

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)

FTD Alert 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 survey is designed to gather feedback from taxpayers related to the satisfaction of a Field Collection revenue officer contact regarding a decrease or change in payroll tax deposits. The benefits of the survey will allow Internal Revenue Service is to learn the value of the contacts to the customer, their effectiveness in contributing to filing and payment compliance, and gain suggestions for FTD Alert program improvement on assisting the taxpayer in meet their payroll deposit responsibilities.

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

Treas/IRS 00.001, 00.003 and Treas/IRS 36.003

Requested operational date

01/04/2016

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

name, company name, street address, city, state, zip code (to be used to mail survey)

c. Others

N/A

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

Taxpayers who have reduced or missing Federal Tax Deposits and were contacted by Field Collection revenue officers during the Early Intervention Initiatives Alert X Pilot within the last quarter of tax year 2015 and the first quarter of tax year 2016.

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

The data will be obtained through the Collection Integrated Computer Inventory system.

3. Is the survey voluntary

Yes No

a. How is notice given that the survey is optional

Participants will be notified via the letter that a mailed survey will be arriving and asking them to ensure the person with the most contact with the revenue officer receives it. All letters of notification will say that filling out the survey is voluntary.

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*)

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

The Collection FTD Alert team will select the population of 5000 Taxpayers who have reduced or missing Federal Tax Deposits and were contacted by Field Collection revenue officers during the Early Intervention Initiatives Alert X Pilot within the last quarter of tax year 2015 and the first quarter of tax year 2016.

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*)

SB/SE FR&S Research Central office 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 | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2. That all required "non-disclosure" clauses are contained in the contract | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> 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 | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

ii. If question 6b(i) contains any "no" answer, please explain

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 NACIC investigation as well as any other IRS checks related to being a lawful permanent registrant, registering for the military, and financial checks.

Under the Customer Satisfaction survey (CSS) Blanket Purchase Agreement (BPA), some of the contractor employees who work on the IRS project do not have access to the IRS owned SBU/PII data. The level of background investigation is determined by the position description document that is submitted to Contractor Security Management (CSM) and reviewed by Personnel Security as to whether a low or moderate investigation is required.

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

We will provide only aggregated results to Collection FTD Alert Staff. No identifying information will be provided. No adverse actions can be taken against the participants.

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

We will not release any "raw" or un-aggregated data.

e. If any employee or taxpayer identifiers will be provided to the business owner, explain the business reason

N/A - We will not provide any employee or taxpayer identifiers in the results of the survey.

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 data will be transferred. The data will be stored in a secured area on an IRS file server. Only FR&S employees assigned to the project will have access to the data which will be maintained in a restricted access folder.

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 data will be stored in a secured area on an IRS file server.

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 FTD Alert 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.

SB/SE has proposed a three-year retention for the records. SB/SE FR&S will follow IRM 1.7 (Research and Analysis for Tax Administration) and applicable federal guidelines, including the Federal Information Security Management Act of 2002 (FISMA). The information will be stored on the SB/SE FR&S computer system located in a secured area and only those researchers participating in the project will have access to the information. The names collected for participating in the focus groups are covered by Treasury/IRS SORN 10.004 - Stakeholder Relationship Management and Subject Files.

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)

N/A - Contractor is being used to print and mail the surveys. Survey responses will be received and scanned by SBSE FR&S Research.

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*)

No, all requirements of IRM 11.3.16 are included in the letters mailed prior to survey.