

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)

BU 16-423

Date

03/08/2016

Section I - Introduction

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

PPS Survey (Practitioner Priority Service)

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 with the Practitioner Priority Service program. To ensure that the PPS 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. Taxpayers who participated in this service interacted with the automated system and spoke to a Customer Service Representative (CSR).

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.

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

04/15/2016

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)

b. Taxpayers

Yes No

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

The only PII data associated with this survey is that one question asks respondents if they are willing to be contacted for future research, and if so, to provide contact information. This information is maintained by the contractor and is not shared with IRS in any way.

(The contractor only re-contacts those practitioners who have voluntarily left their information for future research when the IRS asks the contractor to conduct IRS research. Most of the time this is to recruit participants for focus groups related to the survey they completed. It would be very difficult to conduct focus groups of practitioners who had called the PPS service if we did not collect volunteers during the survey.) PPS is a telephone survey for taxpayers who contact the IRS Practitioner Priority Service (PPS) via the toll-free lines. The purpose of this survey is to assess their satisfaction with the service that they receive during their call. Taxpayers who participate in this survey interact with the automated system answering questions regarding their interaction with the Customer Service Representative (CSR) who handled their most recent call immediately preceding the survey.

There is only one question asked on the PPS survey which collects PII Data. Question 30, asks the following: "The IRS periodically asks the contractor to do additional research. Would you be willing to participate in future research? If so, please provide us with your phone number and email address if you have one. At the beep, the taxpayer will speak their name and email The recording with the name and email address is stored securely on the Contractor's servers as an audio file. The transcriptionist securely listens to the audio file via a secure web portal and

transcribes it securely into the same portal. Upon submission, the data is securely stored into a database. Additionally the contractor must protect SBU/PII taxpayer data in accordance with the policy that has been set forth and outlined in our Blanket Purchase Agreement (BPA).

c. Others

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

Participants are randomly selected from callers to the IRS. At each of the PPS sites, the call center supervisors select callers for invitation to the survey using a random Sampling Plan. All of our Surveys use the Random Methodology process because in order for it to be valid you have to do random sampling to obtain weighted data. When we do quality review for paper work, phone calls, etc. it is always a random sampling. Variables for selecting the calls include the day of month, time of day, and identification numbers for each site's PPS CSRs. PPS site supervisors notify the CSRs when their calls are selected for the survey. When the business of the call is complete, the CSR invites the caller to participate in the survey. Callers who agree to participate are transferred to the automated 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
NA

3. Is the survey voluntary Yes No

a. How is notice given that the survey is optional

Respondents are told they are invited to participate.

If the taxpayer agrees to take the survey, prior to taking the survey, the CSR reads the following script:

“Thank you for participating in this voluntary survey. This survey is being conducted by an independent, third-party organization, with tax practitioners to assist the IRS in improving its services. It will take about 10 minutes to complete. During this survey you will be asked to rate the service you received from the IRS on this call.”

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*)

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

Data are collected through Interactive Voice Response (IVR) telephone interactions.

Taxpayers who participate in this survey interact with the automated system, answering questions regarding their interaction with the Customer Service Representative (CSR), who handled their most recent call immediately preceding the survey. In other words, the taxpayer contacts the IRS for assistance, after speaking with a CSR and obtaining assistance they are asked if they would like to participate in a survey. If they answer yes, they are transferred into the survey which is automated. This is called Interactive Voice Response (IVR), very similar to when you contact any of your bill collectors (i.e., telephone, Cable or credit card agencies) rather than speaking to a live person, you are speaking into an Interactive Voice Response (IVR) system.

The data are collected and secured as outlined in the previous question.

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

d. Other

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
The contractor is

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 moderate--This task order falls under the customer satisfaction BPA and security clauses and actions associated with the BPA apply to this task order. Any contractor or subcontractor who will have access to employee or taxpayer PII data, must have at least a "Moderate Risk" (NACIC) investigation.

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

When the data are returned to the IRS from the contractor, it contains variable coding. This means that no "taxpayer" or PII data can be individually identified. The contractor returns the data using variable coding and none of the taxpayer information can be identified.

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
NA

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

These are encrypted data files sent electronically with Secure Messaging. Accounts Management Program Management/Process Assurance (PM/PA) analysts consolidate the data and forward to the contractor via secured electronic transfer (EFTU).

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

The contractor's sites have all been subject to site visits by IRS security personnel and have passed all required security protocols. Data are transferred to and from the contractor through EFTU.

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 PPS survey is unclassified. 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 will be consistent with terms agreed to under the Customer Satisfaction BPAs.

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 is included in the script.