

Date of Approval: 04/19/2025
Questionnaire Number: 1224

Basic Information/Executive Summary

What is the name of your project (system, database, pilot, product, survey, social media site, etc.)?

Stakeholder Partnerships, Education and Communication (SPEC)

Business Unit

Taxpayer Services

Preparer

For Official Use Only

Subject Matter Expert

For Official Use Only

Program Manager

For Official Use Only

Designated Executive Representative

For Official Use Only

Executive Sponsor

For Official Use Only

Executive Summary: Provide a clear and concise description of your project and how it will allow the IRS to achieve its mission.

Taxpayer Services' 2024 Stakeholder Partnerships, Education and Communication (SPEC) Partners Survey continues to support the delivery of free tax return preparation, outreach and education for taxpayers by operating more than 12,000 Volunteer Income Tax Assistance (VITA) and Tax Counseling for the Elderly (TCE) sites; this effort was instituted in 2003 and continues to evolve; it supports IRS' Strategic Goal I (Service) "Deliver high quality and timely service to reduce taxpayer burden and encourage voluntary compliance." As a SPEC member, the targeted audience, they are asked during events or in form submissions if they would like to self-identify themselves as a potential participant for future survey projects. They are notified by IRS' contractor [Pacific Consultation Group, PCG] that will be electronically transferred to secure environment for extraction and updates. IRS maintains the contact list to communicate SPEC events and survey opportunities. Therefore, there is no applied methodology for selection; the tax professionals that indicates voluntary participation in a focus group are automatically eligible. The purpose and results

of this survey helps determine two external performance measures: 1) SPEC Partner satisfaction; and 2) SPEC Partner dissatisfaction. These satisfaction measures help SPEC plan actions to meet SPEC Partner needs and improve SPEC products and services to taxpayers. Contractor will have access to the data and sent to the service via Enterprise File Transfer Utility (EFTU). Only the aggregated survey results data will be shared by the contractor to Taxpayer Service's SPEC Office; no responses, specific to an individual, will be captured or used for any reason other than declared within this PCLIA. The aggregated data will include issues identified during each of the sessions; services used, how well the services worked, the user's authentication experience, and areas of improvement such as additional services; the results will be shared with TAS management

Personally Identifiable Information (PII)

Will this project use, collect, receive, display, store, maintain, or disseminate any type of Sensitive but Unclassified (SBU), Personally Identifiable Information (PII), or Federal Tax Information (FTI)?

Yes

Please explain in detail how this project uses sensitive data from inception to destruction (data lifecycle).

The PII used in the presurvey activities is required to invite the targeted audience, our SPEC Partners who previously indicated they are willing to participate in future surveys. Although the participant data is stored it is not analyzed, nor can it be associated to the individual's response. The use of PII is not required in the conduction of the survey, other than the participant's name may be reference during the survey session. Responses will not be recorded to an individual but as an aggregate; therefore, there is no PII used or shared in the post-survey activities as the aggregated results will be shared with the Transformation and Strategy Office.

Please select all types of Sensitive but Unclassified data (SBU)/Personally Identifiable Information (PII)/Federal Tax Information (FTI) that this project uses.

Address

Email Address

Employment Information

Name

Cite the authority for collecting SBU/PII/FTI (including SSN if relevant).

PII for federal tax administration - generally IRC Sections 6001 6011 or 6012

PII for personnel administration - 5 USC

Product Information (Questions)

1.1 Is this survey a result of the Inflation Reduction Act (IRA)?

No

1.13 What is your research method(s) used (i.e., survey, telephone interview, focus group, etc.)?

Survey

1.14 Is this a new survey, telephone interview, focus group, or usability testing?
Throughout the rest of this questionnaire, we will use the term "survey" to include all of these.

No

1.15 Is there a Privacy and Civil Liberties Impact Assessment (PCLIA) for this survey?

Yes

1.16 Enter the full name of the most recent PCLIA.

Stakeholder Partnerships, Education and Communication (SPEC)

1.17 Enter the PCLIA number of the most recent PCLIA.

6047

1.18 What are the reasons for the change?

Revised the questionnaire.

1.19 Which Business Unit (BU) is requesting this survey?

Stakeholder Partnerships, Education and Communication (SPEC)

1.21 Who will the survey be administered to?

External Survey (Taxpayers or Others)

1.22 Is this a reoccurring survey?

Yes

1.22 Will this survey be administered for one year with multiple events (1-year expiration)?

No

1.22 Will the survey be administered annually (3-year expiration)?

Yes

1.22 What is the start date?

03/17/2025

1.23 What is the end date?

7/18/2027

2.11 Will the survey capture any type of PII or is PII (names, addresses, email addresses, etc.) used to select participants?

