Date of Approval: 10/28/2024
Questionnaire Number: 1601

Basic Information/Executive Summary

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

Square Axway Transfer Service

Acronym:

ATS

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.

IRS employees use the Axway Transfer Service (ATS) to electronically serve summonses to Block Inc, formerly known as Square, Inc. (hereinafter Block/Square). The IRS employees using ATS are Revenue Officers, Revenue Agents, and Special Agents (hereinafter IRS Employees). The IRS employee uses ATS to issue a summons (Form 2039 or Form 6639) to Block/Square for their records pertaining to a taxpayer. Along with the summons, the IRS employee provides a partially completed Form 6863, Summons Invoice. Both documents contain the taxpayer's PII to enable Block/Square to search for the summonsed records. Once compiled, Block/Square will email the IRS employee a link to retrieve the summoned records and the completed Form 6863 to claim expenses incurred in gathering the records. This electronic process improves response time and security compared with the former methods of fax and/or mail. The summoned records from Block/Square are downloaded from ATS to the IRS employee's computer and become part of the IRS employee's active case file. Once the case is closed, the IRS employee removes/deletes the records from their computer and all case related information is stored according to the IRS Records Control Schedule. The repository at Block/Square is not the official IRS repository for any data or documents and is non-recordkeeping for IRS purposes.

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).

A summons is issued for the purpose of tax administration electronically through ATS for records maintained by Block/Square. The process begins with the IRS employee creating a summons Form 2039 or Form 6639 and a (a partially filled out) Form 6863, Invoice. For Revenue Officers using ICS, some of the form fields are filled automatically, and the revenue officer must complete the rest of the summons manually. For all other IRS employees serving summonses, the summons forms are completed manually. These forms contain PII to enable Block/Square to locate the summonsed records, and for the IRS employee to be able to put them in the correct file. PII types are listed below. The IRS file is stored, retained, and destroyed according to the IRS Records Control Schedule.

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)
Credit Card Number
Criminal Investigation Information
Driver's License Number
Email Address
Employer Identification Number
Employment Information
Federal Tax Information (FTI)
Financial Account Number
Individual Taxpayer Identification Number (ITIN)
Internet Protocol Address (IP Address)
Name
Other
Passport Number

Photograph
Professional License Number
Social Security Number (including masked or last four digits)
Standard Employee Identifier (SEID)
Tax ID Number
Telephone Numbers
Vehicle Identification Number (VIN)

Please explain the other type(s) of PII that this project uses.

Date of Birth, Tax Account Information, Doing Business As (DBA) and Also Known As (AKAs) Names/Designations, Square Screen Name/User ID

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

Information by CI for certain money laundering cases - 18 USC
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)

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

No

1.3 What type of project is this (system, project, application, database, pilot/proof of concept, power platform/visualization tool)?

Application

1.35 Is there a data dictionary for this system?

No

1.36 Explain in detail how PII and SBU data flow into, through and out of this system.

A summons is issued to Block/Square electronically through this system. The information on the summons (Forms 2039, 6639) and Invoice (Form 6863) is entered manually except for revenue officers using ICS. When this occurs, ICS assists the revenue officer by completing a basic template by entering the taxpayer's name, the revenue officer's contact information and setting up the time and date of the summons, but the revenue officer must manually complete the sections of the summons requesting specific records. The IRS employee (Revenue Officer, Revenue Agent, or Special Agent) provides personal identifying information (PII) from their assigned case file to assist Block/Square to locate the correct records. In some cases, it is sufficient to identify the taxpayer by name and address. In other cases, Block/Square may need a Social Security Number (SSN), Taxpayer Identification Number (TIN) or account number(s). These determinations are made when the summons is issued. The reason why the IRS employee issues a summons often depends upon their job title. Revenue Agents often summons for income records. Revenue Officers often seek income and asset records. While special agents are investigating tax crimes. The IRS employee also provides their email address to Block/Square when the summons is issued. Block/Square receives the summons and personal identifying information through ATS. They gather the summoned records and place them on ATS be retrieved by the IRS employee. Block/Square owns the summoned records, and these records pertain to their transactions with their clients. Their clients are IRS taxpayers. Block/Square will email a link to the IRS employee who issued the summons to access the summoned records when they are available. The IRS employee will use this link to return to ATS and retrieve the summoned records. These records will contain a taxpayer's personal records. Block/Square also provides a completed Form 6863, Invoice, which contains PII. The IRS employee downloads all the summoned records from ATS to their IRS laptop and become a part of the IRS employees case file. Block/Square erases all summons data from ATS 90 days after the IRS employee is notified that the summoned records are available for download.

