Survey PCLIA ID Number: 5528 Date of Approval: December 01, 2020

## **SURVEY DESCRIPTION**

NOTE: All questions will refer to 'Survey' but also apply to a telephone interview or focus group.

Full name and acronym of the Survey.

Credential Service Provider (CSP) Usability Research, SU-5528

What type of information collection will be used?

Survey
Telephone Interview

Is this a new Survey?

Yes

Which Business Unit (BU) is requesting the Survey?

Deputy Comm. Services & Enforcement

Who will the Survey be administered to?

External Survey (Taxpayers or Others)

Is your Survey a Customer Satisfaction or Taxpayer Experience Survey?

Yes

Does the information collection request require OMB Clearance?

Yes

Does this Survey have a Statistics of Income (SOI) number? No

*Is this a reoccurring Survey?* 

No

Provide the date the Survey will begin and end. (1-year expiration date)

Beginning quarter:

- 1 October-December
- 2 January-March

#### GENERAL BUSINESS PURPOSE

What is the general business purpose of this Survey? Provide the reason for the Survey and the benefits to the IRS mission.

The IRS aims to provide taxpayers access to online services in the least amount of time without compromising on security or satisfaction. The IRS is exploring the use of credential service providers (CSPs) to identity proof and authenticate taxpayers accessing online IRS services. A CSP is a "trusted entity that issues or registers subscriber authenticators and issues electronic credentials to subscribers. A CSP may be an independent third party or issue credentials for its own use" (NIST SP 800-63-3 under Credential Service Provider (CSP)). Though some Americans have experienced third-party identity proofing and authentication through industry instances like using Google or Facebook accounts to log into websites such as Spotify, a music streaming service, little is known about how taxpayers may respond to using CSPs for secure federal online services. It is also not well understood if citizens understand the separation between the CSP and the Agency providing the service. The research report will detail user perceptions and usability issues. Usability: What is the usability for the target population for setting up two-factor authentication, submitting identity evidence, and the overall task of successfully creating an account with the two CSPs? What are potential usability and accessibility issues for the target population? User perceptions: What are the user perceptions on the security of using a third party to identity proof and authenticate into an IRS account? Is there a difference in user perceptions between the two CSPs? The research team will identify significant themes that address the broad questions explored and identify all key themes emerging from the data.

# PII DETAILS

Does the Survey use, collect, receive, display, store, maintain, or disseminate PII, or is PII (names, addresses, email addresses, etc.) used to select participants?

Yes

Please specify the types of PII:

Name
Mailing address
Phone Numbers
E-mail Address
Date of Birth
Biometric Identifiers
Tax Account Information

Are there other types of PII collected in the Survey?

Yes

Describe the other types of PII that are applicable to this Survey:

see 9a

Is any PII data collected, disclosed, or studied on employees, taxpayers, stakeholders or other individuals who choose not to participate?

Yes

Describe the PII that is collected.

Recruiting subcontractor (Connect Research, Inc.) collects gender, age, education level, household income range, household size, filing status, ethnicity, US residency, state of residency and disability status/impairment type, language proficiencies, employment information, and federal/state/local tax experience for the purpose of screening participants. PII collected from individuals who choose not to participate by the recruitment subcontractor will not be transferred to MITRE or IRS.

Does the Survey use, collect, receive, display, store, maintain or disseminate linkable data (gender, ethnicity, parts of address, tax filing information, etc.) or use linkable data to select participants?

Yes

List the linkable data applicable to this Survey.

Gender, age, education level, household income range, household size, filing status, ethnicity, US residency, state of residency, disability status/impairment type, language proficiencies, employment information, federal/state/local tax experience, voice/audio recording (for post-collection analysis only). Participants will be only be referred to as an ID number by MITRE and the IRS. Login.gov and id.me pilot studies: Driver's license, state photo ID, passport, State issuance of ID, Social Security number, Photo (ID.me and Login.gov), Image of front & back of ID (Login.gov)

#### PRIVACY ACT & SYSTEM OF RECORDS NOTICE

Does your survey concern any record from which information is retrieved by any personal identifier for an individual who is a US citizen, or an alien lawfully admitted for permanent residence? An identifier may be a symbol, voiceprint, SEID, or other personal identifier that is used to retrieve information.

Yes

*Enter the SORN number(s) and the complete name of the SORN(s):* 

IRS 00.001 Correspondence Files and Correspondence Control Files

IRS 10.004 Stakeholder Relationship Management and Subject Files

The Privacy Act of 1974 (5 USC &sect552a(e)(3)) requires each agency that maintains a system of records, to inform each individual requested to supply information about himself or herself. Do Survey participants provide information about themselves?

Yes

Provide the Privacy Act Statement.

Both Survey and Interview Informed Consent include the following IRS Privacy Act Statement "The authority requesting the information is 5 USC 301. The primary purpose of asking for the information is to determine steps the IRS can take to improve our services to you. The information may be disclosed as authorized by the routine uses published for the following Privacy Act System of Records: (1) IRS 00.001 Correspondence Files and Correspondence Control Files and (2) IRS 10.004 Stakeholder Relationship Management and Subject Files. Providing the information is voluntary. Not answering some or all of the questions will not affect you."

