

TREASURY INSPECTOR GENERAL FOR TAX ADMINISTRATION



The IRS Cannot Readily Identify All Federal Tax Information Data-Sharing Agreements

June 23, 2026

Report Number: 2026-IE-R007

Why TIGTA Did This Evaluation

We initiated this evaluation in response to congressional interest regarding what external organizations have access to federal tax information (FTI).

The Internal Revenue Code (I.R.C.) § 6103 permits certain limited disclosures of FTI to aid in tax administration and for other legal purposes. The IRS enters into data-sharing agreements with external federal, state, and local agencies, legally permitting the entities to use FTI under the authority of I.R.C § 6103.

The objective of our evaluation was to identify all external entities that access or receive FTI.

Impact on Tax Administration

Our nation’s tax system is based on voluntary compliance and a high degree of confidence that personal and financial information furnished to the IRS is protected against unauthorized use, inspection, or disclosure. The IRS is responsible for ensuring that I.R.C. § 6103 legal restrictions are enforced when sharing FTI with external organizations.

What TIGTA Found

We identified 1,124 known data-sharing agreements the IRS has with external organizations that receive FTI. The vast majority of these agreements assist state and local governments with tax administration. All U.S. states and territories have agreements. Of all states, Ohio has the most agreements (42) and Nevada has the least (4).

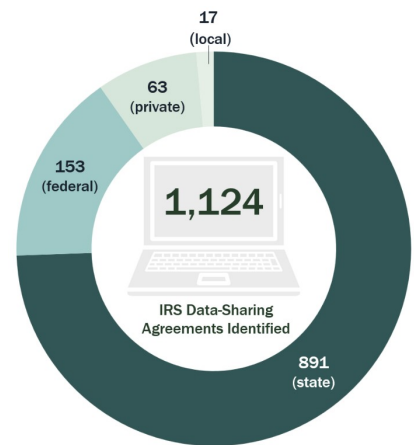
We found that the IRS could not readily identify all data-sharing agreements or contracts with external organizations receiving FTI because the IRS does not have a centralized database.

The IRS’s Privacy, Governmental Liaison and Disclosure (PGLD) division is responsible for I.R.C. § 6103-related agreements with government agencies. As of March 2026, PGLD tracked 1,094 (97 percent) of the 1,124 agreements in its Governmental Liaison Agreement Library (GL Library).

However, PGLD was not aware of all data-sharing agreements that other IRS business units initiated and developed. These business units did not engage with PGLD, even though IRS internal guidance requires business units to do so. As a result, we found 30 additional data-sharing agreements involving FTI, which were not listed in the GL Library.

The Office of the Chief Procurement Officer (OCPO) is responsible for awarding contracts that provide for the sharing of FTI with nongovernment organizations. However, the OCPO does not have a method to readily identify contracts that allow nongovernment organizations to receive FTI.

In addition, the Office of Information Technology identified 27 contracts that involved the sharing of FTI. These contracts represent a wide variety of IRS operational support, such as the scanning of FTI at contractor facilities.



What TIGTA Recommended

We recommended that the Chief Privacy Officer and the Chief Procurement Officer coordinate to establish a centralized database to store information on all data-sharing agreements and contracts. We also recommended that the Chief Privacy Officer remind all IRS business units to engage with the PGLD when developing FTI data-sharing agreements with government agencies. In addition, we recommended that the Chief Procurement Officer develop a process to readily identify all contracts with external organizations that involve the sharing of FTI. The IRS agreed with all recommendations.



TREASURY INSPECTOR GENERAL

for Tax Administration

DATE: June 23, 2026

MEMORANDUM FOR: COMMISSIONER OF INTERNAL REVENUE

FROM:

Nancy A. LaManna

A handwritten signature in cursive script that reads "Nancy LaManna".

Deputy Inspector General for Inspections and Evaluations

SUBJECT:

Final Evaluation Report – The IRS Cannot Readily Identify All Federal Tax Information Data-Sharing Agreements (Evaluation No.: IE-25-012-I)

This report presents the results of our evaluation to identify all external entities that can access or receive federal tax information. This evaluation was part of our Fiscal Year 2025 Annual Program Plan and addresses the major management and performance challenge of *Protection of Taxpayer Data and IRS Resources*.

Management's complete response to the draft report is included as Appendix III. If you have any questions, please contact me or Kent Sagara, Director, Inspections and Evaluations.

