

Survey Privacy Impact Assessment (PIA)

Authority: Office of Management Budget (OMB) Memorandum (M) 03-22, OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002 & BRRM PVR #10- Privacy Accountability and #21-Privacy Risk Management, and the Privacy Act of 1974 (as amended).

SOI control number (if applicable)

DOI 16-001 - OMB Control No. 1090-007

Date

June 15, 2016

Section I - Introduction

Full survey name, and acronym (if this is a reoccurring survey, show date)

American Customer Satisfaction Index (ACSI) Survey

General business purpose of survey (provide a clear, concise description of the survey, why it's needed, the benefits to the mission of the service)

IRS uses ACSI scores to communicate taxpayers' satisfaction to internal and external stakeholders, including the IRS Oversight Board. The ACSI survey All Individual Tax Filer score has been approved by the IRS Oversight Board as an IRS Long-Term Measure. IRS has participated in ACSI since 1994 and is one of the original federal government participants. Unlike IRS' transactional surveys, ACSI uses a model that allows benchmarking agencies, companies, and industries against each other. ACSI provides valuable feedback from Wage and Investment individual tax filers (including those who file Schedules C & F) and Small Business/Self-Employed and Large Business/International corporate tax filers about their experiences with filing taxes. This information enables the IRS to better understand what impacts customer satisfaction levels and informs its customer service improvement processes.

NOTE: The Federal Consulting Group (FCG), an agency within the Department of the Interior, coordinates the ACSI survey for other federal agencies through an interagency agreement. They handle administrative tasks for the survey, such as getting OMB clearance for federal agency participants through the DOT's approval process, so this PCLIA will not go through IRS' SOI coordinated OMB process. FCG's subcontractor, _____, conducts and analyzes the survey with the assistance of their subcontractor, _____, who provides computer assisted telephone interviewing (CATI) capabilities. The Office of Program Evaluation and Risk Analysis, which is part of Research, Analysis, and Statistics, coordinates the ACSI Survey on the tax filing process. There is also a separate, unrelated ACSI Survey coordinated by Online Services that covers IRS.gov.

THIS PCLIA IS ONLY FOR THE OPERA/RAS ACSI SURVEY ON THE TAX FILING PROCESS. The previously approved PIA for this project expires August 22, 2016 and needs to be updated. The survey parameters have not changed.

List all System of Records Notices (SORN) that apply. (SORN review required)

Treasury/IRS 00.001 - Correspondence Files and Correspondence Control Files

Requested operational date

7/08/16

CATEGORIES OF INDIVIDUALS COVERED BY THE SYSTEM include Initiators of correspondence; persons upon whose behalf the correspondence is initiated (including customers and employees who are asked to complete surveys); and subjects of correspondence

CATEGORIES OF RECORDS IN THE SYSTEM:

Correspondence received and sent with respect to matters under the jurisdiction of the IRS. Correspondence includes letters, telegrams, memoranda of telephone calls, e-mail and other forms of communication. Correspondence may be included in other systems of records described by specific notices.

Section II - About The Survey

1. Who will the survey be administered to

a. IRS employees, managers or executive service

Yes No

i. List all PII data used in the survey, or to select participants (*PII data includes information that can be linked to an individual by using other information. Data does not have to be linked by the IRS to be PII data. Data in the contractor's custody that is never requested by the IRS may also be PII data. Read the web page at http://irweb.irs.gov/AboutIRS/bu/pipds/pip/privacy/privacy_art/8352.aspx before answering this question*)
 N/A - This survey does not target IRS employees, managers, or executive service. The target population is taxpayers.

b. Taxpayers

Yes No

i. List all PII data used in the survey, or to select participants

No IRS or other government systems, applications, or data are used to conduct the survey or to select CTAS survey participants. In fact, no IRS data of any kind are being provided by IRS to the vendor as part of this survey. Additionally, the vendor is not providing any sensitive PII to IRS, as part of this survey. All analysis provided to IRS will be anonymized.

