



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

DEC 10 2003

MEMORANDUM FOR LAURETTA BROWN  
DIRECTOR, ATLANTA CONTACT CENTER SUPPORT

FROM: Maya A. Bernstein  
Privacy Advocate

A handwritten signature in black ink, appearing to read "Maya A. Bernstein".

SUBJECT: Predictive Dialing System  
Privacy Impact Assessment

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

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. That office may request information concerning the statements contained in the PIA to ascertain compliance with applicable security requirements. If you have any questions, please contact me at 202-927-5170; or Priscilla Hopkins at 202-927-9758.

Attachment

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

Date: (signed November 6, 2003)

MEMORANDUM FOR MAYA A. BERNSTEIN  
PRIVACY ADVOCATE CL:PA

FROM: Laretta Brown, Director Contact Center Support  
Division OS:CIO:I:EO:CC

SUBJECT: Request for Privacy Impact Assessment (PIA) –  
Predictive Dialing System (PDS)

Purpose of the System: The Predictive Dialing System (PDS) is telephone equipment designed specifically to make outgoing calls. It is a management tool that is used to control the outcalls. The PDS manages the calls where there were no answers, or received busy signals, answering machines, or telephone company signals such as "this number is no longer in service." These are considered non-productive phone attempts. Since the predictive dialer manages all these calls, employees are freed to take only calls where the taxpayer has answered the phone (productive calls).

Name of Request Contact:

Name: Sabrina Johnson  
Organization Name & Symbols: M:I:EO:CC:M  
Mailing Address: NCFB B4-342  
Phone Number (with area code): 2-2=283-4608

Name of Business System Owner:

Name: Laretta Brown  
Organization Name & Symbols: Contact Center Support Division  
M:O:EO:CC  
Mailing Address: ATSC  
Phone Number (with area code): 678-530-5958

Requested Operational Date: February 4, 2004

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

New System?: Y  
Recertification? (if no change, enter date of last certification)  
Modification of existing system?: \_\_\_\_\_

Is this a National Standard Application (NSA)?: N

Is this a Modernization Project or System? N

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

System of Record Number(s) (SORN) #:

IRS 24.030--CADE Individual Master File (IMF), (Formerly: Individual Master File (IMF))

IRS 24.046--CADE Business Master File (BMF) (Formerly: Business Master File (BMF))

IRS 22.060--Automated Non-Master File (ANMF)

IRS 22.061--Individual Return Master File (IRMF)

IRS 26.016--Returns Compliance Programs (RCP)

IRS 26.019--Taxpayer Delinquent Accounts (TDA) Files including subsystems: (a) Adjustments and Payment Tracers Files, (b) Collateral Files, (c) Seized Property Records, (d) Tax SB/SE, W&I, LMSB Waiver, Forms 900, Files, and (e) Accounts on Child Support Obligations

Attachment: PIA

Each evening, an extract of the Automated Collection System (ACS) databases is downloaded to the Predictive Dialing System. The systems administrator generates predefined campaign types (types of cases to be called based on the extract from the ACS system) to be worked that day. The predictive dialer dials the taxpayer's phone number. If the taxpayer answers the phone, the call is sent to an ACS employee to work that case. At the same time the call is delivered, the ACS employee is sent a screen with the extract data so that they can identify that the correct individual or business has been contacted. The predictive dialer marks that record to indicate that the taxpayer has been contacted so the PDS will not call the taxpayer again during that campaign. The employee works that case in the ACS System real time just as he/she would any other ACS call.

If there is a no answer, or if there is a busy signal, answering machine, bad telephone number/signal, or the taxpayer hangs up, the predictive dialer records that information and schedules the case for a follow-up call. At the end of the day, the predictive dialer uploads all of these nonproductive calls to ACS.

