1.0 Introduction

The E-Government Act of 2002 (Public Law 107-347, 44 U.S.C., Ch 36) requires federal agencies to conduct Privacy Impact Assessments (PIAs) when developing, maintaining or significantly modifying information technology (IT) systems or information collection. One key purpose of the E-Government Act is to ensure that no collection, storage, access, use, or dissemination of identifiable respondent information occurs that is not needed or permitted. In accordance with the purpose and objectives of the E-Government Act the PBGC is committed to honoring and protecting the rights, privileges, and/or benefits of its customers and constituents.

Furthermore, the Office of Management and Budget (OMB) established requirements for completing PIAs for funding IT. OMB Circular A-11 and OMB Exhibit 300, "Capital Asset Plan and Business Case," require PIAs to be prepared for and approved by OMB for every new IT funding request.

2.0 Privacy Impact Assessment Executive Summary

2.1 System Overview

eTalk is a monitoring software/recording system that provides PBGC with the ability to monitor and evaluate calls for internal and third-party quality review. eTalk captures/records incoming participant calls from the Customer Contact Center's (CCC) 1-800 number.

The purpose of the eTalk Qfiniti system is to assist PBGC in meeting it's strategic plan to improve the federal pension insurance program. In doing so, PBGC's goal is to safeguard the federal pension insurance system by providing exceptional customer service to its plan participants. In carrying out this mission, performance measures must be placed in order to examine and improve the effectiveness of the customer service that PBGC provides. eTalk Qfiniti was purchased as a solution to provide internal quality review and evaluation in order to meet this goal.

2.2 What information will be collected for this system?

eTalk Qfiniti is a call recording/monitoring application. Therefore incoming calls through the CCC's 1-800 number will be recorded and collected by the application.

2.3 Why is the information being collected?

In order to provide a quality review of the PBGC's internal customer service level in order to improve the quality of customer service given to participants and all other callers.

2.4 What is the intended use of the information?

The recorded calls will be used for quality review purposes in several ways:

- Internal monitoring processes with the Customer Contact Center and the Field Benefit Administration offices (FBA) in order to provide feedback and coaching to the customer service representatives.
- To provide internal scoring to conduct comparative analysis with the Fraser Group (third-party quality reviewers)
- To provide data for comparative analysis for the PBGC's Call Satisfaction Survey (C-SAT)

2.5 With whom will the information be shared?

The information is transferred to the Fraser Group for analysis and third-party scoring.

2.6 What opportunities do individuals have to decline to provide information or to consent to particular uses of information, and how can individuals grant consent?

There is an automated message that informs all callers that their call may be recorded. If a caller does not want the call recorded, they are given the option of hanging up and dialing the main number (202-326-4000).

In addition, each caller is asked if PBGC has permission to view their file and gain additional information at the beginning of each call.

2.7 How will the information be secured?

All users ensure the security of the data that is stored, processed, and transmitted is in compliance with all relevant federal laws, regulations, and policies in addition to the following security requirements set forth by PBGC. In addition, all users of the application ensure that:

1. All files are stored up to 60 days, but no longer.
2. The WAV files may not be stored in any other location on any user's workstation (desktop, other shared drives, etc.)
3. After 60 days all recorded files **must** be deleted.
4. The use of CDs to store **any** recorded files is strictly prohibited.
5. In the event that CDs are used to submit samples to the Fraser Group/or the FBAs, it is prohibited to copy these CDs as well

In addition, the information is transferred to Fraser Group for analysis using an encrypted file transfer program.

Rules of Behavior documents are signed and are in place for all users.

2.8 Is this system or collection part of a privacy act system of records?

No. The eTalk system, while containing PII, does NOT require a SORN due to the fact the system is not indexed using PII. While the content of the recorded calls contains PII, the eTalk record system only stores the calls as sound files without identifying the identity of the caller. PBGC needs to protect the confidentiality of the information contained in the sound files, but since the system cannot retrieve a specific call by a caller's name (or other PII), and the system

exists only to assess customer service quality and does not serve as an element of any computer matching program, a SORN is not required.