Privacy analyst agreement date.

10/6/2020

## **INCOMING PII INTERFACES**

Does the employee/taxpayer PII come from the IRS, Treasury, or other Government system(s), application(s) or data base(s)?

No

Does the employee/taxpayer PII come from external resources (contractor, subcontractor, etc.)?

Yes

Identify the external resource(s) the PII data is extracted/derived from, how the data is transmitted, and is there a reciprocal agreement.

Name: Connect Research Inc. - participant ID listing Transmission Method: secure email with digital signature

ISA/MOU: No

#### PH SENT TO EXTERNAL ORGANIZATIONS

Are the Survey results disclosed to any other Federal or State Government? (For example, the Federal Viewpoint Survey/Questionnaire - the results are sent to OPM.)

No

Are the Survey results disclosed to any other sources? (Contractor, Sub-contractor etc.)

No

#### SURVEY PARTICIPATION

Explain how the participants are selected. Include a detailed description. (If the selection is random, explain the process.)

Selection is based on specific characteristics and availability of participants. Required participant characteristics are: Must reside in the United States, Must be 18 years of age or older, Estimated household income must fall within \$0 - \$35K (See Recruiting Screener for question format and clarifications), Must have English proficiency (written and spoken), Must meet identity proofing requirements for CSPs, Must have access to a computer that meets the technical requirements for the online survey and for the CSPs, Must report a history of completing at least two complex internet activities (e.g., use online financial services, make travel arrangements or get directions). The Recruiting Subcontractor will recruit a balanced participant mix or meet quotas across the following characteristics: Age, Gender, Ethnicity, Education.

How are participants notified (letter, postcard, email etc.) of the Survey?

All participants are solicited via an ad, email or phone call from the recruiting subcontractor for the usability study.

*Is the Survey voluntary/optional?* 

Yes

How is notice given that the Survey is voluntary/optional?

Survey participants are asked to review and sign an informed consent prior to participation. The informed consent includes notice that the survey is voluntary, and they may withdraw at any time. Interview participants will be notified by the session facilitator that participation is voluntary at the beginning of the session. The participant can end the session at any time with no negative consequences.

## **SURVEY PROCESS**

How will the Survey be conducted?

Electronic

What survey application or tool is used to create the survey?

Web Based (Contractor or Third-party website)

Provide the website name/address

Custom survey within www.IRSLabs.org

Are cookies used to prevent a participant from taking the Survey multiple times?

No

Do participants who have not taken the Survey receive a second notification?

Yes

Phone

Explain the procedure. (Random Digit Dialing, Calling List)

As participants complete the survey, the recruiting subcontractor (Connect Research, Inc.) will schedule a 30-minute phone call between MITRE and the participant on a Monday through Friday, 8AM to 6PM EST, based on a schedule provided by MITRE. Participants will be sent a calendar invitation and an email reminder one day before their session by the recruiting subcontractor.

Will the Survey be audio-taped?

Yes

Provide the consent method and statement.

Survey participants will be asked to sign an Informed Consent Form and interview participants will be informed verbally.

Will the Survey be video-taped?

No

## **DATA SECURITY**

Does the IRS administer or perform analysis of the survey?

Neither

Does a contractor/vendor administer or perform analysis of the survey?

Yes

Provide the name of the Contractor/Vendor:

The MITRE Corporation (and Connect Research, Inc. for recruitment)

*Is the contractor in the continental United States (US)?* 

Yes

*Is all work performed and retained within the continental US?* 

Yes

Provide the Cyber security approved security and encryption used when data is transferred electronically from the IRS to contractors and back to the IRS.

Encrypted email with password protected attachments.

*Is data sent electronically?* 

Yes

Provide, in detail the information regarding the transfer back and forth from the IRS to contractors.

Encrypted email with password protected attachments.

How is the survey PII protected and stored when it is housed at a contractor's site, on contractor's computers? Provide detailed information regarding the physical and electronic security and protection of the data before, during, and after the Survey.

All PII is collected by the recruitment subcontractor and no PII is shared with MITRE or the IRS. All data concerning the study, including the recruiting screener, interview notes, and audio recordings, will have participant names removed, and will be stored in an encrypted directory within MITRE. IRS Labs will use a "passwordless" authentication system to provide participants access to the multi part survey without revealing their email addresses to the MITRE research team. Recruiting subcontractor (Connect Research, Inc.) has implemented and will maintain reasonable and appropriate administrative, physical and technical safeguards to (a) protect the security and confidentiality of PII; (b) protect against any anticipated threats or hazards to the security or integrity of PII; (c) protect against unauthorized access to or use of PII.

Has a Contracting Officer or a Contracting Officer's Representative (COR) verified that contracts include all applicable clauses for data protection, and that all contractor employees who will have access to the data, have signed non-disclosure agreements and that the non-disclosure forms are on file with the COR.

