

Survey PCLIA Report

Date of Approval: December 13, 2018

Survey PCLIA ID Number: **3801**

A. Survey Description

1. Full name and acronym of the Survey. Secure Access Usability Study, N/A
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
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4. Is this a reoccurring Survey? No

4.a. If yes, list the schedule or requested operational date(s) of when the Survey will be administered.

4.b. If no, provide the dates collection of information will begin and end. 12/3/18 - 2/3/19

5. Does this Survey have an SOI (Statistics of Income) control number? No

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

6.a. If yes, what is the OMB Clearance number? 1545-2256

A.1. General Business Purpose

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 goal is to get the customer perspective and test some of the usability and design aspects for future iterations of Secure Access. Given the National Institute of Standard and Technology's (NIST) NIST's Digital Identity Guidelines 800-63-3, we are looking to understand: 1) What might be the usability and accessibility opportunities/areas of concern for tax professionals using such identity proofing methods? 2) How willing are tax professionals to remotely identity proof? How might users respond to new remote identity proofing processes? 3) How might the IRS better design initial notification and instructions on how to remotely identity proof?

B. PII Details

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>On Primary</u>	<u>On Spouse</u>	<u>On Dependent</u>	<u>Selected</u>	<u>PII Element</u>
Yes	Name	Yes	No	No
No	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	Standard Employee Identifier (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 Number	No	No	No
No	Financial Account Numbers	No	No	No
No	Photographic Identifiers	No	No	No
Yes	Biometric Identifiers	No	No	No
Yes	Employment Information	No	No	No
No	Tax Account Information	No	No	No
No	Centralized Authorization File (CAF)	No	No	No

8.b Are there other types of PII collected in the Survey? Yes

8.b.1. If yes, describe the other types of PII that are applicable to this Survey. Gender; Age Range; Preparer Tax Identification Number (PTIN): No PTINs will be requested or recorded, but the recruiting questionnaire will ask whether the individual has a PTIN.

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

C. Privacy Act & System of Records

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>
IRS 10.004	Stakeholder Relationship Management and Subject Files
IRS 00.001	Correspondence Files and Correspondence Control Files

C.1. Privacy Act Notice

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

9.1.a. If yes, please provide the Privacy Act Statement. From the facilitator's verbal script: "Your participation is entirely voluntary, and you are free to end our session at any time. You will not be paid or receive compensation for your participation. This interview will take approximately one (1) hour. We would like to record this interview. The recording is for research purposes only and your name will not be associated directly with the content in the recording. Recordings will be kept in a secure location and shared only with persons with a valid need to know. Instead, the content of all interviews will be aggregated to identify key issues, which would be non-attributional. Your name and contact details are stored in an encrypted file that is only available to the MITRE Corporation research team, which will be destroyed on completion of this study. Your name will not be linked to anything you say in any reporting within MITRE Corporation or to the IRS. There are no expected risks of participation. MITRE Corporation will take appropriate precautions to protect your privacy, as explained in our Privacy Act Statement and Privacy and Civil Liberty Impact Assessment. Do you have any questions about this research? Do you agree to participate? Do you consent to the use of the recording by MITRE Corporation?" From the questionnaire: "Privacy Act Statement: The authority requesting the information is 5 USC 301. The primary purpose of asking for the information is to determine steps the IRS can take to improve our services to you. The information may be disclosed as authorized by the routine uses published for the following Privacy Act System of Records: (1) IRS 00.001 Correspondence Files and Correspondence Control Files and (2) IRS 10.004 Stakeholder Relationship Management and Subject Files. Providing the information is voluntary. Not answering some or all of the questions will not affect you."

D. Responsible Parties

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

E. Incoming PII Interfaces

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

11.a. If yes, list the source that the PII is extracted or derived from.

<u>Organization Name</u>	<u>Transmission method</u>	<u>ISA/MOU</u>
W&I Electronic Products Services and Support (EPSS)	Secure email	No

11.1. Does the data come from other sources? No

F. PII Sent to External Organizations

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

G. Survey Participation

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

If Others, please explain. Tax Professionals who participated in the Secure Access Soft Launch in December 2017 (e-mail address listing maintained in Excel by Wage and Investment Electronic Products and Services Support (W&I EPSS))

15. Explain how participants are selected. Include a detailed description on the method and reason of selection. If selection is random, explain. Selection is based on availability to participate in a telephone interview.

