: Automated Collection System, Integrated Collection System, Delinquency Investigation/Accounts Listing (DIAL), Master File, Automated Non-Master File, Standardized IDRS Access, Automated Insolvency System

C. PURPOSE OF COLLECTION

Authorities: OMB M 03-22 & Internal Revenue Manual (IRM) 10.8.8, IT Security, Live Data Protection Policy & PVR #16, Acceptable Use

13. What is the business need for the collection of PII in this system? Be specific.

ALS: The information is required for the general purpose of the system. ALS generates Notices and Releases of Federal Tax Liens and other lien certificates. It also generates collection due process letters using information derived from the Notice of Federal Tax Lien. Only information relevant to the objective of ALS-ENTITY is downloaded. ENTITY: All the information is required for the business purpose of the system. Data collected from the ENTITY portion of the application is critical as it serves as a management tool for analysis of data and to rank cases to enable proper selection of work for Revenue Officers.

D. PII USAGE

Authority: OMB M 03-22 & PVR #16, Acceptable Use

14. What is the specific use(s) of the PII?

To conduct Tax Administration	<u>Yes</u>
To provide Taxpayer Services	<u>No</u>
To collect Demographic Data	<u>No</u>
For employee purposes	<u>Yes</u>

If other, what is the use?

Other:

Yes

ALS: The system will not be used to identify or locate individuals or groups. However, individual lien notices are public information and may be identified by the use of the taxpayer name or TIN (EIN or redacted SSN) and address. This is considered an authorized disclosure under IRC Sec. 6321 Lien for Taxes and 6103. The system does not have the capability to monitor individuals or groups. Liens are one-time events and no data is retained after the lien has been released or satisfied. ENTITY: The application provides statistical data for all taxpayers that are worked by Collection field personnel. Case data can be retrieved by individuals or by groups, e.g. all individual or business taxpayers with delinquent accounts, or by Business Operating Division, e.g. Wage and Investment, Large and Mid-size Business, Small Business, Self-employed, etc. The application is a management information tool that can be used to query and sort Collection activity on individual of business taxpayer cases.

E. INFORMATION DISSEMINATION

Authority: OMB M 03-22 & PVR #14- Privacy Notice and #19- Authorizations

15. Will the information be shared outside the IRS? (for purposes such as computer matching, statistical purposes, etc.) Yes

15a. If yes, with whom will the information be shared? The specific parties are listed below:

	Yes/No	Who?	ISA OR MOU**?
Other federal agency (-ies)	Yes	ALS: General Accounting Office (GAO) or Treasury Inspector General Accounting Office (TIGTA) may be provided information if a formal request is made. ENTITY: No	No
State and local agency (-ies)	Yes	ALS: Lien information is sent to state and county governments. All liens on personal and real property in MA are filed at the United States District Court (USDC) in Boston. ALS maintains the recorded lien release, withdrawals, etc., on these filed liens and the data is made available by access through an ALS terminal located on the court's premises by the public. The Secretary of State in Hartford, CT (CTSOS) has a similar ALS setup with one exception, that the ALS terminal is located behind the counter and only the CTSOS employees have access. ALS contains over 350,000 lien records for both locations. A dedicated server containing the partial ALS database is located outside the IRS intranet firewall and the external stakeholders access it through the Enterprise Computing Center-Detroit (ECC-DET) Extranet enterprise security zone.	Yes
Third party sources	No		
Other:	Yes	ALS: In addition, the IRS has Memoranda of Understandings with the state of Minnesota, Los Angeles County, the Secretary of State of California and four (4) boroughs of New York City. Lien data is exchanged with these courts for the purpose of electronic lien filing.	

** Inter-agency agreement (ISA) or Memorandum of Understanding (MOU)

Contractor System Administrators _____

Contractor Developers _____

Other: _____

No _____

If you answered yes to contractors, please answer 22a. (All contractor/contractor employees must hold at minimum, a "Moderate Risk" Background Investigation if they have access to IRS owned SBU/PII data.)

22a. If the contractors or contractor employees act as System Administrators or have "Root Access", does that person hold a properly adjudicated "High Level" background investigation?

23. How is access to the PII determined and by whom?

ALS and ENTITY: Access to the data is determined by the manager based on a user's position and need-to-know. The manager will request a user be added. They must access the OL5081 application and complete Form 5081, Information System User Registration/Change Request, to request access to the application. A user's access to the data terminates when it is no longer required. Criteria, procedures, controls, and responsibilities regarding access are documented in the Information Systems Security Rules on Form 5081. Contractors are active as developers and hold approval for staff-like access.

24. How will each data element of SBU/PII be verified for accuracy, timeliness, and completeness?

ALS: Information is uploaded into ALS-ENTITY from ICS and ACS or is manually input. ICS and ACS entity and tax period information are extracted from IDRS/IMF and forwarded to ALS-ENTITY. ALS-ENTITY does not change or verify information submitted. However, ALS-ENTITY does receive entity and collection statute updates on the weekly data run from masterfile. If the taxpayer's address changes, ALS generates a coversheet with the correct address when a certificate of release is issued. ENTITY: Information is loaded from ALS QUEUE DIAL and from ICS. ENTITY is the recipient of the data from the other applications. The validity of the data is done in the other applications.