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Background

The Internal Revenue Service (IRS) accumulates large amounts of data as it processes hundreds of millions of tax returns and other forms. The Internal Revenue Code (I.R.C.) § 6103 generally restricts access and disclosure of federal tax information (FTI) to IRS employees and contractors unless the disclosure is expressly authorized by a specific I.R.C. exception or the taxpayer consents to the disclosure. In addition, the IRS can share FTI with federal, state, and municipal agencies, and other external partners, through information-sharing programs based on certain I.R.C. § 6103 exceptions.

For example, the IRS may enter into FTI data-sharing agreements with external organizations to support state tax filing or processing. These agreements may also help determine Social Security benefits, education-related financial aid eligibility, and provide delinquent tax data for private debt collections. Written data-sharing agreements generally establish the authorities and parameters for the IRS to provide FTI to external organizations and can be in the form of a:

- Memorandum of Agreement (MOA).
- Memorandum of Understanding (MOU).
- Computer Matching Agreement.
- Interface Control Document (ICD).¹

The IRS's Privacy, Governmental Liaison and Disclosure (PGLD) division is responsible for protecting the sensitive information and privacy of taxpayers and employees, ensuring only authorized disclosures of data. As part of its mission, PGLD develops FTI data-sharing agreements with external organizations. The PGLD's Office of Safeguards ensures that all requirements are met when federal, state, and local agencies obtain FTI.

Unless otherwise stated in I.R.C. § 6103(p)(3)(A), the IRS must track what FTI is disclosed for any taxpayer. The PGLD stores all data-sharing agreements for government agencies that it reviews in the Governmental Liaison Agreement Library (hereafter the GL Library). The PGLD also executes and tracks agreements with government agencies.

The IRS's Office of the Chief Procurement Officer (OCPO) is responsible for awarding contracts that provide for the sharing of FTI with nongovernment organizations. Officials from the OCPO stated that they do not have a method to readily identify contracts that allow for the sharing of FTI data with nongovernment organizations. In addition, the OCPO's contracting system does not track whether an agreement involves the sharing of FTI.

IRS policies and procedures require each business unit to maintain a record of the date, nature, and purpose of each FTI disclosure. Business units must also maintain the name and address of the external organizations receiving the information disclosed.

Annually, the IRS provides a disclosure report to the Joint Committee on Taxation, a nonpartisan committee of the United States Congress. Under I.R.C. § 6103(p)(3)(C), the Secretary of the

¹ See the Glossary of Terms in Appendix IV.

Treasury shall provide a public report to the Joint Committee on Taxation and identify the number of:

- (1) Requests for disclosure of returns and return information.
- (2) Instances in which returns and return information were disclosed because of the requests.
- (3) Taxpayers whose return or return information were disclosed because of the requests.

In addition, the report must describe the general purposes for which such requests were made. According to the IRS's April 2025 report to the Joint Committee on Taxation, over 35 billion taxpayer disclosures were made to various federal, state, and municipal agencies in Calendar Year (CY) 2024.² Appendix II presents the summary table from the CY 2024 report.

Due to heightened risks associated with allowing FTI to leave the IRS, we have issued numerous audit reports about data protection and accuracy. Our audit reports have reviewed the IRS's monitoring of state agencies and private debt-collection agencies receiving FTI.

For example, a recent audit report addressed inaccurate FTI being shared with the U.S. Department of Education.³ We found that inaccurate data shared with the Department of Education could lead to incorrect financial aid eligibility calculations, interrupt a student's financial aid offers, or delay major educational decisions for those applying for student aid.

There has also been congressional interest in FTI shared with other federal agencies. In April 2025, TIGTA received a request to identify sensitive information shared with agencies in the Executive Branch.

Due to congressional interest in IRS agreements with other agencies, we initiated this evaluation to identify all external organizations with which the IRS shares FTI. Knowing these organizations and why FTI is being shared with them is important. This information provides insight and understanding about how FTI can create efficiencies for tax administration at all government levels, strengthen partnerships for other program areas, and produce reciprocal arrangements across the federal government. Knowing this information also meets the American public's expectation for good government. Our nation's tax system is based on voluntary compliance and a high degree of confidence that personal and financial information furnished to the IRS is protected against unauthorized use, inspection, or disclosure.

In addition to this evaluation, we are also completing an evaluation on the Department of the Treasury and IRS data-sharing agreement with the Department of Homeland Security and its Immigration and Customs Enforcement agency. A separate report will be issued assessing the IRS's compliance with the implementation plan for that data-sharing agreement.

