Date of Approval: 05/10/2024 Questionnaire Number: 1048

### **Basic Information/Executive Summary**

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

Free File Prototype Usability Test

**Business Unit** 

Office of Online 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.

The study will help fulfill the Inflation Reduction Act's (IRA) requirement to "improve self-service options". Free File is an anonymous, self-service tool for taxpayers to use to browse free tax filing offers from third party companies. This study will focus on reviewing a prototype and how users interact with the tool. It will also focus on taxpayers' reaction to content within the tool and landing pages. Taxpayers will use "dummy data" to go through parts of the tool that ask for taxrelated information. Participants will also answer interview questions from a moderator. The main goals of the study are to: 1. Determine areas of enhancement and improvement for Free File. 2. Investigate if the organization and content of the application are understandable. 3. Explore taxpayers' experiences finding the

Free File application on the IRS.gov website. 4. Investigate taxpayers' reactions to and understanding of both landing pages for the tool. 5. Investigate taxpayers' understanding of the purpose and functionality of different parts of the tool (such as browse Trusted Partners versus Find Trusted Partners tool). Office of Online Services (OLS) will use these findings to make iterative improvements to the application. Participant recruitment will be handled by a third-party vendor ForsMarsh/BLN24. ForsMarsh/BLN24 may collect Personally Identifiable Information (PII) such as name, e-mail address, and employment information during the recruitment handling and participant outreach and scheduling, however PII will not be used to identify the participants in the research report or findings. Notes will be captured by OLS during the study, however no PII will be captured in the notes.

## **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).

ForsMarsh/BLN24 will recruit participants for the usability tests using their internal database of volunteer participants. They will send an email to potential participants asking to take an online screener to determine their eligibility. The participants have self-registered with ForsMarsh/BLN24 to conduct their surveys. The participants have voluntarily accessed the vendor's website to self-register and in doing so have volunteered to be contacted by phone or email to be part of future market research studies. The ForsMarsh/BLN24 maintains a database for these potential participants. As part of the ForsMarsh/BLN24 contract, they will contact the third-party vendor who will then use the potential participants listing to contact possible participants by email. Within the email they are notified of an upcoming survey event, the dates and times are shared with the potential participants. The participants are asked to indicate if they can participate in a screener survey (also referred to as a qualifying questionnaire). The selection for this study is based on certain criteria, the participants responses to a screener questionnaire and their availability to participate. The recruitment vendor will maintain the participant's privacy by keeping their data in a secure database stored in an encrypted format on their private server. Upon study completion, any recruitment data will be destroyed within 1 year.

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

Address

Biometric Information

**Email Address** 

**Employment Information** 

Federal Tax Information (FTI)

Internet Protocol Address (IP Address)

Name

Telephone Numbers

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

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

## **Product Information (Questions)**

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

Yes

1.12 What is the IRA Initiative Number?

**IRA 1.4** 

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

**Usability Test** 

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.

yes

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

Office of Online Services

1.21 Who will the survey be administered to?

The general public; taxpayers

1.22 Is this a reoccurring survey?

no

1.22 What is the start date?

May 2024

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

Yes

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

No

1.23 What is the end date?

June 2024

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.

Access to this data will be limited to select members of the third-party vendor's project team. First names, email addresses, and phone numbers are securely shared with IRS-cleared Fors Marsh staff directly working on the project in the event the moderator needs to contact the participant. Otherwise, no PII is shared with Fors Marsh. No PII is shared with IRS at any time. Upon completion of the study, any recruitment data will be destroyed within 60-90 days. PII of participants who chose not to participate in this in-depth interview will not be retained.

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?

Personally Identifiable Information (PII) such as name, primary contact number and/or e-mail address may be collected by the recruitment firm handling

participant outreach and scheduling, however PII will not be released to federal government personnel.

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

To stay within the bounds of Office of Management and Budget (OMB)/Paperwork Reduction Act (PRA) requirements for collecting information and to ensure sufficient data to make meaningful conclusions, we will be conducting usability tests with up to 8 participants. ForsMarsh/BLN24 will recruit participants for the usability tests using their internal database of volunteer participants. They will send an email to potential participants asking to take an online screener to determine their eligibility. The participants have self-registered with ForsMarsh/BLN24 to conduct their surveys. The participants have voluntarily accessed the vendor's website to self-register and in doing so have volunteered to be contacted by phone or email to be part of future market research studies. The ForsMarsh/BLN24 maintains a database for these potential participants. As part of the ForsMarsh/BLN24 contract, they will contact the third-party vendor who will then use the potential participants listing to contact possible participants by email. Within the email they are notified of an upcoming survey event, the dates and times are shared with the potential participants. The participants are asked to indicate if they can participate in a screener survey (also referred to as a qualifying questionnaire). The selection for this study is based on certain criteria, the participants responses to a screener questionnaire and their availability to participate. The recruitment vendor will maintain the participant's privacy by keeping their data in a secure database stored in an encrypted format on their private server. Upon study completion, any recruitment data will be destroyed within 1 year.

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.

Participants are notified by email and/or phone, mail. Participation is voluntary. Notice is given in email and/or phone call informing participants of the survey participation opportunities: Providing feedback is voluntary and confidential. Any responses you provide are completely voluntary. During usability testing, the moderator will read the statement informing participants their participation is voluntary.

