



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

JUL 3 0 2024

MEMORANDUM FOR THOMAS HULL, ACTING DIRECTOR
COMPLIANCE POLICY

S:C

FROM:

for Mary J. Roman Jr
CHARLENE WRIGHT THOMAS
ACTING PRIVACY ADVOCATE CL:PA

SUBJECT: AIS Privacy Impact Assessment (PIA)

The Office of the Privacy Advocate has reviewed the Privacy Impact Assessment for the Automated Insolvency System (AIS). Based on the information you provided, we do not have any privacy concerns that would preclude this system from operating. However, a revised PIA is required when considering any future upgrades or major modifications to the system or before the project progresses to the next milestone.

We will forward a copy of the PIA to the Director, Security Services Mission Assurance Certification Program Office to be included in the Security Accreditation Package for formal acceptance for operation. The Director, Security Policy Support and Oversight, which has security oversight responsibility, may request information concerning the statements contained in the PIA to ascertain compliance with applicable requirements.

If you have any questions please contact me at 202-927-5170; or your staff may contact Priscilla Hopkins at 202-927-9758.

Attachment

cc: Director, Security Services Mission Assurance, Certification Program
Office M:S:A
Director, Security Policy Support and Oversight M:S:S
Division Information Officer Charles J Valentino M:SP:SB

Privacy Impact Assessment – Automated Insolvency System (AIS)

July 3, 2003

MEMORANDUM FOR CHARLENE WRIGHT THOMAS
ACTING PRIVACY ADVOCATE CL:PA

FROM: Jerry Dalpiaz, Chief, Compliance Development Branch
M:I:B:CA:CD

SUBJECT: Request for Privacy Impact Assessment (PIA) –
Automated Insolvency System (AIS)

Purpose of the System: The Automated Insolvency System (AIS) contains information that used in processing of bankruptcy and other insolvency proceedings. The major processes that AIS performs are preparing and filing proofs of claim with the court. APOC (Automated Proof of Claim) System will prepare 70% of the proofs of claim and EPOC (Electronic Proof of Claim) will deliver the documents to the U.S. Bankruptcy Courts that mandate electronic transmission in .pdf format. Paper format is available to those courts requesting paper submission.

Name of Request Contact:

Name: Susan Howell
Organization Name & Symbols: M:I:B:CA:IS:OU
Mailing Address: 1973 North Rulon White Blvd M/S 6502, Ogden UT 84404
Phone Number (with area code): 801-620-4022

Name of Business System Owner:

Name: Tom Hull, Acting
Organization Name & Symbols: Director, Compliance S:C
Mailing Address: 5000 Ellin Rd., Lanham, MD 20706
Phone Number (with area code): 202-283-2180

Requested Operational Date: In operation

Category

New System?: _____
Recertification? (if no change, enter date of last certification) _____
Modification of existing system?: X _____

APOC has been added to AIS

Is this a National Standard Application (NSA)?: N _____

Is this a Modernization Project or System? N _____

If yes, the current milestone?: _____

Privacy Impact Assessment – Automated Insolvency System (AIS)

System of Record Number(s) (SORN) #:

Treasury/IRS 26.009 Lien Files

Treasury/IRS 26.019 Taxpayer Delinquent Account Files

Treasury/IRS 34.037 IRS Audit Trail and Security Records System

Attachment: PIA

Data in the System

<p>1. Describe the information (data elements and fields) available in the system in the following categories:</p> <ul style="list-style-type: none"> A. Taxpayer B. Employee C. Audit Trail Information (including employee log-in info) D. Other (Describe) 	<ul style="list-style-type: none"> a. Refer to Attachment 1. All elements on Attachment 1 are taxpayer data. b. AIS contains the name of the employee assigned to the case (docket number). c. The system the user uses to access AIS collects the employee log-in information. d. AIS does not contain data other than taxpayer or employee data.
<p>2. Describe/identify which data elements are obtained from files, databases, individuals, or any other sources.</p> <ul style="list-style-type: none"> A. IRS B. Taxpayer C. Employee D. Other Federal Agencies (List agency) E. State and Local Agencies (List agency) F. Other third party sources (Describe) 	<ul style="list-style-type: none"> a. Lien information comes from ALS (Automated Lien System). Taxpayer information comes from Masterfile, IDRS (Integrated Data Retrieval System), and AIMS (Audit Information Management System). b. Taxpayer information comes form taxpayer filed forms and correspondence. c. The employee supplies the name of the employee assigned to the case (docket number). d. Taxpayer information is collected through the Bankruptcy Courts. The Bankruptcy Courts transmit the information to the U.S. Bankruptcy Courts Noticing Center. The data is picked up by AIS. e. No State or Local Agencies provide data for AIS. f. Attorneys and trustees provide data..
<p>3. Is each data item required for the business purpose of the system? Explain.</p>	<p>All data items are necessary to process and control insolvency cases.</p>
<p>4. How will each data item be verified for accuracy, timeliness, and completeness?</p>	<p>Data will be visually inspected and corrected manually when errors are encountered. Validity checks for timeliness and completeness are completed on the data prior to and while it is loaded into AIS.</p>

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5. Is there another source for the data? Explain how that source is or is not used.	No.
6. Generally, how will data be retrieved by the user?	The data is generally retrieved by Docket Number or Taxpayer Identification Number (TIN).
7. Is the data retrievable by a personal identifier such as name, SSN, or other unique identifier?	Yes, data is retrievable by Taxpayer Identification Number (TIN).

Access to the Data

8. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Others)?	AIS Users, Managers, Developers, and SAs (System Administrators) will have access to the AIS system.
9. How is access to the data by a user determined and by whom?	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 fill out 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.
10. Do other IRS systems provide, receive, or share data in the system? If YES, list the system(s) and describe which data is shared. If NO, continue to Question 12.	Taxpayer information extracted from AIS is utilized by IIP (Insolvency Interface Program) to update IDRS. Information retrieved from IDRS/Masterfile by IIP is provided to AIS. Lien information is sent to and returned from ALS (Automated Lien System). Exam information is added from AIMS.

<p>11. Have the IRS systems described in Item 10 received an approved Security Certification and Privacy Impact Assessment?</p>	<p>IDRS, IIP, ALS, and AIMS have been certified and granted approval to operate.</p>
<p>12. Will other agencies provide, receive, or share data in any form with this system?</p>	<p>Taxpayer information is collected through the Bankruptcy Courts. The Bankruptcy Courts transmit the information to the U.S. Bankruptcy Courts Noticing Center where AIS retrieves the data.</p> <p>Data is sent electronically to U.S. Bankruptcy Courts as required by individual Courts.</p>

Administrative Controls of Data

<p>13. What are the procedures for eliminating the data at the end of the retention period?</p>	<p>Data in the AIS system is retained until the case has been closed. Therefore, the retention period will vary from case to case. However, it has been determined that an average retention period is 10 years. At the end of the retention period (A closed AIS date of six years) the data is purged from the system</p>
<p>14. Will this system use technology in a new way? If "YES" describe. If "NO" go to Question 15.</p>	<p>No.</p>
<p>15. Will this system be used to identify or locate individuals or groups? If so, describe the business purpose for this capability.</p>	<p>Yes, the system is used to identify or locate individuals. AIS is used to prepare and file proofs of claim with the court.</p>
<p>16. Will this system provide the capability to monitor individuals or groups? If yes, describe the business purpose for this capability and the controls established to prevent unauthorized monitoring.</p>	<p>Yes, the system provides the capability to monitor individuals. One of the business purposes of AIS is to monitor the status of the insolvency.</p>

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<p>17. Can use of the system allow IRS to treat taxpayers, employees, or others, differently? Explain.</p>	<p>AIS treats all taxpayers and employees equally.</p>
<p>18. Does the system ensure "due process" by allowing affected parties to respond to any negative determination, prior to final action?</p>	<p>AIS does not impact due process rights of taxpayers/employees. AIS is only a collection and tracking system that is used to process and control bankruptcy and other insolvency cases.</p>
<p>19. If the system is web-based, does it use persistent cookies or other tracking devices to identify web visitors?</p>	<p>Only the EPOC portion of AIS is web-based. EPOC does not use persistent cookies.</p>