## **Section 1.0 Data in the System**

### **1. Describe the information (data elements and fields) available in the system in the following categories:**

The Predictive Dialing System (PDS) is outbound calling technology in which calls are placed without an attending ACS employee on the originating telephone line. The system retrieves the number to be dialed from Automated Collection System (ACS) extract files that are downloaded to the Buffalo site's PDS Calling Campaign database. The PDS Calling Campaign database is the source for triggering the calls. PDS dials the number, listens to the line, and if a "live" answer is detected, transfers the call to a waiting ACS employee. The result of each call is captured such as no answer, bad number, busy or answered call.

At the end of the day, the PDS Calling Campaign database records are uploaded to the ACS system. No upload is required on cases where the individual or business taxpayer answered the phone since the case is worked in real time in the ACS system. The statistical or Management Information System data on the number of calls made, calls completed, no answer, busy, or answering machines detected are used for management reports.

Data elements protected by the Privacy Act which will be used by the PDS are listed below. The ACS file layouts are listed in Appendix A, ACS Download and Appendix B, ACS Upload.

#### **1.1 Taxpayer Data Elements**

The taxpayer related data elements downloaded into the PDS system are not changed by any system user in the PDS system. The data elements used in the PDS database with Privacy Act impacts are as follows:

## TAXPAYER DOWNLOAD

### Data Element

TIN  
File Source Code  
TIN Type  
Delinquency Type  
Team – Function - Unit  
Name Control  
First Name Line  
Home Phone  
Work Phone  
Zip Code  
Follow-up Date  
Earliest CSED Date  
ACS Established Cycle  
Time Constraint Indicator  
Time Constraint Pre  
Time Constraint Post  
Account Yield Score  
Total Module Balance  
TP Action Indicator  
Assignment Code  
Form Indicator  
Alerts  
Issuance Codes

The taxpayer data elements used in the uploaded from the PDS to be transmitted to the ACS databases with Privacy Act impacts are listed below. Once the upload to the ACS system is confirmed the PDS clears the ACS data from the system to make room for the next download from ACS. No upload is required on cases where the individual or business taxpayer answered the phone since the case is worked in real time in the ACS system. The statistical or Management Information System data on the number of calls made, calls completed, no answer, busy, or answering machines detected are used for management reports. The only data that is captured is the statistical data captured in the "Predictive Dialer Counts" data element.

## TAXPAYER UPLOAD

### Data Element

TIN  
File Source Code  
TIN Type  
Name Control  
First Name Line  
Home Phone

Work Phone  
Predictive Dialer Counts

The taxpayer confirmation screen displayed on the ACS employee's work station contains the data elements listed below. The taxpayer data elements are used to confirm that the correct taxpayer has been contacted.

### **TAXPAYER CONFIRMATION SCREEN**

#### **Data Element**

TIN  
First Name Line  
Home Phone  
Work Phone  
Alerts extracted from data elements previously discussed

#### **1.2 Employee Data Elements**

The Employee data elements used in the PDS database tables with Privacy Act impacts are listed below.

The Security table is in compliance with LEM 25.10.9, Unix Systems Security Configuration Requirements and IRM 25.10.1, Information Technology Security Manual.

### **SECURITY**

#### **Data Element**

User Name  
User Logon ID  
User Password  
User Permission Level  
User ID

The Job Call Handling captures statistical data regarding how much time each ACS employee spends talking to customer, updating records, and waiting for the next call.

### **JOB CALL HANDLING**

#### **Data Element**

User Name  
User ID  
Agent Type  
Connects Per Hour  
Average Talk  
Average Idle  
Average Update

## Duty Cycle

The Supervisor Agent Screen can be accessed by the ACS employee's Manager or the System Administrator. This provides the Manager with an overview of the ACS employee's status. The Supervisor Agent Screen can be viewed from the Manager's workstation.

## SUPERVISOR AGENT

### Data Element

Job Instance  
ACS employee  
Agent ID  
Status  
On Status  
ACS employee type  
On Job  
Headset

The Agent Detail has detailed information about the current activity and performance of an ACS employee. This information can only be accessed by the ACS employee's Manager or the System Administrator.

