Facilitated Self-Assistance Research Project (FSRP) – Privacy Impact Assessment

PIA Approval Date – May 29, 2008

System Overview

The Facilitated Self-assistance Research Project (FSRP) is defined as self-help, with guidance available. The design gives taxpayers the tools (a computer with IRS.gov access and a phone) and opportunity (with a Taxpayer Assistance Center (TAC) employee on-hand) to help themselves to IRS services. Traditional assistance will remain an option for any TAC customer who prefers face-to-face service. The FSRP will tell us: who our TAC customers are (demographics); whether TAC users who traditionally rely on face-to-face assistance, our most expensive resource, willingly and successfully use facilitated self-assist options on the Web or by phone; how satisfied those who try facilitated self-assistance are with the experience; how many taxpayers who experienced FSRP in a TAC say they will choose self-service in the future; and whether FSRP helps IRS redirect TAC resources toward helping customers with account issues instead of those whose needs can be met online or by phone.

System of Records Number

- Treasury/IRS 00.001 – Correspondence Files

Data in the System

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

Taxpayer:
An IRS Initial Account Representative (IAR) using FSRP will provide assistance to a taxpayer by issuing the (optional) eligibility survey and generating a Customer Access Number (CAN) for eligible taxpayers that wish to use the service. The taxpayer will input the customer access number to use the workstation and be able to access IRS.gov to do research, print forms, and/or use the free-file sites to complete tax returns. FSRP will record only that information necessary to determine the service path of the participant. No confidential or identifying information will be gathered. The following taxpayer data is captured in this survey:
- Demographic information to find out which TAC is being used
- Service needs
- Satisfaction

Employee:
The IAR Standard Employee ID (SEID) is a field captured when the taxpayer is being interviewed (at the same time the CAN is generated).

Audit Trail Information:
Information describing the activities of each participant, with no information linking to identity of test subjects. For each auditable event the audit trails capture, at minimum, the following information:
- Date and time that the event occurred;
- Type of event;
- Subject of the event (e.g., the user, file, or other resource affected) and the action taken on that subject; and
- The outcome status (success or failure) of the event.

The IAR sub-system generates the following key information required to produce reports:
- CAN;
- Start and End IAR Timestamp;
- Start FSRP Queue Timestamp;
- Eligibility Status;
- Refusal Survey Status;
- Intake Status;
- Preparedness Status;
- Participation Status;
- Start Taxpayer (TP) Timestamp;
- Start and End Exit Survey Timestamp; and
- End TP Timestamp.

The Content Filtering System records all URL activity from all FSRP workstations used by taxpayers. The Content Filtering System organizes URL activity by workstation ID, log-in identifier and date/time. The following events are captured via content filtering:
- Date (MM/DD/YYYY);
- Time (HH:MM:SS);
- Domain/SEID;
- Transaction Type;
- Website Visited;
- Client Internet Protocol (IP) Address;
- Category of Website;
- Content Type;
- Bytes Received;
- User-Agent;
- Transaction Status;
- Referring Uniform Resource Locator (URL); and
- Hierarchy or Parent Proxy.

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

IRS:
FSRP does not provide, receive, or share data with other IRS systems. However, FSRP's Web, Application, and Database servers will reside on Modernization and Information Technology Services (MITS) Atlanta Domain (MITS-6) General Support System (GSS). The routers will reside on the IRS Perimeter Security and Network Backbone (MITS-1) GSS with the workstations residing in IRS Workstations and Support (MITS-17) GSS.
Additionally, FSRP relies on the following MITS GSSs for infrastructure support:
- MITS-3 – Martinsburg Computing Center (ECC Martinsburg) Domain
- MITS-12 – Philadelphia Campus Domain
- MITS-26 – Enterprise VPN
- MITS-28 – IRS.GOV

Taxpayer:
Database containing survey responses and computer terminal activity.

Employee:
IRS IAR SEID will be captured for each record created during the intake survey.

