
A. SYSTEM DESCRIPTION

1. Enter the full name and acronym for the system, project, application and/or database. Green Dot Bank API Web Service, N/A

2. Is this a new system? Yes

3. Check the current ELC (Enterprise Life Cycle) Milestones (select all that apply)

- | | |
|-----|--|
| Yes | Vision & Strategy/Milestone 0 |
| Yes | Project Initiation/Milestone 1 |
| No | Domain Architecture/Milestone 2 |
| No | Preliminary Design/Milestone 3 |
| No | Detailed Design/Milestone 4A |
| No | System Development/Milestone 4B |
| No | System Deployment/Milestone 5 |
| No | Operations & Maintenance (i.e., system is currently operational) |

4. Is this a Federal Information Security Management Act (FISMA) reportable system? No

A.1 General Business Purpose

5. What is the general business purpose of this system? Provide a clear, concise description of the system, application or database, the reason for the system, and the benefits to the IRS to use the information, and how the information will be used. 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 & Compliance Services (RICS) 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.

B. PII DETAIL

6. Does the system use, collect, receive, display, store, maintain, or disseminate IR Code 6103 taxpayer information; or any type of Sensitive but Unclassified (SBU) or Personally Identifiable Information (PII)? Yes

6a. If **yes**, does the system use, collect, receive, display, store, maintain, or disseminate Social Security Numbers (SSNs) or tax identification numbers (i.e. last 4 digits, etc.)? Yes

If **yes**, check who the SSN (or tax identification number) is collected on.

Yes On Primary Yes On Spouse No On Dependent

If **yes**, check all types SSN s (or tax identification numbers) that apply to this system:

- | | |
|-----|--|
| Yes | Social Security Number (SSN) |
| No | Employer Identification Number (EIN) |
| Yes | Individual Taxpayer Identification Number (ITIN) |
| No | Taxpayer Identification Number for Pending U.S. Adoptions (ATIN) |
| No | Practitioner Tax Identification Number (PTIN) |

Describe the planned mitigation strategy and forecasted implementation date to mitigate or eliminate the use of SSN s (or tax identification numbers). The 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.

6b. Does this system contain other (non-SSN) PII that it uses, collects, receives, displays, stores, maintains, or disseminates? (i.e. Names, addresses, etc.) Yes

If **yes**, specify the information.

<u>Selected</u>	<u>PII Element</u>	<u>On Primary</u>	<u>On Spouse</u>	<u>On Dependent</u>
Yes	Name	Yes	Yes	Yes
No	Mailing address	No	No	No
No	Phone Numbers	No	No	No
No	E-mail Address	No	No	No
No	Date of Birth	No	No	No
No	Place of Birth	No	No	No
No	SEID	No	No	No
No	Mother's Maiden Name	No	No	No
No	Protection Personal Identification Numbers (IP PIN)	No	No	No
No	Internet Protocol Address (IP Address)	No	No	No
No	Criminal History	No	No	No
No	Medical Information	No	No	No
No	Certificate or License Numbers	No	No	No
No	Vehicle Identifiers	No	No	No
No	Passport Number	No	No	No
No	Alien (A-) Number	No	No	No
Yes	Financial Account Numbers	No	No	No
No	Photographic Identifiers	No	No	No
No	Biometric Identifiers	No	No	No
No	Employment (HR) Information	No	No	No
No	Tax Account Information	No	No	No

6c. Does this system contain SBU information that is not PII, it uses, collects, receives, displays, stores, maintains, or disseminates? No

6d. Are there other types of SBU/PII used in the system? No

6e. Cite the authority for collecting SBU/PII (including SSN if relevant)

- Yes PII for federal tax administration is generally Internal Revenue Code Sections 6001, 6011, 6012e(a)
- Yes SSN for tax returns and return information is Internal Revenue Code Section 6109
- No SSN for personnel administration (IRS Employees) is 5 USC & Executive Order 9397
- No PII for personnel administration is 5 USC
- No PII about individuals for Bank Secrecy Act compliance 31 USC
- No Information by CI for certain money laundering cases may be 18 USC