Yes

The following people have access to the employee/taxpayer PII

Contractor Users: Read-Only Moderate

Contractor Managers: Read-Only Moderate

Contractor Developers: Read and Write Moderate

Contractor System Administrator: Administrator Moderate

## **SURVEY INFORMATION**

What information/results will be provided to the business owners (IRS Requestors) of the Survey?

A report will provide estimated time on task, task success, and satisfaction. The following measures will be reported for each condition: Estimated time on task, Errors, Task success, Satisfaction, Themes from open-ended comments. The report will also capture information about how participants used the system, such as: Identity proofing documents used, Comfort level with documents for an IRS.gov account created by a third party CSP, Device and browser used. The report will provide the aggregated demographic characteristics of the participant sample. The study findings will be used to summarize insights into how users of this target population might respond to using CSPs and any usability and accessibility concerns to address in design.

Are the results aggregated?

Yes

What is the minimum sample size?

n/a

Explain the precautions taken, to ensure the survey results will not be used for any other purpose, not listed in question 7, General Business Purpose.

The survey is designed to focus solely on perceptions of and feedback on CSPs. Aggregated demographic data collected will only be reported on as a means to describe the group of individuals who participated in the research and will not be directly tied to any quotes, survey responses or feedback provided on the CSP.

Does the administrator of the Survey have access to information identifying participants?

No

Explain the precautions taken, to ensure that employees or taxpayers who participate in the survey cannot be identified or re-identified under any circumstances?

Recruiting screener data for survey participants will be stored in an encrypted file. Access will be limited to the MITRE research team only. Participants will be referred to by an ID code shared between the Recruiting Company and the MITRE research team. The Recruiting Company will manage all contact with survey participants, including email invitations to the survey. The recruiting screener data will be combined with any survey data and processed by the MITRE research team. No contact information (for example, name or email address) is included within the Recruiting Screener Data spreadsheet provided to MITRE. In addition, survey participants will be instructed to not share any personal information or anecdotes that

could identify themselves on all free text entry survey questions. Interview selection will be on a first come, first serve basis (based upon survey completion and response to recruiting agency invitation and scheduling). All communications on participant scheduling for interviews, which will include participant first name, will be shared using an encrypted file by the MITRE research team. Access will be limited to the MITRE research team only. The encrypted participant scheduling spreadsheet will not be combined with the recruiting screener data but will include the participant ID code for reference of the MITRE research team only. Participant first names will be removed from the participant scheduling spreadsheet by the MITRE research team on study completion and the spreadsheet will be stored for archival purposes. Interviews will be audio recorded for post-collection analysis only. Interview participants will be asked to provide verbal consent to audio recording. The informed consent script will be read aloud by the moderator. Any instances of participant names will be removed from audio recordings. Recordings will be stored in an encrypted directory within MITRE. Access to processed audio recordings will be limited to the MITRE research team only. Audio recordings will not be directly used in any reporting on research results. Anonymous, selected quotes gleaned from recordings may be shared in reporting on the research.

Explain the precautions taken to ensure no adverse actions can be taken against participants?

If a participant chooses to withdraw from the study all information collected by MITRE (recruiting screener, survey) will be deleted. In reporting, survey and interview data will not be directly tied to participant IDs.

For Employee or Taxpayer Satisfaction Surveys, explain how you have ensured that no "raw" or unaggregated employee or taxpayer data will be provided to any IRS office?

No "raw" or unaggregated taxpayer data from the recruiting screener or survey will be provided to any IRS office.

## RECORDS SCHEDULE

Are the Survey records covered under a General Records Schedule (GRS, IRS Document 12829) or has the National Archives and Records Administration (NARA) approved a Records Control Schedule (RCS, IRS Document 12990) for the retention and destruction of this Survey and supporting documentation?

Yes

How long are the records required to be held under the corresponding GRS or RCS and how are they disposed of? Explain how long any data will be retained by the contractor if they are conducting the Survey on behalf of the IRS. In your response, provide the GRS or RCS chapter number, the specific item number, and records series title.

The Survey "Credential Service Provider Usability Research" will be managed using GRS 6.5, Item 010 Public Service Operations Records. Temporary. Destroy 1 year after resolved, or when no longer needed for business use, whichever is appropriate. Any additional records developed from the "Credential Service Provider Usability Research" maintained by the IRS will be scheduled as coordinated with the IRS Records and Information Management (RIM) Program and IRS Records Officer. IRM 1.15.1, Records and Information Management, The Records and Information Management Program.

#### **CIVIL LIBERTIES**

Does the Survey maintain records describing how an individual exercises rights guaranteed by the First Amendment (including, but not limited to information regarding religious and political beliefs, freedom of speech, freedom of the press, and freedom of assembly and petition)?

No

Will this Survey have the capability to identify, locate, and monitor individuals or groups of people?

No

#### **RESPONSIBLE PARTIES**

## OFFICIAL USE ONLY