² We cite information from the Joint Committee on Taxation, *Disclosure Report for Public Inspection Pursuant to Internal Revenue Code Section 6103(p)(3)(C) for Calendar Year 2024* (JCX-17-25), April 23, 2025. Information from the CY 2024 report was more relevant to the scope of our evaluation.

The Joint Committee on Taxation published the *Disclosure Report for Public Inspection Pursuant to Internal Revenue Code Section 6103(p)(3)(C) for Calendar Year 2025* (JCX-15-26) on April 23, 2026. In the CY 2025 report, the number of taxpayer disclosures decreased to 18.2 million.

³ TIGTA Report No. 2025-2S0-029, *The IRS Transferred Incorrect Federal Tax Information to the Department of Education for Federal Student Aid* (June 2025).

Results of Review

We identified 1,124 known data-sharing agreements that the IRS had with external organizations that receive FTI.

- The vast majority of these agreements assist state and local governments with tax administration.
- Most agreements were started within the last 25 years, although one agreement was initiated in 1977.
- All states and territories have agreements. Of all 50 states, Ohio has the most agreements (42) and Nevada has the least (4).

We also noted that the IRS did not have a complete and authoritative library of all data-sharing agreements and contracts that share FTI with external organizations.

Breadth and Scope of IRS Data-Sharing Agreements

What are the reasons for sharing FTI with external organizations?

I.R.C. § 6103 and other legal citations allow several justifications for disclosing FTI to external organizations. Figure 1 presents a breakdown of the most used data-sharing agreements and their corresponding legal authority. Some data-sharing agreements cite multiple legal authorities, so the numbers in Figure 1 total more than the 1,124 data-sharing agreements previously mentioned.

Figure 1: Most Used Data-Sharing Agreement Legal Authorities

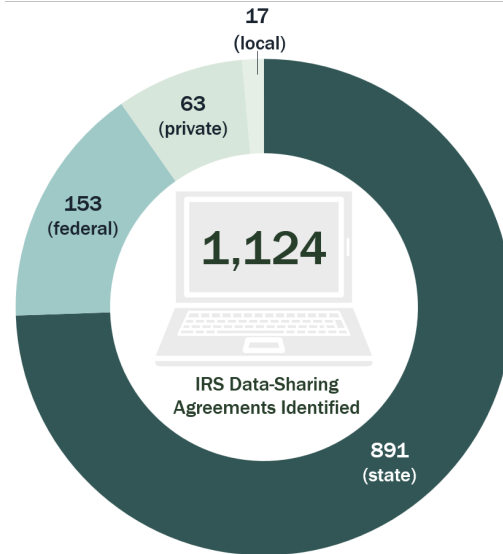
Legal Authority	Legal Authority Description	Frequency in Data Sharing Agreements
26 U.S.C.: Title 26 – Internal Revenue Code	§ 6103(d): Disclosure to State tax officials and State and local law enforcement agencies.	753
	§ 7803: Establishes the position of the Commissioner of Internal Revenue, who is appointed by the President.	189
	§ 6331: Authorizes the Secretary to collect taxes by levy on all property and rights where a lien has been issued.	42
	§ 6332: Establishes the responsibilities of the Commissioner of Internal Revenue.	42
5 U.S.C.: Title 5 – Government Organization and Employees	§ 552a: Disclosure to an individual requesting his/her tax return information.	100
Treasury Order 180-01 (Jan. 14, 2020) - Delegation of Authority to FinCEN	Establishes the Financial Crimes Enforcement Network (FinCEN) as a bureau within the U.S. Department of Treasury outlining its responsibilities to combat financial crimes.	44
FinCEN's Delegation of Authority for Dissemination of Bank Secrecy Act Examination Information (Appendix A)	Authorizes disclosure or dissemination of BSA Examination Information.	44
Treasury Order 150-10 (Feb. 1, 2021) - Delegation of Responsibility for Internal Revenue Laws	Establishes the responsibility of the Commissioner of the Internal Revenue to administer and enforce Internal Revenue laws.	42

Source: TIGTA analysis of the PGLD's GL Library as of January 2026.

What organizations receive FTI data from the IRS?

Figure 2 presents the total number of agreements identified during our evaluation, as well as various industry sectors receiving FTI.

