

# 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-486

Date

## Section I - Introduction

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

E-Help Focus Group Option Year 3, (annually or every other year)

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 E-Help Desk IVR phone survey currently conducted by used to measuring customer satisfaction has not been reviewed for several years. Three focus groups will be used to test potential changes to the survey. This research has two components. The first will utilize a screener to invite taxpayers who have participated in a prior E-Help Desk survey to participate in a telephone focus group to provide feedback. The second component will be conducting the E-help Desk telephone focus groups with those taxpayers.

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

IRS 00.001 Correspondence Files and Correspondence Control Files  
IRS 00.003 Taxpayer Advocate Service and Customer Feedback and Survey Records  
IRS 22.026 Form 1042S Index by Name of Recipient  
IRS 24.030 Customer Account Data Engine Individual Master File  
IRS 24.046 Customer Account Data Engine Business Master File, formerly (BMF)  
IRS 34.037 IRS audit trail and security records system to each one

Requested operational date

06/26/2015

## 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](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

- 1.First Name
- 2.Phone Number

c. Others

Not for the authority of the taxpayer but to provides support to external customers who experience technical problem using IRS online electronic products for electronic return originators, enrolled agents, intermediate service providers, reporting agents, financial institutions, software developers, and transmitters. Electronic products include online services such as e-file, modernized e-file, Electronic Federal Tax Payment System, and e-Services. Contractors do not see phone numbers and can't be identified.

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

The contractor will be recruiting from a list of people who said they were willing to participate in future research. The contractor will pay an incentive of \$50 to participants. Let the participant know that their participation will help the IRS improve its services. The contractor will have focus groups at different times of the day to allow people to participate when it is most convenient for them.

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

NA

3. Is the survey voluntary  Yes  No

a. How is notice given that the survey is optional

The service provider agrees to participate in future surveys or focus groups

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*)

The contractor will be recruiting from a list of people who said they were willing to participate in future research. he contractor will have focus groups at different times of the day to allow people to participate when it is most convenient for them.

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

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

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

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.

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

No

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 data will be given from the Focus Group.

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

The focus Groups are done via phone.

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. There are also clauses in our contract that states the information will be purged from their systems at the end of our contract.

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 E-Help Focus Group for Option Year 3 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 Focus Group will include retentions for the datasets/raw data, background documentation, and summary/final reports. 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 (12/9/2013-10/08/2015), 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) equipment 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 records retention. All legal requirements that apply to IRS records (*and non-records*) must be followed by contractors)

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 Service-wide Records control Schedules. By that token, E-Help Focus Group for Option Year 3 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, E-Help Focus Group for Option Year 3 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 disposed of using pre approved 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. 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