

Survey PCLIA ID Number: 3978  
Date of Approval: April 17, 2019

## **SURVEY DESCRIPTION**

*Full name and acronym of the Survey.*

Online Account Usability Testing, SU 3978

*Type of Survey:*

Focus Group

Note: the remaining questions will be simplified to refer to *the Survey* but still apply to Telephone Interview or Focus Group. If Telephone Interview or Focus Group, a copy of Interview Questions or the Moderator's Guide will be requested by the Privacy Analyst.

*Is this a new Survey?*

Yes

*Is this a reoccurring Survey?*

No

*Provide the dates collection of information will begin and end:*

There will be three rounds of testing conducted between 4/2019 and 12/2019.

*Does this survey have an SOI (Statistics of Income) control number?*

No

*Does the Information Collection Request require OMB clearance?*

Yes

*What is the OMB Clearance number?*

1545-2274

## GENERAL BUSINESS PURPOSE

*What is the general business purpose of this Survey? Provide a clear, concise description of the Survey, the reason for the Survey, and the benefits to the IRS mission.*

The purpose of the Survey is to test Online Account's delivery of relevant, understandable information to taxpayers through intuitive functionality, and taxpayer satisfaction with service delivery, W&I Strategies & Solutions Research (W&I Research) proposes a usability testing research study to understand the taxpayer experience and satisfaction with Online Account. Information obtained through this survey is essential for program evaluation, process improvement, and to identify taxpayer needs, preferences, and behavior.

## PII Details

*Is Personally Identifiable Information (PII) used, collected, received, displayed, stored, maintained, or disseminated in the Survey; or is PII used to select participants? (i.e. names, addresses, email addresses, etc.)?*

Yes

*Please specify the types of PII:*

Name

Mailing address

Phone Numbers

E-mail Address

Date of Birth

Financial Account Numbers

Biometric Identifiers

Employment Information

Tax Account Information

*Are there other types of PII collected in the Survey?*

Yes

*Describe the other types of PII that are applicable to this Survey:*

The individuals online account login user name will be used, and the participant will enter their password to login to their account. This information will not be stored in any manner. The last four digits of the taxpayers Social Security Number (SSN) may appear in the online interface but it will not be stored in any way. We do ask for a self-identified gender to help with the variation of our recruitment pool and the participants do tell us about their tax preparation method. Gender and tax preparation method are both saved information. Each participant's voice will be collected as the sessions are audio recorded to allow moderators to fill in any gaps in note-taking after the session ends. In the moderator's guide, the participant is told about the audio recording and asked to grant permission. If the participant does not grant permission, no audio recording will occur.

*Is any PII data collected, disclosed, or studied on employees, taxpayers, stakeholders or other individuals who choose not to participate?*

Yes

## **PRIVACY ACT & SYSTEM OF RECORDS**

*Is there a System of Records Notice(s) or SORN(s) that addresses the PII records in this Survey?*

Yes

*Enter the SORN number(s) and the complete name of the SORN(s):*

IRS 00.001 Correspondence Files and Correspondence Control Files

## **PRIVACY ACT NOTICE**

*Based on the information you have provided, does the Survey require a Privacy Act Notice to be provided to the participants?*

No

*Please add the Disclosure office agreement date:*

4/10/2019

## **RESPONSIBLE PARTIES**

## OFFICIAL USE ONLY

## **Incoming PII Interfaces**

*Does the employee/taxpayer PII come from the IRS, Treasury, or other Government system(s), application(s) or data base(s)?*

Yes

*List the source that the PII is extracted or derived from.*

Name: Individual Online Account

Transmission Method: Online

ISA/MOU: No

*Does the data come from other sources?*

No

## **PII SENT TO EXTERNAL ORGANIZATIONS**

*Are the Survey results disclosed to any other Federal or State Government? (For example, the Federal Viewpoint Survey/Questionnaire - OPM gets the results.)*

No

*Are any external resources used to create the database of the participants?*

No

## **SURVEY PARTICIPATION**

*Who will the Survey be administered to?*

Taxpayers

*Explain how participants are selected. Include a detailed description of the method and reason of selection. If selection is random, please explain.*

Participants are selected based on their Individual Online Account (OLA) status. For this study we only need participants who have an active IRS OLA. We are working with a contractor, Fors Marsh Group, to recruit individuals who have these accounts. All recruitment is done by the contracting office.

*How are participants notified of the Survey?*

Via the contractor. Participants will not directly contact IRS employees via email or other means.

*Is the Survey voluntary?*

Yes

*How is notice given that the Survey is optional?*

It is stated in the consent form and is also restated by the moderator at the start of the sessions.

*How will the Survey be conducted?*

Other

*Please explain:*

These are in-person usability testing sessions, or Individual Interviews (IDI).