1.4 Is this a new system?

No

1.5 Is there a Privacy and Civil Liberties Impact Assessment (PCLIA) for this system?

Yes

1.6 What is the PCLIA number?

6446

1.7 What are the changes and why?

No changes. PCLIA 6446 is expiring.

2.1 If this system discloses any PII to any third party outside the IRS, does the system have a process in place to account for such disclosures in compliance with IRC 6103(p)(3)(A) or Subsection c of the Privacy Act? Contact Disclosure to determine if an accounting is required. Enter "Yes" or "No". If Exempt, type "Exempt".

Exempt: The disclosures made by IRS employees when serving summonses through this system are made in the furtherance of tax administration under IRC 6103(n) and are exempt from accounting requirements.

2.2 Please provide the full name of and acronym of the governance board or Executive Steering Committee (ESC) this system reports to.

Compliance Integration Council

3.1 Does your project/system involve any use of artificial intelligence (AI), including virtual assistant, chat bot, and robotic process automation, as defined in Executive Order 13960?

No

3.3 Does this system use cloud computing?

No

3.6 Does this system interact with the public through a web interface?

No

3.7 Describe the business process allowing an individual to access or correct their information.

The IRS employee would process a revised summons through ATS referencing the error and withdraw the erroneous summons.

4.1 Who owns and operates the system (IRS Owned and Operated, IRS Owned and Contractor Operated, Contractor Owned and Operated)?

Block/Square

4.2 If a contractor owns or operates the system, does the contractor use subcontractors?

No

4.5 Identify the roles and their access level to the PII data. For contractors, indicate whether their background investigation is complete or not.

The IRS employees (Revenue Officers Revenue Agents and Special Agents) are authorized to handle PII on assigned cases. The MOU between IRS and Block/Square states that users of this system will undergo background and clearance process required by their organization and have a mission need to access summons information.

4.51 How many records in the system are attributable to IRS Employees? Enter "Under 50,000", "50,000 to 100,000", "More than 100,000" or "Not Applicable".

Under 50,000

4.52 How many records in the system are attributable to contractors? Enter "Under 5,000", "5,000 to 10,000", "More than 10,000" or "Not Applicable".

Not Applicable

4.53 How many records in the system are attributable to members of the public? Enter “Under 5,000”, “5,000 to 10,000”, “More than 10,000” or “Not applicable”.

Not Applicable

4.54 If records are attributable to a category not mentioned above in 4.51 through 4.53, please identify the category and the number of corresponding records to the nearest 10,000. If none, enter "Not Applicable".

Not Applicable

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

IRS employees obtain access to ATS as part of the onboarding process. Once granted access to the IRS intranet on their IRS issued computer, they can access ATS through a link posted on the Summons Knowledge Base. When assigned cases and the need to summons Block/Square arises, revenue officers, revenue agents and special agents who serve summonses have access to the link to ATS through the link posted on the Summons Knowledge Base. An employee at Block working in their law enforcement summons and subpoena department receives the summons and gathers the summoned records. Within Block/Square, access to ATS is determined by Block management to facilitate their responsibility to fulfill legal process requests. When the records are available Block/Square sends an email to the IRS employee who issued the summons with a link to the summoned records. Only that IRS employee access to these records on ATS.

5.1 Please describe any privacy risks, civil liberties and/or security risks identified for the system that need to be resolved and what is the mitigation plan?

No risks. The IRS employee accesses the Axway Transfer Service by going to the https site. No software program or executable file is used.

5.11 Is there a Risk Assessment Form and Tool (RAFT) associated with this system on file with your organization or the IRS Risk Office.

