

# Survey PCLIA Report

Date of Approval: August 9, 2017

Survey PCLIA ID Number: **2812**

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## A. Survey Description

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1. Full name and acronym of the Survey. Return Preparer Office CE Provider Customer Satisfaction Survey, RPO CE Provider Survey

2. Is this a Survey, Telephone Interview or Focus Group? Survey

*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 Moderators Guide will be requested by the Privacy Analyst.*

3. Is this a new Survey? Yes

4. Is this a reoccurring Survey? No

4.b. If no, provide the dates collection of information will begin and end. IRS CE Providers will be asked to take the survey October 1, 2017 – June 30, 2018.

5. Does this Survey have an SOI (Statistics of Income) control number? Yes

5.a. If yes, enter the number. CS-17-485

6. Does the Information Collection Request require OMB Clearance? Yes

6.a. If yes, what is the OMB Clearance number? 1545-1432

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## A.1. General Business Purpose

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7. 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 IRS Return Preparer Office (RPO) Continuing Education Department is conducting an online survey to measure customer satisfaction for IRS Continuing Education (CE) Providers using the online IRS CE Provider system known as CE-PRATS. The RPO Continuing Education Department has a contractual obligation with the external vendor, Advocation Strategies, Inc., to perform a survey of the CE-PRATS system users. Feedback from IRS customers (IRS Approved CE Providers) is very important to assess the current satisfaction rate and to evaluate the system's ease of use and to consider needed improvement efforts if necessary.

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## B. PII Details

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8. 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

8.a. If yes, specify the information.

<u>Selected</u>	<u>PII Element</u>	<u>On Primary</u>	<u>On Spouse</u>	<u>On Dependent</u>
Yes	Name	Yes	No	No
Yes	Mailing address	No	No	No
Yes	Phone Numbers	No	No	No
Yes	E-mail Address	No	No	No
No	Date of Birth	No	No	No
No	Place of Birth	No	No	No
No	SEID	No	No	No
No	Mother's Maiden Name	No	No	No
No	Protection Personal Identification Numbers (IP PIN)	No	No	No
No	Internet Protocol Address (IP Address)	No	No	No
No	Criminal History	No	No	No
No	Medical Information	No	No	No
No	Certificate or License Numbers	No	No	No
No	Vehicle Identifiers	No	No	No
No	Passport Number	No	No	No
No	Alien (A-) Number	No	No	No
No	Financial Account Numbers	No	No	No
No	Photographic Identifiers	No	No	No
No	Biometric Identifiers	No	No	No
No	Employment (HR) Information	No	No	No
No	Tax Account Information	No	No	No

8.b Are there other types of PII collected in the Survey? No

8.c. Is any PII data collected, disclosed, or studied on employees, taxpayers, stakeholders or other individuals who choose not to participate? No

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### **C. Privacy Act & System of Records**

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9. Is there a System of Records Notice(s) or SORNs that addresses the PII records in this Survey? Yes

9a. If yes, enter the SORN number(s) and the complete name of the SORN(s).

<u>SORNS Number</u>	<u>SORNS Name</u>
Treas/IRS 37.111	Preparer Tax Identification Number Records
Treas/IRS 00.003	Taxpayer Advocate Service and Customer Feedback an

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#### **C.1. Privacy Act Notice**

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9.1 Based on the information you have provided, does the Survey require a Privacy Act Notice to be provided to participants? No

9.1.b. If no, please add the Disclosure office agreement date? 8/3/2017

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### **D. Responsible Parties**

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10. Identify the individuals for the following Survey roles: # # Official Use Only

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## E. Incoming PII Interfaces

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11. Does the employee/taxpayer PII come from the IRS, Treasury, or other Government system(s), application(s) or data base(s)? No

11.1. Does the data come from other sources? Yes

11.1.a. If yes, describe the source of the information. The data comes from the CE-PRATS system which is administered by Advocation Strategies, Inc. The data was entered by the providers via the electronic Form 8498. We will be presenting the survey to providers to complete voluntarily through their accounts.

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## F. PII Sent to External Organizations

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12. Are the Survey results disclosed to any other Federal or State Government? (For example the Federal Viewpoint Survey/Questionnaire – OPM gets the results.) No

13. Are any external resources used to create the database of the participants? No

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## G. Survey Participation

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14. Will the Survey be administered to IRS, Taxpayers or Others? Others

If Others, please explain. IRS Approved Continuing Education Providers

15. Explain how participants are selected. Include a detailed description on the method and reason of selection. If selection is random, explain. It is anticipated that that the survey will be presented to approximately 545 approved IRS CE Providers. The survey will be offered to all providers and they can voluntarily choose to participate, but they are not required. All providers will have the same options regarding the survey.

16. How are participants notified of the Survey? A pop up box will appear on their screen once a new provider submits a application or an existing provider completes the annual renewal process. It will ask them if them want to participate. If so, they can click on the link. There will also be a link on the home screen in case they want to take the survey at a later date. We will also send a secure message to each provider's mailbox explaining that we will be conducting a voluntary customer satisfaction survey and explain the information described above.

