

# Survey PCLIA Report

Date of Approval: January 10, 2018

Survey PCLIA ID Number: **3070**

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## A. Survey Description

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1. Full name and acronym of the Survey. M&P Spanish Pub 17 Focus Group, MPP17FG
2. Is this a Survey, Telephone Interview or Focus Group? Focus Group

*NOTE: the remaining questions will be simplified to refer to the Survey but still apply to Telephone Interview or Focus Group. If Telephone Interview or Focus Group, a copy of Interview Questions or the Moderators Guide will be requested by the Privacy Analyst.*

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3. Is this a new Survey? Yes

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4. Is this a reoccurring Survey? No

4.b. If no, provide the dates collection of information will begin and end. It will begin and end in January 2018.

5. Does this Survey have an SOI (Statistics of Income) control number? Yes

5.a. If yes, enter the number. SOI-516

6. Does the Information Collection Request require OMB Clearance? Yes

6.a. If yes, what is the OMB Clearance number? 1545-1349

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### A.1. General Business Purpose

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7. What is the general business purpose of this Survey? Provide a clear, concise description of the Survey, the reason for the Survey, and the benefits to the IRS mission.  
Media & Publications wants participants to review the Spanish Publication (Pub) 17 to determine if certain chapters can be eliminated to reduce the size and cost of the publication. We plan to conduct 2 focus group, one with tax practitioners and one with taxpayers to gather feedback to ensure a redesigned Spanish Pub 17 will still meet their needs.

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### B. PII Details

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8. Is Personally Identifiable Information (PII) used, collected, received, displayed, stored, maintained, or disseminated in the Survey; or is PII used to select participants? (i.e. names, addresses, email addresses, etc)? Yes

8.a. If yes, specify the information.

<u>Selected</u>	<u>PII Element</u>	<u>On Primary</u>	<u>On Spouse</u>	<u>On Dependent</u>
Yes	Name	Yes	No	No
Yes	Mailing address	No	No	No
Yes	Phone Numbers	No	No	No
Yes	E-mail Address	No	No	No
No	Date of Birth	No	No	No
No	Place of Birth	No	No	No
No	SEID	No	No	No
No	Mother's Maiden Name	No	No	No
No	Protection Personal Identification Numbers (IP PIN)	No	No	No
No	Internet Protocol Address (IP Address)	No	No	No
No	Criminal History	No	No	No
No	Medical Information	No	No	No
No	Certificate or License Numbers	No	No	No
No	Vehicle Identifiers	No	No	No
No	Passport Number	No	No	No
No	Alien (A-) Number	No	No	No
No	Financial Account Numbers	No	No	No
No	Photographic Identifiers	No	No	No
No	Biometric Identifiers	No	No	No
No	Employment (HR) Information	No	No	No
No	Tax Account Information	No	No	No

8.b Are there other types of PII collected in the Survey? No

8.c. Is any PII data collected, disclosed, or studied on employees, taxpayers, stakeholders or other individuals who choose not to participate? No

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### **C. Privacy Act & System of Records**

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9. Is there a System of Records Notice(s) or SORNs that addresses the PII records in this Survey? No

9b. If No, explain why the Survey does not have a SORN? The focus group does not gather or collect an PII information.

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#### **C.1. Privacy Act Notice**

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9.1 Based on the information you have provided, does the Survey require a Privacy Act Notice to be provided to participants? Yes

9.1.a. If yes, please provide the Privacy Act Statement. The legal authority to request the information is 26 USC 7801 and the Internal Revenue Service Restructuring and Reform Act of 1998. The principal purpose of requesting the information is to review the Spanish Publication (Pub) 17 to determine if certain chapters can be eliminated to reduce the size and cost of the publication. The information may be disclosed to a contractor if necessary to help IRS analyze the results to make the determination. Providing the information is voluntary. Not providing all or part of the information would result in IRS not having information that would be considered in making the determination.

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**D. Responsible Parties**

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10. Identify the individuals for the following Survey roles: ## Official Use Only

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**E. Incoming PII Interfaces**

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11. Does the employee/taxpayer PII come from the IRS, Treasury, or other Government system(s), application(s) or data base(s)? No

11.1. Does the data come from other sources? Yes

11.1.a. If yes, describe the source of the information. The vendor, Fors Marsh Group (FMG), will recruit participants for the focus groups. FMG recruiters will reach out to our panel as well as local organizations (i.e. Latino Association of Tax Preparers Inc. Association (latex.org)) that provide tax preparation services via email to advertise for the study. We will be recruiting 24 bilingual tax preparers in MD/VA/DC area to seat 18 individuals total for in-person focus groups with the objective to gather qualitative feedback on the Spanish version of Publication 17. We believe this population will be most familiar with the publication to provide the feedback IRS requires.

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**F. PII Sent to External Organizations**

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12. Are the Survey results disclosed to any other Federal or State Government? (For example the Federal Viewpoint Survey/Questionnaire – OPM gets the results.) No

13. Are any external resources used to create the database of the participants? No

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**G. Survey Participation**

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14. Will the Survey be administered to IRS, Taxpayers or Others ? Others

If Others, please explain. The focus groups will be administered to tax practitioners and individual taxpayers.