Figure 2: Number of Data-Sharing Agreements by Industry Sector



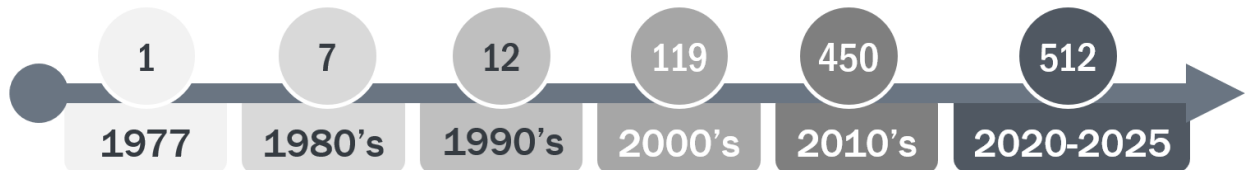
Source: TIGTA analysis of IRS data-sharing agreements as of March 2026.

Most data-sharing agreements are with government agencies. However, we also found 63 data-sharing agreements with private industry. These agreements allow private companies to partner with the IRS to receive/exchange information, such as tax preparation services, identity theft tracking and monitoring services, and customer service feedback.

When were current data-sharing agreements initiated?

The IRS has FTI data-sharing agreements dating back to 1977. The U.S. Territory of Guam holds the oldest active agreement with the IRS for coordinating tax administration services. After CY 2000, the IRS began executing more data-sharing agreements with external organizations. The GL Library identified the largest number of data-sharing agreements in 2025 and 2023 with 147 and 137 agreements, respectively. Figure 3 shows that the number of active data-sharing agreements has steadily increased since the 1970s.

Figure 3: Active Data-Sharing Agreements: 1977–2025



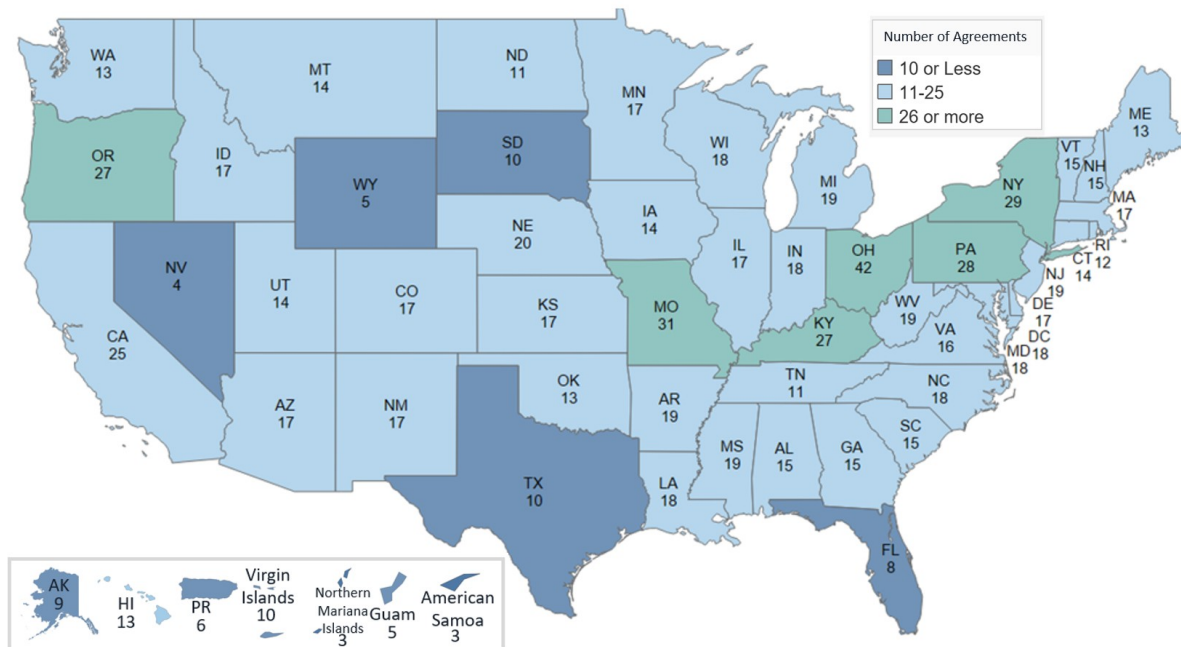
Source: TIGTA analysis of the PGLD's GL Library as of March 2026.

How many states have data-sharing agreements with the IRS?

The IRS has data-sharing agreements with agencies in every U.S. state and territory. State agencies make up the largest population of agreements. We found that the IRS executed agreements with some states more than others. For example, Ohio has 42 active data-sharing agreements with the IRS, which is the most among all states. Additionally, the majority of agreements are with state departments of revenue for tax filing purposes.

