



COMMISSIONER

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, DC 20224

The Honorable Jenniffer González-Colón
U.S. House of Representatives
Washington, DC 20515

Dear Representative González-Colón:

Thank you for your letter requesting information about online authentication for access to IRS applications and websites for U.S. citizens living in Puerto Rico. The IRS is committed to developing authentication methods that protect taxpayer data and promote broad access to secure online tools. Our goal is to provide all taxpayers, including those in Puerto Rico, the immediate online access and service levels they deserve.

Below are responses to the questions in your letter.

- 1. Provide the number of IRS accounts that have been created for U.S. citizens living in Puerto Rico in comparison to the overall total U.S. population, including pass rates, before and after the implementation of services with ID.me.**

The IRS's modernized authentication platform uses ID.me, our current credential service provider, to provide identity verification for access to IRS online services.

For the period January 1, 2022, through October 31, 2022, 107,099 U.S. citizens with a Puerto Rico address or Puerto Rico documents¹ have successfully established an ID.me account with a pass rate² of 78.6%.

Over that same period, 14.9 million U.S. taxpayers successfully established an account with ID.me with an overall pass rate² of 73.0%.

Prior to our deploying the modernized IRS authentication platform, between June 2016 and July 2022, 29,509 U.S. citizens with a Puerto Rico address

¹ These users had an affiliation with Puerto Rico, as defined by either submission of a document from Puerto Rico or submission of a document that had a Puerto Rico address on it. The same logic is applied for U.S. affiliated users.

² The pass rate is the number of affiliated users who successfully verified divided by the number of affiliated users who started verification.

successfully established a legacy Secure Access account³ with a pass rate of 23.9%.

For that same period, 27.9 million U.S. taxpayers successfully established a legacy Secure Access account³ with a pass rate of 45%.

2. Describe any past circumstances that have prevented access for Puerto Ricans and identify any barriers that still prevent people from creating an IRS profile going forward.

The legacy Secure Access authentication process required validation of IRS data, financial account information and mobile phone data or address of record confirmation. Also, the legacy registration process was only available in English. Some taxpayers had difficulty with the Secure Access registration process, including taxpayers living abroad, unbanked taxpayers,⁴ and those without a mobile phone in their name. Additionally, the IRS did not offer support to taxpayers who could not verify their identity. The IRS directed them to use non-digital channels such as telephone, in-person, and paper correspondence.

The ID.me identity proofing process mitigated some of these barriers. ID.me offers self-service and video chat verification options, both of which are available in multiple languages, including Spanish. Users who cannot verify using the self-service flow now have the option to verify on a video call with an ID.me Trusted Referee.

ID.me has shared that the most common verification failure reasons Puerto Rican taxpayers encounter are due to:

1. Shortcomings of existing data sources used for validation (e.g., not having a presence in credit records); and
2. Existing systemic data patterns that make resolving identity in online records difficult (e.g., shared family names, multi-generational households, use of P.O. Boxes on credit reports, etc.).

3. Has the collaboration with ID.me addressed any of the historical barriers to establishing a digital program with the IRS?

Yes. Our modernized digital identity platform with ID.me improves authentication

³ Legacy Secure Access accounts created at Level of Assurance 3 as outlined in the National Institute of Standards and Technology Special Publication 800-63-2, Electronic Authentication Guidelines.

⁴ Unbanked taxpayers are taxpayers who do not use or do not have access to any traditional financial services, including savings accounts, credit cards, or personal checks and instead rely on alternative financial services such as money orders, check-cashing services, and payday loans rather than on traditional loans and credit cards to manage their finances and fund purchases.

for all taxpayers accessing IRS online applications. It expands identity document options and no longer relies exclusively on the validation of personal information in financial records. Additionally, ID.me provides 24/7 multi-lingual customer support options for taxpayers, including the video chat verification option.

Between February and April 2022, ID.me made a series of operational changes to their video chat verification process to better support all Spanish-speaking users. Once ID.me implemented these changes, the number of days required to complete a verification for users from Puerto Rico improved. The number of days dropped from 6.4 to 1.7 days compared to 1.6 days for IRS users overall.

These changes included:

- Added support for two additional identity documents for Puerto Rican taxpayers:
 - Nutrition Assistance Program (NAP) Recipient Certification (Certificación de Beneficiario del Programa de Asistencia Nutricional (ADSEF)) and
 - Women, Infants, and Children (WIC) Puerto Rico Recipient Certification;
- Increased Spanish-speaking video chat support;
- Added outbound engagement channels for Puerto Rican users (e.g., combination of phone + text + email vs. email only);
- Deployed additional tools for faster review of foreign language documents (e.g., translation guides);
- Established a dedicated team of specialists to conduct outbound calls to Puerto Rico; and
- Enabled appointment scheduling for Puerto Rican users who contacted ID.me on social media or were unavailable when contacted by an ID.me outbound specialist.

Additionally, ID.me provided in-person support at two Taxpayer Experience Day events in Puerto Rico on June 11, 2022, and June 25, 2022. These events helped IRS and Non-Governmental Organizations educate taxpayers on what's needed to verify their identity with ID.me so they can establish an account to access IRS online services. These events also focused on helping first-time filers determine eligibility for the Child Tax Credit under the American Rescue Plan Act.

I hope this information is helpful. I am sending a similar response to your colleague, the Honorable Stephanie Murphy, who also signed your letter. If you have questions, please contact me, or a member of your staff may contact Amy Klonsky, Chief, National Congressional Affairs Branch, at 202-317-6985.

Sincerely,

Douglas W. O'Donnell
Acting Commissioner