## AGENT DETAIL

### Data Element

Name  
Dialer  
Supervisor  
Job  
Status  
Agent Type  
Current Type  
Last Released  
Last Acquired  
Total Talk  
Total Update  
Total Idle  
Average Talk – This Agent  
Average Idle – This Agent  
Average Update – This Agent  
Duty Cycle – This Agent

C. Audit Trail Information (including employee log-in info)

## AUDIT TRAIL

### Data Element

User Name  
User Logon ID  
Session ID  
Terminal identifier  
Object Name  
Operation  
Completion Code  
Date and Time Stamp  
System Privileges Used

## EMPLOYEE LOGIN

### Data Element

Agent  
Agent ID  
Dialer  
Dialer ID  
Job  
Job ID  
First Login  
Last Logout  
Agent Hours

#### D. Other (Describe)

The Avaya Predictive Dialing System User's Guide volumes 1 and 2 are available for review and are located in the Contact Center Planning and Management Section and in the Security Certification and Accreditation tool.

## 2. Describe/identify which data elements are obtained from files, databases, individuals, or any other sources.

### A. IRS

Each evening, an extract of the 14 ACS databases is downloaded to the PDS in Buffalo, NY. The system administrator generates predefined campaign types (types of cases to be called based on the extract from the ACS system) to be worked that day. The predictive dialer dials the taxpayer's phone number. If the taxpayer answers the phone, the call is sent to an ACS employee to work that case. At the same time the call is delivered, the ACS employee is sent a screen with the extract data so that they can identify that the correct individual or business has been contacted. The predictive dialer marks the record of the taxpayer who has been contacted so the PDS will not call the taxpayer again during that campaign. The employee works that case in the ACS System real time just as he/she would any other ACS call. If there is a no answer, a busy signal, an answering machine, a bad telephone number/signal, or the taxpayer hangs up, the predictive dialer tracks that



The ACS extract files are checked for record layout corruption before they are sorted into campaign types. The extract files are downloaded every morning at approximately 4:00 a.m. The tests for accuracy are performed in the ACS system.

**5. Is there another source for the data? Explain how that source is or is not used.**

The ACS system is the only source of the data elements. The extract files downloaded from the ACS system and sent to the site are the only source for the data. The data is used to generate the calls. The data uploads to the ACS system contains all the statistical data such as the number of no answer, busy, or answering machines tries to ACS as well as the identifiers such as TIN, so the update is associated with the correct taxpayer file. No upload is required on cases where the taxpayer answered the phone since the case is worked in real time in the ACS system.

**6. Generally, how will data be retrieved by the user?**

The data is not retrieved by the user. When the PD detects a “live” answered call, the call is transferred to an available ACS employee. At the same time the call is transferred to the ACS employee, the Taxpayer Confirmation Screen is displayed on the workstation monitor. See section 1.1 Taxpayer Data Elements, Taxpayer Confirmation Screen.

**7. Is the data retrievable by a personal identifier such as name, SSN, or other unique identifier?**

The Taxpayer Confirmation Screen is displayed by the PDS when the PD detects a “live” answered call. The home or work telephone triggers the data retrieval and displays the taxpayer data on the Taxpayer Confirmation Screen of the ACS employee receiving the “live” call. The data displayed on the ACS employee’s screen does contain TIN, individual or business taxpayer name, home telephone number, work telephone number, alerts and delinquency type.

The ACS employee’s name and call statistics data are available on the monitoring screen of the ACS employee’s Supervisor and is also available to the System Administrator.

**Section 2.0 Access to the Data**

**8. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Others)?**

System Administrator The System Administrator has access to the ACS data in order to select the pre-defined calling campaign type.

Supervisors The Supervisors have access to their own employees’ call statistics.