3. Is each data item required for the business purpose of the system?
Yes, FSRP is meant to test the effectiveness of a facilitated self-assistance process. It is necessary to understand the type of taxpayer that is using this system to refine the facilitator's role, and define the scope of tasks addressed through facilitated self assistance. The data will also help recommend ways to improve training and support for IRS facilitators, improvements to IRS.gov, and resource allocation for facilitated self-assistance. This will help the IRS achieve better taxpayer service.

4. How will each data item be verified for accuracy, timeliness, and completeness?
Electronic data collection will ensure time measures and activity tracking are maintained in an FSRP database. Most data is obtained and electronically captured when an IAR conducts an interview with the taxpayer, only after receiving the taxpayer's approval. Because survey participation is optional, FSRP cannot verify the accuracy of taxpayer's responses.

5. Is there another source for the data? Explain how that source is or is not used.
No, there is no other source for the data.

6. Generally, how will data be retrieved by the user?
Taxpayers may access FSRP through the IRS Intranet at one of the fifteen (15) pilot locations around the country. The IRS Facilitator at each TAC location logs onto each workstation every morning to give taxpayers access to FSRP.

Access to application data will be through a secure database on a secure, IRS server that is part of the IRS Intranet. Predefined reports that reflect system utilization, taxpayer demographics, and satisfaction survey results will be provided to authorized management and researcher officials.

7. Is the data retrievable by a personal identifier such as name, SSN, or other unique identifier?
No. The data cannot be retrieved or organized using a personal identifier.

IRS IARs give each taxpayer a unique (not personal) CAN, which is to be used as an authentication mechanism rather than a unique identifier. The CAN is required to be entered before access to the workstation is permitted. A CAN becomes invalid if it is not used the same day. The account that the taxpayers are using is a local account, not a domain account. This prevents them from accessing any internal intranet services.

Access to the Data

8. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Others)?
There are two roles created on the workstation. They include the IAR Group Role and the Manager (Research) Role. IARs are limited to accessing the initial Intake Survey component used to determine if taxpayers are eligible to use FSRP. Managers and other research personnel are assigned to the Manager role. This role allows them to research data captured on the back-end database to see how users are using FSRP.

> **Users:** FSRP System Administrators (SAs)
> **Permissions:**
> ▪ Edit, write, read, and delete data.
> ▪ Routine maintenance of the database and on an "as needed" basis

Users: FSRM Field Assistance Managers
Permissions:
▪ Access to pre-defined reports generated from FSRP data.

Users: FSRP Initial Account Representative (IAR) / Facilitator
Permissions:
▪ Provides assistance to a taxpayer by issuing the (optional) eligibility survey and generating a Customer Access Number (CAN) for eligible taxpayers that wish to use the service.

Users: W&I Managers
Permissions:
▪ Only need access to FSRP reports.

Users: W&I Research personnel
Permissions:
▪ Extract data to create W&I reports.
▪ Have access to FSRP pre-format reports generated from FSRP database.

9. How is access to the data by a user determined and by whom?
Each account created for the IAR is unique (Windows only permits unique account creation). The verification occurs through authenticating with a password combined with the unique username. The password follows Internal Revenue Manual (IRM) 10.8.1 password complexity requirements.

Access rights for FSRP data will be assigned by the FSRP Field Assistance Managers through the Online (OL) 5081 (OL5081) process and Active Directory Authorization. The authentication for local accounts on the workstation is managed by Modernization and Information Technology Services (MITS) personnel. The use of the OL5081 process is being reviewed as a means to handle authenticator management for IAR users. The OL5081 process is currently in place for users who want access to the research servers maintained in Atlanta.

All new users requesting access to an IRS system must do so through the OL5081 system. Users are required to complete an OL5081, Information System User Registration/Change Request Form, which lists mandatory rules for users of IRS information and information systems. When a user has been approved for access to the application by his/her manager (i.e., FSRM Field Assistance Managers in this case), the OL5081 system sends an email to the user, providing an approval notification. The user then logs into the OL5081 system, reads the "Rules of Behavior," and provides an "electronic signature," acknowledging that he/she has read, understands, and agrees to abide by the "Rules of Behavior."

