

Nationwide Tax Forum Online Feedback Form (NTFO) – Privacy Impact Assessment

PIA Approval Date – Sep. 28, 2011

Survey Overview:

The NTFO Feedback Form is an online, optional form that any student taking an NTFO seminar for CPE credit can complete at the end of their online seminar experience. The Feedback Form is intended to measure the student's satisfaction with their online experience. National Public Liaison uses the information to determine where changes can be made to improve this online training. This survey helps the IRS fulfill its mission to improve taxpayer customer service and deliver the products that will help tax practitioners and taxpayers fulfill their tax obligations.

Systems of Records Notice (SORN):

- IRS 00.003--Taxpayer Advocate Service and Customer Feedback and Survey Records

About the Survey

1. What persons will the survey to be administered to:

A. IRS employees, managers or executive service?

No.

B. Taxpayers?

No.

C. Others?

Yes, tax practitioners who choose to enroll for a NTFO seminar for CPE credit are the only persons given the opportunity to complete the Feedback Form.

2. Explain how participants are chosen:

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, give complete title of the system.

Participants are chosen from the list of registered users on NTFO. Everyone who takes a seminar for CPE credit has the option to complete the Feedback Form.

B. Do the systems described above have a current/valid Privacy Impact Assessment (PIA) on file?

Yes. Nationwide Tax Forums Online

C. Date of the current/valid PIA?

April 13, 2011.

3. Is the survey voluntary?

Yes.

A. How is notice given that the survey is optional?

When the student is directed to the Feedback Form, the following statement appears at the top of the screen to notify them that the form is voluntary: "The following is an optional survey about your experience in this seminar. To proceed without taking this survey, please click the "Certificate of Completion" button above."

4. Is any identifiable data collected, shared or studied on employees or taxpayers who refuse to take the survey?

No

5. How will the survey be conducted?

A. Electronically?

Yes.

B. Phone?

No.

C. Mail?

No.

D. Other?

No.

6. Who will conduct the survey?

A. IRS conducted?

No.

B. Contractor conducted?

Yes.

• **Has a Contracting Officer or COTR verified that:**

○ **All applicable FAR requirements are met to engage a contractor to perform the survey?**

Yes

○ **That all required “non–disclosure” clauses are contained in the Contract?**

Yes.

○ **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 COTR?**

Yes.

C. If question 6b contains any “no” answers, please explain why.

Not applicable.

D. What is the level of background investigation completed on contractor employees prior to access to PII information about employees or taxpayers?

A Contractor Moderate Risk Level Background Investigation is the standard for contractor who have access to PII information.

E. What information will the contractor provide to the business owner (IRS requestor) of the survey?

The contractor will provide raw data for all completed feedback forms. The raw data does not contain any information that would identify the participants who choose to take the survey.

F. If any employees or taxpayers identifiers will be provided to the business owner, explain the business reason?

No SBU/PII information about any participant is collected, used or stored, therefore, no SBU/PII information will be provided to the IRS business owner.

7. How does the administration of the survey guarantee that the PII data regarding employees or taxpayers is not compromised, lost or stolen?

The contractor will comply with all Federal requirements for Privacy and Disclosure law; will have received Privacy and Disclosure training; and will have signed non-disclosure agreements. Also, the contractor facilities will have been inspected and approved for security and disclosure measures.

8. How is the survey PII data protected and stored?

The contractor will have met all Federal and IRS requirements for physical and electronic security & protection of the participant's data. As noted above, the contractor's facilities have been inspected by IRS personnel to ensure compliance with all governmental requirements for physical and electronic security.

9. Is any other Federal or State government data used to create the database of participants?

No.

10. Are the survey results shared with any other Federal or State government office?

No.

11. Survey Records – Retention and Disposal:

A. Cite any business owner policy IRM Chapter (including Sections/subsection) and IRM 1.15/Record Control Schedule (including item number) that described how the data is retained, stored and disposed of.

Because this survey (feedback) form does not ask for names of participants and will not identify participants to the business owner, the records created are likely to be considered "non-records" and may not need to be scheduled. However, the business owner will work with the IRS Records Control Officer to assure that the feedback answers collected and used meet retention and disposal requirements of NARA. The determination of the IRS Record Administration Office will be provided to the Office of Privacy Compliance, and this section will be updated if needed.

B. Explain how long any PII data will be retained by the contractor if they are conducting the survey on behalf of the IRS.

All legal requirements that apply to IRS records (and non-records) must be followed by contractors. The contractor will not destroy or remove any records or non-records associated with the survey in their possession until guidance is provided by the approved records disposition authority that NARA will provide.

12. Base on the information you have provided above, does the survey require a Privacy Act Notice to be provided to participants?

No. This survey does not meet the requirements for the use of a Privacy Act Notice, since no names are collected, used, stored or shared.

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