For the Individual Taxpayer Survey segments:

No IRS data are provided by the IRS to the vendor, so this survey is not subject to Section 6103 requirements. Individual participants are selected via Random Digit Dialing (RDD) of household telephone numbers from working phone area codes and exchanges and by computer generating the last 4 digits. A screening question ensures that respondents are at least 18 years old. The CATI system displays the number that was dialed during the course of conducting the interview. It remains with the data collected only as long as needed to confirm the quality of the data collected and then is anonymized with a unique record ID. In the event that a call back is needed (in cases where the qualified respondent was not available or in cases where the respondent was not able to complete the survey all at one time and needed to be called back), the telephone number is retained for purposes of completing the survey, and the computer assisted telephone interviewing (CATI) vendor asks for first names only. This is retained in the CATI system, which is only accessible to those who are authorized to work on the survey. Once completed, the record is anonymized with a unique record ID as part of the completion process. No telephone numbers are retained past the completion of the survey. No sensitive PII or any information that could be tied to an individual respondent is ever provided to IRS. Additionally, no phone numbers or names are stored with the response data. The data reside on secure servers.

For the Corporate Taxpayer Survey segments:

No IRS data are provided by the IRS to the vendor, so this survey is not subject to Section 6103 requirements. Corporate participants are selected from contact lists provided by _____, which collects publicly available information that the Securities and Exchange Commission requires corporations to publish. _____ provides lists that include company name, trade style, corporate address, corporate contact name(s)/title(s)/prefix(es)/suffix(es), corporate contact telephone number(s), DUNS number, large/small Business indicator, and miscellaneous codes (DLVYPTCODE, CARR ROUTE, PKG LVL CD, STATUSIND, MANUF IND, POPUL CODE, LINE BUSIN, SIC CODE, USER AREA, PUB_PRV_IN, ASSET_RNGE). In the event that a call back is needed (in cases where the qualified respondent was not available or in cases where the respondent was not able to complete the survey all at one time and needed to be called back), the telephone number is retained for purposes of completing the survey, and the computer assisted telephone interviewing (CATI) vendor asks for full names to know exactly whom to request when calling back, since more than one employee may share the same first name. This is retained in the CATI system, which is only accessible to those who are authorized to work on the survey. Once completed, the record is anonymized with a unique record ID as part of the completion process. No telephone numbers are retained past the completion of the survey. No sensitive PII or any information that could be tied to an individual respondent is ever provided to IRS. Additionally, no phone numbers or names are stored with the response data. The data reside on secure servers.

c. Others

N/A

2. Explain how participants are selected (*detailed description on method & reason of selection, if random, explain*)

No IRS, Treasury, or other government systems, applications, or data bases are used to select ACSI survey participants. As noted above, participants are selected as follows:

Individual participants are selected via Random Digit Dialing (RDD) of household telephone numbers from working phone area codes and exchanges and by computer generating the last 4 digits. A screening question ensures that respondents are at least 18 years old. The CATI system displays the number that was dialed during the course of conducting the interview. It remains with the data collected only as long as needed to confirm the quality of the data collected and then is anonymized with a unique record ID. In the event that a call back is needed (in cases where the qualified respondent was not available or in cases where the respondent was not able to complete the survey all at one time and needed to be called back), the telephone number is retained for purposes of completing the survey, and the computer assisted telephone interviewing (CATI) vendor asks for first names only. This is retained in the CATI system, which is only accessible to those who are authorized to work on the survey. Once completed, the record is anonymized with a unique record ID as part of the completion process. No telephone numbers are retained past the completion of the survey. No sensitive PII or any information that could be tied to an individual respondent is ever provided to IRS. Additionally, no phone numbers or names are stored with the response data. The data reside on secure servers.

