

Internal Revenue Service  
SURVEY PRIVACY IMPACT ASSESSMENT (PIA) for  
W&I CAS-Practitioner Priority Service Customer Satisfaction Survey  
(OMB#1545-1432)  
**CS-12-382**

*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: 10/03/2012**

**SOI Control Number (if applicable): CS-12-382**

**SECTION I - INTRODUCTION**

**Full Survey Name, and Acronym:** *if this is a reoccurring survey, please show date*  
**Customer Account Services (CAS) Practitioner Priority Service (PPS) Customer Satisfaction Survey, continuous**

**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 survey is conducted as part of the IRS agency-wide initiative to monitor and improve taxpayer satisfaction with the Practitioner Priority Service program. To ensure that the PPS program is meeting the needs of the taxpayers, feedback from external customer satisfaction surveys is critical for assessing the customer's perception of our products and services. This is an IVR survey which is conducted on a monthly basis to assess the taxpayer's customer satisfaction with the service they received during their call. Taxpayers who participated in this service interacted with the automated system and spoke to a Customer Service Representative (CSR).

The primary purpose for requesting this information is to help the IRS improve its service to taxpayers. Our authority for requesting the information is 5 USC and 26 USC 7801.

Providing information is voluntary. However, if you do not answer all or part of the

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survey questions, the IRS may lack information it could use to improve taxpayer service. The information you provide may be disclosed to an IRS contractor when authorized by law. The contractor is required to follow confidentiality protections required by the Privacy Act and /or Internal Revenue Code section 6103.

**Requested Operational Date: January 1, 2013**

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

- 00.001: Correspondence Files and Correspondence Controls
- 00.003: Taxpayer Advocate Service and Customer Feedback and Survey Records
- 22.062: Electronic Filing Records
- 24.030: Customer Account Data Engine Individual Master File
- 24.046: Customer Account Data Engine Business Master File, formerly BMF
- 34.037: IRS audit trail and security records system

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**SECTION II – ABOUT THE SURVEY**

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Additional Information

**SECTION II – ABOUT THE SURVEY**

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

The only PII data associated with this survey is that one question asks respondents if they are willing to be contacted for future research, and if so, to provide contact information. This information is maintained by the contractor and is not shared with IRS in any way.

*(The contractor only re-contacts those practitioners who have voluntarily left their information for future research when the IRS asks the contractor to conduct IRS research. Most of the time this is to recruit participants for focus groups related to the survey they completed. It would be very difficult to conduct focus groups of practitioners who had called the PPS service if we did not collect volunteers during the survey.)*

PPS is a telephone survey for taxpayers who contact the IRS Practitioner Priority Service (PPS) via the toll-free lines. The purpose of this survey is to assess their satisfaction with the service that they receive during their call. Taxpayers who participate in this survey interact with the automated system answering questions regarding their interaction with the Customer Service Representative (CSR) who handled their most recent call immediately preceding the survey.

There is only one question asked on the PPS survey which collects PII Data. Question 30, asks the following: “The IRS periodically asks the contractor to do additional research. Would you be willing to participate in future research? If so, please provide us with your phone number and email address if you have one. At the beep, the taxpayer will speak their name and email

The recording with the name and email address is stored securely on the Contractor’s servers as an audio file. The transcriptionist securely listens to the audio file via a secure web portal and transcribes it securely into the same portal. Upon submission, the data is securely stored into a database.

Additionally the contractor must protect SBU/PII taxpayer data in accordance with the policy that has been set forth and outlined in our Blanket Purchase Agreement (BPA) and Performance Work Statements (PWS). See attached file

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**Section III, Security and Safeguards Requirements**

A. **Safeguarding** – Please refer to attached file “Blanket Purchase Agreement” for contractor specifications.

- 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 randomly selected from callers to the IRS. At each of the PPS sites, the call center supervisors select callers for invitation to the survey using a random Sampling Plan. All of our Surveys use the Random Methodology process because in order for it to be valid you have to do random sampling to obtain weighted data.

When we do quality review for paper work, phone calls, etc. it is always a random sampling.

Variables for selecting the calls include the day of month, time of day, and identification numbers for each site’s PPS CSRs.

