

Date of Approval: 04/10/2025
Questionnaire Number: 2145

Basic Information/Executive Summary

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

Pre-Verification Bank API Web Service

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.

The system is owned by Green Dot Bank. Green Dot is not a contractor of IRS. The system is a means for federal and state government stakeholders to gain pre-verification information on accounts where monies will be deposited. In the case of IRS tax refunds, Return Integrity & Verification Program Management (RIVPM) will use the system to verify accounts where tax refunds will be deposited. Information returned will include a risk score for the account, if a refund going to the account will be rejected back to IRS and if rejected, the reason why. The benefit to IRS will be to identify suspicious refund activity and take appropriate tax administration action.

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).

This system uses, collects, receives, displays, stores, maintains, and disseminates IR Code 6103 taxpayer information: Sensitive but Unclassified (SBU) and Personally Identifiable Information (PII). This includes Social Security Number (SSN) and other identifiable information. The approved Treasury uses of the SSNs is Law Enforcement and Intelligence Purposes. As a mitigation this system does not use the entire SSN, it only accepts the last 4 digits of the SSN, which is needed to verify that the correct account is matched to the tax return information. The information shared includes the name, financial account number, and tax account information. The information includes Official Use Only (OUO) or Limited Official Use (LOU). The following authority covers our disclosure: 1) PII for federal tax administration is generally Internal Revenue Code Sections 6001, 6011, 6012e(a) and 2) SSN for tax returns and return information is Internal Revenue Code Section 6109. The authority been verified with the system owner. How the PII gets into the system: We load the file into the Application Programming Interface (API) portal with the refund amount, last 4 of the SSN, bank account, first and last name. How we process the PII: Once in the system GreenDot goes into the system and pulls the data, analyzes the data and tells us how they would treat the data and loads it back into the system. What happens with the PII: We export the data (PII) and process the file on our end in an access database. We analyze the data to determine return status, and we allow the returns to process through our normal Return Review Program (RRP)/ Dependent Database (DDB) filter process. Once finalized we pull the data from the access database to create a weekly summary.

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

Address

Agency Sensitive Information

Federal Tax Information (FTI)

Financial Account Number

Individual Taxpayer Identification Number (ITIN)

Name

Official Use Only (OUO) or Limited Office Use (LOU)

Social Security Number (including masked or last four digits)

Tax ID Number

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

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

SSN for tax returns and return information - IRC section 6109

Product Information (Questions)

1 Is this PCLIA a result of the Inflation Reduction Act (IRA)?

No

2 What type of project is this (system, project, application, database, pilot/proof of concept/prototype, power platform/visualization tool)?

System

3 What Tier designation has been applied to your system?

3

4 Is this a new system?

No

4.1 Is there a previous Privacy and Civil Liberties Impact Assessment (PCLIA) for this project?

Yes

4.11 What is the previous PCLIA number?

5536

4.12 What is the previous PCLIA title (system name)?

Pre-Verification Bank API Web Service

4.2 You have indicated this is not a new system; explain what has or will change and why. (Expiring PCLIA, changes to the PII or use of the PII, etc.)

Expiring PCLIA

5 Is this system considered a child system/application to another (parent) system?

No

7 Is this a change resulting from the OneSDLC process?

No

8 Please provide the full name and acronym of the governance board or Executive Steering Committee (ESC) this system reports to.

The Wage and Investment (W&I) Risk Committee

10 If this system discloses any PII to any third party outside the IRS, does the system have a process in place to account for such disclosures in compliance with IRC 6103(p)(3)(A) or Subsection c of the Privacy Act?

Yes

11 Does your project/system involve any use of artificial intelligence (AI), including virtual assistant, chat bot, and robotic process automation, as defined in Executive Order 13960 and 14110?

No

12 Does this system use cloud computing?

No

13 Does this system/application interact with the public?

No

14 Describe the business process allowing an individual to access or correct their information. (Due Process)

Individuals are not able to access or correct their information.

15 Is this system owned and/or operated by a contractor?

No

16 Identify what role(s) the IRS and/or the contractor(s) performs; indicate what access level (to this system's PII data) each role is entitled to. (Include details about completion status and level of access of the contractor's background investigation was approved for.)

Users	Yes	Read and Write
Managers	Yes	Administrator
Contractors	No	

17 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 himself or herself. Please provide the Privacy Act Statement presented by your system or indicate a Privacy Act Statement is not used and individuals are not given the opportunity to consent to the collection of their PII.

