

Date of Approval: **October 22, 2019**

PIA ID Number: **4319**

## **SYSTEM DESCRIPTION**

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

Contact Recording, CR

*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 Recording for Taxpayer Assistance Centers (TAC) #576

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

9/19/2016

*Changes that occurred to require this update:*

Conversions

Expiring PCLIA

*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.*

Infrastructure Executive Steering Committee (IESC)

*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?*

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.*

Contact Recording is a premium system responsible for recording 100% of all taxpayer interactions with Internal Revenue Service (IRS) phone agents and a significant sampling of screens as well. These are critical to the business, serving as the basis for employee performance evaluations, performance improvement, and assessments of quality and accuracy. They are also used in National Treasury Employees Union cases, and Treasury Inspector General for Tax Administration and other criminal investigations.

## **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:*

Legal/statutory basis (e.g. where collection is expressly required by statute)

When there is no reasonable alternative means for meeting business requirements

*Explain why the authorized use(s) above support the new or continued use of SSNs (or tax identification numbers)*

The CR system does not use the SSNs. SSNs are captured when the taxpayer and/or agent speak the SSN. The CR system records the spoken conversation between the taxpayer and agent. Any spoken PII is retained in the audio recording. The CR system also records the workstation interactions via a video recording. Any PII pulled up on the agents' workstation will be captured in the video recording.

*Describe the planned mitigation strategy and forecasted implementation date to mitigate or eliminate the use of SSN's (or tax identification numbers).*

The CR system only records the audio and screen captures from other IRS systems. The information contained in the recordings is controlled by the contents on the systems used on the representative's workstations. The CR software cannot make any changes to the files once recorded. Any steps to mitigate or eliminate the use of Social Security Numbers (SSN's) would have to come from the other systems that appear on the assistor's computer screen.

Employer Identification Number

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

Phone Numbers

E-mail Address

Date of Birth

Place of Birth

Standard Employee Identifier (SEID)

Mother's Maiden Name

Protection Personal Identification Numbers (IP PIN)

Financial Account Numbers

Biometric Identifiers

Employment Information

Tax Account Information

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

Yes

*Specify the types of SBU from the SBU Types List*

Protected Information Information which if modified, destroyed or disclosed in an unauthorized manner could cause: loss of life, loss of property or funds by unlawful means, violation of personal privacy or civil rights, gaining of an unfair procurement advantage by contractors bidding on government contracts, or disclosure of proprietary information entrusted to the Government

*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.*

Federal Tax Information

*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)

SSN for tax returns and return information is Internal Revenue Code Section 6109

*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 primary purpose is for quality. The information is collected for Centralized Quality Review System (CQRS). CQRS can evaluate whether the assistor gave the taxpayer a correct answer or not. In order to assist taxpayers, assistors must be able to verify disclosure to access their tax information. This is done by accessing the information and accounts via the taxpayer's SSN.

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

The CR system only records the audio and screen captures from other IRS systems. The CR software cannot make any changes to the files once recorded. Any verification would have to come from the other systems that appear on the assistor's computer screen.

## **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 00.008 Recorded Quality Review Records

## **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: Automated Collection System Web (ACSWeb)

Current PCLIA: Yes

Approval Date: 10/12/2018

SA&A: No

System Name: Integrated Data Retrieval Systems (IDRS)

Current PCLIA: Yes

Approval Date: 10/1/2018

SA&A: Yes

ATO/IATO Date: 10/14/2018

System Name: Accounts Management System (AMS)

Current PCLIA: Yes

Approval Date: 1/18/2018

SA&A: Yes

ATO/IATO Date: 3/16/2019

System Name: Modernized e-File (MeF)

Current PCLIA: Yes

Approval Date: 2/20/2019

SA&A: Yes

ATO/IATO Date: 2/9/2019

System Name: Remittance Transaction Research (RTR)

Current PCLIA: Yes

Approval Date: 5/3/2018

SA&A: Yes

ATO/IATO Date: 11/27/2018

System Name: Control-D WebAccess (CTDWA)

Current PCLIA: No

SA&A: No

System Name: Field Assistance Queuing Management System (Q-Matic)

Current PCLIA: No

SA&A: No

System Name: Integrated Automated Technologies (IAT)

Current PCLIA: Yes

Approval Date: 6/21/2016

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.?*

Yes

*Briefly explain how the system uses the referenced technology.*

The Contact Recording platform records the spoken conversation between the taxpayer and Call Center agent. These recordings are used to perform quality reviews, in an effort to improve the taxpayers' interaction experiences with IRS Call Center agents.



*Does the system use cloud computing?*

No

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

No

## **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?*

Individuals are provided notification about the collection of the information via a recorded greeting, included here, that says their call may be recorded for quality purposes. Text of recorded message: Your call may be monitored or recorded for quality purposes. Please hold while your call is transferred.

*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 asking the assistor to turn off recording.

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

Taxpayers can request a copy of a recording by filing a Freedom of Information Act request. Employees will have the opportunity to hear and respond to recordings during feedback sessions, and if appropriate dispute, file a grievance, or pursue litigation as a result of the manager's evaluation.

## **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 Operated

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

*IRS Employees*

Users: Read Only

Managers: Read Only

System Administrators: Administrator

*IRS Contractor Employees*

Contractor Users: Read Only

Contractor System Administrators: Administrator

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

Users complete an OnLine5081 (OL5081) to request access to CR. Part of the job requires accessing Personally Identifiable Information (PII) for IRS systems. Once approved, the user is given a specific profile with controls on what data can be viewed in the CR system. Administrators assign the roles and grant the access level. Administrators cannot modify their own profiles.

## **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.*

CR data is scheduled and retained in accordance with IRS Records Control Schedule 31, items 24 and 25 (published in Document 12990). Audio and screen captures used for evaluative reviews are deleted from the server after 18 months. Non-evaluated files are deleted no longer than 60 days from the date of the original recording. No PII data is retained by contractors or employees.

## **SA&A OR ASCA**

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

Yes

*What date was it completed?*

6/19/2019

*Describe the system's audit trail.*

There are several types of audit trails generated in the Impact360 software. These provide a record of the actions performed in the various Impact360 business and administrative applications, for example who logged into the system, performed a search, played back, etc. Each action is noted in one of the audit trail files and is accompanied by descriptive information of the action.

## **PRIVACY TESTING**

*Does the system require a System Test Plan?*

No

*Please explain why:*

The system functionality is provided by commercial off-the-shelf software. The software inputs and outputs were tested upon implementation but do not require recurring testing.

## **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: Under 50,000

Contractors: Under 5,000

Members of the Public: More than 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