Date of Approval: 03/28/2025 Questionnaire Number: 2197

# **Basic Information/Executive Summary**

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

**AM18-AMS Closure Tool** 

Business Unit

Small Business and Self Employed

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 automation is being developed for the Small Business/Self-Employed Accounts Management tax examiners. The users of this automation will be at least 30 full-time Grade Series 05 (GS-05) employees. This automation is intended to be attended. The Individual Master File (IMF) performs a weekly audit of unresolved credits on Tax Delinquency Investigation (TDI) cases that are loaded into Accounts Management Service (AMS). The user then goes and matches the unresolved credits to the Taxpayer Identification Number (TIN) with any other notes. They will mark the case as closed and return it to the unassigned queue. The current process requires little decision making, but it is labor and time intensive and therefore prone to human error. Each year, 30 full time employees (FTEs) spend ~6,000+ hours per year completing this process. Automating this process will provide value by reducing the FTEs time spent leading to human error reductions and savings from managerial, clerical, and tax examining resources.

## **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).

The automation will help the tax examiner perform weekly audits of unresolved credits on Tax Delinquency Inquiry (TDI) cases that are loaded into Accounts Management Service (AMS) using Individual Master File (IMF). The user will then go and match the unresolved credits to the Taxpayer Identification Number (TIN) with any other notes. After the automation is complete, the data will be stored on Account Management Service.

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

Document Locator Number (DLN)

Federal Tax Information (FTI)

Individual Taxpayer Identification Number (ITIN)

Name

Social Security Number (including masked or last four digits)

Standard Employee Identifier (SEID)

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 a specific initiative or process improvement? Yes
- 1.1 What is the name of the Business Unit (BU) or Agency initiative? Small Business and Self-Employed

2 Describe in detail, the Robotic Process Automation (RPA) process; be sure to identify the project title and business unit owner; state what IRS Strategy or initiative it supports; identify the system or process it supports and if PII will be required for the RPA to run; identify activities and workflow controls with the type and capabilities that will be incorporated; lastly indicate how the service benefits from the use of this RPA. (Process, Library, Test Automation, Template.)

Small Business and Self-Employed (SBSE) will implement an attended robotic process automation (RPA) to improve the manual process of performing a weekly audit of unresolved credits on Tax Delinquency Inquiry (TDI) cases that are loaded into Account Management System (AMS). The RPA Bot will reside on the Robotic Process Automation Program, UiPath, and will be ran each day by the assigned analyst on their laptop. The SBSE analyst will launch the UiPath Assistant from their desktop and run the bot at defined times throughout the day. The SBU/PII elements identified in this PCLIA supports the RPA process and the table. The SBSE AM18/AMS Closure Tool is a medium complexity RPA and is registered with One Solution Delivery Lifecyle (OneSDLC); it will be programmed to mimic human actions. The RPA bot will automatically click buttons and copy data from Integrated Data Retrieval System (IDRS) and AMS. This technique is vital for the automation of repetitive tasks such as data extraction and process activities like field input (PIN). Due to the nature of this RPA, we do require the use of IDRS and AMS. The process automation will increase proactivity by being able to resolve the credit and alert the analyst so they can take appropriate actions, it reduces customer wait time, and IRS' mission to implement and modernize IT solutions and services which ultimately improves the customer's experience.

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

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

This automation no longer uses Integrated Data Retrieval System (IDRS), but Enterprise Consolidated Legacy Access Application Programming Interface (ECLAS API). The ECLAS API can connect to the Individual Master File (IMF), which is how the automation accesses the data that is needed to run.

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.

Employees will no longer need to log into IDRS and AMS, only for their own review. The RPA will still use the Social Security Number (SSN) and Taxpayer Identification Number (TIN) but will use the ECLAS API to do the search.

6 Is your RPA Attended/Unattended?
Attended

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.

The current process requires little decision making but it is labor and time intensive and therefore prone to human error. The resources used are diverted from actual taxpayer contact increasing case age and decreasing customer satisfaction. The ability to identify these cases is recent and the resources needed to work them have been diverted to assisting with the COVID surge. After the resources return, the streamlined process will help them catch up and can be repurposed to other workflow processes. Each year, 30 full time employees (FTEs) spend at least 6,000+ hours per year completing this process. Automating this process will provide value by reducing the FTE time spent leading to human error reductions and FTE savings from managerial, clerical, and tax examining resources. In the long term, this can be leveraged to many other programs that work transcripts or casework on AMS to streamline their process.

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

This is a medium complexity automation. This automation was required to register 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 connections are through the Enterprise Consolidated Legacy Access System Application Programming Interface (ECLAS API) which will connect via the backend. The bot will have its own credentials.

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

The users still need the following access to IDRS, but it is for their own review and not for the bot to function. The user that will have permission to access the data will be the Subject Matter Expert (SME) and tax examiners that will be using the automation. The users will be authenticated through their Business Entitlement Access Request System (BEARS) request for IDRS.

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

Access to IDRS and AMS is requested via Business Entitlement Access Request System (BEARS). Data access is granted on a need-to-know basis. BEARS enrollment process requires that an authorized manager approve access requests on a case-by-case basis. Access approval is based on the user role(s) and responsibilities. Users are given the minimum set of privileges required to perform their regular and recurring work assignments; they are restricted from changing the boundaries of their access without management approval.

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.

UiPath will use Security Assertion Markup Language (SAML) for UiPath Orchestrator.

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 of 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.)