25. 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? Yes

25a. If Yes, how long are the records required to be held under the corresponding RCS and how are they disposed of? In your response, please include the complete IRM number 1.15.XX and specific item number and title.

ALS data is approved for destruction one year after lien is paid in full (Job No. N1-58-97-13, item 32, and published under IRM 1.15.35, item 32...to transition soon to Document 12990, under Records Control Schedule 35). The ALS database initiated purge procedures in 2008. These current procedures eliminate all released liens over five (5) years old. The elimination of additional records would create delays and complications to taxpayer service. Frequently taxpayers and title companies contact IRS looking for copies of liens released in prior years in order to pave the way for real estate closings involving properties that are encumbered by Notices of Federal Tax Liens. Although the law does not require IRS to issue a release of a lien that has time expired and although IRS has the legal right to rely on wording in the notice that makes the notice of lien a "self-releasing" document, title companies in many places in the country insist on receipt of a separate release before agreeing to proceed with a real estate closing. Purging these records would result in significant problems. ALS-ENTITY: This system supports IRS Collection activities and other program related records maintained in accordance with RCS 28 for Collection.

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.

26. Describe how the PII data in this system is secured, including appropriate administrative and technical controls utilized.

ALS and ENTITY: Access to the data is determined by the manager based on a user's position and need-to-know. The manager will request a user be added. They must access the OL5081 application and complete Form 5081, Information System User Registration/Change Request, to request access to the application. A user's access to the

data terminates when it is no longer required. Criteria, procedures, controls, and responsibilities regarding access are documented in the Information Systems Security Rules on Form 5081. Contractors are active as developers and hold approval for staff-like access.

26a. Next, explain how the data is protected in the system at rest, in flight, or in transition.

Application Level Implementation: The ExFIRS application stores employee PII data in the Operational Data Base (ODB) in the Employee Table. Secure logical and physical access controls are in place to ensure only authorized users have access to the ODB. GSS Level Implementation: IRS users may download PII data from the ExFIRS application to their IRS laptops. The IRS laptops are fully encrypted with the implementation of Entire Disk Encryption (EDE). Refer to the GSS-32 SSP for additional information. Update after eCM 2012 As a result of the eCM assessment, it was determined that control SC-28 is Inherited because the ExFIRS information at rest is stored in the Oracle database. The protection of data in the Oracle database is the responsibility of GSS-31. Therefore, the implementation status has been updated from In Place (Hybrid) to Inherited.

27. Has a risk assessment (e.g., SA&A) been conducted on the system to ensure that appropriate security controls have been identified and implemented to protect against known risks to the confidentiality, integrity and availability of the PII? Yes

28. Describe the monitoring/evaluating activities undertaken on a regular basis to ensure that controls continue to work properly in safeguarding the PII.

Continuous Monitoring (eCM) occurs annually to ensure that controls remain in place to properly safeguard PII. The application is about to go through eCM-r activities beginning August 2013.

29. Is testing performed, in accordance with Internal Revenue Manual (IRM) 10.8.8 - IT Security, Live Data Protection Policy? Yes

29a. Has approval been received from the Office of Privacy Compliance to use Live Data in testing (if appropriate)? Yes

29b. If you have received permission from the Office of Privacy Compliance to use Live Data, when was the approval granted? 06/19/2008

H. PRIVACY ACT & SYSTEM OF RECORDS

Under the statute, any employee who knowingly and willfully maintains a system of records without meeting the Privacy Act notice requirements is guilty of a misdemeanor and may be fined up to \$5000.

Authority: OMB M 03-22 & Privacy Act, 5 U.S.C. 552a (e) (4) & PVR #13-Transparency

30. Are 10 or more records containing PII maintained/stored/transmitted through this system? Yes

31. Are records on the system retrieved by any identifier for an individual? (Examples of identifiers include but are not limited to Name, SSN, Photograph, IP Address) Yes

31a. If YES, the System of Records Notice(s) (SORN) published in the Federal Register adequately describes the records as required by the Privacy Act? Enter the SORN number and the complete name of the SORN.

SORNS Number

SORNS Name

Treasury/IRS 26.009 Lien Files (Open and Closed)

Treasury/IRS 36.003 General Personnel and Payroll Records

Treasury/IRS 34.037 IRS Audit Trail and Security Records System

Treasury/IRS 24.030 CADE Individual Master File (IMF)

Treasury/IRS 24.046 CADE Business Master File (BMF)

Treasury/IRS 26.019 Taxpayer Delinquent Account (TDA)

Comments

I. ANALYSIS

Authority: OMB M 03-22 & PVR #21- Privacy Risk Management

32. What choices were made or actions taken regarding this IT system or collection of information as a result of preparing the PIA?

Resulted in the removal of PII from the system (e.g., SSN use reduced/eliminated)	<u>No</u>
Provided viable alternatives to the use of PII within the system	<u>No</u>
New privacy measures have been considered/implemented	<u>No</u>
Other:	<u>No</u>

32a. If Yes to any of the above, please describe:

Not Applicable.

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