We noted that some states imposed no state income taxes, which explains why Nevada, South Dakota, and Wyoming had the fewest numbers of data-sharing agreements with the IRS. Figure 4 shows the number of data-sharing agreements the IRS has in each U.S. state and territory.

Figure 4: Data-Sharing Agreements the IRS Has in Each U.S. State and Territory














Source: TIGTA analysis of the PGLD’s GL Library as of March 2026.

How many data-sharing agreements were initiated or renewed with other Executive Branch agencies in 2025?

In response to the congressional request mentioned earlier in the report, we identified 16 data-sharing agreements with federal agencies under the Executive Branch. These agreements were implemented or renewed in CY 2025 and include agreements with the U.S. Office of Personnel Management.

The PGLD executed 8 of the 16 Executive Branch agreements. The remaining eight agreements were executed through the IRS’s Chief Counsel, Human Capital Office, Small Business/Self-Employed, Criminal Investigation, Large Business and International, and Taxpayer Services business units, in addition to the U.S. Office of Personnel Management. Figure 5 lists the Executive Branch agencies, legal authorities, and the number of agreements each agency executed with the IRS in CY 2025. These agreements were included in the PGLD’s GL Library.

Figure 5: CY 2025 IRS Data-Sharing Agreements with Executive Branch Agencies

 <p>Department of Veterans Affairs, Veterans Benefits Administration(1) §6103(l)(7): Verify eligibility needs-based pension benefits (CMA). Department of Veterans Affairs, Veterans Health Administration(1) §6103(l)(7): Unearned income for VHA health care (CMA).</p>	 <p>Department of Justice (1) §6103(m)(2): Debt collection (CMA).</p>
 <p>Social Security Administration (2) §6103(l)(7): Verify eligibility and amounts of benefits (CMA). §6103(l)(7): Verify eligibility for Medicare Part D Subsidy (CMA).</p>	 <p>Department of Treasury (1) §6103(n): Tax administration technology improvements (MOU); Department of Treasury Bureau of Fiscal Services (2) §6103(h)(1): Altered checks examination (MOU); Verification of Taxpayer and bank account information Affordable Care Act Verification System (ISA).</p>
 <p>Department of Education (1) §6103(l)(13): Eligibility for Income-Driven Repayment plans (CMA).</p>	 <p>Office of Personnel Management (1) §6103(n): Modernize software and technology (MOU).</p>
 <p>Department of Health and Human Services – Centers for Medicare and Medicaid Services (2) §6103(l)(21): Household size and income verification (CMA). §6103(n): No Surprises and Transparency Act (IEA).</p>	 <p>Railroad Retirement Board (1) §6103(l)(1): Tax administration (MOU).</p>
 <p>Department of Homeland Security (1) §6103(l)(2): Exchange of Information for Nontax Criminal Enforcement (MOU).</p>	 <p>Small Business Administration (1) §6103(c): Disaster assistance (MOU).</p>
	 <p>Department of Energy (1) §6103(n): Determination of provisional emissions rates (MOA).</p>

Source: TIGTA’s analysis of Executive Branch data-sharing agreements with the IRS.

Our initial approach to this evaluation was to gain an understanding of data-sharing agreements that the IRS enters into with external organizations and present that data in an informational report to the public. However, we learned that the IRS did not have a complete and authoritative library of all FTI agreement with external organizations.

Not All Data-Sharing Agreements With External Organizations Were Listed in the IRS’s Data-Sharing Agreement Library

We found that the IRS could not readily identify all external organizations receiving FTI. We determined that the GL Library was the best and most complete source of information available for data-sharing agreements with government agencies. However, PGLD officials stated that the database was not a centralized, authoritative database because IRS business units may implement agreements without informing PGLD. In addition, the number of agreements in the library fluctuates when agreements are added, removed, or expire.

IRS internal guidance requires business units to collaborate with PGLD on agreements with federal, state, and local government agencies. Conversely, the OCPO is responsible for awarding contracts involving the IRS’s sharing of FTI with organizations outside of the government sector. However, OCPO officials stated that its contracting system does not track whether a contract involves FTI data-sharing. Therefore, the OCPO could not provide us with a listing of nongovernment organizations receiving FTI.

The PGLD provided a listing of 1,094 data-sharing agreements tracked in the GL Library. However, after our outreach to various IRS business units, we identified 30 additional data-sharing agreements with government and nongovernment agencies. We believe that these 30 agreements should have been included in the GL Library. In addition, the Office of Information Technology provided 27 additional contracts with nongovernment organizations.

