



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

NOV 1 8 2003

MEMORANDUM FOR LAURETTA BROWN
DIRECTOR, ATLANTA CONTACT CENTER SUPPORT

FROM:

Maya A. Bernstein
Privacy Advocate

A handwritten signature in cursive script, appearing to read "Maya A. Bernstein", written over the printed name.

SUBJECT:

Intelligent Contact Manager Privacy Impact Assessment

The Office of the Privacy Advocate has reviewed the Privacy Impact Assessment (PIA) for the Intelligent Contact Manager (ICM). Based on the information you provided, our office does not have any privacy concerns that would preclude ICM from operating. However, a revised PIA is required when considering any future upgrades or major modifications to the system or at the scheduled recertification of this system.

We will forward a copy of the PIA to the Director, Modernization and System Security, to be included in the Certification and Accreditation package for formal acceptance for operation. If you have any questions, please contact me at 202-927-5170; or your staff may contact Priscilla Hopkins at 202-927-9758.

Attachment

cc: Director, Modernization and System Security OS:MA:M

Privacy Impact Assessment - NAME OF PROJECT

MEMORANDUM FOR MAYA A. BERNSTEIN
PRIVACY ADVOCATE CL:PA

FROM: Laretta Brown;
Director, Contact Center Support Division M:I: EO: CC
2385 Chamblee Tucker Road
Chamblee, Georgia 30341

SUBJECT: Request for Privacy Impact Assessment (PIA) –
Intelligent Contact Manager (ICM)

Purpose of the System:

The primary purpose of the Internal Revenue Service (IRS) call system is to answer taxpayers questions on technical tax issues of varying complexity and provide assistance in procedural matters. IRS Customer Service Representatives (CSRs) also resolve account inquiries; secure payment of delinquent taxes; provide information on the status of refunds; and, complete orders for tax forms and publications.

In order to conduct this mission, the IRS currently operates a very large toll-free call center environment. The IRS has 42 Automated Call Distributors (ACDs), hundreds of Voice Response Units (VRUs) thousands of phone circuits, and assorted peripheral components at locations across the continental United States and Puerto Rico. In order to assist the taxpayer, the IRS uses XXXXX XXXXX Intelligent Contact Manager (ICM) to route taxpayers' calls to the CSR in as timely a manner as possible. The (BOD's) Business Operating Director's/Site Manager assigns and reassigns agents at the local level, the JOC Routing only requests the sites to add or remove number of agents when call volume rises and falls throughout the day. The ICM makes no determinations as to the skill level of individual employees. The IRS Call Center environment, and specifically ICM, operates 365 days a year, 24 hours a day. To determine if taxpayers are receiving quality service, Joint Operation Center (JOC) staff, managers and executives review numerous call volume reports daily.

Name of Request Contact:

Name: George Shipman
Organization Name & Symbols:
Contact Center Support
M:I:EO:CC:JOC-ITS
Mailing Address:
2385 Chamblee-Tucker Rd
MS 950C
Atlanta, Ga. 30341
Phone Number (with area code):
678-530-5422

Privacy Impact Assessment - NAME OF PROJECT

Name of Business System Owner:

Name: Laretta Brown
Organization Name & Symbols:
Contact Center Support Division
M:I:EO:CC
Mailing Address:
2385 Chamblee-Tucker Rd.
MS 950C
Atlanta, Ga. 30341
Phone Number (with area code):
678-530-5958

Requested Operational Date:

Category: (Reason PIA is required--enter "y" or "n" and applicable dates)

New System?: _____

Recertification? (if no change, enter date of last certification)

Modification of existing system? _____

PIA never done on this system

Is this a National Standard Application (NSA)? _____

Is this a Modernization Project or System? _____

If yes, the current milestone? _____ (Enter 1-5; explain if combining milestones)

System of Records Notice(s) (SORN) #: I confirmed with David Silverman that Treasury/IRS 00.001 is the SORN Number for this PIA.

Treasury/IRS 34.037 IRS Audit Trail and Security Records System for the audit trail

Attachment: PIA

Data in the System

<p>1. Describe the information (data elements and fields) available in the system in the following categories:</p> <ul style="list-style-type: none"> A. Taxpayer B. Employee C. Audit Trail Information (including employee log-in info) D. Other (Describe) 	<ul style="list-style-type: none"> A. No taxpayer data (names, social security numbers, addresses) in ICM. B. No IRS employee data in ICM. C. JOC Joint Operation Center system administrators and vendor log in information captured in Audit Trails D. Information is statistical information related information related to telephone call volume, time, site, etc.
<p>2. Describe/identify which data elements are obtained from files, databases, individuals, or any other sources.</p> <ul style="list-style-type: none"> A. IRS B. Taxpayer C. Employee D. Other Federal Agencies (List agency) E. State and Local Agencies (List agency) F. Other third party sources (Describe) 	<p>NONE</p> <p>The JOC does not take taxpayer calls. Taxpayer calls do not terminate in the (ICM) Intelligent Contact Manager. ICM is an interface between the (ACD) Automated Call Distribution and AT&T, which selects the best optimum point to route the taxpayer's call to the most available and skilled (CSR) Customer Service Representative. The routing decisions are explained below. The decisions are not based on the skills of individual CSRs, but expected wait times and other criteria.</p>

