

## Notice Conversion (NC) Release 4.1, Milestone 4B – Privacy Impact Assessment

PIA Approval Date – Mar. 25, 2011

### System Overview

Notice Conversion (NC) is an application that receives data and then subsequently creates a notice, which is ultimately sent to respective taxpayers. The primary function of this application is to take that data and put it in a format for communication to the taxpayer. The number of estimated notices generated from NC is between 80–100 million notices annually. NC delivers improved customer support and functionality by leveraging existing IRS applications and new technologies to bridge the gap between modernization and legacy systems. The purpose of NC is to provide a streamlined and modernized platform for the composition of taxpayer correspondence, to provide for the enablement of enforceable standards on style, format, text and data, to enable Business User initiated text changes and to enable alternative delivery methods for outbound taxpayer correspondence. This application has no users. It is a batch application that processes batches from the data it receives. This application utilizes a database (referred to as a “Content Repository”). The NC application picks up and drops off data directly from the servers where it resides. The servers then utilize the Enterprise File Transfer Utility (EFTU) for sending and receiving data.

### Systems of Records Notice (SORN):

- IRS 00.001--Correspondence Files and Correspondence Control Files
- IRS 22.054--Subsidiary Accounting Files
- IRS 24.030--Customer Account Data Engine Individual Master File
- IRS 24.046--Customer Account Data Engine Business Master File
- IRS 26.019--Taxpayer Delinquent Account Files
- IRS 34.037--Audit Trail and Security Records

### Data in the System

#### **1. Describe the information (data elements and fields) available in the system in the following categories:**

A. Taxpayer – Notice Conversion contains the following taxpayer information:

- Social Security Number (SSN)
- Employer Identification Number (EIN)
- Individual Taxpayer Identification Number (ITIN)
- Taxpayer Name
- Taxpayer Address

B. Audit Trail Information – Logon ID, captures start time, operational activity and end time.

#### **2. Describe/identify which data elements are obtained from files, databases, individuals, or any other sources.**

State and Local Agencies (List agency)

Other third party sources (Describe)

A. IRS – The following data elements are obtained from other systems via Enterprise File Transfer Utility (EFTU):

- SSN
- EIN

- ITIN
- Taxpayer Name
- Taxpayer Address

The following are the sources where data comes from (via EFTU):

- Customer Account Data Engine (CADE)
- Individual Master File (IMF)
- Business Master File (BMF)
- Individual Taxpayer Identification Number (ITIN)/Real Time System (RTS)
- Taxpayer Delinquent Account (TDA), which resides on IDRS
- Computer Paragraph Program Analysis System (CP-PAS)

The following are the sources where data is sent (via EFTU):

- Correspondence Production Services (CPS) sites, via the Integrated Collection System/Automated Collection System/Print (IAP). This is used for printing and sending IRS notices via the United States Postal Service (USPS). CPS utilizes the Notice Delivery System (NDS).
- Office of Taxpayer Correspondence (OTC), which is an office within Wage and Investment (W&I) that performs enterprise-wide correspondence analysis. This is not a system.

- B. Taxpayer: No information is collected directly from the taxpayer. All the information used by Notice Conversion is received directly from CADE, IMF, TDA, BMF or RTS-ITIN via EFTU.

**3. Is each data item required for the business purpose of the system? Explain.**

Yes. Notice Conversion delivers improved customer support and functionality by leveraging existing IRS applications and new technologies to bridge the gap between modernization and legacy systems. Notice Conversion enables Notice Projects to support and manage taxpayer accounts that require generation of notices to be composed.

**4. How will each data item be verified for accuracy, timeliness, and completeness?**

Notice Conversion relies on accuracy of the data that Notice Projects transfers. Notice Projects validates the accuracy, timeliness and completeness of the data before the data is sent to Notice Conversion. They provide the Extensible Markup Language (XML) in the format approved by Enterprise Data Management Office (EDMO) that includes validation of specified XML elements. Information is uploaded to Notice Conversion daily from Notice Projects via EFTU. The data file will have date and time stamp information included.

**5. Is there another source for the data? Explain how that source is or is not used.**

No. All the information used by Notice Conversion is received directly from notice projects via EFTU. Information is not collected directly from any other sources.

**6. Generally, how will data be retrieved by the user?**

There are no interactive users of the system.

**7. Is the data retrievable by a personal identifier such as name, SSN, or other unique identifier?**

No, the data cannot be retrieved by a personal identifier.

