

# 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 16-418

Date

## Section I - Introduction

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

W&I Stakeholder Partnerships, Education and Communication (SPEC) Partner Customer Satisfaction 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 purpose of this contract is to survey SPEC Partners to determine their level of satisfaction with SPEC products and services. Results of this survey determine two SPEC external measures: 1) SPEC Partner Satisfaction; and 2) SPEC Partner Dissatisfaction. - A web based survey with an email invitation is the most cost effective way to deliver the Partner Survey. This survey historically has a high response rate as a web survey with email invitation, moving to another administration method will likely decrease the response rate and will cost the IRS money. Links will be disabled in the email invitations. No SBU data allowed in the email; no reply allowed to the email. The participants must opt-in for email; SPEC has a partner agreement (form 13533) that is signed each year, we are proposing adding a line to that agreement asking for the email address of the contact to take the survey. They will be allowed to leave this new line blank. This has not been approved by SPEC leadership but we want to make sure it will meet privacy requirements. This would be acceptable if they agree to email and surveys. Will include how to get to IRS Privacy Policy on IRS.gov- in invitation email.

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

Treasury/IRS 00.001

Treasury/IRS 24.030

Treasury/IRS 24.046

Requested operational date

01/01/2017

## 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

The Stakeholder Partnerships, Education, and Communication (SPEC) organization in the Wage & Investment (W&I) Division fosters voluntary compliance by making W&I taxpayers aware of their federal tax responsibilities and assisting them to prepare timely and accurate returns. SPEC builds and maintains partnerships with key stakeholders, seeking to create and share value by informing, educating, and communicating with shared customers. SPEC services W&I taxpayers through education, tax preparation and asset building.

The SPEC Partners are organizations such as the \_\_\_\_\_ that assist taxpayers with the products and services provided by the SPEC organization. Examples of SPEC Partner Types include: Local; National; Outreach; Return Preparation; and, Financial Education.

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

The contractor shall administer a web-based survey, to SPEC Partners during the filing season, optimally during the month of March. SPEC shall provide a list of all SPEC Partners to survey, showing organization name, e-mail contact information, partner type, and other needed information. SPEC will select all SPEC Partners that have a survey contact identified in SPEC's MIS system SPECTRM (SPEC Total Relationship Management) to be included in the survey. The contractor shall send a pre-notification e-mail to SPEC Partners notifying them of the upcoming survey. Hyperlinks will be disabled in the email ; no reply allowed to the email. The contractor shall capture optouts, contact information changes, and e-mail addresses from data collection attempts returned as undeliverable. This information will be shared with the W&I COR, SPEC representative and W&I survey researcher/s on a weekly basis via e-mail. The IRS will attempt to locate correct e-mail addresses for partners whose e-mails were returned undelivered. A web based survey with an email invitation is the most cost effective way to deliver the Partner Survey. This survey historically has a high response rate as a web survey with email invitation, moving to another administration method will likely decrease the response rate and will cost the IRS money

- 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  
SPECTRM: SPEC Total Relationship Management

3. Is the survey voluntary  Yes  No

a. How is notice given that the survey is optional  
SPEC has a partner agreement (form 13533) that is signed each year, we are proposing adding a line to that agreement asking for the email address of the contact to take the survey. They will be allowed to leave this new line blank. – This has not been approved by SPEC leadership but we want to make sure it will meet privacy requirements.

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)*

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

d. Other

A unique survey link created specifically for that partner to copy and paste. Links will be disabled in the email invitations..

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

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

Copy attached

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

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

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 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

No information will be provided to IRS that in any way identifies the survey respondents

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

Neither SPEC nor WIRA will receive any "raw" or un-aggregated data.

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

No employee or taxpayer identifiers will be provided to SPEC and/or WIRA.

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

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? 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

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 SPEC Partner Customer Satisfaction 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)

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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. Communications and Liaison will work with the IRS Records Office to obtain the legal requirements for the retention and disposition of their survey data. This focus group is conducted internally. No contractors will be used to generate any IRS records.

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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, stated in the survey