Yes

2.12 If any PII data is collected, disclosed, or studied on individuals who choose not to participate, please describe the data.

SPEC uses PII during the selection process; a list of partner names and e-mails is used to send an invitation to the survey. Although, the data (the partner listing) is stored within SPECs secure environment, even if the Partner does not respond to the survey; no association to the individual is made whether they participate or not and therefore cannot be disclosed.

2.13 List any linkable data that the survey uses, collects, receives, displays, stores, maintains, or disseminates (gender, ethnicity, parts of address, tax filing information, etc.) or uses to select participants?

The linkable items identified are used to select and notify participants; they are address, name, email address, employment information, other, and state. Other is defined as external organization membership information and/or organization title; these elements are used for selection and notification purposes.

2.14 Explain how the participants are selected. Include a detailed description. Please provide your research plan as supporting documentation.

There is no applied participant selection process; all SPEC partners are the targeted participant and are eligible to participate based on their SPEC membership. They opt-in by voluntarily indicating their willingness to participate in a future survey (each SPEC has a partner agreement (Form 13533) that is signed each year with a line asking for the email address of the contact to take the survey). We do not have a research plan; this is a means to receive direct feedback from our customers specific to their experience with IRS' products and services. SPEC is providing a SPEC partner listing of all SPEC partner's that have a survey contact identified in SPEC's MIS system SPECTRM (SPEC Total Relationship Management). The listing includes organization name, e-mail contact information, partner type, and other needed information. SPEC transfers the listing to contractor (Pacific Consulting Group; PCG) as a secured, encrypted, and zipped electronic file via the IRS Enterprise File Transfer Utility (EFTU) process. The list is available to IRS personnel connected to the project and the contractor. Email addresses are used for contact only and cannot be connected to any given SPEC Partner's responses. The contractor shall send a pre-notification e-mail to SPEC Partners notifying them of the upcoming survey. Hyperlinks will be disabled in the email, and no replies are allowed to the email. The contractor shall capture opt-outs, contact information changes, and e-mail addresses from data collection attempts returned as undeliverable. This information will be shared

with the Taxpayer Services (TS) Contracting Officer Representative (COR), SPEC representative and TS survey researcher/s on a weekly basis via e-mail. The IRS will attempt to locate correct e-mail addresses for partners whose e-mails were returned undelivered. To locate correct e-mail addresses, SPEC Headquarters will work with SPEC Relationship Managers to contact SPEC Partners to obtain the correct contact information for these Partners.

2.15 How are the participants notified (letter, postcard, email, etc.) of the survey, and if the survey is voluntary/optional, how is notice given? If it is not voluntary, please explain why it is mandatory.

There is no applied participant selection process; all SPEC partners are the targeted participant and are eligible to participate based on their SPEC membership. They opt-in by voluntarily indicating their willingness to participate in a future survey (each SPEC has a partner agreement (Form 13533) that is signed each year with a line asking for the email address of the contact to take the survey). Participants (SPEC Partners) will receive a pre-survey notification e-mail notifying them of the upcoming survey; this notice will include a privacy notice letting them know the date and purpose of the survey, what information we will collect and that their responses are voluntary and no adverse actions by not participating. We do not have a research plan; this is a means to receive direct feedback from our customers specific to their experience with IRS' products and services.

3.11 What tool(s) is/are used to conduct the survey? Please indicate if the anonymous feature has been set for the survey, if applicable.

The contractor uses Qualtrics, a FedRAMP certified, data-collection survey tool to create and conduct the survey. The anonymous feature is set for the survey.

3.12 Will the survey be audio-recorded or video-recorded?

No

4.11 Does this survey retrieve information by any personal identifier for an individual who is a U.S. citizen, or an alien lawfully admitted for permanent residence? If the answer is Yes, you must have at least one SORN name and number selected in the SORNs section.

Yes

4.12 The Privacy Act of 1974 (5 USC § 552a(e)(3)) requires each agency that maintains a system of records to inform each individual requested to supply information about themselves. Do survey participants provide information about themselves?

Yes

4.13 Please provide the Privacy Act 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 our

service to you. The information may be disclosed to a contractor to analyze to improve our service to you. Providing the information is voluntary. Not answering some or all the questions will not affect you.

4.14 Does the IRS administer (conduct) the survey?

No

4.21 If a contractor administers (conducts) and analyzes the survey, is all work performed and contained in the United States?

Yes

4.22 How does the administrator of the survey protect employees' or taxpayers' SBU/PII from compromise, loss, theft, or disclosure?

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.