These 27 contracts represent a wide variety of IRS operational support, such as the scanning of FTI at contractor facilities. These contracts are not required to be captured in the GL Library.

Data-sharing agreements from other IRS business units

Individual IRS business units provided a total of 30 data-sharing agreements with government and nongovernment agencies that were not in the GL Library.⁴ These data-sharing agreements consisted of MOUs and ICDs. Figure 6 shows how many data-sharing agreements individual IRS business units established, as well as examples explaining the purpose of the agreements.

Figure 6: Business Unit Data-Sharing Agreements Not Found in GL Library

Taxpayer Services: 20

Provides customers top quality service by helping them understand and comply with applicable tax laws and to protect the public interest by applying the tax law with integrity and fairness to all.

Example: Providing information to the Department of Education necessary for verifying income for Federal Student Aid and Income Driven Repayment plans.

Research, Applied Analytics & Statistics (RAAS): 8

Ensures that all IRS procedures, guidance and actions comply with the established government standards for data governance. Data governance is the management of policies and procedures to ensure the availability, usability, integrity, and security of data.

Example: For the development of two statistical methodologies (1) high-quality synthetic tax data, and (2) validation process, to expand research access to administrative tax data while protecting privacy.

Human Capital Office (HCO): 2

Ensures the success of every business unit by providing human capital strategies and tools for recruiting, hiring, developing, retaining, and transitioning a highly-skilled and high-performing workforce to support IRS mission accomplishments.

Example: Department of Treasury employee working at the IRS on a detail.

Source: TIGTA analysis of IRS business unit data-sharing agreements as of March 2026.

IRS guidance states that all business units are required to collaborate with PGLD on agreements with federal, state, and local government agencies. The data we received were based on IRS business units that responded to our request.

Data-sharing agreements with contractors

As of August 2025, the IRS Office of Information Technology identified 27 contractors that were given FTI or allowed to access FTI. These contracts represent a wide variety of IRS operational support, such as scanning FTI at contractor facilities.

The IRS Cybersecurity organization was aware of these contractors, because it is required to perform security control assessments on contractors. Security control assessments evaluate whether controls are being implemented correctly, operating as intended, and producing the desired outcome with respect to system security requirements.

⁴ Four of the agreements were with nongovernment agencies that provide a specific service to the federal government.

IRS contractors performing work at contractor/subcontractor managed sites, and using contractor/subcontractor managed information technology resources, are required to follow IRS internal guidance. They also must follow specific privacy and security control requirements found in Publication 4812, *Contractor Security and Privacy Controls*. This publication defines security requirements for contractors and subcontractors working with the IRS to handle protected FTI, Personally Identifiable Information, and Sensitive But Unclassified data. Figure 7 presents the types of taxpayer data that the IRS provided to a sample of contractors and the purpose of the contract.

Figure 7: Types of Taxpayer Data That Contractors Have Access to and the Purpose



Source: TIGTA analysis of four IRS contractors that have access to or exchange FTI.

Because of Publication 4812 and the IRS's responsibility to assess security controls of these contractors, the risk for unauthorized access or disclosure of FTI is lowered. However, we believe that the OCPO should be able to readily identify that these contracts pertain to the sharing of FTI, through labeling or data marking. All 27 contracts were with private companies.

The IRS noted that it does not have a centralized database identifying all agreements with organizations that receive FTI. Further, the OCPO cannot readily identify contracts it has with nongovernment organizations receiving FTI. However, OCPO officials stated that Contracting Officer Representatives have the capability to use naming conventions to indicate whether an agreement involves the IRS sharing FTI. The IRS should ensure that it has an accurate and complete database of all organizations receiving FTI to ensure transparency to taxpayers and congressional stakeholders.

When we brought these omissions to the IRS's attention, the IRS agreed and stated that it plans to develop a centralized database to store all data-sharing agreements. As a result of recent staffing changes, the IRS could not provide a time frame for when this would be completed.

The Chief Privacy Officer and the Chief Procurement Officer should:

Recommendation 1: Coordinate to establish a centralized database to store information on all data-sharing agreements and contracts.

Management's Response: The IRS agreed with this recommendation. The PGLD division has a centralized location for data-sharing agreements with government agencies. The OCPO has a centralized system that stores contract information and will collaborate with the Chief Privacy Officer as needed.

