

Internal Revenue Service
SURVEY PRIVACY IMPACT ASSESSMENT (PIA) for
W&I Innocent Spouse (ISP) – Customer Satisfaction – IVR Survey
(OMB#1545-1432)
CS-12-370

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).

Date: 09/25/2012

SOI Control Number (if applicable): CS-12-370

SECTION I - INTRODUCTION

Full Survey Name, and Acronym: *Innocent Spouse (ISP); yes this is a re-occurring survey*

General Business Purpose of Survey: *provide a clear, concise description of the survey, why it's needed and the benefits to the Mission of the Service*

The survey is conducted as part of the IRS agency-wide initiative to monitor and improve taxpayer satisfaction with the W&I Innocent Spouse program. To ensure that the ISP is meeting the needs of the taxpayers, feedback from external customer satisfaction surveys is critical for assessing the customer's perception of our products and services. The survey is conducted on a monthly basis via telephone using Interactive Voice Response (IVR). The ISP program is responsible for protecting the rights of the requesting and non-requesting spouses. The program ensures each claim receives timely and consistent treatment in accordance with established guidelines and the law. Under current tax laws, when a married couple files a joint federal income tax return, each spouse becomes individually responsible for paying the entire tax bill. As a result, one spouse can be held liable for tax deficiencies assessed after a joint return was filed, even if the additional taxes were solely attributable to the income of the other spouse. If the Internal Revenue Service (IRS) cannot collect the additional taxes owed on the unreported income from the spouse who earned the income, it may seek to collect the money from the other spouse. The spouse may obtain relief from the additional liability if certain conditions are met. The program ensures each claim receives timely and consistent treatment in accordance with established guidelines and the law.

Requested Operational Date: April 1, 2013

List all System of Records Notices (SORN) that apply:

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

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24.046: Customer Account Data Engine Business Master File, formerly BMF.

SECTION II – ABOUT THE SURVEY

1. What persons will the survey to be administered to: *IRS employees or taxpayers – must list all PII data used to select participants, or that will a part of the survey questions*

a. IRS employees, managers or executive service - (No)

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

b. Taxpayers - (Yes)

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

1. Taxpayer's phone number and email address

c. Others: N/A

2. Explain how participants are chosen: *(detailed description on method & reason of selection, if random, explain)* Participants are chosen via a stratified random sample... Participants are randomly selected each month via a stratified random sample using the IRS Audit Information Management System (AIMS) secured database. Samples are stratified by campus in order to ensure an adequate number of respondents for campus level analyses.

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, give complete title of the system. PII data is extracted from the IRS secured database, Audit Information Management System (AIMS). 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? Participants are advised by the CSR that survey is voluntary.

4. Is any identifiable data collected, shared or studied on employees or taxpayers 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. Telephone-IVR – Yes (explain method for choosing participants, and provide example of cover letter to the participants) The Survey is conducted via telephone, the method of choosing survey participants is described above in #2. The contractor administers the survey on a monthly basis. The current survey processes include: The survey data is collected via an IVR phone questionnaire. The representative asks the customers if they would like to participate in the voluntary survey. Callers who agree to participate are transferred to an IRS monitor, who then transfers the customer into the automated survey, which is conducted by the contractor.

Other (No)

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1. Who will conduct the survey? The Contractor (ICF Macro) will conduct the survey.

a - IRS conducted *(name the office that will conduct the survey): N/A*

1. - What information/results will be provided to the business owners (IRS requestors) of the survey? The Business Owners will receive one disposition report from the contractor, as well as monthly datasets from the monthly survey administration. No specific taxpayer information regarding the survey will be provided to the Business Owners. The contractor uses variable coding on the reports where participants are referred to as “respondents”. Participants cannot be identified and no adverse actions will be taken against them regarding their responses.

2. 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 for any reason? Yes. The contractor, provides a “clean” dataset to the IRS. No individual identifying information such as names, addresses, phone numbers, or TINs are provided in the datasets. The participants responses are aggregated with all other taxpayer’s responses prior to providing the IRS with this information.

b. Contractor conducted (business name of contractor/subcontractors involved) (names will be redacted before publishing at [irs.gov](https://www.irs.gov)) The contractor, will conduct/administer the survey. Data Collection of the survey will be conducted and maintained by the contractor. There will be no sub-contractor involved with this survey.

The contractor administers the survey by telephone on a monthly basis via an IVR phone questionnaire. The representative asks the customer to participate in the voluntary survey. Callers who agree to participate are transferred to the IRS monitor, who then transfers them to the automated survey, which is conducted by the contractor. Survey scoring for this contract is based on the Customer Satisfaction Survey Score response average to the keystone question – “Everything considered, rate your overall satisfaction with the service you received during this call.” Questions utilize a 5-point rating scale, with 1 being very dissatisfied and 5 being very satisfied. All survey responses are released only as summaries. The contractor shall hold the identities, of the taxpayers responding to the survey, private to the extent permitted by law.

The scope of this survey will include the appropriate survey research design methods and tools to measure customer satisfaction. These tasks will be conducted in a manner that conforms with IRS’ definition of its customer satisfaction measures; with IRS’ standards of statistical reliability; and to the reporting requirements of the business operating divisions (BODS). Industry standard methods shall be employed to increase survey response while decreasing burden to taxpayers.

In addition to providing the required performance measurements, the methodology and data collection instruments shall serve a diagnostic purpose; testing for the most critical factors affecting customer satisfaction and to the courses of action that will address them. Data collected shall reflect key customer expectations; assessments of the most significant aspects of their service experiences; and shall illustrate for IRS management the improvement opportunities that are likely to have the greatest impact.

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1 - Has a Contracting Officer or a COR verified that:

- all applicable FAR requirements are met to engaged a contractor to perform the survey; **Yes**
- that all required “non-disclosure” clauses are contained in the contract, and; **Yes**
- 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**

c. - If question 6b contains any “no” answer, please explain why:

d. - What is the level of background investigation completed on contractor employees prior to access to PII information about employees or taxpayers? 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 for the military, and financial checks.

e - What information will the contractor provide to the business owners (IRS requestors) of the survey?

The Business Owners will receive one disposition report from the contractor, as well as monthly datasets from the monthly survey administration. No specific taxpayer information regarding the survey will be provided to the Business Owners. The contractor uses variable coding on the reports where participants are referred to as “respondents”. Participants cannot be identified and no adverse actions will be taken against them regarding their responses.

All reports are prepared internally by the W&I Research Team.

f. - If any employees or taxpayers 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 is not compromised, lost or stolen:

Cyber-security and National Institute of Standards and 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 Unit (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? 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. Is any other Federal or State government data used to create the database of participants? **(No)**

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10. Are the survey results shared with any other Federal or State government office?

(No)

11. Survey Records - Retention and Disposal:

a. - Cite any business owner policy IRM Chapter (including Sections/subsection) and IRM 1.15/Record Control Schedule (including item number) that described how the data is retained, stored and disposed of.

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 will provide guidance on IRS requirements for record retention. All legal requirements that apply to IRS records (and non-records) must be followed by contractors. At the conclusion of the Life Cycle of this contract, the contractor will dispose of inventory according to its approved scrap procedures or will submit SF 1428, Inventory Disposal Schedule.

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), whereas the participation of the contractor under the CSS BPA has been terminated. At that time, the contractor will return all files securely to the IRS or the data may be properly disposed of by using preapproved 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.

The business owner will work with the IRS Records Office to obtain an approved Records Disposition Schedule.

12. Base on the information you have provided above, does the survey require a Privacy Act Notice to be provided to participants

. Yes