15. Explain how participants are selected. Include a detailed description on the method and reason of selection. If selection is random, explain. Taxpayers and Tax Practitioners will be recruited by the vendor. FMG recruiters will reach out to our panel as well as local organizations (i.e. Latino Association of Tax Preparers Inc. Association (latex.org)) that provide tax preparation services via email to advertise for the study. IRS will supply contact information, (email address) of the Latino Association of Tax Preparers to the vendor. We will be recruiting 24 bilingual tax preparers in MD/VA/DC area to seat 18 individuals total for in-person focus groups with the objective to gather qualitative feedback on the Spanish version of Pub 17. We believe this population will be most familiar with the publication to provide the feedback IRS requires.

16. How are participants notified of the Survey? Recruiters will be initially contacting potential participants via email with a link to an online screener as this is the best way to reach more individuals in a timely manner without being intrusive. Based on past experience, we find individuals are wary of scams when they receive cold calls about IRS studies. With emails, we have the opportunity to send the OMB number to provide legitimacy to the study. Once potential participants have completed the screener, recruiters will follow up with qualifying participants via email or phone to schedule them for the focus group and provide additional information about the study

17. Is the Survey voluntary? Yes

If yes, how is notice given that the Survey is optional? At the beginning of the focus group session, the participants will be told that that they do not have to answer all questions and are free to leave the session at any time.

18. How will the Survey be conducted?

No Electronically.

No Web Based

No Phone

No Mail

Yes Other

Please explain. The focus groups will be conducted in person at the vendors facilities.

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### G.1. Survey Process

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19. Does IRS administer or perform analysis of the survey? Neither

20. Does Contractor/Vendor administer or perform analysis of the survey? Yes

Contractor/Vendor: Both

Provide the name of the Contractor/Vendor. Fors Marsh Group

Has a Contracting Officer or a Contracting Officer's Representative (COR) verified that:

20.a.1. All applicable FAR requirements are met to engage a contractor to perform the survey. Yes

20.a.2. That all required "non-disclosure" clauses are contained in the contract. Yes.

20.a.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.

20.b. If yes, what is the level of access and background investigation completed on contractor employees prior to access to PII about employees or taxpayers? *Any contractor or subcontractor who will have access to the PII should have at least a "Moderate Risk" (NACIC) investigation. See Publication 4812 - Contractor Security Controls*

Contractor Users	Yes	Read and Write	Moderate
Contractor Managers	No		
Contractor Sys. Admin.	No		
Contractor Developers	No		

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### I. Information Protection

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21. What information/results will be provided to the business owners (IRS Requestors) of the Survey?  
A written report will be provided.

22. Can you confirm that employees or taxpayers who participate in the survey cannot be identified under any circumstances? Yes

23. Can you confirm that no adverse actions can be taken against participants regarding the participant's answers. Yes

24. 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? Yes

25. Are there any employee or taxpayer identifiers that are obtained as a result of responding to the survey? No

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## **I.1 Records Schedule**

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26. Are the Survey records covered under the General Records Schedule (GRS), or have a National Archives and Records Administration (NARA) archivist approved a Record Control Schedule for the retention and destruction of official agency records stored in this Survey? No

26.b. If No, how long are you proposing to retain the records? Please note, if you answered no, you must contact the IRS Records and Information Management Program to initiate records retention scheduling before you dispose of any records in this Survey.

Spanish Pub 17 focus group 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 focus group 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.

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## **P.1 Data Security**

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27. How does the administrator of the survey guarantee that the PII regarding employees or taxpayers will not be compromised, lost or stolen when housed on IRS computers? Where and how is it stored and protected? The security of the data used in this project and the privacy of taxpayers as allowed by law will be carefully safeguarded at all times. Security requirements are based on the Computer Security Act of 1987 and Office of Management and Budget Circular A-130, Appendices A & B. Physical security measures include a locked, secure office. Notes are stored in locked cabinets or shredded. Data security at the C-2 level is accomplished via the Windows NT operating system. Systems are password protected, users profiled for authorized use, and individual audit trails generated and reviewed periodically.

28. Does a contractor/vendor administer or perform analysis of the survey? Yes

28.a. If yes, Please provide the Cyber security approved security and encryption used when data is transferred electronically from IRS to Contractors and back to the IRS. Data will be transferred electronically using password via Electronic File Transfer Utility (EFTU).

28.b. If yes, When data is not sent electronically, provide in detail the information regarding the transfer back and forth from the IRS to contractors. NA

28.c. If yes, How is the survey PII protected and stored when it is housed at a contractor's site, on contractor's computers, please provide detailed information that the contractors uses regarding

the physical and electronic security and protection of the data before, during, and after the survey. FMG employs the necessary hardware, software, stringent accounting and auditing procedures, and customized security processes to protect the sensitive data provided to us. This includes limited access to instrument material, locked storage facility, encrypted files, and secure network storage. FMG has implemented robust safeguard procedures to ensure the protection of sensitive information in accordance with government policy. We follow U.S. Government regulations regarding System of Record (SOR) requirements, Privacy Act regulations, and other important aspects of managing sensitive Government information. Our procedures explicitly define security policy and procedures governing media access, server security, sensitive data handling, audit and accountability, router security, and the prevention of unauthorized access. The software used allows the administrator to set up strict rules so the data remains consistent when new data is added, updated, or deleted.

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## **M. Civil Liberties**

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29. Does the Survey maintain records describing how an individual exercises rights guaranteed by the First Amendment (including, but not limited to information regarding religious and political beliefs, freedom of speech and of the press, and freedom of assembly and petition)? No

30. Will this Survey have the capability to identify, locate, and monitor individuals or groups of people? No

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**End of Report**

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