

# 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-487

Date

06/11/2015

## Section I - Introduction

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

Volunteer Income Tax Assistance (VITA) Program Volunteer Recruitment Optimization Survey

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)

Every year, millions of people devote substantial amounts of their time and energy to helping others. Among these, nearly 92,000 people volunteer with the Internal Revenue Service (IRS) Volunteer Income Tax Assistance (VITA) Program. VITA volunteers are responsible for preparing nearly 3.2 million returns annually, free of charge to taxpayers that qualify. This survey is a follow-up to the 2015 Examining Motivations to Volunteer with the VITA Program survey, and aims to investigate how need-relevant persuasive communications can influence volunteer behavior. It will survey current and prospective VITA volunteers to better understand the optimal combination of message and delivery mode for volunteer recruitment messaging. Because the VITA program relies on volunteers to carry out its mission, the ability for Stakeholders, Partnerships, Education and Communication (SPEC) to learn more about the preferences of these individuals and leverage their potential volunteer pool is vital to the strength and sustainability of the program. The feedback gained from this study will be used to help attract and retain VITA volunteers. This could include revising solicitation language on IRS and partner websites, updating promotional materials, and tailoring social media messages to reach taxpayers segments that might not traditionally participate in the VITA program. The findings from this survey will also help stabilize the VITA volunteer base, allowing resources that might have been allocated to training new volunteers to be allocated elsewhere in the program.

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

00.001: Correspondence Files and Correspondence Controls; IRS 00.003:Taxpayer Advocate Service and Customer Feedback and Survey Records; IRS 34.037:IRS audit trail and security records system to each one.

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)

b. Taxpayers

Yes  No

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

c. Others

Current and prospective VITA volunteers who may or may not be current VITA Volunteers will be surveyed. Participants will not be asked to provide their name or any other information that would identify them. Contact information (e.g., name, mailing address, e-mail address) for current VITA volunteers will be provided by SPEC to WIRA and the Contractor (TBD) administering the survey. No PII will be collected from the survey instrument; the name and e-mail addresses of a random sample will be provided to the Contractor, ( ), to use for survey recruitment. The survey will be administered on-line.

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

Taxpayers: Both current and prospective VITA volunteers will be encouraged to complete the survey. Contact information for current VITA volunteers (provided by SPEC) will be provided to the Contractor. The Contractor will be responsible for recruiting individuals that are currently

volunteers (though not necessarily with the VITA program) to participate. Participants will be randomly selected; the only requirement is that they be age 18 or over, and be currently engaged in volunteer work (either with the VITA Program or with another organization).

- 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

Taxpayers: SPEC will provide a list of current VITA volunteers to WIRA and the Contractor for use in survey recruitment. SPEC will use information provided by community partners, IRS data on individuals that have completed the VITA Volunteer Training and/or internal SPEC databases to compile the VITA volunteer contact information.

3. Is the survey voluntary  Yes  No

- a. How is notice given that the survey is optional

Respondents will be advised at the beginning of the survey and in all recruitment solicitations that the survey is completely voluntary and optional.

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*)

The survey will be administered by the Contractor as a web survey. The link to the survey site along with instructions for logging in and completing the survey will be included in the email solicitation. No cookies will be used on the survey website.

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

N/A

- 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*)

N/A

- 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 and 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 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

The IRS/WIRA will be provided summary statistics of responses to survey questions by the Contractor, including the total number of surveys completed and segmentation by volunteer type (e.g., current or prospective VITA, IRS Employee). All results will be provided in aggregate form

and no results will be linked to any specific respondent; no employee PII will be included with the aggregated survey results.

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 WIRA in an aggregate form and will not include any identifying information of respondents.

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

Although PII will be used for recruitment (see response 1A above), no PII will be obtained or collected from the survey instrument or included with aggregated results provided by the Contractor to the IRS. Cyber-security and National Institute of Standards and Technology (NIST) require data to be transferred through the Electronic File Transfer Unit (EFTU), or using the SecureZip data transfer method. Although EFTU and SecureZip are preferred and will be used. Any time 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. via telephone call to communicate the 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

No PII will be obtained or collected from the survey instrument or included with aggregated results provided by the Contractor to the IRS. All PII data sent to the Contractor (for recruitment) 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

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 IRS-WIRA VITA Program Volunteer Recruitment Optimization Survey is un-scheduled. A request for records disposition authority for this survey will be coordinated with the IRS Records Office, either in conjunction with other similar internal/external agency surveys, 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)

No PII will be obtained from this survey. The Contractor will be provided a list of current VITA volunteers for use in survey recruitment. As outlined in our Blanket Purchase Agreement (BPA), the Contractor must adhere to the following when conducting surveys on behalf of the IRS:

- The contractor certifies that the data processed during the performance of this contract shall be completely purged from all data storage components of his/her computer facility (after they are surrendered by the contractors to designated persons in IRS or transferred to another contractor with the express permission and instructions from IRS staff responsible for the records) and no output will be retained by the contractor at the time the IRS work is completed. If immediate purging of all data storage components is not possible, the contractor certifies that any IRS data remaining in any storage component will be safeguarded to prevent unauthorized inspection or disclosure.

- Any intermediate hard copy printout which may result during the processing of IRS data shall be given to the IRS Contracting Officer or his/her designee. When this is not possible, the Contractor will be responsible for the destruction of the intermediate hard copy printouts and provide the IRS Contracting Officer with a statement containing the date of destruction, description of material destroyed, and the method used.

- All data bases created by the contractor shall be used only for the purpose of survey administration and data analysis, and shall not be available to the IRS unless cleansed of all identifying taxpayer information.

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