FSRP personnel have contracted the Enterprise Life Cycle (ELC) documentation development to Management Systems Designers (MSD). All contractors undergo background investigations performed by the National Background Investigations Center (NBIC) in Florence, Kentucky in accordance with guidelines stipulated in IRM 1.23.22 Contractor investigations. Upon completion of the investigation, the contractors are given staff-like access only to the systems that they need to use to perform their tasks.

10. Do other IRS systems provide, receive, or share data in the system?
No. FSRP does not provide, receive, or share data with other IRS systems. However, FSRP's Web, Application, and Database servers will reside on Atlanta Domain (MITS-6) GSS. The routers will reside on the IRS Perimeter Security and Network Backbone (MITS-1) GSS with the workstations residing in IRS Workstations and Support (MITS-17) GSS.

Additionally, FSRP relies on the following MITS General Support Systems (GSSs) for infrastructure support:
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- MITS-28 – IRS.GOV

11. Have the IRS systems described in Item 10 received an approved Security Certification and Privacy Impact Assessment?
The following are the Certification & Accreditation (C&A) and Privacy Impact Assessment dates for the MITS GSS that support ESP:

MITS-1 – IRS Perimeter Security and Network Backbone
- PIA completed 02/15/2007
- C&A completed 08/31/2006, expires 08/31/2009

MITS-3 – Martinsburg Computing Center (ECC Martinsburg) Domain
- PIA completed 03/15/02006
- C&A completed 08/31/2006, expires 08/31/2009

MITS-6 – Atlanta Domain
- PIA completed 05/05/2006
- C&A completed 08/31/2006, expires 08/31/2009

MITS-12 – Philadelphia Campus Domain
- PIA completed 05/09/2006
- C&A completed 08/31/2006, expires 08/31/2009

MITS 17 – IRS Workstations and Support
- PIA completed, 02/27/2007
- C&A completed 03/31/2006, expires 03/31/2009

MITS-26 – Enterprise Remote Access Project (ERAP)
- PIA completed, 04/27/2006
- C&A completed 06/13/2005, expires 06/13/2008

MITS-28 – IRS.GOV
- PIA completed, 05/01/2007
- C&A completed 10/11/2006, expires 10/11/2009

12. Will other agencies provide, receive, or share data in any form with this system?
No. Other agencies will not provide, receive, or share data in any form with this system.

<u>Administrative Controls of Data</u>

13. What are the procedures for eliminating the data at the end of the retention period?
Records will be maintained and disposed of in accordance with the Records Disposition Handbooks, IRM 1.15.2.1 through IRM 1.15.2.31.

14. Will this system use technology in a new way?
No. FSRP will not use technology in a new way.

15. Will this system be used to identify or locate individuals or groups?
Yes. Data analysis will identify behaviors common to taxpayer groups. These groups will be aggregated by demographic characteristics (listed in Question 1 of this PIA), taxpayer service needs, or behavioral similarities. Identifying how tasks, demographic groups, or behaviors relate to facilitated self assistance is the objective of this pilot. Identifying how computer-mediated service might be improved is another objective of this experiment.

16. Will this system provide the capability to monitor individuals or groups?
No. FSRP will collect data on behavior at the individual level, but it will not be able to the capability to monitor individuals because it does not associate individual behavior with their personally identifying information. This capability allows matching survey responses to service tasks and internet use activities only.

17. Can use of the system allow IRS to treat taxpayers, employees, or others, differently?
No. FSRP cannot be used to treat taxpayers, employees, or others differently. The system will allow taxpayers to choose facilitated self-assistance in the TACs selected for the study. Verbal and written disclosure of the voluntary nature of the study will be delivered to the taxpayer, displayed on the workstation screens, and posted in the TAC.

Employees supporting the study will be asked to either interview taxpayers or facilitate taxpayer self-assistance at the designated workstations provided for the study.

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

19. If the system is Web-based, does it use persistent cookies or other tracking devices to identify Web visitors?
N/A. The application is not Web-based.

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