## **SURVEY PROCESS**

*Does the IRS administer or perform analysis of the survey?*

Both

*Provide the name of the IRS office:*

IRS Wage and Investment Research

*Does a contractor/vendor administer or perform analysis of the survey?*

Administer

*Provide the name of the contractor/vendor:*

Fors Marsh Group (FMG)

*Has a Contracting Officer or Contracting Officer's Representative (COR) verified:*

*That all applicable FAR requirements are met to engage a contractor to perform the survey?*

Yes

*That all required "non-disclosure" clauses are contained in the contract.*

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

*What is the level of access and background investigation completed on contractor employees prior to access to PII about employees or taxpayers? Any contractor or subcontractor who will have access to the PII should have at least a "Moderate Risk" (NACIC) investigation. See Publication 4812 - Contractor Security Controls.*

Contractor Users: Read and Write Moderate

Contractor Managers: Read and Write Moderate

Contractor Developers: Read and Write Moderate

Contractor Sys. Admin.: Read and Write Moderate

## **INFORMATION PROTECTION**

*What information/results will be provided to the business owners (IRS Requestors) of the Survey?*

The business owners are looking for feedback about functionality and ease of use of the online account system. The participants will be giving the moderator live feedback throughout the session and all feedback will be consolidated and shared with the business owners as recommendations.

*Can you confirm that employees or taxpayers who participate in the survey cannot be identified under any circumstances?*

Yes

*Can you confirm that no adverse actions can be taken against participants regarding the participant's answer?*

Yes

*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

*Are there any employee or taxpayer identifiers that are obtained as a result of responding to the survey?*

No

## **RECORDS SCHEDULE**

*Are the Survey records covered under the General Records Schedule (GRS), or have a National Archives and Records Administration (NARA) archivist approved a Record Control Schedule for the retention and destruction of official agency records stored in this Survey?*

Yes

*How long are the records required to be held under the corresponding RCS and how are they disposed of? Explain how long any PII data will be retained by the contractor if they are conducting the Survey on behalf of the IRS. In your response, please include the complete IRM number and specific item number and title.*

All records for the survey will be deleted or destroyed in accordance with approved retention periods. Any records will be managed according to requirements under Internal Revenue Manual (IRM) 1.15.1 and 1.15.6 and will be destroyed using the Internal Revenue Service (IRS) General Records Schedule (GRS) 6.5, Item 010 and as coordinated with the IRS Records and Information Management (RIM) Program and IRS Records Officer. GRS may be superseded by IRS specific record requests in the future.

## **DATA SECURITY**

*How does the administrator of the survey guarantee that the PII regarding employees or taxpayers will not be compromised, lost or stolen when housed on IRS computers? Where and how is it stored and protected?*

We will follow cyber-security and National Institute of Standards and Technology (NIST) Standards (see reference below) for records retention requirements state that documents must be securely maintained for seven years prior to destruction. These requirements will be considered in drafting a final request for records disposition authority for National Archives and Records Administration (NARA) submission and approval. NIST Data security guidance/policy 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 Blanket Purchase Agreement (BPA)

contract Section Secure Data Transfer (SDT) Requirement Blanket Purchase Agreement (BPA) contract clause 1052.224-9000(c).

*Does a contractor/vendor administer or perform analysis of the survey?*

Yes

*Please provide the Cyber security approved security and encryption used when data is transferred electronically from IRS to Contractors and back to the IRS.*

The files will be transferred using secured transfer technology.

*When data is not sent electronically, provide in detail the information regarding the transfer back and forth from the IRS to contractors?*

All data will be sent electronically.

*How is the survey PII protected and stored when it is housed at a contractor's site, on contractor's computers? Please provide detailed information that the contractor uses regarding the physical and electronic security and protection of the data before, during, and after the survey.*

The contractor shall certify that the data processed during the performance of this contract shall be completely purged from all data storage components of his/her computer facility and no output will be retained by the contractor at the time the IRS work is completed for this task order. If immediate purging of all data storage components is not possible, the contractor shall certify that any IRS data remaining in any storage component will be safeguarded to prevent unauthorized inspection or disclosure. The contractor expressly acknowledges that the requirements of the referenced sections are in full force and effect all times during the delivery order. All applicable disclosure and privacy safeguard provisions addressed in the Interim Guidance on IRS Acquisition Procedures (IRSAP). Tax Information Security Guidelines for Federal, State and Local Agencies and Safeguards for Protecting Federal Tax Returns and Return Information are upheld. These documents ensure that the contractor maintains data safeguarding procedures for all IRS data designated as Federal Taxpayer Information (FTI), or as sensitive, but non-classified. Authority



## **CIVIL LIBERTIES**

*Does the Survey maintain records describing how an individual exercises rights guaranteed by the First Amendment (including, but not limited to information regarding religious and political beliefs, freedom of speech and of the press, and freedom of assembly and petition)?*

No

*Will this Survey have the capability to identify, locate, and monitor individuals or groups of people?*

No