

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 16-438

Date

05/23/2016

Section I - Introduction

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

Customer Assistant Relationship & Education (CARE) Media & Publication External Customer Satisfaction 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 Media and Publications (M&P) Division of the Internal Revenue Service needs to measure external customer satisfaction with its products and services. M&P wants to measure satisfaction with their products, to ensure they enhance taxpayer's abilities to understand and meet their obligations under Federal tax laws. Feedback from external customer satisfaction surveys is critical for assessing the customer's perception of our products and services and for helping the various program areas develop service improvement actions. M&P requires a commitment from a contractor to establish sampling methods to select valid samples from the appropriate populations—and to conduct web-based and mail surveys designed and owned by M&P.

The M&P surveys are a continuation of previous customer satisfaction studies. Survey venues include: Individual Taxpayers survey, Business Taxpayers survey, Tax Preparers survey, (web/mail surveys), and Forms Distribution survey (web only survey).

The primary goals of the survey are to survey external customers who use the documents and services provided by M&P (i.e., individual taxpayers, business taxpayers, tax preparers, and forms distributors). More specifically to: 1-Assess the level of customer satisfaction with M&P's products and services. 2-Provide M&P with suggestions for product and service improvements. 3-Produce actionable results that can be used to improve specific products and business processes. 4-Generate an understanding of customer satisfaction with all aspects of a document (e.g., ease of use, readability, clarity of language).

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/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 contractor will be provided with all of the data shown below from Media & Publications. This information is provided to the Contractor so that the survey is sent to the randomly selected participants. Name and Address; tax period and e-mail address (Forms Distribution only). It is critical that the information above be provided to the contractor so that we can obtain the analysis we need to develop our reports.

c. Others
N/A

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

Participants are randomly selected from IMF and BMF databases and the list of our Forms Distribution customers. WIRA provides the "data" file of the randomly selected participants to the Contractor. W&I Media & Publications is the source of the extracted data provided to the Contractor for the Forms Distribution survey. The sampling plan will include the target population and sampling frame, sampling specifications, expected reliability of the sample estimates, sampling limitations, preliminary sampling weights, and the strategy for achieving target quotas within key strata. These are encrypted data files sent electronically with Secure Messaging. The data is consolidated and forward to the contractor via secured electronic transfer. When the data is return to the IRS from the contractor, it contains variable coding. This means that no "taxpayer" can be identified. We do not send it to the contractor in variable coding.

- 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
BMF, IMF, and Forms Distribution e-mail list.

3. Is the survey voluntary Yes No

- a. How is notice given that the survey is optional

The letters and the survey just ask the taxpayers to participate in the survey. Nowhere on the letter or survey does it state that the survey is mandatory.

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*)

Forms Distribution provides the vendor with the e-mail addresses of their customers, primarily libraries and post offices, who request tax products using this e-mail address. The vendor sends the Forms Distribution customer an e-mail inviting them to participate in the survey. The participants are given an access code and password and a web address which they have to cut and paste to access the survey. For the Individual, Business, and Tax Preparer surveys, there is the option to take the survey online. If they chose to do so, the letter contains the access code, password, and e-mail address which takes them to the survey. Yes, cookies are used by the vendor.

- 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*)

WIRA delivers the Individual and Tax Preparer participant list for the . WIRA delivers all of the lists except Forms Distribution. The Individual Taxpayers are selected from a pool of taxpayers over 18 who did not use a preparer and filled a 1040, 1040A or 1040EZ. The Business Taxpayers are selected if they file one of the following returns and have less than \$10 million in assets and less than \$1 million in gross receipts. Form 1040 with a Schedule C, C-EZ, or F; Form 1120; Form 1120S and/or Form 1065. Tax Preparers were those with a Preparer TIN that were compliant and did not have a felony.

- d. Other

Business needs justification-all of the Forms Distribution survey interactions are conducted via e-mail. The taxpayers contact the IRS via e-mail and therefore we correspond back to them via e-mail. There are no other means of communicating with the taxpayer.

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 . 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

No information will be provided to IRS that in any way identifies the survey respondents. Refer to question #6-2 above. The contractor will also provide the IRS with the following goods/services if (exercised) some of the tasks are optional:

- Project Planning/Conference Call Kick-Off Meeting
- Survey Questionnaire/Screening Guide
- Monthly Survey Administration
- Survey Help Desk
- Focus Groups

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.

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 M&P 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

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)*

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 – as provided on the survey instruments.