

Internal Revenue Service
SURVEY PRIVACY IMPACT ASSESSMENT (PIA) for
(Injured Spouse Customer Satisfaction Survey) CS-12-385

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).

Date: 11/05/2012

SOI Control Number CS-12-385

SECTION I - INTRODUCTION

Full Survey Name, and Acronym: *if this is a reoccurring survey, please show date*

Customer Account Services (CAS) Injured Spouse Customer Satisfaction Survey

General Business Purpose of Survey: *provide a clear, concise description of the survey, why it's needed and the benefits to the Mission of the Service*

The Injured Spouse operation within the Customer Accounts Services (CAS) Operating Unit of the W&I Business Operating Division (BOD) is responsible for responding to written customer technical and account inquiries, resolving customer account issues, providing account settlement (payment options), and working related issues. W&I requires feedback from customers to continually improve the Injured Spouse operations. W&I solicits this feedback through customer satisfaction research.

W&I CAS expects to accomplish the following objectives:

- To measure the level of customer satisfaction concerning services provided to the customer during their Injured Spouse interaction.
- To identify problems that customers encounter when interacting with the Injured Spouse function.
- To gain insight on improvements that can be made to Injured Spouse services.
- To improve the service that Injured Spouse provides to their customers.
- To assess improvements/problems by comparing this year's results to prior years'.

From the survey responses, W&I CAS will be able to assess the current level of customer satisfaction for the Injured Spouse operations and draw on customer input to improve our products and services.

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Requested Operational Date: January 1, 2013

List all System of Records Notices (SORN) that apply:

Treasury/IRS 00.001

Treasury/IRS 00.003

Treasury/IRS 22.062

Treasury/IRS 24.030

Treasury/IRS 24.046

SECTION II – ABOUT THE SURVEY

1. What persons will the survey to be administered to: *IRS employees or taxpayers – must list all PII data used to select participants, or that will a part of the survey questions*

a. IRS employees, managers or executive service: **No**

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

b. Taxpayers: **Yes**

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

Injured Spouse closed cases - The contractor will be provided the following data from the Injured Spouse Functional Coordinators: Name, Address; City, State, Zip Code.

The Injured Spouse function coordinators have been informed to stop sending out SSNs/TINs in their data collection to the contractor. They have agreed to stop this practice.

c. Others:

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

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, give complete title of the system.

Participants are selected from taxpayers who correspond with IRS or send in amended tax returns. W&I Injured Spouse operation is the source of the extracted data provided to the Contractor. The contractor will prepare and submit to IRS a sampling plan for the survey. The sampling plan will include the target population and sampling frame, sampling specifications, expected reliability of the sample estimates, sampling limitations, preliminary sampling weights, and the strategy for achieving target quotas within key strata. Sample plans are followed by IRS based on expected volumes in each site. Names and addresses are collected in a data base. Each site forwards their Access database monthly to the W&I Accounts

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Management Headquarters office. These are encrypted data files sent electronically with Secure Messaging. Accounts Management Program Management/Process Assurance (PM/PA) analysts consolidate the data and forward to the contractor via secured electronic transfer. Each month, the contractor will draw a stratified random sample from the sampling data file in accordance with the sampling procedures.

3. Is the survey voluntary? Yes

a. How is notice given that the survey is optional?

Respondents are invited to participate via letters

4. Is any identifiable data collected, shared or studied on employees or taxpayers who choose not to participate? No

5. How will the survey be conducted?

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

b. Phone (explain procedure, and provide script)

c. Mail (explain method for choosing participants, and provide example of cover letter to the participants): Data are collected through mail surveys using a four wave letter strategy. Wave 1, Pre-notification letter from the IRS informing the TP that a letter and survey will be sent (to help us improve our service) from an independent research company. Wave 2, the Notification letter and survey from the independent research company informing the TP to take the survey that their responses are anonymous and grouped together with other TP responses so that no single response can be traced back to an individual. Wave 3, a Reminder card to let the TP know that we have not received their survey response and if they did not receive it or need a replacement to call the number on the card. Wave 4, Final letter and survey to the TP. If TP responds on the survey, their name is taken out of the database and they will not receive any notifications.

d. Other

6. Who will conduct the survey?

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

1. - What information/results will be provided to the business owners (IRS requestors) of the survey N/A

2. 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 for any reason? N/A

b. Contractor conducted: YES

1 - Has a Contracting Officer or a COR verified that:

- all applicable FAR requirements are met to engaged a contractor to perform the survey; **Yes**
- that all required "non-disclosure" clauses are contained in the contract, and; **Yes**

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- **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**

c. - If question 6b contains any “no” answer, please explain why:

d. - 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.

The level of background investigations completed on the contractor and its employees prior to access to PII information about taxpayers range from Low to Moderate Risk, depending upon the position descriptions submitted to CSM. This will include the NACI check as well as any other IRS checks related to being a lawful permanent registrant, registering for the military and financial checks.

e - What information will the contractor provide to the business owners (IRS requestors) of the survey? *We need to know that employees or taxpayers who participate cannot be identified and no adverse actions can be taken against participants regarding their answers.*

No information will be provided to IRS that in any way identifies the survey respondents.

f. - If any employees or taxpayers identifiers will be provided to the business owner, explain the business reason:

7. How does the administration of the survey guarantee that the PII data regarding employees or taxpayers is not 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 send electronically, you should 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.*

Cyber-security and National Institute of Standards and Technology (NIST) require data to be transferred via password protected encrypted disk via FedEx overnight mail (including return acknowledgement form,) through the Electronic File Transfer Unit (EFTU), or using the SecureZip data transfer method. Although EFTU and SecureZip are preferred, currently all methods are being used. Any time a bulk file encryption is used, requiring the sharing of an encryption phrase, the pass phrase will be communicated separately from the email/package, with an alternate method to communicate, e.g. Phone call to communicate pass phrase.

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.*

All data is required to be segregated from other non IRS data. In addition, all data at rest or in transport must be encrypted. Whenever information is stored on IT assets at the facility, the contractor must be compliant with the implementation of NIST 800-53, *Recommended Security Controls for Federal Information Systems & Organizations* controls.

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9. Is any other Federal or State government data used to create the database of participants? **No**
10. Are the survey results shared with any other Federal or State government office? **No**

11. Survey Records - Retention and Disposal:

- a. - **Cite any business owner policy IRM Chapter (including Sections/subsection) and IRM 1.15/Record Control Schedule (including item number) that described how the data is retained, stored and disposed of.**

11a) The CAS Injured Spouse Customer Satisfaction Survey is unscheduled. A request for records disposition authority for this Survey (and other similar external surveys Servicewide) 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 instructions for this survey will include retentions for the datasets/raw data, background documentation, and summary/final reports, as appropriate. Cyber-security and NIST Standards for records retention requirements state that documents must be securely maintained for seven years prior to destruction or until the end of the contract term (Period Of Performance), whereas the participation of the contractor under the CSS BPA has been terminated. These requirements will obviously be considered in drafting a final request for records disposition authority for NARA submission and approval.

Reference other data security guidance/policy:
NIST 800-53, *Recommended Security Controls for Federal Information Systems & Organizations* (Media Protection, Media Storage, System and Information Integrity)
NIST Special Publication 800-88
CSS BPA contract Section Secure Data Transfer (SDT) Requirement
CSS BPA contract IRSAP clause 1052.224-9000(c)

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 record retention. All legal requirements that apply to IRS records (and non-records) must be followed by contractors.*

11b) 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 Servicewide Records Control Schedules. By that token, CAS Injured Spouse Customer Satisfaction 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, CAS 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

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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. Base 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