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

The data collected by the ICM Enterprise is used to provide a better experience to the taxpaying client. This call data is used to either select the best destination for a particular call based on services requested or to predicatively manage resource-staffing levels

Routing Traffic On Available Basis

ICM Interface

- First, route traffic to the primary agent and alternate staffing group with the shortest handling time
- Second, route traffic to the back-up agent group with the shortest handling time

ACD Interface

- Route traffic to the most available agent within a group
- Calls are routed to single agent groups

Routing Traffic On Minimum Expected Delay

ICM Interface

- First, route traffic to the primary agent and alternate staffing group with the shortest relational MED Minimum Expected Delay calculation. This value is computed using call durations, calls in progress (in queue and with an agent), overall handling times and ready agents.
- Second, route traffic to the back-up agent group with the shortest relational MED calculation.

ACD Interface

- Route traffic to the next available agent within a group
- Calls are routed and queued for a single agent group
- Multiple, individual queues possible for one Aspect application

Duration in queue determines answering order of a call (i.e. Agent Group 15 has calls queued in both Applications 15 [for 10 minutes] and App 5 [for 5 minutes]- App 15 call would be answered next, then the App 5 call)

Privacy Impact Assessment - NAME OF PROJECT

<p>4. How will each data item be verified for accuracy, timeliness, and completeness?</p>	<p>The data collected in this process is electronically processed and stored.</p>
<p>5. Is there another source for the data? Explain how that source is or is not used.</p>	<p>No, this data is generated dynamically when the client contacts the IRS and selects a set of requested services based on the Caller Enter Digits (CED). This data is stored historically in a number of places for use in the predictive staffing phase of resource management.</p>
<p>6. Generally, how will data be retrieved by the user?</p>	<p>Access by system administrators and Enterprise Telephone Data (ETD) web access. This data is used to statistically evaluate the staffing resources required to provide better service to the taxpayer.</p>
<p>7. Is the data retrievable by a personal identifier such as name, SSN, or other unique identifier?</p>	<p>No.</p>

Access to the Data

<p>8. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Others)?</p>	<p>Selective system administrators, analysts, and contractors and/or vendors working for the Joint Operations Center or the Call Center Staffs.</p>
<p>9. How is access to the data by a user determined and by whom?</p>	<p>Form 5081 must be filled out and approved before a user is granted access. IRS (JOC) meets or exceeds compliance with the IRM 25.10 guidelines for providing access to electronic data (Minimum Background Investigation and/or 5081's for system access).</p>
<p>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. If NO, continue to Question 12.</p>	<p>No.</p>

Privacy Impact Assessment - NAME OF PROJECT

<p>11. Have the IRS systems described in Item 10 received an approved Security Certification and Privacy Impact Assessment?</p>	<p>n/a</p>
<p>12. Will other agencies provide, receive, or share data in any form with this system?</p>	<p>No other agencies, including GAO, NTEU, TIGTA</p>

Administrative Controls of Data

<p>13. What are the procedures for eliminating the data at the end of the retention period?</p>	<p>The time period for online retention is configurable. It is currently set for 9 months based on IRM 1.15 Records Control Schedule. The Historical Data Base stores ICM data.</p>
<p>14. Will this system use technology in a new way? If "YES" describe. If "NO" go to Question 15.</p>	<p>No.</p>
<p>15. Will this system be used to identify or locate individuals or groups? If so, describe the business purpose for this capability.</p>	<p>No.</p>
<p>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.</p>	<p>No. This system is used to track statistics needed to manage telephone call volumes and patterns. It also directs calls based on criteria explained in question 3.</p>
<p>17. Can use of the system allow IRS to treat taxpayers, employees, or others, differently? Explain.</p>	<p>No</p>

Privacy Impact Assessment - NAME OF PROJECT

<p>18. Does the system ensure "due process" by allowing affected parties to respond to any negative determination, prior to final action?</p>	<p>N/A</p>
<p>19. If the system is web-based, does it use persistent cookies or other tracking devices to identify web visitors?</p>	<p>No it is not web-based.</p>