

Survey PCLIA Report

Date of Approval: February 21, 2017

Survey PCLIA ID Number: **2042**

A. Survey Description

1. Full name and acronym of the Survey. Optimizing Future State Strategies through Partnering with Tax Preparation and Software Companies: Third Party Refund Status Application Programming Interface Pilot 2, RAPI2

2. Is this a Survey, Telephone Interview or Focus Group? Survey

NOTE: the remaining questions will be simplified to refer to the Survey but still apply to Telephone Interview or Focus Group. If Telephone Interview or Focus Group, a copy of Interview Questions or the Moderators Guide will be requested by the Privacy Analyst.

3. Is this a new Survey? Yes

4. Is this a reoccurring Survey? No

4.b. If no, provide the dates collection of information will begin and end. January 2017 and end by April 2017.

5. Does this Survey have an SOI (Statistics of Income) control number? Yes

5.a. If yes, enter the number. SOI-506

6. Does the Information Collection Request require OMB Clearance? Yes

6.a. If yes, what is the OMB Clearance number? 1545-1432

A.1. General Business Purpose

7. What is the general business purpose of this Survey? Provide a clear, concise description of the Survey, the reason for the Survey, and the benefits to the IRS mission. 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.

B. PII Details

8. Is Personally Identifiable Information (PII) used, collected, received, displayed, stored, maintained, or disseminated in the Survey; or is PII used to select participants? (i.e. names, addresses, email addresses, etc)? Yes

8.a. If yes, specify the information.

<u>Selected</u>	<u>PII Element</u>	<u>On Primary</u>	<u>On Spouse</u>	<u>On Dependent</u>
No	Name	No	No	No
No	Mailing address	No	No	No
No	Phone Numbers	No	No	No
Yes	E-mail Address	No	No	No
No	Date of Birth	No	No	No
No	Place of Birth	No	No	No
No	SEID	No	No	No
No	Mother's Maiden Name	No	No	No
No	Protection Personal Identification Numbers (IP PIN)	No	No	No
No	Internet Protocol Address (IP Address)	No	No	No
No	Criminal History	No	No	No
No	Medical Information	No	No	No
No	Certificate or License Numbers	No	No	No
No	Vehicle Identifiers	No	No	No
No	Passport Number	No	No	No
No	Alien (A-) Number	No	No	No
No	Financial Account Numbers	No	No	No
No	Photographic Identifiers	No	No	No
No	Biometric Identifiers	No	No	No
No	Employment (HR) Information	No	No	No
No	Tax Account Information	No	No	No

8.b Are there other types of PII collected in the Survey? No

8.c. Is any PII data collected, disclosed, or studied on employees, taxpayers, stakeholders or other individuals who choose not to participate?

No

C. Privacy Act & System of Records

9. Is there a System of Records Notice(s) or SORNS that addresses the PII records in this Survey? Yes

9a. If yes, enter the SORN number(s) and the complete name of the SORN(s).

<u>SORNS Number</u>	<u>SORNS Name</u>
Treasury/IRS 00.001	Correspondence Files
Treasury/IRS 00.003	Taxpayer Advocate Service and Customer Feedback an
Treasury/IRS 24.030	CADE Individual Master File
Treasury/IRS 24.046	CADE Business Master File (BMF)

C.1. Privacy Act Notice

9.1 Based on the information you have provided, does the Survey require a Privacy Act Notice to be provided to participants? Yes

9.1.a. If yes, please provide the Privacy Act Statement. Your participation in this survey is entirely voluntary and your answers will be kept private to the fullest extent of the law.

D. Responsible Parties

10. Identify the individuals for the following Survey roles: (System Owner = Survey Owner/Business Owner) ## Official Use Only

E. Incoming PII Interfaces

11. Does the employee/taxpayer PII come from the IRS, Treasury, or other Government system(s), application(s) or data base(s)? No

11.1. Does the data come from other sources? Yes

11.1.a. If yes, describe the source of the information. The tax preparer, who is a Third Party Participant in the Refund Status API Pilot and covered by the pilot's MOU, will use the email address that they already have for Pilot taxpayer participants to send them a link to the survey. The Third Party Participant will not share the email address with the IRS.

F. PII Sent to External Organizations

12. Are the Survey results disclosed to any other Federal or State Government? (For example the Federal Viewpoint Survey/Questionnaire – OPM gets the results.) No

13. Are any external resources used to create the database of the participants? Yes

13.a. If yes, identify the external resources used to create the database, how the data is transmitted and if there is an Inter-Agency Agreement (ISA) /Memorandum of Understanding (MOU).

<u>Organization Name</u>	<u>Transmission method</u>	<u>ISA/MOU</u>
Refund Status API Third Party Pilot Participants	The organization will keep the information itself. The email information is not exchanged.	Yes

G. Survey Participation

14. Will the Survey be administered to IRS, Taxpayers or Others ? Taxpayers

15. Explain how participants are selected. Include a detailed description on the method and reason of selection. If selection is random, explain. To participate in the pilot, taxpayers give permission on their Form 1040 for their tax preparer to receive their refund status. Since the taxpayer already gave the tax preparer their e-mail address and communicates with the taxpayer about other tax-related items, the tax

preparer will send a survey invitation to all taxpayers who participated in the pilot for Tax Year 2016 through that tax preparer. The IRS will provide the language to the tax preparer. This message may be presented to the taxpayer-customer as part of an existing communication vehicle. It is preferred that this message be delivered to the taxpayer-customer within two weeks of their Form 1040 family submission. Participants will be instructed to visit a web link, which will be included in the solicitation and reminder letters, to take the online survey administered via a contractor.