The Chief Privacy Officer should:

Recommendation 2: Remind all IRS business units to engage with the PGLD when developing FTI data-sharing agreements with government agencies.

Management's Response: The IRS agreed with this recommendation. The Chief Privacy Officer will send the IRS senior executive team a memorandum reminding business units to engage with the PGLD when developing FTI data-sharing agreements with government agencies.

The Chief Procurement Officer should:

Recommendation 3: Develop a process to readily identify all contracts with external organizations that involve the sharing of FTI.

Management's Response: The IRS agreed with this recommendation. The OCPO will add a designated identifier on the Acquisition Checklist and in the contract writing system to identify all contracts that involve sharing FTI.

Appendix I

Detailed Objective, Scope, and Methodology

Our overall objective was to identify all external entities that can access or receive FTI.

To accomplish our objective, we:

- Obtained information necessary to respond to an April 2025 congressional request seeking information about IRS data-sharing agreements implemented in CY 2025.
- Identified all known open data-sharing agreements the IRS has with federal, state, and local governments in CY 2025.
- Identified any data-sharing agreements with other external organizations, such as contractors or private-sector partners.

Performance of This Review

This evaluation was performed in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation* during the period of April 2025 through January 2026. Those standards require that the work adheres to the professional standards of independence, due professional care, and quality assurance and followed procedures to ensure accuracy of the information presented. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions.

Data Validation Methodology

We analyzed data provided by various IRS business units. To track data-sharing agreements, we compared select data provided by IRS business units to the current system of records, which is the GL Library maintained by PGLD. We also interacted with officials from various IRS business units to understand how the data were created and to determine whether the data were sufficiently reliable for the work we performed. We did not independently validate the data for this report.

Appendix II

Disclosure Report for Public Inspection Pursuant to Internal Revenue Code § 6103(p)(3)(C) for Calendar Year 2024

Disclosure To/For	IRC Section 6103 Subsection	Bulk Master File Data ¹	Other Disclosures ²	Total Number of Disclosures ³
Tax Checks	(c)	0	9,901	9,901
State Tax Agencies	(d)	15,225,428,634	897,938	15,226,326,572
Joint Committee on Taxation	(f)(2)	0	102	102
Joint Committee on Taxation	(f)(4)	1,020,720,935	0	1,020,720,935
GAO, as Agent to Congressional Committees	(f)(4)	272,359,327	0	272,359,327
President and Head of Agencies	(g)	0	0	0
Department of Justice ⁴	(h)(3)(B)	0	0	0
US Attorneys ⁵	(i)(1)	0	54,662	54,662
US Attorneys	(i)(2)	0	24,415	24,415
-	(i)(3)(A)	0	0	0
-	(i)(3)(B)	0	0	0
-	(i)(3)(C)	0	11	11
-	(i)(7)(A)	0	0	0
-	(i)(7)(B)	0	0	0
US Attorneys	(i)(7)(C)	0	0	0
Government Accountability Office	(i)(8)	0	1,293	1,293
Bureau of Census	(j)(1)(A)	3,027,392,480	0	3,027,392,480
Bureau of Economic Analysis	(j)(1)(B)	0	453	453
Treasury Office of Tax Analysis	(j)(3)	15,437,754,166	0	15,437,754,166
Treasury Office of Economic Policy	(j)(3)	7,129,005	0	7,129,005
Department of Agriculture	(j)(5)	2,108,551	0	2,108,551
Congressional Budget Office	(j)(6)	5,362,608	0	5,362,608
Foreign Countries Tax Treaty Authority ⁶	(k)(4)	4,516,375	5,444	4,521,819
Bureau of Prisons (Federal and State)	(k)(10)	0	0	0
Department of State	(k)(11)	0	140,665	140,665
Whistleblower Office	(k)(13)	0	6,039	6,039
Information Sharing and Assistance Center (ISAC)	(k)(14)	145,314,943	0	145,314,943
Social Security Administration	(k)(15)	1,652,507	0	1,652,507
Department of Labor Pension Benefit Guaranty Corporation	(l)(2)	0	564	564
Federal Agencies	(l)(3)	0	0	0
Department of Treasury Employees	(l)(4)(A)	0	20	20
Child Support Enforcement Agencies	(l)(6)	11,212,346	0	11,212,346
Department of Education	(l)(13)	143,870,988	0	143,870,988
Medicare Premium Subsidy Adjustment	(l)(20)	5,888,694	0	5,888,694
HHS CMS (Affordable Care Act)	(l)(21)	91,132,781	0	91,132,781
States - IRC Section 6104(c)		0	19,335	19,335
TOTALS		35,401,844,340	1,160,842	35,403,005,182

Source: Joint Committee on Taxation, [Disclosure Report for Public Inspection Pursuant to Internal Revenue Code Section 6103\(p\)\(3\)\(C\) for Calendar Year 2024](#) (JCX-17-25), April 23, 2025, p. 3.

