

Date of Approval: **March 28, 2022**

PIA ID Number: **6808**

## **SYSTEM DESCRIPTION**

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

Automated Collection System (ACS) Conversational Interactive Voice Response (IVR), ACI

*Is this a new system?*

No

*Is there a PCLIA for this system?*

Yes

*What is the full name, acronym, and milestone of the most recent PCLIA?*

Contact Center GSS-15 - 5947, O&M

*What is the approval date of the most recent PCLIA?*

6/16/2021

*Changes that occurred to require this update:*

Significant Merging with Another System

New Access by IRS employees or Members of the Public

*Were there other system changes not listed above?*

No

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

User and Network Services (UNS), Technology Integration Board (TIB)

*Current ELC (Enterprise Life Cycle) Milestones:*

Preliminary Design/Milestone 3

Detailed Design/Milestone 4A

*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 Internal Revenue Services (IRS) manages and operates one of the largest contact centers in the world to assist taxpayers with tax-related problems and questions. At the end of FY2021, the individual taxpayer telephone demand was 52 million calls received, an increase of 270% from FY2020. The increase is attributed to new legislation, resulting in added, unplanned demand for the toll-free phone line. Business taxpayer telephone demand was 8.3 million calls received, 189% higher than the previous year. The number of taxpayers calling to schedule appointments at TACs was 3.9 million above the same period last year and call disconnects were 1,477% more than the prior year at 4.1 million compared to 260,000 in FY 2020. This demand has surpassed agents' capacity forcing IRS to request need for additional funding every year to onboard more agents. ACI and overall voicebot projects target on reducing the need to contact agent by authenticating taxpayer and providing automated conversational responses. GSS-15 supports the IRS business in responding to taxpayer requests and services in an expedient and efficient manner and represents one of the largest and most complex Contact Center Environment (CCE) in the world. GSS-15 components are dispersed throughout IRS facilities nationwide, including over 26 call center sites, and supports over 15,000 customer service representatives (CSRs). GSS-15 provides an efficient, cost effective, secure, and highly reliable contact center infrastructure and voice network for IRS business entities and taxpayers using the CCE. GSS-15 contains the voice network and telecommunications equipment that supports the CCE, which contains several business unit applications such as Wage and Investment (W&I), Small Business Self-Employed (SBSE), and Electronic Products and Services (EPPS). Infrastructure and applications within GSS-15 boundary are primarily managed by the Contact Center Support Division (CCSD) within UNS (User Network Services) and by Enterprise Operations (EOPS). CCSD is responsible for managing the systems and applications used to monitor, manage, and maintain the critical telephony infrastructure that encompasses components of the CCE. To ensure effective operations, GSS-15 uses state of the art call routing and distribution equipment. CCSD is responsible for managing the day-to-day operations of the CCE and is the integrator of technical and program services for the successful delivery of IT commitments to the business. GSS-15 provides real time monitoring and scripting as well as operational support to ensure all contact center technology is functioning and meeting business requirements.

## 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:*

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).*

SSN used by ICCE systems (system developed by AD) to authenticate taxpayer and retrieve account information.

*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. ACI requires the use of SSN's because no other identifier can be used to uniquely identify a taxpayer at this time. The use of SSNs are permissible from Internal Revenue Code (IRC) 6109, which requires individual taxpayers to include their SSNs on their income tax returns.

Other Taxpayer Identification Number

*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  
Date of Birth  
Protection Personal Identification Numbers (IP PIN)  
Tax Account Information

*Does this system use, collect, receive, display, store, maintain, or disseminate SBU information that is not PII?*

No

*Are there other types of SBU/PII used in the system?*

No

*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)

PII for personnel administration is 5 USC

*Has the authority been verified with the system owner?*

Yes

## **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.*

The only information collected from the taxpayer is their name, mailing address, date of birth and IP PIN. This information is processed to conduct the call with the taxpayer. But the PII is not stored. Upon completion of the call the information is relinquished.

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

Only the taxpayers name, mailing address, date of birth and IP PIN is collected and used. The name, mailing address, date of birth and IP PIN is the source. Adverse determination about an individual's rights, benefits and/or privileges cannot be derived from the name, mailing address, date of birth and IP PIN provided by the taxpayer. Nor can a determination of fairness be derived from a name, mailing address, date of birth and IP PIN provided by the taxpayer.

