

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-501

Date

Section I - Introduction

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

Understanding Taxpayer Use of Paper Products (UTUPP) Follow-Up Interviews

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 IRS has a vested interest in understanding taxpayer behavior and preferences. For this research inquiry, the IRS is specifically interested in taxpayer uses of IRS paper products. There are a number of taxpayers who obtain hard copy paper products, but the IRS is uncertain how these products are used. The IRS is interested in understanding both internal and external drivers for taxpayer decision-making regarding physical attainment and utilization of paper products. The IRS is particularly interested in why some taxpayers opt to travel to distribution locations seeking forms and publications; project observations in Taxpayer Assistance Centers (TACs) have indicated that some taxpayers make multiple trips when paper products are not immediately available. This study will administer in-depth interviews with taxpayers who have visited TACs to obtain IRS paper products.

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

00.001: Correspondence Files and Correspondence Controls / 00.003: Taxpayer Advocate Service & 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 / 34.037: IRS Audit Trail and Security Records

Requested operational date

June 27, 2016

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 before answering this question)

N/A

b. Taxpayers

Yes No

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

Name, address, telephone number, and e-mail address. E-mail address needed to send out reminder notices to taxpayers.

c. Others

N/A

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

The contractor will recruit taxpayers who previously visited select project sites (TACs) to obtain IRS publications and/or forms and completed a survey about their experience. Taxpayers at the completion of that survey were asked if they were willing to participate in future research, if so they disclosed their contact information to the contractor. The contractor will solicit participants from the 60 taxpayers who indicated a willingness to participate in future research.

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

N/A

3. Is the survey voluntary Yes No

a. How is notice given that the survey is optional

Notice will be indicated verbally during recruitment and reiterated prior to the beginning of the actual interview.

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*)

N/A

b. Phone (*explain procedure, and provide script*)

Taxpayers will be invited to participate in interviews that will take place over the phone.

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*)

Wage and Investment Strategies and Solutions (WISS) Research and

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

N/A

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 from 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

Cleansed Data Files

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

The contractor will only provide findings to WISS in an aggregate form and will not include any identifying information of taxpayers who participated in the interviews.

e. If any employee or taxpayer identifiers will be provided to the business owner, explain the business reason

N/A

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 taxpayer PII is gathered. Cyber-security and National Institute of Standards & Technology (NIST) require data to be transferred via password protected encrypted disk via FedEx overnight mail (including return acknowledgement form), through the Electronic File Transfer (EFTU), or using the SecureZip data transfer method. Although EFTU and SecureZip are preferred, currently all methods are being used. Any time a bulk file encryption is used, requiring the sharing of an encryption phrase, the pass phrase will be communicated separately from the email/package, with an alternate method to communicate; e.g., phone call to communicate pass phrase.

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.

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

N/A

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 UTUPP interviews are unscheduled. A request for records disposition authority for this interview (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 Customer Satisfaction Survey will include retentions for the datasets/raw data, background documentation, and summary/final reports.

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)

No taxpayer PII is obtained. 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). At that time, the contractor will return all files securely to the IRS or the data may be properly disposed of by 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*)

Yes. Notice is on the interview guide and possibly the introduction letter.