

# 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)

Date

## Section I - Introduction

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

Customer Assistant Relationship & Education (CARE) Field Assistance Customer Satisfaction "Your Opinion Counts!" 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 survey is conducted as part of the IRS agency-wide initiative to monitor and improve taxpayer satisfaction within the CARE, Field Assistance program. To ensure that the Field Assistance program is meeting the needs of the taxpayers, feedback from external customer satisfaction surveys is critical for assessing the customer's perception of our products and services. The goal of the comment card survey is to provide specific qualitative feedback and comments for the TAC offices, measure and track customers' satisfaction, experiences, and expectations with services received at TACs. The comment cards retain rating questions, which are tabulated and reported monthly and in-depth for three planning periods annually, but the emphasis would be on quick turnaround of comment card feedback to the offices where the comment took place. The Spanish version of the card is printed on the reverse side of the English card. Respondents are instructed to leave the completed comment cards in a secure, locking drop-box at the site. Each TAC returns the comment cards to the contractor on a weekly basis.

The primary purpose for requesting this information is to help the IRS improve its service to taxpayers. Our authority for requesting the information is 5 USC and 26 USC 7801. Providing information is voluntary. However, if you do not answer all or part of the survey questions, the IRS may lack information it could use to improve taxpayer service. The information you provide may be disclosed to an IRS contractor when authorized by law. The contractor is required to follow confidentiality protections required by the Privacy Act and /or Internal Revenue Code section 6103.

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

00.001: Correspondence Files and Correspondence Controls  
00.003: Taxpayer Advocate Service and Customer Feedback and Survey Records  
22.062: Electronic Filing Records  
24.030: Customer Account Data Engine Individual Master File  
24.046: Customer Account Data Engine Business Master File, formerly BMF  
34.037: IRS audit trail and security records system

Requested operational date

04/01/2016

## 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/About/IRS/bu/pipds/pip/privacy/privacy\\_art/8352.aspx](http://irweb.irs.gov/About/IRS/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 taxpayer PII is collected.

c. Others

N/A

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

The survey which began in 2003 is currently administered by having Individual Taxpayer Advisory Specialists (ITAS) on odd calendar days of the month offer a survey comment card to each customer who is provided a service to be completed and left at the TAC office. The goal of the comment card survey is to provide specific qualitative feedback and comments for the TAC offices, measure and track customers' satisfaction, experiences, and expectations with services received at TACs. Weighting procedures have been used previously to help ensure the results reported reflect the opinions of Field Assistance customers throughout the country. The need to weight data has been assessed on an annual basis.

- 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

N/A

3. Is the survey voluntary

Yes  No

a. How is notice given that the survey is optional

Notice is printed on the front of the comment card. Also, per IRM 21.3.4.3.4.2, Providing Survey Cards to Taxpayers:

1. On odd calendar dates of the month, the Individual Taxpayer Advisory Specialist (ITAS) or Initial Assistance Representative (IAR) will offer each taxpayer who is provided assistance at a TAC office a Customer Satisfaction Survey card. The employee should advise the taxpayer that:

- o Completion of the card is voluntary
- o Their feedback is used to improve our customer service
- o The card should not be folded
- o The completed card should be placed in the survey card drop box, or when appropriate, the TAC employee can accept the card and place it into the drop box.

2. On even calendar dates of the month, the ITAS or IAR will not offer the survey card to taxpayers.

o If taxpayers question why they are not offered a card, the employee should advise the taxpayer that the survey is being offered to taxpayers through a random sample.

o On even days if a taxpayer requests the card to provide feedback, the card should be provided to the taxpayer.

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*)

This survey is not offered electronically.

b. Phone (*explain procedure, and provide script*)

The surveys are not offered by phone.

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

The survey is not offered via the mail.

d. Other

After the ITAS has helped the taxpayers, they will offer the comment card survey to them. The taxpayer then decides if they are interested in completing the survey. Completed surveys are placed in survey boxes and then mailed to the contractor.

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  
N/A

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

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

Monthly Cleansed Data Files

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

N/A

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

No taxpayer PII is gathered. 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 Field Assistance Customer Satisfaction Survey is unscheduled. A request for records disposition authority for this Survey (and other similar external surveys Service-wide) is currently being 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 Customer Satisfaction Survey will include retentions for the datasets/raw data, background documentation, and summary/final reports. Reference:

NIST 800-53, Recommended Security Controls for Federal Information Systems & Organizations (Media Protection, Media Storage, System and Information Integrity)

NIST Special Publication 800-88

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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)*

No taxpayer PII is obtained. Cyber-security and NIST Standards for record retention requirements states 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. At that time, the contractor will return all files securely to the IRS or the data may be properly disposed of by using preapproved methods and appropriately witnessed and then submitting a form similar to or same as the Standard Form 1428, Inventory Disposal Schedule to designated IRS officials.

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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