A Privacy Act Statement is not used, and individuals are not given the opportunity to consent to the collection of their PII.

18 How many records in the system are attributable to IRS Employees? Enter "Under 50,000", "50,000 to 100,000", "More than 100,000" or "Not Applicable".

Not Applicable

19 How many records in the system are attributable to contractors? Enter "Under 5,000", "5,000 to 10,000", "More than 10,000" or "Not Applicable".

Not Applicable

20 How many records in the system are attributable to members of the public? Enter "Under 100,000", "100,000 to 1,000,000", "More than 1,000,000" or "Not applicable".

100,000 to 1,000,000

22 How is access to SBU/PII determined and by whom?

Need to know / System Owner RIVPM's director selects the team that supports this task. The team members are authorized access to the database. The API portal requires authentication to transfer files for import/export purposes. The API owner (GreenDot Bank) approves participants access to their portal. GreenDot provided the routing numbers for the Internal Revenue Service to monitor and transfer SBU/PII information that comes up suspicious in IRS SNAP database. The IRS determines which files are transferred to GreenDot bank.

23 Is there a data dictionary on file for this system? Note: Selecting "Yes" indicates an upload to the Attachment Section is required.

No

24 Explain any privacy and civil liberties risks related to privacy controls.

There are no privacy and civil liberties risks related to privacy controls.

25 Please upload all privacy risk finding documents identified for the system (Audit trail, RAFT, POA&M, Breach Plan, etc.); click "yes" to confirm upload(s) are complete.

No

26 Describe this system's audit trail in detail. Provide supporting documents.

Publication 1075, Tax Information Security Guidelines for Federal, State and Local Agencies, which is the IRS published guidance for security guidelines and other safeguards for protecting returns and return information pursuant to 26 CFR 301.6103(p)(4)-1. The API portal is a controlled system that required first last name and phone number that required password authentication. This requirement meets NIST 800-53 and FIPS 140 security controls standards. The API portal protects the integrity of transmitted information. This meets NIST 800-52 and 800-77 standards.

27 Does this system use or plan to use SBU data in a non-production environment?

No

Interfaces

Interface Type

IRS Systems, file, or database

Agency Name

Selections and Analytics Platform (SNAP)

Incoming/Outgoing

Both

Transfer Method

Secure Data Transfer (SDT)

Interface Type

IRS Systems, file, or database

Agency Name

Selections and Analytics Platform (SNAP)

Incoming/Outgoing

Both

Agency Agreement

Yes

Agreement Name

Green Dot Bank & IRS, Memorandum of Understanding (MOU)
and pursuing Publication 1075 requirement

Transfer Method

Other

Other Transfer Method

API web service

Systems of Records Notices (SORNs)

SORN Number & Name

IRS 24.030 - Customer Account Data Engine Individual Master
File

Describe the IRS use and relevance of this SORN.

To maintain records of tax returns, return transactions, and
authorized taxpayer representatives.

Records Retention

What is the Record Schedule System?

Record Control Schedule (RCS)

What is the retention series title?

29 - Taxpayer Services

What is the GRS/RCS Item Number?

RCS 29 ITEM 49

What type of Records is this for?

Electronic

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

All Taxpayer Case Files

What is the disposition schedule?

Destroy 3 years after case is closed, or when no longer needed,
whichever is earlier.

Data Locations

What type of site is this?

System

What is the name of the System?

API (Application Programming Interface)

What is the sensitivity of the System?

Federal Tax Information (FTI)

Please provide a brief description of the System.

The API system is owned by Green Dot Bank. Green Dot is not a contractor of IRS. The system is a means for federal and state government stakeholders to gain pre-verification information on accounts where monies will be deposited. In the case of IRS tax refunds, Return Integrity & Verification Program Management (RIVPM) will use the system to verify accounts where tax refunds will be deposited. Information returned will include a risk score for the account, if a refund going to the account will be rejected back to IRS and if rejected, the reason why. The benefit to IRS will be to identify suspicious refund activity and take appropriate tax administration action.

What are the incoming connections to this System?

No incoming connections. IRS employees Retrieve data from Green Dot Application Program Interface (API) portal and upload the file into IRS database. This is a manual transaction not automated

What are the outgoing connections from this System?

No outgoing connections. IRS employees perform a query/compile and consolidate data in IRS database. IRS employees upload the files into Green Dot Provided Application Program Interface (API) Portal. This is a manual transaction not automated.