16. How are participants notified of the Survey? A "Call for Participants" email will be sent to the potential participant listing. Those who are interested will be asked to complete a recruiting questionnaire Portable Document Format (PDF) and return it via email. The first fifteen respondents who are available to participate in a telephone interview will be selected. A telephone interview will be scheduled over email. During the telephone interview, participants will be asked to view mock-ups via a Uniform Resource Locator (URL) that will be provided to them.

17. Is the Survey voluntary? Yes

If yes, how is notice given that the Survey is optional? The "Call for Participants" email states that participation is voluntary.

18. How will the Survey be conducted?

Yes Electronically

Explain the delivery method & if cookies are used. No cookies will be used. A "Call for Participants" email will be sent to the aforementioned email address listing. Those who are interested in participating will be asked to complete a recruiting questionnaire (PDF) and return in via email and the first fifteen respondents who are available to participate in a telephone interview will be selected and a telephone interview will be scheduled over email.

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

If Other, please explain. Email/PDF

Yes Web Based

Explain the delivery method & if cookies are used. No cookies will be used. During the telephone interview, participants will be asked to view mock-ups via a URL that will be provided to them (hosted via Loop11).

Yes Phone

Explain the procedure. At the scheduled date and time, a facilitator will contact the participant via phone to conduct the study.

G.1. Survey Process

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

Provide the name of the IRS office administering the survey.

Provide the name of the IRS office performing analysis of the survey. IRS Online Services

Provide the name of the IRS office.

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

Contractor/Vendor: Both

Provide the name of the Contractor/Vendor. MITRE Corporation

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. Yes

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*

Contractor Users	Yes	Read-Only	Moderate
Contractor Managers	No		
Contractor Sys. Admin.	No		
Contractor Developers	No		

I. Information Protection

21. What information/results will be provided to the business owners (IRS Requestors) of the Survey? The deliverable will be a report that details aggregated user perceptions and usability issues.

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

I.1 Records Schedule

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.

The Survey "Secure Access Usability Study" will be managed using GRS 6.5, Item 010 Public Service Operations Records. Temporary. Destroy 1 year after resolved, or when no longer needed for business use, whichever is appropriate. Any additional records developed from the "Secure Access Usability Study" maintained by the IRS will be scheduled as coordinated with the IRS Records and Information Management (RIM) Program and IRS Records Officer. IRM 1.15.1, Records and Information Management, The Records and Information Management Program.

P.1 Data Security

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? Names and email addresses of tax professionals that participated in the Secure Access Soft Launch (December 2017) are maintained by W&I EPSS in an excel listing. The excel listing is on a secure drive in a limited access folder that is password protected. All data returned to the IRS will be aggregated and have no identifying information to attribute feedback/records to an individual. The IRS will ensure that privacy is maintained to the extent allowed by the law.

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. Encrypted email with password protected attachments.

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. All data concerning the study, including the recruiting screener, interview notes and audio recordings, will be de-identified and stored in an encrypted directory within MITRE Corporation. The de-identified data will include basic demographics (gender, age, professional role), reported experience with identity proofing and authentication technologies, smartphone security practices, and interview data. Participant names and contact information will be destroyed within 30 days of the completion of the study. Collected data will be identified only by a participant ID code in any research reporting within or external to MITRE Corporation. Participant ID codes will never be linked with the participants identities. The following describes a detailed procedure for all data containing personally identifying information: Recruiting Screener Data: a) Recruiting Screener data will be stored in an encrypted file. Access will be limited to the MITRE Corporation research team only; b) The recruiting screener data will be combined with any survey data and de-identified by the MITRE research team. c) The original Recruiting Screener data file with contact information will be destroyed within 30 days of the study. Participant Scheduling Spreadsheet: a) All communications on participant scheduling, which may include participant name, email, and employment, will be shared using an encrypted file by the MITRE Corporation

research team. Access will be limited to the MITRE Corporation research team only; b) The participant scheduling spreadsheet will be de-identified by the MITRE Corporation research team and stored for archival purposes. Audio recordings: a) Audio recordings will be de-identified and stored in an encrypted directory within MITRE Corporation; b) Access to de-identified audio recordings will be limited to the MITRE Corporation research team only; c) Audio recordings will not be used in any reporting on research results; d) De-identified, selected quotes and observations gleaned from recordings may be shared in reporting on the research. Informed Consent: a) An informed consent script will be read aloud to each participant by the moderator; b) Participants will be asked to provide verbal consent on an audio recording and the audio recordings will be de-identified and stored in an encrypted directory within MITRE Corporation.

M. Civil Liberties

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

End of Report
