

# 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)

CS 15-452

Date

01/13/2015

## Section I - Introduction

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

SBSE E-File (Form 2290) Survey (Mail); This is a one-time survey

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

Treas/IRS 00.001: Correspondence Files and Correspondence Control Files

Requested operational date

04/01/2015

## 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

- Taxpayer's name, street address, city, state, zip code
- Wave Number

a. The current mail survey process includes 4 waves. 1) An advance letter about the survey; 2) the initial survey with a cover letter; 3) a postcard reminder; and, 4) a second letter and survey to non-respondents.

b. The survey would go out a second time to all those who hadn't filled out the survey initially with a reminder letter that we would like them to fill out the survey and return it.

- Form Number
- Initial Mail Date

c. Others

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

The target population is Form 2290 filers whose most recent Form 2290 was filed on paper, in or since July 2014. (July is the primary filing month for Form 2290; Form 2290s filed in some other month can only apply to vehicles which were not in use between the previous July and the time of filing.) The client will provide a list of these taxpayers from the Compliance Data Warehouse (Masterfile). This is not a complete list of the current cycle, as the list will be created before June 2015, but based on past years will omit only a small proportion of the population; in the previous three

years, under 10 percent of Form 2290s were filed from March to June. The sampling frame will also exclude taxpayers with no usable domestic mailing address in the data provided by the client. We will draw a simple random sample of 2000 TINs. Anticipated sampling precision is 2 percent.

- 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  
 PII data is extracted from the Compliance Data Warehouse (Masterfile). We do not extract PII Data from any other sources.

3. Is the survey voluntary  Yes  No

- a. How is notice given that the survey is optional  
 It is written at the top of the survey, and also on the cover letter that accompanies the survey.

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*)  
 No

- b. Phone (*explain procedure, and provide script*)  
 No

- c. Mail (*explain method for choosing participants, and provide example of cover letter to the participants*)  
 Yes, Survey is conducted via U.S. Mail, the method of choosing survey participants is described above #2. IRS administers the survey by mail. The mail survey process includes: 1) an advance letter about the survey; 2) the initial survey with a cover letter; 3) a postcard reminder; and, 4) a second letter and survey to non-respondents.

- d. Other  
 No

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

- a. IRS conducted (*name the office that will conduct the survey*)  
 Yes, SBSE Research PAC

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

- 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

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

SBSE Research will be administering the survey and will be collecting/analyzing the raw data.

e. If any employee or taxpayer 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 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

No contractor. Data will be stored on the Laguna Server which is certified under General Support Systems (GSS) MITS 17 and MITS 30. Access to the data is restricted to SBSE Research Analysts by using access controls specified in NIST 800-53 which enforces the most restrictive set of rights/privileges or accesses needed by users for the performance of specified tasks. The paper documents will be stored in a secure 4 drawer filing cabinet in a room with limited/secure access ( ).

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

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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 Form 2290, E-File survey is un-scheduled. 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 Survey 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 (Period of Performance), whereas the participation of the contractor under the CSS BPA has been terminated. These requirements will 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) 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)

No contractor.

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*)

Yes, updated privacy notices, which were approved by the Disclosure Office, are included on the survey instruments.