

Internal Revenue Service
SURVEY PRIVACY IMPACT ASSESSMENT (PIA) for
2013 W&I Virtual (VITA) TCE - Customer Satisfaction Survey
(OMB#1545-1432) CS-12-386

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: 11/07/2012

SOI Control Number (if applicable): CS-12-386

SECTION I - INTRODUCTION

Full Survey Name, and Acronym: W&I Virtual VITA TCE - 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 survey is conducted as part of the IRS agency-wide initiative to monitor and improve taxpayer satisfaction with the W&I Virtual VITA TCE program. To ensure that this 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 offered through the Virtual VITA TCE Program. Taxpayers that use the Virtual service will be asked to take the survey at a SPEC partner VITA or TCE location. SPEC partners will be asked to mail completed surveys to W&I Research & Analysis at predetermined intervals during the 2013 filing season. No taxpayer data is used in this survey. Taxpayers do not provide their name.

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.

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SECTION II – ABOUT THE SURVEY

1. What persons will the survey 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) The survey will be issued to taxpayers who use the Virtual services at SPEC partner VITA or TCE locations.

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

None – taxpayers are not asked to provide their name or any other information that would identify them.

c. Others: N/A

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

Taxpayers that use the Virtual service will be asked to take the survey at a SPEC partner VITA or TCE location. SPEC partners will be asked to mail completed surveys to W&I Research & Analysis at predetermined intervals during the 2013-filing season.

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. N/A

3. Is the survey voluntary? (Yes) (No)

a. How is notice given that the survey is optional? Participants are advised by the VITA/TCE volunteer that survey is voluntary.

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

c. Telephone-IVR – No (explain method for choosing participants, and provide example of cover letter to the participants) The Survey

Other (No)

1. Who will conduct the survey? Stakeholder Partnerships, Education and Communication (SPEC)

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

1. - What information/results will be provided to the business owners (IRS requestors) of the survey? Business owners will be provided summary statistics of taxpayer responses to survey questions. In addition, business owners will be provided information regarding the total number of surveys completed.

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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? All completed surveys will be sent from VITA/TCE locations directly to W&I Research & Analysis and retained in locked cabinets. Following the project completion, all “raw” surveys will be destroyed in accordance with IRS policy.

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

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

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

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? No contractor will be used for this survey

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.

Business owners will only be provided summary statistics and total population counts for the survey. No taxpayer identifiable information is being collected on the survey (i.e., name, SSN, address, state, etc.) and there are no “open-ended” questions in which taxpayers could provide personal information.

All reports will be prepared internally by the W&I Research & Analysis Team.

f. - If any employees or taxpayers identifiers will be provided to the business owner, explain the business reason: No taxpayer identifiers will be provided to the business owners.

7. How does the administration of the survey guarantee that the PII data regarding employees or taxpayers is not compromised, lost or stolen: No PII data will be obtained for this survey.

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

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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? **(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.

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 will provide guidance on IRS requirements for record retention. All legal requirements that apply to IRS records (and non-records) must be followed by contractors. At the conclusion of the Life Cycle of this contract, the contractor will dispose of inventory according to its approved scrap procedures or will submit SF 1428, Inventory Disposal Schedule.

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).* **No**