4.23 Where and how is the PII stored and protected?

SBU/PII used in SPEC's pre-survey activities is limited to two sets of data; the participant listing is extracted from IRS' SPEC system and temporarily stored in the EFTU tool. This data will form a working participant list; both the contractor and the IRS will make updates throughout the project's lifecycle. The second data set is the notification of the survey or survey communication templates. The survey templates used to provide the notice of survey, including reminders and thank you's, will be stored by both the Project Office and Contractor in a secure environment with limited or restricted access; access is granted only to the working project team. The email invite will be stored in the contractor's secure email environment and retained per industry standards and as declared in this PCLIA. This survey administration does not request nor anticipate the use of PII other than the elements declared for participant contact, i.e. the participant's name (first and last), e-mail and mailing address, state, and their organizational information). The eGovernment reporting requirements dictates raw responses will be captured and shared to Office of Management and Budget; however, any PII that identifies a person will be redacted prior to being stored/transmitted; this promotes disassociation from the individual and their response. During the last phase or post-survey activities the use of SBU/PII is not required. All survey results will be aggregated; any PII that identifies a person will be redacted prior to being transmitted/stored in SPECs secure environment. As indicated in the Records Section, retention of this survey's data will be retained for one year passed the project's resolution or when no longer needed.

4.24 Provide the Cyber Security approved security and encryption used when data is transferred electronically from the IRS to contractors and back to the IRS.

Electronic File Transfer Unit

4.25 How is the survey PII protected and stored when it is housed at a contractor site on contractor computers? Provide a detailed explanation of the physical and electronic security and protection of the data before, during and after the survey.

The contractor, as the survey administrator, protects the participants' data by temporarily transmitting the listing to a secure electronic file transfer tool; the aggregated reports do not contain PII; this ensures the responses cannot be associated to the individual. The Applied controls as indicated in the Publication 4812 are adhered to; a separation of duties and data and limited access is granted based on assigned duties. The data is stored on a secured shared drive with limited access.

4.26 Has a Contracting Officer or Contracting Officer's Representative (COR) verified the contract included privacy and security clauses for data protection and that all contractors have signed non-disclosure agreements which are on file with the COR?

Yes

4.27 Identify the roles and their access level to the PII data.

Contractor Users & Contractor Managers - Read and Write Access

Contractor Developers & Contractor Sys. Admin. - Administrator Access

4.28 Identify the roles and their access level to the PII data and indicate whether their background investigation is complete or not.

Contractor Users & Contractor Managers - Read and Write Access

Contractor Developers & Contractor Sys. Admin. - Administrator Access

All have completed Moderate Background Investigation.

4.28 Explain the precautions taken to ensure the survey results will not be used for any other purpose not listed in the Detailed Business Purpose and Need section and to ensure that employees or taxpayers who participate in the survey cannot be identified or re-identified under any circumstances and no adverse actions taken.

To ensure survey results are not used for any other purpose than identified in this PCLIA, the contractor will not share "raw" survey results outside of the IRS; information that can identify an employee or taxpayer is deleted from the data that is retained by the administrator/vendor [Pacific Consulting Group (PCG)] as identified in the Records section of this PCLIA. Deliverables will be sent to the business unit with aggregated data only; no PII Specific to an individual is included when shared to SPEC; there is no means to reidentify or associate a response to an individual; therefore, there is no means to take adverse action. For transfer of potential participants contact information or survey results in aggregated form, and OMB reporting only Approved Cyber Security and National Institute of Standards and Technology (NIST) requirements will be used to transfer/transmit data, i.e. data will be password protected. The participant data is electronically transferred to and from the contractor using the Electronic File Transfer Utility tool (EFTU) as a bulk data file; file encryption and an encryption

phrase are communicated separately from the email/package is applied as a precaution. An alternate method to communicate the pass phrase, e.g., phone call will also be used facilitate access to the data. Aggregated data/reports are sent to the Business Unit (BU); the survey results are destroyed at the end of the contract. Although EFTU and SecureZip are preferred, currently all methods are being used.

4.29 Does the administrator of the survey have access to information identifying participants?

Yes

5.11 For employee or taxpayer satisfaction surveys explain how you have ensured that no "raw" or unaggregated employee or taxpayer data will be provided to any IRS office.

No information will be provided to IRS that in any way identifies the survey respondents. Neither SPEC nor Technical Support (TTS) will receive "raw" or un-aggregated employee or taxpayer data; employee/ taxpayer identifiers specific to an individual cannot be associated to the participant which eliminates the risks associated to these elements.

5.13 Does the individual about whom the information was collected or maintained expressly authorize its collection/maintenance?

