

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)

BU 16-421

Date

03/08/2016

Section I - Introduction

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

Adjustments 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)
The survey is conducted as part of the IRS agency-wide initiative to monitor and improve taxpayer satisfaction within the Customer Account Services (CAS), Adjustments program. To ensure that the Adjustments 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 a mail survey conducted on a monthly basis by the contract to assess customer satisfaction with the Adjustments process by drawing a sample via a random process at each of the Adjustments Sites. The primary purpose for requesting this information is to help the IRS improve its service to taxpayers.

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

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

Requested operational date

04/15/2016

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)

b. Taxpayers

Yes No

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

The contractor will be provided with all of the data shown below from the Adjustments Operations Unit. This information is provided to the Contractor on a "Monthly Basis" so that the survey is sent to the randomly selected participants. Name and Address; Filing Status; DOB; AGI, taxable income; Business Operation Division (BOD) code, e-file indicator, IRS received date, case closure date, tax form filed, taxpayer's issue, correspondence type, tax period, discrepancy date, discrepancy amount, current service center, resolution process code, disposal code, and most recent IRS Notice sent. It is critical that the information above be provided to the contractor so that we can obtain the analysis we need to develop our reports. At the end of the survey we ask if you would like to participate in future research if the answer is yes we request telephone # and email address.

c. Others

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

Participants are randomly selected from taxpayers who have corresponded with the Adjustments Operations Division with technical and account inquiries. Such as, resolving customer account issues; providing account settlement; (payment options), and/or working other technical/account related issues (i.e. amended tax returns). The W&I Adjustments Operations Division provide the "data" file of the randomly selected participants to

the Contractor on a monthly basis. W&I Adjustments Operations is the source of the extracted data provided to the Contractor. 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 database monthly to the W&I Accounts 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 (EFTU).

- 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
W&I Adjustments Operations extracts the data from Integrated Data Retrieval System (IDRS) and Correspondence Imaging System (CIS) and provides it to the Contractor. No other data bases are used.

3. Is the survey voluntary

Yes No

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

Respondents are invited to participate via letters and notice is given at the beginning of the survey. The following language is written at the top of the survey:

"The IRS is trying to improve the service it provides taxpayers. You can help in this important mission by answering the questions below. This survey is voluntary and should take less than 7 minutes to complete. Your responses will be kept as anonymous as allowed by law to the IRS. If you have any questions about this survey, you may call the Survey Helpline at 1-800-521-7177. "

The following language is sent to the participant in Letter 1, which is our Pre-Note Letter:

"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 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."

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*)

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

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

The contractor collects data via a mail survey using a four wave strategy. The survey is conducted on a monthly basis by the contractor via US postal mail. The four wave strategy includes 1) an advance letter about the survey; 2) the initial survey with a cover letter; 3) a postcard reminder; and 4) a second letter and survey to non-respondents. No SSN's are displayed on the postcard or any letters.

- d. Other

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

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

- 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
The contractor is

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

moderate--This task order falls under the customer satisfaction BPA and security clauses and actions associated with the BPA apply to this task order. Any contractor or subcontractor who will have access to employee or taxpayer PII data, must have at least a "Moderate Risk" (NACIC) investigation.

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

When the data is return to the IRS from the contractor, it contains variable coding. This means that no "taxpayer" or PII data can be individually identified. The contractor returns the data using variable coding and none of the taxpayer information can be identified.

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

No raw or aggregated data will be provided to the IRS. The contractor returns the data using variable coding and none of the taxpayer information can be identified.

e. If any employee or taxpayer 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 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

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 (EFTU).

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

The contractor's sites have all been subject to site visits by IRS security personnel and have passed all required security protocols. Data are transferred to and from the contractor through EFTU.

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

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 Adjustments survey is unscheduled. A request for records disposition authority for this Survey (and other similar external surveys Servicewide) will be 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

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 will be consistent with terms agreed to under the Customer Satisfaction BPAs.

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.