17. Is the Survey voluntary? Yes

If yes, how is notice given that the Survey is optional? The following statement is part of the survey instructions: Completion of this survey is entirely voluntary. Responses will be compiled by Continuing Education Provider System vendor and remain anonymous.

18. How will the Survey be conducted?

Yes Electronically

Explain the delivery method & if cookies are used. The survey will be delivered through the existing Continuing Education Provider Registration and Tracking System (CE-PRATS). No cookies will be used.

18.a.2. What application is used to create the survey? Other

(Survey Manager, Centra, Verint/Vovici, Live Meeting, ELMS, TEMPO, SharePoint, Other)

If Other, please explain. We will use the existing CE-PRATS system to create and administer the survey.

Yes Web Based

Explain the delivery method & if cookies are used. The survey will be delivered through the existing Continuing Education Provider Registration and Tracking System (CE-PRATS). No cookies will be used.

No Phone

No Mail

No Other

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### **G.1. Survey Process**

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19. Does IRS administer or perform analysis of the survey? Analysis

20. Does Contractor/Vendor administer or perform analysis of the survey? Yes

Contractor/Vendor: Both

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

20.a.1. All applicable FAR requirements are met to engage a contractor to perform the survey.

No

20.a.1.a. If no, please explain. FAR is a 2,000-page single-spacing small-font document. Our contracting Officer is not aware of any requirements uniquely applicable to contractors performing customer satisfaction surveys. If there are requirements in FAR that are uniquely applicable to contractors performing surveys, please provide citation. I'm providing my answer to 20.b here because there is nowhere to add it below. Low Risk --- the contractor does not have physical access to IRS facilities. Neither do they have access to IRS IT systems and applications. They do not have access to tax return information. The survey and responses will not include any PII or SBU.

20.a.2. That all required "non-disclosure" clauses are contained in the contract. Yes

20.a.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

20.b. If 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*

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Contractor Users	No
Contractor Managers	No
Contractor Sys. Admin.	No
Contractor Developers	No

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## I. Information Protection

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21. What information/results will be provided to the business owners (IRS Requestors) of the Survey? Below is what is in the contract between IRS and the contractor. 4.19 CE Provider Customer Satisfaction Survey The Contractor shall establish a process to solicit voluntary feedback from Providers to measure satisfaction with the registration and renewal processes. The process shall be in the form of a customized survey offered to Providers in electronic format via their account homepage. The survey, jointly developed with the IRS, shall include questions regarding satisfaction with the registration/renewal process, CSRs, letters/notices, and other areas as determined by the IRS. Allow for multiple choice and free-form responses of up to 500 characters as determined by the IRS. The Contractor shall summarize the survey information in report format and submit to the IRS. Include in the summary report an analysis of survey feedback and recommendations to improve customer satisfaction with the processes and services provided pursuant to this contract. The Paperwork Reduction Act (PRA) of 1980 (Pub. L. 96-511) requires the OMBs' approval before collecting information from more than ten (10) members of the public. The IRS will manage the OMB approval process for the survey. Initial OMB approval requires a minimum of sixty (60) calendar days and annual renewal requires a minimum of forty-five (45) calendar days. The PRA language and OMB Control Number will be provided by the IRS and shall be displayed on the survey. The Contractor shall give due consideration to the OMB and IRS approval processes by submitting the required documentation to the IRS such that the summary reports are issued and available by their due dates as determined by the IRS.

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

23. Can you confirm that no adverse actions can be taken against participants regarding the participant's answers. Yes

24. 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

25. Are there any employee or taxpayer identifiers that are obtained as a result of responding to the survey? No

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### I.1 Records Schedule

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26. 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

26.a. If 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.

RPO CE Customer Satisfaction Survey is scheduled. Our record retention schedule was approved by the National Archives and Records Administration (NARA) in April 2016, which includes instructions for this survey and includes retentions for the datasets/raw data, background documentation, and summary/final reports, to be destroyed 5 years after the end of period (12/31). 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. Our contract with Advocation Strategies, Inc. (system/survey administrator) runs a maximum of 5 years and was effective 06/15/2016.

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### **P.1 Data Security**

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27. 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? None of the vendor's information is housed on IRS computers. All information is contained in our current database application (cloud) and we will not be using anything outside of our current system for this survey.

28. Does a contractor/vendor administer or perform analysis of the survey? Yes

28.a. If 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. We use SSL encryption that is Fed RAMP approved (CE-PRATS).

28.b. If yes, when data is not sent electronically, provide in detail the information regarding the transfer back and forth from the IRS to contractors. No data will be sent non-electronically.

28.c. If yes, 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 contractors use regarding the physical and electronic security and protection of the data before, during, and after the survey. No data is stored locally. It is contained in the approve database application (CE-PRATS).

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### **M. Civil Liberties**

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29. 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

30. Will this Survey have the capability to identify, locate, and monitor individuals or groups of people? No

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**End of Report**

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