PPS site supervisors notify the CSRs when their calls are selected for the survey. When the business of the call is complete, the CSR invites the caller to participate in the survey. Callers who agree to participate are transferred to the automated survey.

**B. 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 (Yes) or (No) - No**

b. **Taxpayers (Yes) or (No) Yes- (Practitioners)**

c- **List all PII data used in the survey, or to select participants**

The only PII data associated with this survey is that one question asks respondents if they are willing to be contacted for future research, and if so, to provide contact information. This information is maintained by the contractor and is not shared with IRS in any way.

**Refer to comment above in #1**

d-**Others: none**

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

Participants are randomly selected from callers to the IRS through Interactive Voice Response (IVR) telephone interactions.

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PS site supervisors notify the CSRs when their calls are selected for the survey. When the business of the call is complete, the CSR invites the caller to participate in the survey. Callers who agree to participate are transferred to the automated survey.

**3. Is the survey voluntary? (Yes) / (No) - Yes**

**A. How is notice given that the survey is optional?**

Respondents are told they are invited to participate.

If the taxpayer agrees to take the survey, prior to taking the survey, the CSR reads the following script:

*“Thank you for participating in this voluntary survey. This survey is being conducted by an independent, third-party organization, with tax practitioners to assist the IRS in improving its services. It will take about 10 minutes to complete. During this survey you will be asked to rate the service you received from the IRS on this call.”*

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

**5. How will the survey be conducted?**

**a. Electronically** (explain delivery method & if cookies are used) **No**

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

Data are collected through Interactive Voice Response (IVR) telephone interactions.

Taxpayers who participate in this survey interact with the automated system, answering questions regarding their interaction with the Customer Service Representative (CSR), who handled their most recent call immediately preceding the survey. In other words, the taxpayer contacts the IRS for assistance, after speaking with a CSR and obtaining assistance they are asked if they would like to participate in a survey. If they answer yes, they are transferred into the survey which is automated. This is called Interactive Voice Response (IVR), very similar to when you contact any of your bill collectors (i.e.. telephone, Cable or credit card agencies) rather than speaking to a live person, you are speaking into an Interactive Voice Response (IVR) system.

The data is collected and secured as outlined in the previous question. Additionally, we have a Service-Wide Contracting Officer Representative (currently, ) who is responsible for making annual site visits to each of the contractor/sub-contractor facilities and performing “security reviews” which they are required to pass. His responsibility is not just for W&I, but for all BODS within the IRS.

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c. **Mail** (explain method for choosing participants, and provide example of cover letter to the participants) **No**

d. **Other** **No**

6. **Who will conduct the survey? Contractor**

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?** *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.* **NA -none**

**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?**  
**NA - none**

b. **Contractor conducted** (business name of contractor/subcontractors involved) (names will be redacted before publishing at irs.gov )-

**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 No Yes**
- that all required “non-disclosure” clauses are contained in the contract, and; **Yes No Yes**
- 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 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

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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. The "Blanket Purchase Agreement" /SOW specifically state how any PII data captured /stored would be handled. Section III of our BPA and PWS specifically outlines the procedures the contractor must follow for capturing and storing and ensuring that our data is secured.

For the PPS Survey, the results provided to the IRS, are the answers to the survey questionnaire which are compiled and uses variable coding and DOES NOT CONTAIN ANY Taxpayer PII data. The IRS has no way of determining who specifically answered the survey questionnaire.

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.

This information is specifically stated under Section III on our BPA as well as our PWS. For our contracts, we use Performance Work Statements (PWS) not Statements of Work (SOW).

Additionally, this information is reiterated during the annual site reviews by the Service-Wide Contracting Officer Representative

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

**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 sent 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

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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.

**9. Is any other Federal or State government data used to create the database of participants?** (Yes) (No) No

**10. Are the survey results shared with any other Federal or State government office?**

(Yes) (No) 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.**

The PPS Customer Satisfaction 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 instructions for this Customer Satisfaction Survey will include retentions for the datasets/raw data, background documentation, and summary/final reports.

Reference:

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*

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

Cyber-security and NIST Standards for record retention requirements states 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. At that time, the contractor will return all files securely to the IRS or the data may be properly disposed of by 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**