Assistors/Agents (ACS Employees) The ACS employee only sees the data when a “live” taxpayer call is received. The PDS assigns the call to the assistor’s teletset at the same time that the PDS assigns the contacted taxpayers data to the assistor’s terminal. The Taxpayer Confirmation Screen contains the taxpayer’s confirmation information for the assistor to use to verify that the correct taxpayer was contacted. The taxpayer confirmation screen displayed on the ACS employee’s work station contains the data elements listed below. ACS employees logon to the ACS system for account information and to update the taxpayer’s record.

### **TAXPAYER CONFIRMATION SCREEN**

#### **Data Element**

TIN

First Name Line

Home Phone

Work Phone

Alerts extracted from data elements previously discussed

Delinquency Type

Vendor Maintenance Staff The Vendor maintenance staff have access to PDS directly controlled by System Administration personnel.

#### **9. How is access to the data by a user determined and by whom?**

All IRS employees and contractors must complete a form 5081 to access the PDS system. The Manager or Contract Officer’s Technical Representative (COTR), the security coordinator, and the system owner approve system access and the permission level.

#### **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.**

Automated Collection System (ACS) The ACS provides downloads to the PDS system and the PDS system return record identification data and call statistics to ACS.

Aspect Automated Call Distributor (ACD) The PDS transfers the “live” call to the ACS Employee’s ACD teletset. When the call is completed the ACD signals the PDS that the call is completed.

#### **11. Have the IRS systems described in Item 10 received an approved Security Certification and Privacy Impact Assessment?**

ACS received certification in 2001. ACS is going through a re-certification. The expected date of completion is January 26, 2004.

ACD received a conditional certification in 2001. The ACD is going through a new certification with the upgrade of the ACD to version 8.4. The expected date of completion is January 2004.

**12. Will other agencies provide, receive, or share data in any form with this system?**

This is an IRS only system. It may be accessed for TIGTA or GAO for oversight or reporting purposes.

**Section 3.0 Administrative Controls of Data**

**13. What are the procedures for eliminating the data at the end of the retention period?**

The PDS system is an efficiency tool. ACS is the database that PDS receives taxpayer data and returns statistical data back to ACS. Once the upload to the ACS system is confirmed the PDS clears the ACS data from the system to make room for the next download from ACS.

**14. Will this system use technology in a new way? If "YES" describe. If "NO" go to Question 15.**

No, the Avaya Predictive Dialing System is a replacement of the "end of life" EIS 7000 Predictive Dialer.

**15. Will this system be used to identify or locate individuals or groups? If so, describe the business purpose for this capability.**

No, the system does not identify or locate individuals or groups. Individuals or groups have previously been identified by other IRS certified systems.

**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.**

Monitoring capability is available to the ACS employees' Supervisor and the System Administrator. The Manager can only monitor his or her ACS employees. The System Administrator monitors all the ACS employees to determine if the call campaign needs to be sped up or slowed down.

Any call monitoring by the ACS employee's Manager or the Quality Monitoring groups is done through the Aspect Automated Call Distributor (ACD). No call monitoring is performed through the PDS system.

**17. Can use of the system allow IRS to treat taxpayers, employees, or others, differently? Explain.**

No the taxpayer is not treated differently by the PDS. All taxpayers that have IRS identified delinquent tax obligations can be a part of any calling campaign regardless of whether the calls are made by the PDS or by the individual ACS employee. The types of delinquency cases placed on the system are determined by ACS Management. ACS employees follow the guidelines in the IRM for policy and procedures in working the actual case. Buffalo is the only site that has PDS. However, the ACS employees in Buffalo work cases of all the ACS sites if selected for PDS as well as their own case assignments.

**18. Does the system ensure "due process" by allowing affected parties to respond to any negative determination, prior to final action?**

There is no interaction between the PDS system and the taxpayer. The employee data is used for training purposes only per the local union agreement. Systems are in place to allow either taxpayers or employees the same due process rights afforded all citizens.

**19. If the system is web-based, does it use persistent cookies or other tracking devices to identify web visitors?**

The PD has no web capabilities.