

**Date of Approval: February 21, 2024**

**PIA ID Number: 7902**

## **SYSTEM DESCRIPTION**

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

*Automated Liens Systems Extranet, ALS Extranet*

Is this a new system?

*Yes*

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

*The application goes through the Small Business/Self-Employed (SBSE) Technology Governance Board (TGB).*

Current ELC (Enterprise Life Cycle) Milestones:

*Domain Architecture/Milestone 2*

*Detailed Design/Milestone 4A*

*System Development/Milestone 4B*

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 purpose of a Notice of Federal Tax Lien is to put the public on notice that a lien has been placed on a taxpayer's property. ALS Extranet system provides the legal repository of Federal Tax Liens (FTLs) to the two federal tax lien filing jurisdictions: 1) US District Court, Boston, Massachusetts 2) Secretary of State, Hartford, Connecticut. Per agreements made in 1988 and 1989, the IRS will would input federal tax liens to be filed at either of these two filing jurisdictions into the ALS system where they will be reviewed, approved, and recorded. Upon recording on the ALS system, the lien will be considered filed, and the court*

*recording data applied. Implementation and continued use of this application provides a more effective Federal lien filing process at considerable cost savings to all parties and implementation will increase accessibility and accuracy of information available to the general public which supports both the IRS and FTL missions, which benefits both the IRS and the taxpayer(s) by providing a modernized technology (web service versus a database) and a filing system that will satisfy external users (US Courts of Boston and the Secretary of State of Connecticut) legal requirements. Following a multi-tiered design, the front-end will be hosted in Integrated Enterprise Portal (IEP) and the back-end in Enterprise Container Platform (ECP). To enable the courts to access the lien data, a web address will be provided to the courts to access the web application. The court users will be authenticated using Secure Access Digital Identity (SADI). Court personnel and the public may research the lien records on the web application; however, the modernized tool will only allow data viewing. Functionality is strictly limited to research and printing. Furthermore, users in the USDC Boston may research the lien records for USDC Boston only. Likewise, users in the SoS Connecticut court are limited to the lien records for SoS Connecticut. The modernization of the ALS-Extranet system supports the Agency's mission and enables Field Collection to align work with business priorities and meet their goals. Management can monitor inventory prioritization and case assignment practices by offering both pre-programmed, user programmable queries and reports to meet business needs, monitor performance and achieve organizational goals.*

## **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:

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

*When there is no reasonable alternative means for meeting business requirements*

*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 ALS Extranet system requires the use of SSN's because no other identifier can be used to uniquely identify a taxpayer at this time. The use of an SSN is permissible from Internal Revenue Code (IRC) 6109, which requires individual taxpayers to include their SSNs on their income tax returns. The ALS Extranet system displays lien documents using Taxpayer (TP) Information, which is recognized and retrieved by a taxpayer name and Taxpayer Identification Number (TIN) (e.g., Social Security Number (SSN), Employer Identification Number (EIN), or similar number assigned by the IRS). SSNs will be masked. (All but the last four digits are redacted/removed. The ALS Extranet system requires the use of SSN's because no other identifier can be used to uniquely identify a taxpayer at this time. The use of an SSN is 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. ALS Extranet will use masked SSNs to mitigate or eliminate the use of SSNs for outgoing notices. Access controls will be set and applied no less than those published in Internal Revenue Manual (IRM) 10.8, Information Technology (IT) Security, and IRM 10.2, Physical Security Program.*

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  
Phone Numbers  
E-mail Address  
Standard Employee Identifier (SEID)  
Internet Protocol Address (IP Address)  
Financial Account Numbers  
Employment Information  
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 (SBUList):

*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.*

*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?

*Yes*

Describe the other types of SBU/PII that are applicable to this system.

*The following SBU elements are recognized, and retrievable elements stored in this system; Tax Lien Numbers; open and closed Federal tax liens, including Certificates of Discharge of Property from Federal Tax Lien; Certificates of Subordination; Certificates of Non-Attachment; Exercise of Government's Right of Redemption of Seized Property; and Releases of Government's Right of Redemption. Audit and tracking records also track system and user activities.*

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*

## **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.

*Automated Lien System (ALS) Extranet uses and maintains PII/SBU to identify those individuals on whom a Notice of Federal Tax Lien, discharge, or subordination on lien attachment has been filed. Routine uses of records maintained in the system, including categories of users and the purposes of such uses: Record Categories: Open and closed Federal tax liens, including Certificates of Discharge of Property from Federal Tax Lien; Certificates of Subordination; Certificates of Non-Attachment; Exercise of Government's Right of Redemption of Seized Property; and Releases of Government's Right of Redemption. Taxpayer (TP) Information is recognized and retrieved by a taxpayer name and Taxpayer Identification Number (TIN) (e.g., Social Security Number (SSN), Employer Identification Number (EIN), or similar number assigned by the IRS). The use of SSN allows the system to establish taxpayer assets for the purpose of potential tax obligation fulfillment, by making case updates and filing official lien notices with State and Local Jurisdictions and taxpayers, which are known as Notices of Federal Tax Lien (NFTLs).*

