

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)

N/A

Date

04/13/2016

Section I - Introduction

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

Optimizing Future State Strategies through Partnering with Tax Preparation and Software Companies: Third Party Refund Status Application Programming Interface Pilot

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)
Wage and Investment Strategies and Solutions (WISS) is working alongside Office of Online Services (OLS) Product Management to conduct a customer satisfaction survey for taxpayers that participated in the Third Party Refund Status Application Programming Interface (API) pilot. As outlined in the Internal Revenue Service (IRS) Strategic Plan, the agency is working towards delivering high quality service to reduce taxpayer burden and encourage voluntary compliance. In order to achieve this goal, WISS will develop and administer a survey to taxpayers who participated in the pilot to assess quality assurance, migration from previous channels, potential future use, and opinions about their experience. The results of this survey will aid in the development of program evaluative measures, identify potential quality risks, assist with overall improvement of service delivery and support effective tax administration by fostering strong relationships with the tax community and government partners.

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

Treasury/IRS 00.001
Treasury/IRS 00.003
Treasury/IRS 24.030
Treasury/IRS 24.046

Requested operational date

05/31/2016

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/AboutIRS/bu/pipds/pip/privacy/privacy_art/8352.aspx before answering this question)

N/A

b. Taxpayers

Yes No

i. List all PII data used in the survey, or to select participants

Taxpayers who participated in the pilot program will be asked to take this survey. No PII will be collected from the survey instrument; however, name, address, state, zip code information will be provided to the Contractor to mail-out reminder letters. Demographic data (i.e., age, filing status, adjusted gross income, refund amount) will also be provided to the Contractor to append to the survey results for analytic purposes.

c. Others

N/A

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

A random selection of taxpayers who participated in the pilot will be selected from all taxpayers that participated in tax year 2015. The Contractor will use name and address information to mail-out solicitations and reminders to potential participants. Participants will be instructed to visit a web link, which will be included in the solicitation and reminder letters, to take the online survey.

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

Information Technology (IT) will provide a comprehensive list of taxpayers that participated in the pilot from the Individual Master File database.

3. Is the survey voluntary Yes No

a. 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.

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*)

The survey will be administered by the Contractor as a web survey. The link to the survey site along with instructions for logging in and completing the survey will be included in the letter solicitation. No cookies will be used on the survey website.

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

N/A

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

Invitation sent via mail

d. Other

N/A

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

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

Wage and Investment Strategies and Solutions

contract is currently in Procurement for Request for Quote from Blanket Purchase Agreement which includes _____, _____ and _____ contractors

BPA 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

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

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 _____. 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

A document outlining top-level results will be provided to internal IRS stakeholders. No PII from the survey 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 participated in the Refund Status Application Programming Interface pilot. Descriptive techniques will be employed to provide a basic understanding of this population and their overall satisfaction with this alternative method of receiving refund status information.

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 identifiable information will be shared with any IRS office.

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

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 Optimizing Future State Strategies through Partnering with Tax Preparation and Software Companies: Third Party Refund Status Application Programming Interface Pilot survey 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)

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 survey is being conducted externally by a Blanket Purchase Agreement (BPA) contractor. The project is currently being announced as a Request for Quote (RFQ) in Procurement. 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.

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 it's provided in the letter and in the survey.