

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-491

Date

12/15/2015

Section I - Introduction

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)
This purpose of the research is to follow up with focus groups after the Taxpayer Experience Survey (TES) to drill deeper on responses to specific questions.

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

TREAS/IRS 00.003

Requested operational date

11/23/2015

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 before answering this question)

b. Taxpayers

Yes No

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

The contractor maintains all the PII used to recruit/select participants, such as names, addressess, e-mail addressess, and/or phone numbers.

c. Others

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

The contractor maintains a contact list of individuals who have previously said they would like to participate in follow up research. People from that list are called by the contractor and scheduled for focus groups. For this particular research, the selection criteria include people who are eligible for a Premium Tax Credit (PTC) who did not file as married filing separately.

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

The taxpayer PII is extracted from a list maintained by the contractor.

3. Is the survey voluntary

Yes No

a. How is notice given that the survey is optional

The participants are asked to volunteer for future research by providing contact information on a questionnaire. They do not have to volunteer.

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*)

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

These focus groups will be conducted via telephone.

c. Mail (*explain method for choosing participants, and provide example of cover letter to the participants*)

d. Other

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

a. IRS conducted (*name the office that will conduct the survey*)

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

The contractor is

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
moderate

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 provided to the business owners will not identify the participants. The information will be used to gain deeper qualitative insight into the experiences of taxpayers than could be gained from a survey alone.

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

Yes, no raw or unaggregated taxpayer data will be provided to the IRS.

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

NA

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 PII will be transferred to or from the IRS.

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
The contractor's sites have all been subject to site visits by IRS security personnel and have passed all required security protocols.

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

These Survey/Focus Group records are unscheduled. A request for records disposition authority for these records (and other similar records Service-wide) 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 disposition instructions will include retentions for the datasets/raw data, background documentation, and summary/final reports, as applicable.

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)

Disposition of records created by the Internal Revenue Service, including those records created by all Service employees and contractors performing agency functions, is controlled using the Service-wide Records Control Schedules. By that token, W&I records created and/or maintained by the vendor on behalf of the Service must follow the same records disposition authority submitted to/approved by NARA...TBD. At the completion of the vendor contract, W&I Survey/Focus Group records still in existence will be surrendered by the contractors to designated persons in IRS or will be transferred to another contractor with the express permission and instructions from IRS staff responsible for the records.

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.