

# Survey PCLIA Report

Date of Approval: May 30, 2018

Survey PCLIA ID Number: **3407**

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## A. Survey Description

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1. Full name and acronym of the Survey. W&I ITIN Program Changes: Taxpayer Experience with the ITIN Application and Renewal Process, CAA/AA/Org 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.*

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3. Is this a new Survey? Yes

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4. Is this a reoccurring Survey? No

4.b. If no, provide the dates collection of information will begin and end. May 2018 - August 2018

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

5.a. If yes, enter the number. CS-493

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 requested Privacy Impact Assessment (PIA) is for a survey. From an operational value perspective, the purpose of this research is to help the Internal Research Service (IRS) measure the Individual Taxpayer Identification Number (ITIN) taxpayer's understanding of program changes, their knowledge of the documentation requirements, identifying channels most used for communication of tax information, and comprehension of ITIN related notices (CP 565, CP 566 and CP 567). This information will aid in making process improvement recommendations that can reduce the number of rejected applications, increase ITIN taxpayer compliance and assist in migrating this population to digital customer service channels which could potentially reduce the demand on IRS staffing and training resources. From a taxpayer value perspective, the purpose of this research is to better understand the taxpayer experience with the ITIN application and renewal process and to identify any improvement opportunities. Conducting a survey of Certifying Acceptance Agents (CAA), Acceptance Agents (AA) and community organizations that assist with completing ITIN applications, will provide perspective on the experience of the ITIN

taxpayer during the application and renewal process. CAAs / AAs and community organizations developed to assist this population can deliver information on all aspects of the application process, help identify improvement priorities and help gain an understanding of common pain points experienced during the process.

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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>
No	Name	No	No	No
No	Mailing address	No	No	No
No	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? No

9b. If No, explain why the Survey does not have a SORN? Survey participants are selected from organizations that are registered with the Agency as authorized parties that can work with ITIN taxpayers to complete ITIN applications. As a part of the program, they are aware that they will be periodically surveyed to ensure the needs of the ITIN taxpayer are being met.

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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? 5/9/2018

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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. From the ITIN office.

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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. The survey will be administered to Certifying Acceptance Agents (CAA), Acceptance Agents (AA) and community organizations that are registered with the Agency.

15. Explain how participants are selected. Include a detailed description on the method and reason of selection. If selection is random, explain. In order to be selected for receiving a survey, respondents must be recognized by the Agency as a Certified Acceptance Agent, an Acceptance Agent or a community organization that works with ITIN taxpayers.

16. How are participants notified of the Survey? Survey administration will include an emailed invitation to opt-in, an opt-in email, information to access the survey and one reminder email in an effort to maximize the response rate. Emails addresses will be provided by the business unit that works on the ITIN program and that is responsible for managing the requirements of the prospective survey respondents.

17. Is the Survey voluntary? Yes

If yes, how is notice given that the Survey is optional? Participants will be advised at the start of the survey that their participation is completely voluntary and optional.

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18. How will the Survey be conducted?

No Electronically

Explain the delivery method & if cookies are used.

Yes Web Based

Explain the delivery method & if cookies are used. The selected Contractor will administer the survey

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

Provide the name of the IRS office administering the survey.

Provide the name of the IRS office performing analysis of the survey. W&I Strategies and Solutions

Provide the name of the IRS office.

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

Contractor/Vendor: Administer

Provide the name of the Contractor/Vendor. Fors Marsh Group

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	No		
Contractor Managers	Yes	Read and Write	Moderate
Contractor Sys. Admin.	Yes	Read and Write	Moderate
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? A document outlining common themes and issues will be shared with the research team. No PII from the surveys will be captured or shared. All survey question data will be released in summary form only. Given a statistically valid sample size, results from the survey will be presented as a representation of the larger taxpayer population that works with ITIN taxpayers.

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? No

26.b. If No, how long are you proposing to retain the records? Please note, if you answered no, you must contact the IRS Records and Information Management Program to initiate records retention scheduling before you dispose of any records in this Survey.

These Survey records are unscheduled. A request for records disposition authority for these records (and other similar records Service-wide) 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 disposition instructions will include retentions for the datasets/raw data, background documentation, and summary/final reports, as applicable.

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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? Email address for survey participants will be provided by the Submission Processing organization. This information will be stored on a password protected folder on a shared drive only accessible by those directly related to the project. The list will be sent to the Contractor using the Enterprise File Transfer Utility (EFTU) and will be destroyed within 10 business days following the final round of messaging. The computer files containing this tabulated information will remain password protected at all times. Data security approaching level C-2 will be accomplished using the Windows 7 operating system. WISS will apply fair information and record-keeping practices to ensure protection of all participants. The criterion for disclosure laid out in the Privacy Act, the Freedom of Information Act, and section 6103 of the Internal Revenue Code, provides for the protection of taxpayer information as well as its release to authorized recipients.

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. Enterprise File Transfer Utility (EFTU)

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. Information will only be sent using the approved electronic transfer system

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 uses regarding the physical and electronic security and protection of the data before, during, and after the survey. The Fors Marsh Group Team has implemented robust safeguard procedures ensuring the protection of sensitive information in accordance with Government policy. Their procedures ensure strict protection of access to and use of all research data, mandate systematic physical and logical access control, as well as explicitly define security policy and procedures governing media access, server security, sensitive data handling, audit and accountability, router security, and the prevention of unauthorized access. As standard procedure, all research data is stored in a secure network of servers protected by a firewall and located in a secured, locked room. Access to the data center is restricted to authorized persons and alarms are monitored 24x7x365. To fulfill IRS survey operations requirements, they will use their facilities in Arlington, VA. Their site has the personnel, scanning equipment, and data capture applications necessary to administer highly secure Government surveys and collect data immediately via mail and online survey modes.

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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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