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

*ALS information is received directly from the Delinquent Inventory/Accounting Listing (DIAL) data extract from the Master File. Batched lien requests are received from Integrated Collections System (ICS) and Automated Collections System (ACS) to generate and process Notices of Federal Tax Liens in addition to Collection Due Process (CDP) notice. Weekly Individual Master File (IMF) and Business Master File (BMF) extracts from Master File of satisfied modules, (e.g., full paid, expired statutes, or situations where the lien is no longer valid) to generate Releases of Federal Tax Liens. The systems, databases, applications are deemed reliable and accurate. The information is not altered in any way. Critical Business Process perform updates and verifications using: Advocate Fair Taxpayer Treatment, Conduct Collection Activities, Detect and Stop Fraudulent Refunds, and Issue Taxpayer Notices. ALS Extranet will not have its own database. The ALS Database will provide the lien data as needed to the ALS Extranet web interface.*

## **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.

*Treasury/IRS - 26.009 - Lien Files*

*Treasury/IRS - 34.037 - Audit Trail and Security Records*

## **RESPONSIBLE PARTIES**

Identify the individuals for the following system roles:

*## For 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: Automated Lien System-entity*

*Current PCLIA: Yes*

*Approval Date: 5/1/2022*

*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?

*No*

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

*Yes*

Identify the full names of the federal agency(s) that receive SBU/PII from this system, and if there is an Inter-Agency Agreement (ISA) / Memorandum of Understanding (MOU).

Organization Name: TIGTA

Transmission Method: Extraction sent via secure data transfer or Outlook

*ISA/MOU: No*

Organization Name: GAO

Transmission Method: Extraction sent via secure data transfer or Outlook

*ISA/MOU: No*

Organization Name: SPLUNK

Transmission Method: Extraction sent via secure data transfer

*ISA/MOU: No*

Organization Name: Office of Management and Budget

Transmission Method: Extraction sent via secure data transfer or Outlook email.

*ISA/MOU: No*

Organization Name: Statistics of Income

Transmission Method: Extraction sent via secure data transfer or Outlook email.

ISA/MOU: No

Identify the authority.

*Disclosure of returns and return information may be made only as provided by 26 U.S.C. 6103.*

Identify the Routine Use in the applicable SORN (or Privacy Act exception).

*Routine uses, as identified in 26 U.S.C. 6103, Paragraph (d), (e), (h), (p)(2)(b) exemptions under 5 U.S.C. 552a(j)(2). (1) 5 U.S.C. 552a(e)(4)(G) and (f)(l). The records shall be available for a purpose that is consistent with title 31, as required by 31 U.S.C. 5319 This system has been designated exempt from sections (c)(3), (d)(1)-(4), (e)(1), (e)(4)(G) -(I), and (f) of the Privacy Act, pursuant to 5 U.S.C. 552a(k)(2). (See 31 CFR 1.36.)*

For what purpose?

*This information is collected and distributed to facilitate the tax administration process and provide statuses or inventory control of delinquent accounts, to other Federal Agencies. (Liens identify individuals on whom a Notice of Federal Tax Lien, or subordination on lien attachment has been filed.)*

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

Yes

Identify the full names of the state and local agency(s) that receive SBU/PII from this system, and if there is an Inter-Agency Agreement (ISA) /Memorandum of Understanding (MOU).

*Organization Name: US District Court, Boston, Massachusetts  
Transmission Method: web interface  
ISA/MOU: Yes*

*Organization Name: Secretary of State, Hartford, Connecticut  
Transmission Method: web interface  
ISA/MOU: Yes*

Identify the authority.

*Pursuant to section 6103(d) of the Internal Revenue Code (IRC). IRC 6103(d) provides for disclosure of returns and return information to any state agency, body or commission, or its legal representative charged under the laws of the state with the responsibility for administration of any state tax law. Dissemination of PII/SBU to other IRS systems - Authority and purpose is pursuant to section 6103(h)(1) of the Internal Revenue Code (IRC).*



*IRC 6103(h)(1) provides for disclosure of returns and return information to officers and employees of the Department of the Treasury (including IRS) whose official duties require access for tax administration. (The purpose would be for Disclosure of SBU/PII is for tax administration purposes.)*

Identify the Routine Use in the applicable SORN (or Privacy Act exception).

*ALS Extranet became the legal repository for the federal tax liens for these courts as a result of the 1988 and 1989 agreements, respectively, between the IRS and the Secretary of State of Connecticut and the United States District Court, Boston concerning the electronic filing of federal tax liens, defined in the agreements as "the transmission of data from IRS."*

For what purpose?

*To identify those individuals on whom a Notice of Federal Tax Lien, or subordination on lien attachment has been filed.*

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

*No*

Does this system disseminate SBU/PII to other Sources?