Corporate participants are randomly selected from contact lists provided by _____, which collects publicly available information that the Securities and Exchange Commission requires corporations to publish. _____ provides lists that include company name, trade style, corporate address, corporate contact name(s)/title(s)/prefix(es)/suffix(es), corporate contact telephone number(s), DUNS number, large/small Business indicator, and miscellaneous codes (DLVYPTCODE, CARR ROUTE, PKG LVL CD, STATUSIND, MANUF IND, POPUL CODE, LINE BUSIN, SIC CODE, USER AREA, PUB_PRV_IN, ASSET_RNGE). In the event that a call back is needed (in cases where the qualified respondent was not

available or in cases where the respondent was not able to complete the survey all at one time and needed to be called back), the telephone number is retained for purposes of completing the survey, and the computer assisted telephone interviewing (CATI) vendor asks for full names to know exactly whom to request when calling back, since more than one employee may share the same first name. This is retained in the CATI system, which is only accessible to those who are authorized to work on the survey. Once completed, the record is anonymized with a unique record ID as part of the completion process. No telephone numbers are retained past the completion of the survey. No sensitive PII or any information that could be tied to an individual respondent is ever provided to IRS. Additionally, no phone numbers or names are stored with the response data. The data reside on secure servers.

a. List the IRS, Treasury or other Government system(s), applications or data bases that the employee/taxpayer PII data is extracted or derived from. If data comes from other sources, describe the source of the information

No IRS, Treasury, or other government systems, applications, or data bases are used to extract taxpayer data from to conduct the survey or to select ACSI survey participants. No IRS data are provided by the IRS to the vendor, so this survey is not subject to Section 6103 requirements. Additionally, the vendor is not providing any sensitive PII to IRS, as part of this survey. All analysis provided to IRS will be anonymized. Individual tax payers are selected via Random Digit Dialing, as noted above. Corporate taxpayers are selected from contact lists provided by _____, which collects publicly available information that the Securities and Exchange Commission requires corporations to publish.

3. Is the survey voluntary

Yes No

a. How is notice given that the survey is optional

The survey script introduction includes, "Your answers will remain anonymous, and your participation is voluntary. You may stop at any time or skip any question you do not wish to answer."

4. Is any Personally identifiable Information (PII)/data collected, disclosed or studied on employees, taxpayers, stakeholders or other individuals who choose not to participate

Yes No

5. How will the survey be conducted

a. Electronically (*explain delivery method & if cookies are used*)

N/A - This is a phone survey, not an online survey.

b. Phone (*explain procedure, and provide script*)

[Copies of the three ACSI questionnaires are attached]

Yes. This survey will entail live interviews conducted by telephone using CATI—Computer Assisted Telephone Interviewing. Interviewers are professionally trained and continuously monitored and supervised. All data are entered and cleaned through the CATI system during the interviewing process, which eliminates editing and keypunch operations.

Individual participants are selected via Random Digit Dialing (RDD) of household telephone numbers from working phone area codes and exchanges and by computer generating the last 4 digits. A screening question ensures that respondents are at least 18 years old. In the event that a call back is needed (in cases where the qualified respondent was not available or in cases where the respondent was not able to complete the survey all at one time and needed to be called back), the telephone number is retained for purposes of completing the survey. This is retained in the CATI system, which is only accessible to those who are authorized to work on the survey. Once completed, the record is anonymized with a unique record ID as part of the completion process. No telephone numbers are retained past the completion of the survey. No sensitive PII or any information that could be tied to an individual respondent is ever provided to IRS. Additionally, no phone numbers or names are stored with the response data. The data reside on secure servers.