## Access to the Data

### **8. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Others)?**

Operational System Administrators and Database Administrators from Enterprise Operations (Eops). These users have no access to the application. The application residing in production is run via service accounts only. The SA and DBA access is only for migrating a change to the production environment via ClearCase and the Configuration Management Plan. If a change is required to the application, those changes subscribe to the requirements of the Configuration Management Plan and the changes must be approved by the Configuration Control Board.

- Changes are made only by Modernization & Information Technology Services (MITS)–24 General Support System (GSS) personnel within the production environment
- The NC developers only have access to development and the changes consist of massaging the data for presentational purposes only
- The changes are also reviewed by NC management personnel to ensure it meets the specifications of the business customers

*Note: With regards to the NC application; there are no end-users or contractors associated with the application.*

### **9. How is access to the data by a user determined and by whom?**

Access to data will be based on approved security rules determined by individual roles and responsibilities and will be restricted to a “need to know”. Users will follow established IRS procedures for access using On-Line 5081 (OL5081) and Information System User Registration/Change Request. IRS employees only have access to perform their official duties.

### **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.**

Yes. Notice Conversion receives and transfers data to the following systems:

- Customer Account Data Engine (CADE) – Year, cycle, day of the week
- Individual Master File (IMF) – Year, cycle
- Business Master File (BMF) – Year, cycle
- Individual Taxpayer Identification Number (ITIN)/Real Time System (RTS) – Year, Julian day of the year
- Taxpayer Delinquent Account (TDA) – Year, cycle
- Correspondence Paragraph Program Analysis System (CP-PAS) – Month, day, year
- Integrated Collection System/Automated Collection System/Print (IAP) and Office of Taxpayer Correspondence (OTC) – Year, cycle, day, Julian day of the year

### **11. Have the IRS systems described in Item 10 received an approved Security Certification and Privacy Impact Assessment?**

Yes.

Customer Account Data Engine (CADE)

- Authority to Operate (ATO) – April 2, 2009
- Privacy Impact Assessment (PIA) – October 19, 2009

Individual Master File (IMF)

- Authority to Operate (ATO) – March 8, 2010
- Privacy Impact Assessment (PIA) – November 10, 2009

#### Business Master File (BMF)

- Authority to Operate (ATO) – June 14, 2010
- Privacy Impact Assessment (PIA) – March 16, 2010

#### Individual Taxpayer Identification Number (ITIN) / Real Time System (RTS)

- Authority to Operate (ATO) – October 1, 2009
- Privacy Impact Assessment (PIA) – February 24, 2009

#### Taxpayer Delinquent Account (TDA), via the IDRS

- Authority to Operate (ATO) – March 10, 2009
- Privacy Impact Assessment (PIA) – November 6, 2008

#### Computer Paragraph Program Analysis System (CP-PAS)

- Part of SMART, which is not a FISMA reportable system

Correspondence Production Services (CPS) sites, via the Integrated Collection System/Automated Collection System/Print (IAP). This is used for printing and sending IRS notices via the United States Postal Service (USPS). CPS utilizes the Notice Delivery System (NDS):

- Authority to Operate (ATO) – May 3, 2010
- Privacy Impact Assessment (PIA) – March 29, 2010

#### **12. Will other agencies provide, receive, or share data in any form with this system?**

No. There are no International, Federal, State or Local agencies that will share data or have access to data in Notice Conversion. Treasury Inspector General for Tax Administration (TIGTA) or Government Accountability Office (GAO) may request data for auditing purposes.

#### **Administrative Controls of Data**

#### **13. What are the procedures for eliminating the data at the end of the retention period?**

The records in NC are scheduled under IRM 1.15.29, Item 429 (NARA Job No. N1-58-09-76, approved 2/2/10). System data (batch files of taxpayer data reformatted for use in composed settlement notices) is approved for destruction 14 days after receipt.

#### **14. Will this system use technology in a new way?**

No. Notice Conversion is not using technologies in ways that the IRS has not previously employed.

#### **15. Will this system be used to identify or locate individuals or groups? If so, describe the business purpose for this capability.**

No. The system will not be used to identify or locate individuals or groups.

#### **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.**

No. The system does not provide the capability to identify, locate, and monitor individuals or groups.

#### **17. Can use of the system allow IRS to treat taxpayers, employees, or others, differently?**

No, Notice Conversion does not treat individuals or groups differently.

#### **18. Does the system ensure "due process" by allowing affected parties to respond to any negative determination, prior to final action?**

Not applicable. The application does not have the capability to make determinations.

**19. If the system is web-based, does it use persistent cookies or other tracking devices to identify web visitors?**

Not applicable. Notice Conversion is not a web-based system.

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