*Yes*

## **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.?

*No*

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?

*The IRS notifies all individuals who file tax returns of such collection via the Privacy Act Notice which provides the legal right to ask for information under Internal Revenue Code sections 6001, 6011, and 6012(a), and their regulations. Under these sections, response is mandatory. Code section 6109 requires the individual provide an identifying number. At the time the federal tax lien is filed, Collection Due Process notices are sent providing the taxpayer with their appeal rights. Also, when a balance due notice is first sent to a taxpayer, the taxpayer is sent Notice 3172, Privacy Act Notice, Publication 594 The Collection Due Process, and Publication 1660 Collection Appeal Rights.*

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

*No*

Why not?

*The information collected in this system is incurred carrying out the Internal Revenue laws of the United States; an individual cannot decline providing the information. All individuals have the right to decline to provide information; however, they may be subject to examination or deficiency procedures, at which time they are provided applicable notices, such as Your Appeals Rights and How to Prepare a Protest.*

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

*When a balance due notice is first sent to a taxpayer, the taxpayer is sent Notice 3172, Privacy Act Notice, Publication 594 The Collection Due Process, and Publication 1660 Collection Appeal Rights. The system does not replace any individual taxpayer's right to due process, as dictated by the Internal Revenue Manual guidelines. IRS policy allows individual taxpayers whose data is in the system the opportunity to clarify or dispute negative determinations through the appeals process. However, due to the nature of this system, individuals may not receive specific notice that their information has been collected.*

## 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 Only*

*System Administrators: No Access*

*Developers: No Access*

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

*IRS access, as identified above, will be as follows: Access to the Automated Liens Systems Extranet 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 Users 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. Write, Modify, Delete, and/or Print) are defined on BEARS and set (activated) by the System Administrator prior to the user being allowed access. User privileges and user roles determine the types of data that each user has access to. Management monitors system access and removes permissions when individuals no longer require access. Court staff/end user access is as follows: Access to the ALS Extranet is requested via an approved method by SADI (Login.gov or ID.me). The ALS Extranet currently allows for the viewing and printing of public lien data from the District Court of Boston, Massachusetts and the Secretary of State, Hartford, Connecticut. Data can only be viewed and/or printed for the specific court for which it was filed in (i.e. user can only view a Boston lien in the Boston court). The account management lifecycle is supported by Login.gov or ID.me.*

## 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.

*ALS Extranet does not house data. All data comes from the ALS database and is supplied by web services. ALS data is approved for destruction one year after lien is paid in full (Job No. NI-58-97-13, RCS 32-item 32-Automated Lien System (ALS). ALS provides a Service wide database of all notices of Federal tax liens, and published under IRM 1.15.35, item 32 (to transition soon to Document 12990, under Records Control Schedule 35). RCS 28 Item 43- Notice of Federal Tax Lien and Certificate of Release of Federal Tax Lien. (Job No. NC1-58-83-6, Item 36)-Destroy 1 year after account is satisfied or statutory period for collection has expired.*

## **SA&A OR ECM-R**

Has the system been through SA&A (Security Assessment and Authorization) or ECM-R (Enterprise Continuous Monitoring Reauthorization)?

*Yes*

What date was it completed?

*1/4/2023*

Describe the system's audit trail.

*Extranet's Auditing is separate from the parent system. ALS Extranet has a layered approach to Auditing. Commercial-Off-the-Shelf (COTS) tools will be used in conjunction with User Session Auditing Codes, using auditing tools. Each Instance/Container will be configured to audit on the Management Console for any system alterations. This function will be performed by Application Admins (AppAdmin). The Oracle Database will have auditing enabled for the Extranet schema user and auditing will focus on the following tables: Entity (Taxpayer), Documents- Facsimile Column, Tax Modules (LienData), and User Profile Information (Logpass) and will be performed by the Database Administrators (DBA). Application Auditing will audit events handling Application Data. In addition to the auditing tools, ALS Extranet will programmatically track any Authorized User Session Actions and storing parameters and time of action. This will be performed by the ALE Developers. SADI (Identity Provider)-Assumed that SADI has auditing on user Authentication attempts and will be performed by SADI team.*

## **PRIVACY TESTING**

Does the system require a System Test Plan

*Yes*

Is the test plan completed?

*No*

When is the test plan scheduled for completion?

*8/31/2023*

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?

*The ALS Extranet testing process validates data, software, and application programs/code. This is accomplished by running and selecting each program to ensure they start up, validating data is consistent with the level accessed, checking reports and associated data to ensure that it is accurate, checking for duplicate records, and running queries to ensure the appropriate records are returned. Throughout the testing process, testes record any processes that may not be functioning properly and provide documentation to the testing coordinator for dissemination to the programmers.*

### **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: 100,000 to 1,000,000*

*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?

*Yes*

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.

*Yes*