Corporate participants are selected from contact lists provided by _____, which collects publicly available information that the Securities and Exchange Commission requires corporations to publish _____ provides lists that include company name, trade style, corporate address, corporate contact name(s)/title(s)/prefix(es)/suffix(es), corporate contact telephone number(s), DUNS number, large/small Business indicator, and miscellaneous codes (DLVYPTCODE, CARR ROUTE, PKG LVL CD, STATUSIND, MANUF IND, POPUL CODE, LINE BUSIN, SIC CODE, USER AREA, PUB_PRV_IN, ASSET_RNGE). In the event that a call back is needed (in cases where the qualified respondent was not available or in cases where the respondent was not able to complete the survey all at one time and needed to be called back), the telephone number is retained for purposes of completing the survey, and the computer assisted telephone interviewing (CATI) vendor asks for full names to know exactly whom to request when calling back, since more than one employee may share the same first name. This is retained in the CATI system, which is only accessible to those who are authorized to work on the survey. Once completed, the record is anonymized with a unique record ID as part of the completion process. No telephone numbers are retained past the completion of the survey. No sensitive PII or any information that could be tied to an individual respondent is ever provided to IRS. Additionally, no phone numbers or names are stored with the response data. The data reside on secure servers.

c. Mail (*explain method for choosing participants, and provide example of cover letter to the participants*)

N/A - This is a phone survey.

d. Other

N/A - This is a phone survey.

6. Who will conduct the survey? Please provide a copy of the contract

a. IRS conducted (*name the office that will conduct the survey*)

N/A - This survey will be conducted by a contractor. These services are obtained through an Interagency Agreement with the Department of the Interior's Federal Consulting Group (FCG), which provides the OMB Clearance through its generic clearance for ACSI surveys for participating federal agencies. No IRS taxpayer data are provided to the contractor, so this survey is not subject to Section 6103 requirements.

[A copy of the interagency agreement/contract is attached.]

b. Contractor conducted

i. Has a Contracting Officer or a Contracting Officer's Representative (COR) verified that

- 1. All applicable FAR requirements are met to engage a contractor to perform the survey Yes No
- 2. That all required "non-disclosure" clauses are contained in the contract Yes No
- 3. That all contractor employees who will have access to the data have signed non-disclosure agreements, and the non-disclosure forms are on file with the COR Yes No

ii. If question 6b(i) contains any "no" answer, please explain

No IRS taxpayer data are provided to the contractor, so this survey is not subject to Section 6103 requirements. However, per the Privacy Office recommendation for the previous PIA, we have added a requirement to the contract that the vendor provide a letter confirming the steps it will take to protect taxpayer privacy in conducting the survey, including confirmation that all employees involved in the 2016 ACSI survey will sign an agreement to protect taxpayers' privacy. The COR has received a copy of the vendor's letter. [2016 FCG/ letters, as discussed below.]

CATI subcontractor's employees sign a confidentiality agreement upon hiring, which applies to all information an employee will have access to. Information is only provided on a need-to-know basis. [Sample attached.] IRS does not have a copy of each individual letter from CATI subcontractor, but does have a letter with the signatures of every employee who will be processing/analyzing the data [attached], as well as a separate letter agreeing that FCG, , and all subcontractors will protect taxpayers' privacy in conducting the survey. [attached.]

employees sign a confidentiality agreement upon hiring which applies to all information an employees will have access to. Information is only provided on a need-to-know basis.

iii. What is the level of background investigation completed on contractor employees prior to access to PII information about employees or taxpayers? Any contractor or subcontractor who will have access to employee or taxpayer PII data, must have at least a "Moderate Risk" (NACIC) investigation

As noted above, contractor employees are not being provided any IRS employee or taxpayer data as part of this survey effort. However, a background search is conducted for each person who analyzes the data or makes phone calls in the course of administering the survey (i.e., data collection via phone).

Vendor FCG's staff are employees of the Department of the Interior who are subject to standard federal employment background checks. However, they do not have access to any of the data collected. They merely coordinate the surveys for other federal agencies.

Subcontractor uses the company to conduct employee background checks. The search looks for criminal history on both the name and any aliases. If anything comes back based on the name (or aliases) additional information is researched to determine if it is the same person and to bring up any details of an offense. Eligibility for employment is assessed on a case by case basis.