6f. Has the authority been verified with the system owner? Yes

B.1 BUSINESS NEEDS AND ACCURACY

7. Explain the detailed business needs and uses for the SBU/PII, and how the SBU/PII is limited only to that which is relevant and necessary to meet the mission requirements of the system. If SSNs (or tax identification numbers) are used, explicitly explain why use of SSNs meets the criteria. Be specific. Green Dot needs specific information to match IRS refund deposit records with the Green Dot account records. IRS needs to be 100% sure that we are inquiring about the correct account, so we want to provide the information Green Dot says they need to be sure. Information requested includes: (Full) Direct Deposit Account Number; Taxpayer First Name; Taxpayer Last Name; Taxpayer Last 4 Digits of Social Security Number; Deposit \$ Amount.
8. How is the SBU/PII verified for accuracy, timeliness, and completeness? Explain how steps are taken to ensure that all information maintained by the system that is used by IRS to make any adverse determination about an individual's rights, benefits, and/or privileges is maintained with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual in the determination. All returns filed with IRS go through systemic validity checks. If they pass the checks, the return is accepted by IRS. If a return is then selected by RICS as a possible identity theft return or questionable income return, RICS takes steps to authenticate if the taxpayer is the true taxpayer. This is a pilot with Green Dot for pre-verification of refund accounts to assist with tax administration activities on suspicious filed returns.

C. PRIVACY ACT AND SYSTEM OF RECORDS

9. Are 10 or more records containing SBU/PII maintained, stored, and/or transmitted by or through this system? Yes
- 9a. If **yes**, are records in the system retrieved by any personal identifier (e.g., name, SSN, Photograph, IP Address) for an individual? Yes

If **yes**, is there a System of Records Notice(s) or SORNs that addresses the PII records in this system? Yes

If **yes**, enter the SORN number(s) and the complete the name of the SORN.

SORNS Number
Treas/IRS 42.021

SORNS Name
Compliance Programs and Projects Files

If **yes**, does the System of Records Notice(s) (SORN) published in the Federal Register adequately describe the records as required by the Privacy Act? Yes

D. RESPONSIBLE PARTIES

10. Identify the individuals for the following system roles. ## Official Use Only

E. INCOMING PII INTERFACES

11. Does the system receive SBU/PII from other system or agencies? No

F. PII SENT TO EXTERNAL ORGANIZATIONS

12. Does this system disseminate SBU/PII? No

G. PRIVACY SENSITIVE TECHNOLOGY

13. Does this system use social media channels? No

14. Does this system use privacy-sensitive technologies such as mobile, global position system (GPS), biometrics, RFID, etc.? No

15. Does the system use cloud computing? No

16. Does this system/application interact with the public? No

H. INDIVIDUAL NOTICE AND CONSENT

17. Was/is notice provided to the individual prior to collection of information? Yes

17a. If **yes**, how is notice provided? Was the individual notified about the authority to collect the information, whether such is mandatory or voluntary, the purpose for which the information will be used, with whom the information may be shared, and the effects, if any, if they decide not to provide any of the requested information?

Green Dot's privacy policy is on their website located at:
<https://www.greendot.com/content/docs/greendotprivacypolicy.html>

18. Do individuals have the opportunity to decline from providing information and/or from consenting to particular uses of the information? Yes

18a. If **yes**, describe the mechanism by which individuals indicate their consent choice(s): Users cannot decline. Users can limit consent by means of Green Dot's website or calling them directly.

19. How does the system or business process ensure due process regarding information access, correction and redress? Green Dot Bank does not provide adverse information. Green Dot Bank only states whether they would accept or decline the refund and the reason why. Additionally, Green Dot Bank is only suggesting when we believe additional ID verification may be a good idea.

