

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)

Customer Account Services (CAS) Injured Spouse Customer Satisfaction FY2015 Knowledge Gap Testing Research

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 Injured Spouse operation within the Customer Accounts Services (CAS) Operating Unit of the Wage & Investment (W&I) Business Operating Division (BOD) is responsible for responding to written customer technical and account inquiries, resolving customer account issues, providing account settlement (payment options), and working related issues. W&I requires feedback from customers to continually improve the Injured Spouse operations. W&I solicits this feedback through customer satisfaction research.

W&I CAS expects to accomplish the following objectives:

- To measure the level of customer satisfaction concerning services provided to the customer during their Injured Spouse interaction.
- To identify problems that customers encounter when interacting with the Injured Spouse function.
- To gain insight on improvements in Customer Service Representative (CSR) training that can be made to Injured Spouse services.
- To improve the service that Injured Spouse provides to their customers.
- To assess improvements/problems by comparing this year's results to prior years'.

From the Focus Group results, W&I CAS will be able to assess the current level of training for CSRs in the Injured Spouse operations and draw on customer input to improve our products and services.

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

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

Requested operational date

04/01/2017

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

Injured Spouse closed cases - The contractor will be provided the following data from the Injured Spouse Functional Coordinators:
Name, Address; City, State, Zip Code.

c. Others

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

Participants are selected from taxpayers who correspond with IRS or send in amended tax returns. W&I Injured Spouse operation is the source of the extracted data provided to the Contractor. Recruitment for the focus group will be performed at the conclusion of survey transactions, asking participants their willingness to participate in future research. _____ will send follow-up emails or phone calls with recruited participants to ensure the desired number of participants is recruited. _____ will recruit participants with varying characteristics such as customer type, census region, and/or population density (high, medium, low).

The contractor will prepare and submit to IRS a sampling plan for the 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. Sample plans are followed by IRS based on expected volumes in each site. The _____ Team conducts remote focus group testing with participants who live in geographically diverse areas. To accomplish this, _____ will use telephone conferencing to interact with participants. Injured Spouse customers can participate remotely from anywhere in the country by using a program such as Zoom or the GoToMeeting™ online platform. _____ will be using the Zoom program to create a telephone meeting for the participants to call in to for the focus group sessions. Zoom gives _____ the capability to share screens and show video as well, however, these features will not be used for this particular focus group. We will only be using the remote phone/meeting feature.

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

Names and addresses are obtained by using an Individual Data Retrieval System (IDRS) command code in the IRS data base. Each site forwards their Access database monthly to the W&I Accounts Management Headquarters office. 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. Each month, the contractor will draw a stratified random sample from the sampling data file in accordance with the sampling procedures.

3. Is the survey voluntary

 Yes No

a. How is notice given that the survey is optional

Respondents are invited to participate via telephone. Focus will be given remotely by using a program such as Zoom or the GoToMeeting on line platform.

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*)

The focus group session will be led by an experienced FMG Team facilitator, who will lead discussions on established topics defined within a moderator guide. A second team member will participate in the sessions and will assist the facilitator, take notes, and support reporting and analysis efforts. The overall approach to this testing is structured and clinical. The moderator guide will be pre-tested by _____ staff. The IRS will have the opportunity to observe all focus group tests remotely over the phone.

Please see attached screen and moderator's guide.

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*)

Copy 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

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

No information will be provided to IRS that in any way identifies the survey respondents.

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

will not be returning any raw or unaggregated employee or taxpayer data to the IRS.

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

will be collecting contact information from participants for the purposes of reminder emails, calls, and payment. This information will not be shared with IRS for privacy purposes. We may collect demographic and taxpayer data for the purposes of summarizing participant data in the final report. The information in the report will not be tied to personally identifying information.

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 Information Technology (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

Reference:

NIST 800-53, Recommended Security Controls for Federal Information Systems & Organizations (Media Protection, Media Storage, System and Information Integrity)

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)

DLD - see above regarding the required RCS.

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, FMG includes language regarding the Paperwork Reduction Act in the screener's guide. The Injured Spouse survey itself includes the following "Privacy Statement": The authority requesting the information is 5 USC 301. The primary purpose of asking for the information is to determine steps IRS can take to improve on service to you. The information may be disclosed as authorized by the routine uses published for the Privacy Act System of Records entitled, Treasury/IRS 00.001 Correspondence Files, including Stakeholder Partnership File, and Correspondence Control Files, as published in the Federal Register: December 10, 2001 (Volume 66, Number 237) [Notices] pages 63785-6. Providing the information is voluntary. Not answering some or all of the questions will not affect you.