Subcontractor background check process is for US employees only, and it does not bar employment to people who have criminal convictions, unless they have felony convictions and misdemeanors relating to dishonesty (identity theft, embezzlement, fraud etc.). uses e-verify for employment verification.

c. What information/results will be provided to the business owners (*IRS requestors*) of the survey? We need to know that the employees or taxpayers who will participate cannot be identified under any circumstances, and no adverse actions can be taken against participants regarding their answers

No sensitive PII or any other data that could identify respondents will be provided to IRS. All data provided to IRS are anonymized responses to the survey questions.

d. For employee or taxpayer satisfaction surveys, can you verify that no "raw" or un-aggregated employee or taxpayer data will be provided to any IRS office

Yes, no raw/un-aggregated employee or taxpayer data that can be tied to any individual respondent will be provided to any IRS office. Although some data provided to IRS is informally referred to as "raw" data, it has been anonymized and cannot be linked to any individual respondent. It will contain no sensitive personally identifiable information that would allow a respondent to be identified. An anonymized record number is the unique record identifier that enables data analysis at the respondent level should that be needed. IRS will have no way to determine the identity of

respondents.

b. Contractor conducted (business name of contractor/subcontractors involved)

IRS has an Interagency Agreement with the Federal Consulting Group (FCG), an agency within the Department of the Interior (DOI), to conduct the ACSI Survey. FCG coordinates the survey for federal agencies. They are responsible for getting OMB clearances for the government-wide ACSI survey, which is handled through DOI's OMB process rather than IRS' SOI OMB process. FCG has a subcontractor, _____ which completes the analysis. _____ has a subcontractor, _____ international, which completes the computer-aided telephone interviewing for the survey.

e. If any employee or taxpayer identifiers will be provided to the business owner, explain the business reason

N/A - No employee or taxpayer identifiers will be provided to IRS. All data will be anonymized.

7. How does the administration of the survey guarantee that the PII data regarding employees or taxpayers will not be compromised, lost or stolen. Explain Office of Cyber security approved security & encryption used if data is transferred from IRS office to contractors, and back to the IRS. If data is not sent electronically, include in detail, information about commercial courier services, or U.S. mail used to ship paper, tapes or electronic media back and forth from the IRS to contractors. Ensure that Cyber security approves the security and data encryption process used by the contractor

As noted, above, no IRS taxpayer information of any kind is provided by IRS to the contractor, and no sensitive PII is provided to the IRS by the contractor. However, all deliverables, which contain only anonymized information, are transmitted to IRS according to IRS' data protection policies. We further asked IRS' Privacy Policy staff for advice about transmitting the _____ contact lists, which contain publicly available information that SEC requires corporations to publish and were assured that they could be transmitted to the vendor using IRS' data protection policies, since they contain no IRS generated or taxpayer data.

For the individual taxpayer surveys, IRS does not receive or provide any contact lists or PII related to individual taxpayers, because that survey is conducted via RDD.

Although the corporate taxpayer survey contact data from _____ are publicly available information that SEC requires corporations to publish, the vendor will receive the _____ contact lists for LB&I and SB/SE via e-mail using zipped, password protected files using SecureZip, according to current IRS policies. _____ of the IRS Privacy Policy Office provided confirmation that this is acceptable in September 2015.

During the administration of the survey, the system dials the randomly selected landline telephone number. The CATI system displays the number that was dialed during the course of the conducting the interview. It remains with the data collected only as long as needed to confirm the quality of the data collected and then is anonymized with a unique record ID. In the event that a call back is needed (in cases where the qualified respondent was not available or in cases where the respondent was not able to complete the survey all at one time and needed to be called back), the telephone number is retained for purposes of completing the survey. This is retained in the CATI system, which is only accessible to those who are authorized to work on the survey. Once completed, the record is anonymized with a unique record ID as part of the completion process. No telephone numbers are retained past the completion of the survey. No telephone numbers or personally identifiable data are associated with any of the response raw data that is provided to the IRS. Additionally, no phone numbers or names are stored with the response data. The data reside on secure servers.

8. How is the survey PII data protected and stored? If data is housed at a contractor's site, on contractor's computers, give detailed information about the physical and electronic security & protection of the data before, during, and after the survey

As noted above, no IRS taxpayer information of any type is being provided to the contractor by IRS. No phone numbers or names are stored with the response data. The data reside on secure servers.

