

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)

BU 16-395

Date

03/08/2016

Section I - Introduction

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

Taxpayer Experience 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)

The overall objective of this task is to administer the English and Spanish versions of the Taxpayer Experience Survey to survey customers regarding their pre-filing, filing, and post-filing experiences, needs, and preferences.

The key goals of this research are:

1. To determine pre-filing, filing, and post-filing experiences

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

Treas/IRS 00.003

Requested operational date

04/15/2016

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)

b. Taxpayers

Yes No

i. List all PII data used in the survey, or to select participants
No PII will be used in the survey or to select survey the survey participants.

c. Others

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

A contractor selects the majority of participants from a web panel without any information from the IRS whatsoever. A small sample may also be recruited via random digit dialing (RDD), again without any information from the IRS.

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

NA

3. Is the survey voluntary Yes No

a. How is notice given that the survey is optional
Panel members are sent invitations to participate from _____, a subcontractor of _____. If a supplemental phone sample is needed, a _____ subcontractor calls participants and invites them to respond to the phone version of the survey.

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 is conducted electronically by _____ to their panel members.

b. Phone (*explain procedure, and provide script*)
A supplemental sample may be collected via RDD.

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
Survey is currently conducted by contractor _____ and their subcontractor _____

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--This task order falls under the customer satisfaction BPA and security clauses and actions associated with the BPA apply to this task order. Any contractor or subcontractor who will have access to employee or taxpayer PII data, must have at least a "Moderate Risk" (NACIC) investigation. Any contractor or subcontractor, who will have access to employee or taxpayer PII data, must have at least a "Moderate Risk" (NACIC) investigation.

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

When the data is return to the IRS from the contractor, it contains variable coding. This means that no "taxpayer" or PII data can be individually identified. The contractor returns the data using variable coding and none of the taxpayer information can be identified.

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
No raw or aggregated data will be provided to the IRS. The contractor returns the data using variable coding and none of the taxpayer information

can be identified.

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

These are encrypted data files sent electronically with Secure Messaging. Accounts Management Program Management/Process Assurance (PM/PA) analysts consolidate the data and forward to the contractor via secured electronic transfer (EFTU).

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. Data are transferred to and from the contractor through EFTU. 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

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 Taxpayer Experience Survey is unscheduled. A request for records disposition authority for this Survey (and other similar external surveys Servicewide) 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 instructions for this survey will include retentions for the datasets/ raw data, background documentation, and summary/final reports, as appropriate. Cyber-security and NIST Standards for records retention requirements state 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. These requirements will obviously be considered in drafting a final request for records disposition authority for NARA submission and approval.

Reference other data security guidance/policy:

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)

Disposition of records will be consistent with terms agreed to under the Customer Satisfaction BPAs.

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.