Yes

Interfaces

Interface Type

Other Federal Agencies

Agency Name

Office of Management and Budget (OMB)

Incoming/Outgoing

Outgoing (Sending)

Transfer Method

Secure email/Zixmail

Interface Type

Other Federal Agencies

Agency Name

Treasury Inspector General for Tax Administration (TIGTA)

Incoming/Outgoing

Outgoing (Sending)

Transfer Method

Secure email/Zixmail

Interface Type

IRS Systems, file, or database

Agency Name

Electronic File Transfer Utility

Incoming/Outgoing

Both

Transfer Method

Electronic File Transfer Utility (EFTU)

Interface Type

IRS Systems, file, or database

Agency Name

Management Information Systems-SPECTRM SPEC Total
Relationship Management

Incoming/Outgoing

Incoming (Receiving)

Transfer Method

Electronic File Transfer Utility (EFTU)

Systems of Records Notices (SORNs)

SORN Number & Name

IRS 36.003 - General Personnel and Payroll Records

Describe the IRS use and relevance of this SORN.

This SORN cites the routine uses of SORN 36.003, General Personnel and Payroll Records, as they are applied and identified for the purpose of collecting current employee personnel records to conduct the survey; for which IRS collected the records, and no privilege is asserted. Disclosure of this information (and the services this survey supports) is granted under 26 U.S.C. 6103.

SORN Number & Name

IRS 00.001 - Correspondence Files and Correspondence Control Files

Describe the IRS use and relevance of this SORN.

The routine cities uses of SORN 00.001, Correspondence Files and Correspondence Control Files, as they are applied and identified for the purpose of administering personnel and payroll programs and tracking voluntary survey responses. Disclosure of returns and return information may be made only as provided by 26 U.S.C. 6103.

Records Retention

What is the Record Schedule System?

General Record Schedule (GRS)

What is the retention series title?

Public customer service operations records

What is the GRS/RCS Item Number?

6.5/010

What type of Records is this for?

Electronic

Please provide a brief description of the chosen GRS or RCS item.

The web-based survey identifies the routine uses identified in SORN 00.001, Correspondence Files and Correspondence Control Files, are applied and identified, for the purpose of tracking correspondence from voluntary surveys. Correspondence may include letters, calls, email, and other forms of communication. Correspondence may be included in other systems of records described by specific notices. Disclosure of returns and return information may be made only as provided by 26 U.S.C. 6103.

What is the disposition schedule?

Destroy 1 year after resolved, or when no longer needed for business use, whichever is appropriate.

Data Locations

What type of site is this?

Environment

What is the name of the Environment?

Microsoft Azure Government

What is the sensitivity of the Environment?

Personally Identifiable Information (PII) including Linkable Data

Please provide a brief description of the Environment.

Microsoft Azure Government is a FedRAMP-certified designated secure cloud-based data storage environment (see <https://marketplace.fedramp.gov/products/F1603087869>).

What are the incoming connections to this Environment?

The contractor collects survey results via Qualtrics and stores the results in the Microsoft Azure Government cloud-based environment.

What are the outgoing connections from this Environment?

Collected data are used to generate aggregate reports without PII associated to the individual and distributed to SPEC clients as an email attachment.

What type of site is this?

System

What is the name of the System?

Qualtrics

What is the sensitivity of the System?

Personally Identifiable Information (PII) including Linkable Data

What is the URL of the item, if applicable?

https://yourviews.pcgfirm.com/jfe/form/SV_7OQVTXMUQykoEHc

Please provide a brief description of the System.

Qualtrics is FedRAMP authorized at the Moderate Impact level. System is a designated survey results folder. PCG currently owns and maintains an annual subscription to Qualtrics' FedRAMP approved services which is used in support of SPEC-Partner surveys. Licenses used are owned and operated by a small number of PCG staff who all currently hold staff-like access.

What are the incoming connections to this System?

The Qualtrics survey tool receives the survey responses directly from the participant; the data are analyzed and aggregated in the tool to generate the report.

What are the outgoing connections from this System?

Aggregated reports without PII associated to the individual are distributed to SPEC clients as an email attachment.

What type of site is this?

Shared Drive

What is the name of the Shared Drive?

CustSatReporting

What is the sensitivity of the Shared Drive?

Personally Identifiable Information (PII) including Linkable Data

Please provide a brief description of the Shared Drive.

A secure shared drive is used to store project and data files and reports. Data are stored as an Excel file on a secure IRS Taxpayer Services network drive, and each project is stored in a separate folder. Only IRS analysts assigned to the project and with proper clearances can access the data.

What are the incoming connections to this Shared Drive?

Data collected via a Qualtrics survey are saved and stored as Excel files and reports as Microsoft PowerPoint documents on a secure IRS Taxpayer Services network drive, and each project is stored in a separate folder. Only IRS analysts assigned to the project and with proper clearances can access the data.

What are the outgoing connections from this Shared Drive?

Microsoft PowerPoint files are used to distribute aggregated reports without PII to SPEC clients.