16. How are participants notified of the Survey? 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 email solicitation sent by the taxpayer's tax preparer. No cookies will be used on the survey website. Email is being used, because that is the method that the tax preparers are already using to contact their clients. Taxpayers will be notified by the tax preparer that they will receive an email from them about taking a survey when they enroll in the pilot program when completing their taxes.

17. Is the Survey voluntary? Yes

If yes, how is notice given that the Survey is optional? Participants will be advised in the invitation and at the start of the survey that their participation is completely voluntary and optional.

18. How will the Survey be conducted?

No Electronically

Yes Web Based

Explain the 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 email solicitation sent by the taxpayer's tax preparer. No cookies will be used on the survey website.

No Phone

No Mail

No Other

G.1. Survey Process

19. Does IRS administer or perform analysis of the survey? Analysis

Provide the name of the IRS office performing analysis of the survey. Wage & Investment Strategies and Solutions

20. Does Contractor/Vendor administer or perform analysis of the survey? Yes

Contractor/Vendor: Administer

Provide the name of the IRS office administering the survey. XXX contract will go through Procurement for Request for Quote from Blanket Purchase Agreement which includes XXX, XXX and XXX contractors ## Official Use Only

Has a Contracting Officer or a Contracting Officer's Representative (COR) verified that:

20.a.1. All applicable FAR requirements are met to engage a contractor to perform the survey. Yes

20.a.2. That all required “non-disclosure” clauses are contained in the contract. Yes

20.a.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.

20.b. If yes, what is the level of access and background investigation completed on contractor employees prior to access to PII about employees or taxpayers? *Any contractor or subcontractor who will have access to the PII should have at least a “Moderate Risk” (NACIC) investigation. See Publication 4812 - Contractor Security Controls*

Contractor Users	Yes	Administrator	High
Contractor Managers	No		
Contractor Sys. Admin.	No		
Contractor Developers	No		

I. Information Protection

21. What information/results will be provided to the business owners (IRS Requestors) of the Survey? 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.

22. Can you confirm that employees or taxpayers who participate in the survey cannot be identified under any circumstances? Yes

23. Can you confirm that no adverse actions can be taken against participants regarding the participant’s answers. Yes.

24. 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? Yes

25. Are there any employee or taxpayer identifiers that are obtained as a result of responding to the survey? No

I.1 Records Schedule

26. Are the Survey records covered under the General Records Schedule (GRS), or have a National Archives and Records Administration (NARA) archivist approved a Record Control Schedule for the retention and destruction of official agency records stored in this Survey? Yes

26.a. If Yes, how long are the records required to be held under the corresponding RCS and how are they disposed of? Explain how long any PII data will be retained by the contractor if they are conducting the Survey on behalf of the IRS. In your response, please include the complete IRM number and specific item number and title.

The Optimizing Future State Strategies through Partnering with Tax Preparation and Software Companies: Third Party Refund Status Application Programming Interface Pilot Survey 2 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 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. 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 in Procurement. Cyber-security and National Institute of Standards and Technology (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. 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)

P.1 Data Security

27. How does the administrator of the survey guarantee that the PII regarding employees or taxpayers will not be compromised, lost or stolen when housed on IRS computers? Where and how is it stored and protected? The survey data will not be attached to any PII. The only PII that will be used is the taxpayer's email address. The email address is information that the Third Party Participants already have on file in their system and is not something the third parties are collecting for the IRS. The MOU for the Third Party Refund Status API for previous years and this year allow the Third Party Participants to send information to taxpayers who opted into the pilot program. The survey data itself does not contain any PII. However, the survey data will be transferred from the contractor to the IRS via the Electronic File Transfer Unit (EFTU).

28. Does a contractor/vendor administer or perform analysis of the survey? Yes

28.a. If yes, Please provide the Cyber security approved security and encryption used when data is transferred electronically from IRS to Contractors and back to the IRS. Neither the IRS or the Third Party Pilot Participants will be sending any data to the Contractor. The Contractor will use the EFTU to electronically transfer the data to the IRS.

28.b. If yes, When data is not sent electronically, provide in detail the information regarding the transfer back and forth from the IRS to contractors. All data will be sent electronically via the EFTU.

28.c. If yes, How is the survey PII protected and stored when it is housed at a contractor's site, on contractor's computers, please provide detailed information that the contractors uses regarding the physical and electronic security and protection of the data before, during, and after the survey. The survey data will be segregated from other non IRS data. In addition, all data at rest or in transport the data will be encrypted. Whenever information is stored on IT assets at the facility, the contractor will be compliant with the implementation of NIST 800-53, Recommended Security Controls for Federal Information Systems & Organizations controls. This is covered by the BPA.

M. Civil Liberties

29. Does the Survey maintain records describing how an individual exercises rights guaranteed by the First Amendment (including, but not limited to information regarding religious and political beliefs, freedom of speech and of the press, and freedom of assembly and petition)? No

30. Will this Survey have the capability to identify, locate, and monitor individuals or groups of people? No

End of Report
