

Date of Approval: **January 10, 2022**

PIA ID Number: **6004**

## **SYSTEM DESCRIPTION**

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

Enterprise Feedback Management (EFM), Verint, Verint

*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?*

Verint Enterprise Management System (EMS), Verint. PIA ID Number: 3628

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

3/23/2020

*Changes that occurred to require this update:*

Significant System Management Changes

*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.*

HCO Initiatives Governance Board (IGB)

*Current ELC (Enterprise Life Cycle) Milestones:*

Operations & Maintenance (i.e., system is currently operational)

*Is this a Federal Information Security Management Act (FISMA) reportable system?*

No

## 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.*

Facility Management and Security Services (FMSS), Human Capital Office (HCO), Equity, Diversity, and Inclusion (EDI), Chief Financial Officer (CFO), Research Applied Analytics, and Statistics (RAAS) and Information Technology (IT) rely upon customer feedback to validate, improve, and measure their programs, processes, and services. To obtain this feedback on a consistent basis, the IRS needs a survey tool. The IRS has obtained the services of the Verint SAAS AWS Cloud hosted survey product and support. The survey product tool is used to create and administer internal and external confidential surveys and develop reports.

## 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.)?*

No

*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  
Internet Protocol Address (IP Address)  
Employment 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?*

Yes

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

Verint is used by IRS business units to conduct internal and external surveys. Each IRS business unit completes a survey Privacy & Civil Liberties Impact Assessment for each survey conducted. The survey PCLIA assesses the type of SBU/PII used. PII/Potential PII that maybe embedded in survey questions: a. BOD or office (ex W&I Campus, W&I RICS), IAT tool used b. BOD, length of service, position (ex. Senior manager) c. Congressional office Datasets uploaded to link to responses d. IRS BOD or Federal Agency, type of support provided by RAAS Statistics of Income Division (SOI) - this survey goes to some customers in other federal agencies e. Tax form types used and counts Internal survey data collected from IRS employees f. Employee Name, Address, Email, IP Address, BOD External survey data collected from government agencies and taxpayers g. No PII Data is requested or collected from taxpayers. They are surveyed for feedback about IRS.gov site. Surveys are set up using generic links. There's no way to know who responded or how many times they responded. Open ended questions allow for free text entry. As a result, there is potential for unsolicited PII to mistakenly be typed into the free text comment field. h. Vita Sign-up for Volunteer Tax Preparers collects: Name Email address, Phone, City, State, Zip Code, Languages spoken from VITA volunteers Verint user from the IRS have been directed to turn off Verint tracking of respondent metadata such as IP address, browser information and geolocation data for all surveys.

*Cite the authority for collecting SBU/PII (including SSN if relevant).*

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 above referenced SBU/PII items under 6d are needed as identifiers to properly and accurately survey stakeholders. The requesting Business Unit provides a list of potential respondents (via encrypted email) to the in-house survey administrator who prepares the survey and inputs the SBU/PII into the system. 2 IRS Admin employees have super access permissions and visibility to stored Verint system data. Verint access the data to only authorized employees. Only aggregated data is downloaded from Verint and distributed for analysis and distribution to the requesting business unit.

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

Data is provided by the business unit to the Survey administrator via encrypted email.

## **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 36.003    General Personnel and Payroll Records

IRS 00.001    Correspondence Files and Correspondence Control 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: Treasury Integrated Management Information System (TIMIS)

Current PCLIA: No

SA&A: No

System Name: Beckley Finance Center  
Current PCLIA: No  
SA&A: No

System Name: Space Data  
Current PCLIA: No  
SA&A: No

System Name: Graphic Database Interface  
Current PCLIA: No  
SA&A: No

System Name: Discovery Directory  
Current PCLIA: No  
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?*

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?*

No

*Please explain:*

No FedRAMP available.

*Please identify the ownership of the CSP data.*

Third Party

*Does the CSP allow auditing?*

No

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

Low

*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.*

The Verint tool will likely be replaced with a new tool within the next few months, therefore this process will not be conducted.

## **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?*

Subject line of emailed invitation is Request for Feedback on Service Received from IRS. Nowhere is a mandatory response indicated or implied. The following Privacy Act Notice is included in all email invitations asking for survey feedback. "Our authority to request this information is 5 USC 301. The primary purpose for the information is to measure your satisfaction with IRS products and services. IRS will disclose information to contractors when necessary and authorized by law to analyze results or perform services in connection with the request for feedback Your response is voluntary. If you do not provide any or all of the information requested, IRS will not have the benefit of using the information to improve service to you." The Verint system itself does not provide a Privacy Act Notice prior to collection to IRS employees.

*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):*

Per Privacy Act Notice above, email invitations to provide survey feedback can be ignored. The primary purpose for the information is to measure your satisfaction with IRS products and services. Your response is voluntary. If you do not provide any or all of the information requested, IRS will not have the benefit of using the information to improve service to you. The Verint system itself does not provide a notice prior to collection to IRS employees.

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

All responses (with the exception of the mandatory annual Managers Assessment from CFO that is sent via Verint) are voluntary. Individuals have the right to decline to participate.

## INFORMATION PROTECTION

*Identify the owner and operator of the system (could be IRS owned and operated; IRS owned, contractor operated; contractor owned and operated).*

Contractor Owned and Operated

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

*IRS Employees*

Users: Read Write

Managers: Read Only

System Administrators: Administrator

*IRS Contractor Employees*

Contractor Managers: Read Only

Contractor System Administrators: Administrator

Contractor Developers: Read Only

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

While no contractor is used to develop survey questions, results might be disclosed to contractors when authorized by law for analysis purposes if needed. All employees of Verint are required to have Background Investigations. Access to data is on a "need to know" basis and are only given access if they are working on the IRS Verint Contract. (Please see attached background investigation documents.)

## 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.*

GRS 5.8 Item 010-Technical and administrative help desk operational records. -Destroy 1 year after resolved, or when no longer needed for business use, whichever is appropriate.

## **SA&A OR ASCA**

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

No

*Is the system secured in accordance with all applicable federal, treasury, and IRS security policy, procedures, and requirements?*

Yes

*Describe the system's audit trail.*

System administrators can see any and all activities conducted by users. That means any kind of activities users do in the tool, (i.e., developing surveys, administration of surveys, uploading of participants, sending out reminders, etc.)

## **PRIVACY TESTING**

*Does the system require a System Test Plan?*

No

*Please explain why:*

The system is confirmed that it is properly operating by the tool administrators through regular use and monitoring. No specific tests are conducted.

## **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: 50,000 to 100,000

Contractors: Under 5,000

Members of the Public: Not Applicable

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