For more information about the six reference footnotes in the table, please go to the [April 23, 2025, Disclosure Report](#), pp. 3-5.

Appendix III

Management's Response to the Draft Report



CHIEF PRIVACY OFFICER

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, DC 20224

DATE: May 27, 2026

MEMORANDUM FOR NANCY A. LAMANNA
DEPUTY INSPECTOR GENERAL FOR AUDIT

FROM: John J. Walker \s\ *John J. Walker* \s\
Acting Chief Privacy Officer

SUBJECT: Draft Evaluation Report – The IRS Cannot Readily Identify All
Federal Tax Information Data – Sharing Agreements
(Evaluation # IE-25-012-I)

Thank you for the opportunity to respond to the above referenced draft audit report. The IRS remains committed to protecting Federal Tax Information (FTI). The IRS will strengthen the process to readily identify all active data-sharing agreements and contracts containing FTI.

We agree with the recommendations. We value the Treasury Inspector General for Tax Administration identifying the need to establish a centralized database on all data-sharing agreements and contracts; remind all IRS business units to engage with PGLD when developing FTI data-sharing agreements with government agencies; and develop a process to readily identify all contracts with external organizations that involve the sharing of FTI.

Attached is a detailed response outlining our corrective actions.

Attachment

Recommendation 1: The Chief Privacy Officer, Chief Procurement Officer should Coordinate to establish a centralized database to store information on all data-sharing agreements and contracts.

Corrective Action:

The IRS agrees with this recommendation. PGLD has a centralized location for data sharing agreements with government agencies. The Office of the Chief Procurement Officer (OCPO) has a centralized system that stores contract information and will collaborate with the Chief Privacy Officer (CPO) as needed.

Implementation Date: January 15, 2027

Responsible Official(s): Chief Privacy Officer (Privacy, Governmental Liaison & Disclosure) and Chief Procurement Officer.

Recommendation 2: The Chief Privacy Officer should remind all IRS business units to engage with the PGLD when developing FTI data-sharing agreements with government agencies.

Corrective Action:

The IRS agrees with this recommendation. The CPO will send the IRS senior executive team a memorandum reminding the business units to engage with the PGLD when developing FTI data-sharing agreements with government agencies.

Implementation Date: August 15, 2026

Responsible Official(s): Chief Privacy Officer (Privacy, Governmental Liaison & Disclosure)

Recommendation 3: The Chief, Procurement Officer should develop a process to readily identify all contracts with external organizations that involve the sharing of FTI.

Corrective Action: The OCPO will add a designated identifier on the Acquisition Checklist and in the contract writing system to identify all contracts that involve sharing FTI.

Implementation Date: January 15, 2027

Responsible Official(s): Chief Procurement Officer

Appendix IV

Glossary of Terms

Term	Definition
Computer Matching Agreement	A written agreement between the source agency and the recipient agency (or nonfederal agency). The agreement specifies the terms for parties engaging in a matching program.
Interface Control Document	Approved configuration documentation that describes the functional and interface characteristics allocated from a software system for each configuration item.
Memorandum of Agreement	Agreement used to document agreements and execute or deliver support with or without reimbursement between any two or more parties.
Memorandum of Understanding	Agreement used to document a mutual understanding between any two or more parties, that may or may not contain an expectation of payment, and under which the parties do not rely on each other to execute or deliver on any responsibilities.

Appendix V

Abbreviations

CY	Calendar Year
FTI	federal tax information
GL Library	Governmental Liaison Agreement Library
ICD	Interface Control Document
I.R.C.	Internal Revenue Code
IRS	Internal Revenue Service
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
OCPO	Office of the Chief Procurement Officer
PGLD	Privacy, Governmental Liaison and Disclosure Division
TIGTA	Treasury Inspector General for Tax Administration



**To report fraud, waste, or abuse,
contact our hotline on the web at
<https://www.tigta.gov/reportcrime-misconduct>.**

**To make suggestions to improve IRS policies, processes, or systems
affecting taxpayers, contact us at www.tigta.gov/form/suggestions.**

Information you provide is confidential, and you may remain anonymous.