

# 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)

Date

## Section I - Introduction

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

Optional Task 7: Focus Groups/Telephone Interviews -- (ACS-ACSS-CSCO)

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 purpose of the Telephone Interviews (Focus Groups) is to learn more about how customers understand and interpret the On-Line Payment Agreement for taxes that they may owe. We would also like to know if taxpayers are aware of this option and if there anything, the IRS can change to help make the OPA more understandable.

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

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](http://irweb.irs.gov/AboutIRS/bu/pipds/pip/privacy/privacy_art/8352.aspx) before answering this question)

Focus Group participants are asked to provide their email address and telephone number if they are interested in participating in future research.

b. Taxpayers

☒ Yes ☐ No

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

These are telephone focus groups. PII used to contact the participants are email addresses and phone numbers.

c. Others

N/A

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

Participants who have provided their email address and telephone number are contacted and asked if they are still interested in participating in future research. If their answer is yes, they are given information regarding the telephone focus group.

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

This information is not derived from any IRS, Treasury or Government system (s). It comes from the survey questionnaire where survey participants who want to participate in future research provide their email address and telephone number.

a. How is notice given that the survey is optional

This is not a survey; we will be conducting focus groups via telephone interviews. A telephone focus group.

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)

This is not a survey.

b. Phone (explain procedure, and provide script)

This is a telephone focus group.

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)

The Telephone Focus Group will be conducted by our Contractor, \_\_\_\_\_).

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 are Moderate Risk, based 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

Information that will be provided is is how taxpayers interpret, and understand the On-Line Payment option for paying taxes.. also to learn if they are aware of this option for paying their taxes.

No information will be given out on the taxpayers who participate in the telephone focus groups.

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

This is not a survey but a telephone focus group and no "raw" or "un-aggregated" employee or taxpayer data will be obtained.

e. If any employee or taxpayer identifiers will be provided to the business owner, explain the business reason  
No employee or 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 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  
This is not a survey. This is a focus group which will be held via telephone.

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  
This is a Focus Group Task which will be conducted via telephone., earlier this year when we administered the survey, participants were asked to provide their email address and phone number if they were interested in participating in future research (such as focus groups) This information is maintained by the on a secured database that only contractor employees who have approved Background Investigations can access (usually limited to two people). The information is encrypted.

No PII is collected during our Focus Group sessions. We are asking the participants about their experiences using and understanding the different IRS notices.

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

This is a telephone focus groups and the results are not provided to any other Federal, State or Government offices.

#### 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

This is not a survey. This is a Telephone Focus Group.

The IRS-WIRA Optional Task 7 for Focus Groups is unscheduled. A request for records disposition authority for these focus groups will be coordinated with the IRS Records Office, either in conjunction with other similar internal/external agency focus groups, or in the context of a new item for W&I Research and Analysis Files.

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 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)*

This is not a survey. This is a telephone Focus Group

The PII Data (email address and telephone number) will be retained by the contract until the end of the contract's life cycle.

#### 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 it does not. This is a Telephone Focus Group.