## 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.*

IRS 00.001 Correspondence Files and Correspondence Control Files

IRS 26.019 Taxpayer Delinquent Account Files

## RESPONSIBLE PARTIES

*Identify the individuals for the following system roles:*

## 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: Integrated Customer Communications Environment (ICCE)

Current PCLIA: No

SA&A: Yes

ATO/IATO Date: 5/11/2021

*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?*

Yes

*Identify the source that sends the SBU/PII, how the SBU/PII is transmitted and if there is an Inter-Agency Agreement (ISA) /Memorandum of Understanding (MOU).*

Organization Name: Customer or Taxpayer

Transmission Method: Input via voice

ISA/MOU: 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?*

Yes

*Identify the full name and acronym of the IRS system(s) that receive SBU/PII from this system.*

System Name: ICCE

Current PCLIA: No

SA&A: Yes

ATO/IATO Date: 5/11/2021

*Identify the authority.*

Contact Center Support Division (CCSD)

*For what purpose?*

The Automated Collection System (ACS) Conversational Interactive Voice Response (IVR) (ACI) project aims to significantly improve IRS toll-free taxpayer self-service, modernize the toll-free infrastructure, and develop conversational menus and interactive voice response (IVR) applications. The existing Automated Collection System (ACS) IVR is Dual Tone Modular Frequency (DMTF) system with limited voice recognition, i.e., "Press or say one, press or say two," with a structured menu system. The system consists of six IVR applications (five authenticated, one unauthenticated) each with their own "shared secrets" authentication. The ACI initiative converts the existing six IVRS to conversational phone applications using natural language processing (NLP) using a cloud-based solution. The ACI project will improve taxpayer self-service with easier to navigate conversational menus and user-friendly self-service tools (conversational IVRs). The goal is to improve ACS phone Level of Service (LOS). It also implements the foundation to modernize the IRS phone system by developing conversational menus and applications to the enhance taxpayer Live Assistance experience.

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

No

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

No

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

Yes

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

Organization Name: Verizon  
Transmission Method: Network Transfer  
ISA/MOU: Yes

*Identify the authority.*

Verizon/Nuance

*For what purpose?*

Yes

*Did the contract include the appropriate 6103(n) clauses for tax return and return information, and Federal Acquisition Regulations privacy clauses?*

Yes

*Does this system disseminate SBU/PII to other Sources?*

No

## **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?*

Yes

*Is the cloud service provider (CSP) Federal Risk and Authorization Management Program (FedRAMP) certified?*

Yes

*Date Certified.*

4/29/2020

*Please identify the ownership of the CSP data.*

Third Party

*Does the CSP allow auditing?*

Yes

*Who audits the CSP Data?*

IRS

*What is the background check level required for CSP?*

High

*Is there a breach/incident plan on file?*

Yes



*Privacy laws (including access and ownership) can differ in other countries. This cloud will be Continental US (CONUS) only for:*

Storage  
Transmission  
Maintenance

*Does this system/application interact with the public?*

Yes

*Was an electronic risk assessment (e-RA) conducted on the system/application?*

Not Applicable

*Please explain.*

Taxpayer enters phone number directly in the Verizon 3rd party Interactive voice response (IVR) system.

## **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?*

Audio message to taxpayers on how to select the option to talk with an IRS agent

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

Yes

*Describe the mechanism by which individuals indicate their consent choice(s):*

By not selecting the speak with an IRS agent option in the IVR menu

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

The IRS does not give any access other than select the IRS agent option.

## 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 Contractor Operated

*The following people have access to the system with the specified rights:*

*IRS Employees*

System Administrators: Administrator

*IRS Contractor Employees*

Contractor System Administrators: Administrator

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

Security roles and responsibilities are inherited from the Intelligent Call Manager (ICM) & Customer Voice Portal (CVP) which are based on established IRS procedures for access using OL5081 and rules described in the Unauthorized Access (UNAX) for OL5081.

## 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.*

ACI records owners and developers are working with the IRS Records Office to draft data retention requirements for submission to/approval by the National Archives and Records Administration (NARA). All records managed in ACI must be preserved until retention periods are finalized and approved by NARA. RCS 11 Item 1-14. RCS 29 Item 447

## **SA&A OR ASCA**

*Has the system been through SA&A (Security Assessment and Authorization) or ASCA (Annual Security Control Assessment)?*

In-process

*When is the anticipated date of the SA&A or ACS completion?*

4/20/2022

*Describe the system's audit trail.*

Voicebot chat will have audit capabilities with the system logs being sent to SPLUNK for reporting

## **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?*

4/20/2022

*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?*

ACI is an application within the GSS-15 components that undergo an Annual Security Control Assessment (ASCA) and Information Security Contingency Plan exercise every year. These initiatives are conducted by Cybersecurity. Cybersecurity develops the test plans, assess the systems, document the results, and deliver a final package to GSS-15 Stakeholders for information and action. All identified security and privacy risks are entered into the Treasury FISMA Inventory Management System (TFIMS) as Plan of Action and Milestones (POA&M). These items are updated and closed on or before their scheduled completion dates.

## **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?*

No