I. INFORMATION PROTECTION

20. Identify the owner and operator of the system (could be IRS owned and Operated; IRS owned, contractor operated; contractor owned and operated). Contractor Owned and Operated

21. The following people have access to the system with the specified rights:

IRS Employees? Yes

<u>IRS Employees?</u>	Yes/No	Access Level (Read Only/Read Write/Administrator)
Users	Yes	Read-Only
Managers	Yes	Read-Only
Sys. Administrators	No	
Developers	No	

Contractor Employees? No

21a. How is access to SBU/PII determined and by whom? Green Dot is allowing IRS to access their system to assist us in making our own identity theft determinations related to tax administration activities. IRS will provide the Internet Protocol (IP) address for Green Dot to whitelist the IP address for Application Programming Interfaces (and other software programs, interfaces, and webpages) made available to IRS by Green Dot. RICS will provide Green Dot with a list of IRS employees who will be granted access through the Green Dot portal.

21b. If computer matching occurs, can the business owner certify that it meets requirements of IRM 11.3.39 Disclosure of Official Information, Computer Matching & Privacy Protection Act?

Not Applicable

I.1 RECORDS RETENTION SCHEDULE

22. Are these records covered under the General Records Schedule (GRS), or have a National Archives and Records Administration (NARA) archivist approved a Record Control Schedule (RCS) for the retention and destruction of official agency records stored in this system? No

22b. If **no**, how long are you proposing to retain the records? Please note, if you answered no, you must contact the IRS Records and Information Management Program to initiate records retention scheduling before you dispose of any records in this system. This is not an IRS system. IRS will have access for pre-verification of suspicious refund tax returns for tax administration activities related to fraud and/or identity theft determinations. The information returned from Green Dot will not be associated to the tax return; we do not flag for inconsistencies nor do we do not track the results. From previous meetings with RICS they have said that the results are not kept in any of the IRS systems RICS uses (Return Review Program, Electronic Fraud Detection System, Dependent Database, Integrated Data Retrieval System, etc). It is not the official IRS repository for data and documents and does not require National Archives approval to affect data disposition.

I.2 SA&A OR ECM-R

23. Has the system been through SA&A (Security Assessment and Authorization) or ECM-R (Enterprise Continuous Monitoring Reauthorization)? Yes

23a. If **yes**, what date was it completed? 2/9/2017

23.1 Describe in detail the system s audit trail. Security Assessment and Authorization: Green Dot Bank has all their systems continually tested and have process access governance, etc. "The latest testing by Green Dot for the tool was 2/9/17. We continually ping the tool's server to check its status and "keep it warm" + running."

J. PRIVACY TESTING

24. Does the system require a System Test Plan? No

24c. If **no**, please explain why. Green Dot has a privacy policy for all of its systems and processes and is constantly tested and recertified on our end. There is no customer or PII being provided back to the IRS from Green Dot. Green Dot Bank only validates information that the IRS sends to them.

K. SBU Data Use

25. Does this system use, or plan to use SBU Data in Testing? No

L. NUMBER AND CATEGORY OF PII RECORDS

26. Identify the number of individual records in the system for each category:

26a. IRS Employees: Not Applicable
26b. Contractors: Not Applicable
26c. Members of the Public: Not Applicable
26d. Other: No

M. CIVIL LIBERTIES

27. Does the system maintain any information describing how any individual exercises their rights guaranteed by the First Amendment? No

28. Is the system information used to conduct data-mining as defined in the *Implementing the 9/11 Commission Recommendations Act of 2007, Public Law 110-53, Section 804*? No

29. Will this system have the capability to identify, locate, and monitor individuals or groups of people? No

N. ACCOUNTING OF DISCLOSURES

30. Does the system include or require disclosure of tax or employee information to anyone other than IRS employees in the performance of their duties, or to the person to whom the information pertains or to a 3rd party pursuant to a Power of Attorney, tax or Privacy Act consent? Yes

If **yes**, 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? Contact Disclosure to determine if an accounting is required. Not Applicable

30b. If **N/A**, explain the Exemption and/or Disclosure response. These are 6103(k)(6) disclosures.

End of Report