No

5.2 Does this system use or plan to use SBU data in a non-production environment?

No

Interfaces

Interface Type

Forms

Agency Name

Form 6863, Invoice and Authorization for Payment of Administrative Summons Expense

Incoming/Outgoing

Incoming (Receiving)

Transfer Method

Axway

Interface Type

Forms

Agency Name

Form 2039, Summons

Incoming/Outgoing

Both

Transfer Method

Axway

Interface Type

Forms

Agency Name

Form 6639, Financial Records Summons

Incoming/Outgoing

Both

Transfer Method

Axway

Interface Type

IRS Systems, file, or database

Agency Name

Integrated Collection System, (ICS)

Incoming/Outgoing

Outgoing (Sending)

Transfer Method

Other

Other Transfer Method

ICS assists a revenue officer to create a summons. Items such as the taxpayer's name and the revenue officer's contact information are added to the summons by ICS.

Systems of Records Notices (SORNs)

SORN Number & Name

IRS 34.037 - Audit Trail and Security Records

Describe the IRS use and relevance of this SORN.

Summoned records are used in audit examinations.

SORN Number & Name

IRS 42.001 - Examination Administrative Files

Describe the IRS use and relevance of this SORN.

Summoned records are used in examinations.

SORN Number & Name

IRS 00.001 - Correspondence Files and Correspondence Control Files

Describe the IRS use and relevance of this SORN.

Correspondence is associated with summonses.

SORN Number & Name

IRS 26.019 - Taxpayer Delinquent Account Files

Describe the IRS use and relevance of this SORN.

Summoned records are used to determine a filing requirement in delinquent return investigations.

Records Retention

What is the Record Schedule System?

Record Control Schedule (RCS)

What is the retention series title?

CRIMINAL INVESTIGATION (CI) RECORDS

What is the GRS/RCS Item Number?

RECORDS CONTROL SCHEDULE (RCS) 30

What type of Records is this for?

Both (Paper and Electronic)

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

The Axway Transfer Service is non-recordkeeping for IRS purpose. This platform is for secure communications and information sharing between IRS and Block/Square. Axway is not the official repository for any data or IRS documents. ITS submits a summons to Block/Square. The data provided to IRS in response to the summons is the property of Bock/Square. Records secured from Block/Square by the IRS are downloaded to the IRS employee's computer and become part of the IRS case file. This data is then governed under case file criteria.

What is the disposition schedule?

Investigative Files and Related Records., ten years. SEE PART II. INVESTIGATIVE PROGRAM RECORDS.

What is the Record Schedule System?

Record Control Schedule (RCS)

What is the retention series title?

TAX ADMINISTRATION - COLLECTION

What is the GRS/RCS Item Number?

RECORDS CONTROL SCHEDULE (RCS) 28

What type of Records is this for?

Both (Paper and Electronic)

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

The Axway Transfer Service is non-recordkeeping for IRS purpose. This platform is for secure communications and information sharing between IRS and Block/Square. Axway is not the official repository for any data or IRS documents. ITS submits a summons to Block/Square. The data provided to IRS in response to the summons is the property of Bock/Square. Records secured from Block/Square by the IRS are downloaded to the IRS employee's computer and become part of the IRS case file. This data is then governed under case file criteria.

What is the disposition schedule?

When an IRS case file is closed, the IRS employee removes/deletes the records from their laptop. All case related records & information is stored in a central repository and is retained for ten years after the case is closed as required by Document 12990, RCS 28, Tax Administration -- Collection.

What is the Record Schedule System?

Record Control Schedule (RCS)

What is the retention series title?

TAX ADMINISTRATION - EXAMINATION

What is the GRS/RCS Item Number?

RECORDS CONTROL SCHEDULE (RCS) 23

What type of Records is this for?

Both (Paper and Electronic)

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

The Axway Transfer Service is non-recordkeeping for IRS purpose. This platform is for secure communications and information sharing between IRS and Block/Square. Axway is not the official repository for any data or IRS documents. ITS submits a summons to Block/Square. The data provided to IRS in response to the summons is the property of Bock/Square. Records secured from Block/Square by the IRS are downloaded to the IRS employee's computer and become part of the IRS case file. This data is then governed under case file criteria.

What is the disposition schedule?

Ten years as required by Document 12990, RSC 23 for Examination.