

## COMMENT ON TREASURYDIRECT SYSTEM

OMB No. 1530-0071 • Federal Register Document 2026-13505

**Submitted to:** Bureau of the Fiscal Service,  
U.S. Department of the Treasury

**Re:** Extension of a Currently Approved  
Information Collection: TreasuryDirect System

**Comment deadline:** September 4, 2026

I am submitting this comment as an individual TreasuryDirect account holder regarding the Bureau of the Fiscal Service's proposed extension of the TreasuryDirect information collection.

I strongly object to Treasury's decision to require existing TreasuryDirect customers to use ID.me, a private company, as the required means of accessing their accounts, without offering Login.gov as an alternative.

This is not an objection to stronger authentication or identity verification. I support appropriate security for TreasuryDirect accounts. My objection is to requiring citizens who already have TreasuryDirect accounts to establish a relationship with a private identity-verification company and provide highly sensitive identifying information to that company when the federal government operates its own identity service, Login.gov.

Treasury's own November 2023 Privacy and Civil Liberties Impact Assessment for ID.me stated that Login.gov had been considered but was not selected because, at that time, Login.gov had not obtained independent certification at NIST Identity Assurance Level 2 (IAL2). That circumstance has changed. Login.gov received independent IAL2 certification in October 2024. Treasury subsequently issued a Privacy and Civil Liberties Impact Assessment for its own use of Login.gov in March 2025. Treasury therefore has access to a federally operated, IAL2-certified identity service and is already using Login.gov within the Department.

Why, then, are TreasuryDirect customers being given no choice?

This question is particularly important because ID.me is a private company that performs identity verification for government and private-sector organizations. Identity verification can require individuals to provide exceptionally sensitive information, potentially including Social Security numbers, government identification documents, photographs or selfies, and biometric information. Requiring an individual to provide such information to a private company as a condition of accessing securities that the individual already owns and holds directly with the United States Treasury raises legitimate privacy, data-security, and accountability concerns.

On August 27, 2026, I personally called TreasuryDirect about this issue. The representative told me that TreasuryDirect will begin using ID.me on September 13 and that, after the 45-day transition period, ID.me will be required. When I raised concerns about ID.me, I was told that problems with ID.me would have to be addressed by contacting ID.me.

That response heightened rather than alleviated my concern. A citizen should not be forced to depend upon the customer service and identity systems of a private company in order to access assets held directly with the United States government when a government-operated alternative exists.

The Bureau's Federal Register notice specifically requests comments concerning ways to minimize the burden of this information collection on respondents, including through the use of alternative information technology. Offering Login.gov alongside ID.me would appear to be precisely such an alternative.

**I therefore respectfully request that the Bureau of the Fiscal Service:**

1. Offer Login.gov as an alternative to ID.me for TreasuryDirect account access.
2. Explain publicly why Login.gov is not currently being offered, particularly given that the reason Treasury identified in 2023—lack of independent IAL2 certification—no longer applies.

3. Disclose precisely what personal information TreasuryDirect customers will be required to provide to ID.me, including whether photographs, video selfies, facial geometry or other biometric information, Social Security numbers, or copies of government-issued identification will be required.
4. Disclose what information ID.me may retain, for how long, and under what circumstances it may be shared, accessed, or retained after a TreasuryDirect customer's identity has been verified.
5. Provide a non-biometric alternative for existing TreasuryDirect account holders who do not consent to providing biometric information to a private company.
6. Do not make ID.me the exclusive means of accessing an existing TreasuryDirect account until Treasury has publicly addressed these privacy and security issues and explained why the federally operated Login.gov service is inadequate.

TreasuryDirect holds savings bonds and Treasury securities belonging to Americans. Access to those assets should not be conditioned unnecessarily upon surrendering highly sensitive personal information to a private intermediary. The federal government has already developed Login.gov for the purpose of providing secure access to government services. It is now independently certified at IAL2, and Treasury itself uses it. Treasury should explain why TreasuryDirect customers cannot be given that choice.

### **Request for independent review by Treasury OIG**

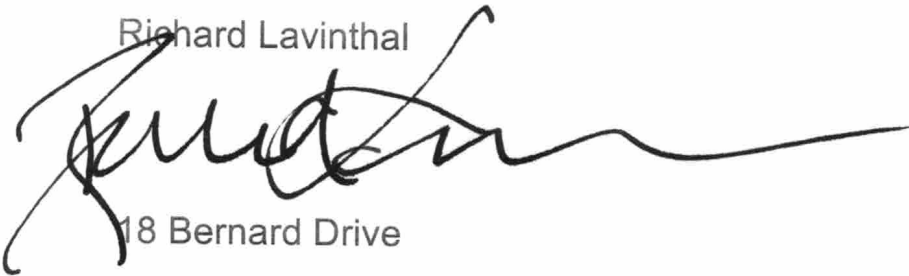
I also respectfully request that the Department of the Treasury Office of Inspector General consider reviewing the Bureau of the Fiscal Service's decision to make ID.me the exclusive identity service for TreasuryDirect. Such a review should examine the basis for the original selection of ID.me, the costs and contractual considerations associated with that selection, the privacy and cybersecurity implications of requiring TreasuryDirect customers to use a private identity provider, and whether the decision was reconsidered after Login.gov obtained independent IAL2 certification in 2024.

Treasury's own 2023 privacy assessment identified Login.gov's lack of independent IAL2 certification as a reason for selecting ID.me. Because that circumstance has since changed, an independent review could determine whether there remains a compelling technical, security, financial, procurement, or operational justification for requiring TreasuryDirect customers to use ID.me rather than offering the federally operated Login.gov as an alternative.

I urge the Bureau of the Fiscal Service and OMB to reconsider this requirement, provide TreasuryDirect customers with Login.gov as a government-operated alternative to ID.me, and ensure that the current basis for the decision is subject to appropriate independent review.

Respectfully submitted,

Richard Lavinthal

A large, stylized handwritten signature in black ink, appearing to read 'Richard Lavinthal', written over the printed name.

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### **Key official sources referenced**

- U.S. Department of the Treasury, Privacy and Civil Liberties Impact Assessment: ID.me (Nov. 2023).
- U.S. General Services Administration, Login.gov IAL2 certification announcement (Oct. 2024).
- U.S. Department of the Treasury, Privacy and Civil Liberties Impact Assessment: Login.gov (Mar. 2025).
- Federal Register, Extension of a Currently Approved Information Collection: TreasuryDirect System, Document No. 2026-13505; OMB No. 1530-0071 (July 6, 2026).

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August 27, 2026

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