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.

Microsoft Teams

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

Yes

3.13 Provide the consent method and statement.

We will provide the following statement at the beginning of the session to verbally acquire consent: "We will capture a video recording of the computer screen during this session, but your name and personal information will not be combined with the recordings or your responses. Other project staff may listen to the recording at a later date."

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.

Privacy Act Statement: The authority requesting this information is 5 USC 301. The primary purpose of asking for the information is to determine steps the IRS can take to improve our services to you. The information may be disclosed as authorized by the routine uses published in the following Privacy Act System of Records: (1) IRS 00.001 Correspondence Files and Correspondence Control Files and (2) IRS 10.004 Stakeholder Relationship Management and Subject Files.

4.14 Does the IRS administer (conduct) the survey?

yes

4.15 Provide the name of the IRS office administering the survey.

Office of Online Services

4.18 Does the IRS perform analysis of the survey results?

yes

4.19 Provide the name of the IRS office performing the analysis of the survey.

Office of Online Services

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.

ForsMarsh/BLN24 will recruit participants for the usability tests using their internal database of volunteer participants. They will send an email to potential participants asking to take an online screener to determine their eligibility. The participants have self-registered with ForsMarsh/BLN24 to conduct their surveys. The participants have voluntarily accessed the vendor's website to self-register and in doing so have volunteered to be contacted by phone or email to be part of future market research studies. The ForsMarsh/BLN24 maintains a database for these potential participants. As part of the ForsMarsh/BLN24 contract, they will contact the third-party vendor who will then use the potential participants listing to contact possible participants by email. Within the email they are notified of an upcoming survey event, the dates and times are shared with the potential participants. The participants are asked to indicate if they can participate in a screener survey (also referred to as a qualifying questionnaire). The selection for this study is based on certain criteria, the participants responses to a screener questionnaire and their availability to participate. The recruitment vendor will maintain the participant's privacy by keeping their data in a secure database stored in an encrypted format on their private server. Upon study completion, any recruitment data will be destroyed within 1 year.

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.

ForsMarsh/BLN24 will not provide any PII gathered in recruitment or during the testing sessions to OLS. OLS Survey administrators will not have any access level to PII. All IRS survey admins have completed background investigations at a moderate level. The PII will not be stored on IRS computers.

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

Fors Marsh Role: System Administrator Fors Marsh Access Level: Ready Only Fors Marsh contractor background investigation is complete.

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 reidentified under any circumstances and no adverse actions taken.

OLS will not collect or store PII. Any notes taken during sessions will not include names or PII. Only OLS researchers will have access to the notes. Findings from usability tests will be aggregated with no names attached to any feedback in final reports.

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.

In reporting to IRS offices, researchers will not connect information collected with employee names or email addresses. Final reports will contain only aggregated employee feedback and will contain no names or emails.

5.12 If the survey maintains records describing how an individual exercises their rights guaranteed by the First Amendment, explain the First Amendment information being collected and how it is used.

No

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

No

5.14 If the First Amendment information will be used as the basis to make any adverse determination about an individual's rights, benefits, and/or privileges, explain the determination process. Consult with IRS General Legal Services to complete this section.

No

#### **Interfaces**

**Interface Type** 

IRS or Treasury Contractor

Agency Name

ForsMarsh/BLN24

Incoming/Outgoing

Incoming (Receiving)

Agency Agreement

No

Transfer Method

Integrated Enterprise Portal (IEP)

# **Systems of Records Notices (SORNs)**

#### **SORN Number & Name**

IRS 10.004 - Stakeholder Relationship Management and Subject Files

Describe the IRS use and relevance of this SORN.

To track stakeholder relationship information, correspondence, newspaper clippings, email, and other forms of communication.

#### **SORN Number & Name**

IRS 00.001 - Correspondence Files and Correspondence Control Files

Describe the IRS use and relevance of this SORN.

To track correspondence including responses from voluntary surveys.

### **Records Retention**

What is the Record Schedule System?

General Record Schedule (GRS)

What is the retention series title?

Public Service Operation Records

What is the GRS/RCS Item Number? GRS 6.5, Item 10

What type of Records is this for?

Electronic

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

The survey will be managed using GRS 6.5, Item 010 Public Service Operations Records, temporary. Destroy 1 year after resolved or when no longer needed for business use, whichever is appropriate. Any additional records developed from the study maintained by the IRS will be scheduled as coordinated with the IRS Records and Information Management (RIM) Program and IRS Records Officer. IRM 1.15.1, Records and Information Management, The Records, and Information Management Program.

#### What is the disposition schedule?

The data records from any given study are redacted and given a numeric code with an assigned participant number that is specific to that study. Only the administrator of the Survey has access to the raw data of the study and is retained for 1 year after resolved or when no longer needed for business use. The reason for maintaining the data for 1 year is in case if any questions or clarification needed should arise about the data that would require further contact with a given participant. If clients should request this information from the third-party vendor, then the third-party vendor will delete all PII about the participant. The third-party vendor would retain the redacted data in order to preserve the integrity of the data records from that study along with all PII. All PII elements will be deleted from this key.