

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)

SOI-493

Date

12/23/2015

Section I - Introduction

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

Demand Migration - Benchmarking Analysis Interviews

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 requested PIA is not for a survey but to conduct interview sessions. Wage and Investment Research and Analysis (WIRA) is working alongside Accounts Management's (AM) Excellence through Productivity Improvement and Quality (EPIQ) program to conduct benchmark analysis interviews for their Demand Deflection Innovation Approach project. EPIQ has been tasked with identifying opportunities within AM to redirect taxpayers away from corresponding through traditional methods to more cost effective solutions.

The goal is to conduct 8-10 interviews with government agencies and private sector companies that handle financial transactions in order to identify their best practices for handling customers. Information from these outside organizations along with IRS employee expertise with current inventory management will allow EPIQ to identify opportunities within AM to shift demand from paper and phone to web based solutions. We intend to analyze the collected data to identify several long term as well as short term high impact opportunities for change within AM that will drive taxpayer traffic and paper correspondence to lower cost web-based channels, determine how these outside organizations achieve their high performance goals, determine what improvements can be made in AM and create a Gap Analysis comparing current state functions against future desired goals.

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

Treas/IRS 36,003 General Personnel and Payroll Records and Treas/IRS 00.001 Correspondence

Requested operational date

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

b. Taxpayers

Yes No

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

N/A

c. Others

No PII will be captured, collected or shared during the interviews; the name and email addresses of agency/company employees will be recorded for reference purposes only. They will also be asked to provide responses to a short series of questions regarding the nature of their organization's business. The information that will be captured during the testing sessions will be generic in nature, outlining the structure of their organization and their service channels, but there will be no participant specific information that is captured or shared in the final reporting. The interviews will be conducted over the phone. A document outlining common themes and issues will be shared with the AM/EPIQ team. The disclosure information read aloud by interview conductor prior to the interview will explain this to the participants.

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

Interview participants will be selected through contacting the agencies/companys customer service department in order to be routed to an individual

that can provide information on the organizations service channels and best practices. Selected organizations will have a similar structure to IRS and offer various service channels to their customer base.

- 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 PII will be collected from government applications.

3. Is the survey voluntary Yes No

- a. How is notice given that the survey is optional
Participants will be advised at the beginning of the interview that their participation is completely voluntary and optional.

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*)
Once the contact is made with the desired individual via phone (see below), an email will be sent outlining the interview questions and disclosures. Interview date and time will be coordinated through email.

- b. Phone (*explain procedure, and provide script*)
WIRA will initially contact the selected agency/company customer services representatives via phone using public information provided by the agency/company's website.

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

- d. Other
N/A

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

- a. IRS conducted (*name the office that will conduct the survey*)
Interview sessions will be conducted by trained WIRA interview facilitators.

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
A contractor is not being used for agency/company interview recruitment.

- 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
N/A

- 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
A document outlining common themes and issues will be shared with the AM/EPIQ team. No PII from the interviews will be captured or shared. The information that will be captured during the testing sessions will be generic in nature, outlining the structure of their organization and their

service channels, but there will be no participant specific information that is captured or shared in the final reporting. The disclosure information read aloud by interview conductor prior to the interview will explain this to the participants.

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 identifiable information will be shared with any IRS office.

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

N/A

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

The listing of participant names and email addresses used for communication will be destroyed after the interviews are complete. All contact information will be destroyed once the interview sessions are completed and the information will at no point be shared with anyone outside of WIRA.

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 contact information collected will be stored on secure WIRA servers that are only accessible to the WIRA project team. Any participant PII information will be destroyed following completion of the project.

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 Demand Migration - Benchmarking Analysis Interviews is unscheduled. A request for records disposition authority for these interviews (and other similar external survey efforts 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 these interviews 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.

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)

No contractor is involved with the creation of these records.

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*)

No