During the course of the administration of the survey, i.e., before the responses are anonymized in cases where call backs are needed, the data are housed in the electronic Computer Aided Telephone Interview (CATI) system. It is accessible only by those authorized to access it for purposes of administering the survey.

Subcontractor _____ - The data files are in proprietary binary encrypted format on the system and are only accessible by employees who are authorized to access it. The call back information is written to those files and dialed automatically by the system so there is no need to have the callbacks in a separate list. It is all managed by the software.

Subcontractor _____ - The data are stored on the server that is in a locked room. The access levels to the server are set so only authorized staff has access to the data from the internal network or through an encrypted VPN tunnel. The server is not accessible from public networks/internet. A daily tape backup is performed overnight, the data are encrypted before being written to tape; the tapes are removed and secured in a locked cabinet in a locked office. The data are archived on a secure media for the set period allowed by the company's archive policy unless the client sends a written request to destroy the data. IRS requests that contact lists be destroyed at the end of the project, per our agreement with _____. _____ provides confirmation that the contact lists have been destroyed.

9. Are any external resources used to create the database of participants Yes No

10. Are the survey results disclosed with any other Federal or State government offices Yes No

If yes, explain

Survey results are not shared unless they are requested and we are required to share the information. IRS has received FOIA requests for ACSI scores and requests for information from the IRS Oversight Board and other external stakeholders. Only high-level results have been shared, such as graphs showing the All Individual Tax Filer scores moving upward or downward over time.

11. Survey Records - Retention and Disposal (*Records Retention review required*)

a. Cite any business owner policy IRM Chapter (including Sections/subsection) and Record Control Schedule (RCS, including item number) that describes how the data is retained, stored and disposed of

The American Customer Satisfaction Index (ACSI) Tax Filer Survey is unscheduled. A request for records disposition authority for this Survey (and other similar external surveys Service-wide) is currently being drafted with the assistance of the IRS Records and Information Management (RIM) Program Office. When approved by the National Archives and Records Administration (NARA), it is anticipated that disposition instructions for this survey will include retentions for the data sets, raw data, background documentation, and summary/final reports, as applicable.

b. Explain how long any PII data will be retained by the contractor if they are conducting the survey on behalf of the IRS. The IRS Records Office can provide guidance on IRS requirements for records retention. All legal requirements that apply to IRS records (*and non-records*) must be followed by contractors)

Disposition of records created by the Internal Revenue Service, including those records created by all Service employees and contractors performing agency functions, is controlled using the Service-wide Records Control Schedules. By that token, the ACSI Tax Filer Survey records created and/or maintained by the vendor on behalf of the Service must follow the same records disposition authority submitted to/approved by NARA...TBD. At the completion of the vendor contract, Survey records still in existence will be surrendered by the contractors to designated persons in IRS or will be transferred to another contractor with the express permission and instructions from IRS staff responsible for the records. All records that have reached their final disposition and are eligible for destruction may be properly disposed of using preapproved methods and appropriately witnessed and then submitting a form similar to or same as the Standard Form 1428, Inventory Disposal Schedule to designated IRS officials.

12. Based on the information you have provided above, does the survey require a Privacy Act Notice to be provided to participants?

Office of Disclosure will help you determine the need for a Privacy Act Notice or see IRM 11.3.16 Disclosure of Official Information, Privacy Act Notification Programs (*provide the Office of Privacy a copy of the Privacy Act Notice if one is required for this survey*)

Yes. It is part of the questionnaire and reflects language provided by the Privacy Office during the previous PIA review process:

The authority for requesting the information is 5 USC 301. The primary purpose of collecting this information is to improve IRS customer service. IRS may disclose information to a contractor when authorized by applicable law in order to analyze and administer the survey. Providing the information is voluntary. If you do not provide all or part of the information requested, the IRS will not be able to use information that might have been provided to improve service to you.