No

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

Mitigation Plan Privacy Risks 1. Data Breach: Risk: Unauthorized access to sensitive personal data. Mitigation Plan: i. Implement robust encryption for data at rest and in transit. ii. Use PIV for accessing sensitive data. iii. Regularly update and patch systems to protect against vulnerabilities. iv. Conduct regular security audits and penetration testing. 2. Unauthorized Data Sharing: Risk: Personal data being shared without user consent. Mitigation Plan: i. Enforce strict access controls and data governance policies. ii. Monitor and log data access and sharing

activities. 3. Inadequate Data Retention Policies: Risk: Holding onto personal data longer than necessary Mitigation Plan: i. Define and implement clear data retention and deletion policies. ii. Regularly review and purge data that is no longer needed. Security Risks 1. Insider Threats: Risk: Employees with access to sensitive data may misuse it. Mitigation Plan: i. Implement strict access controls and the principle of least privilege. ii. Conduct security training for employees. iii. Monitor user activity and establish mechanisms for reporting suspicious behavior. iv. Use role-based access controls and regular access reviews. Mitigation Plan Summary 1. Regular Audits and Assessments a. Conduct periodic security and privacy audits. b. Perform regular risk assessments and update mitigation strategies as needed. 2. User Education and Awareness a. Provide training on security best practices and privacy policies. 3. Policy and Procedure Development a. Establish and enforce comprehensive security and privacy policies. 4. Technical Solutions a. Implement automated tools for detecting and responding to threats. b. Use advanced encryption, access controls, and monitoring tools. By identifying these risks and implementing comprehensive mitigation strategies, business units can better protect privacy and security within their systems.

## **Interfaces**

#### **Interface Type**

IRS Systems, file, or database

Agency Name

**UiPath Robotic Process Automation** 

Incoming/Outgoing

Both

Transfer Method

Other

Other Transfer Method

UiPath can extract and input data directly into the fields on AMS and IDRS.

#### **Interface Type**

IRS Systems, file, or database

Agency Name

Enterprise Consolidated Legacy Access System Application

Programming Interface (ECLAS API)

Incoming/Outgoing

Both

Transfer Method

Other

Other Transfer Method

ECLAS is an undertaking to build and provide an Integrated Middleware, an Enterprise Services platform to access legacy data from mainframe systems. ECLAS exposes web-service access to all the core legacy command codes as Generic JavaScript Object Notation (JSON)/Simple Object Access Protocol (SOAP) responses and secured via SITEMINDER using Security and Communication System (SACS) interface, with added benefits of orchestration, Automated Advanced Acquisition (AAA), security, analytics, etc. Key capabilities include service orchestration, data driven parsing and transformations, automated ingestion of mainframe record layouts, and with continuous integration and deployment pipeline for rapid development, build, test and deployment cycles. ECLAS provides a Service Oriented Architecture based on reusable, scalable Enterprise service, replacement for Local Account Profile (LAP) service and to eventually migrate the existing LAP consumers, especially applications on non-java platforms.

# **Systems of Records Notices (SORNs)**

#### **SORN Number & Name**

IRS 70.001 - Individual Income Tax Returns, Statistics of Income Describe the IRS use and relevance of this SORN.

This SORN relates to the use of the taxpayer's tax return.

#### **SORN Number & Name**

IRS 36.003 - General Personnel and Payroll Records Describe the IRS use and relevance of this SORN.

To administer personnel and payroll programs.

### **Records Retention**

What is the Record Schedule System? Record Control Schedule (RCS)

What is the retention series title?

32 IRS Electronic Tax Administration

What is the GRS/RCS Item Number?

14

What type of Records is this for?

Both (Paper and Electronic)

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

Data entry system used to capture data submitted by taxpayers and other information used in Service Center processing. The database contains tax return information, records checks, and remittances.

What is the disposition schedule?

Delete when 1 year old or when no longer needed for an administrative, legal, audit, or other operational purposes, whichever is sooner.

What is the Record Schedule System?

General Record Schedule (GRS)

What is the retention series title?

Transitory and Intermediary Records

What is the GRS/RCS Item Number?

GRS 5.2 Item 020

What type of Records is this for?

Both (Paper and Electronic)

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

Records that meet the following conditions: they exist for the sole

purpose of creating a subsequent record and they are not required to meet legal or fiscal obligations.

What is the disposition schedule?

Temporary. Destroy upon creation or update of the final record, or when no longer needed for business use, whichever is later.

### **Data Locations**

What type of site is this?

System

What is the name of the System?

Account Management Service

What is the sensitivity of the System?

Personally Identifiable Information (PII) including Linkable Data

Please provide a brief description of the System.

AMS is a system that obtains taxpayer's information and their previous tax return forms.

What are the incoming connections to this System?

SBSE tax examiners are the end-users that have the required access and authority to review taxpayer's PII data. The system developers and operators are IRS FTEs.

What type of site is this?

System

What is the name of the System?

Integrated Data Retrieval System

What is the sensitivity of the System?

Personally Identifiable Information (PII) including Linkable Data

What is the URL of the item, if applicable?

There is not an URL for Integrated Data Retrieval System.

Please provide a brief description of the System.

IDRS holds the taxpayer's information such as their refund balances and due balances.

What are the incoming connections to this System?

SBSE tax examiners are the end-users that have the required access and authority to review taxpayer's Personally Identifiable Information (PII) data. The system developer and operators are IRS FTEs.

What are the outgoing connections from this System?

The automation will export the data back to AMS in the tax examiner's batch.