The Honorable Neomi Rao  
Administrator, Office of Information and Regulatory Affairs  
725 17th Street NW  
Washington, D.C. 20503  

Dear Ms. Rao:  


Any inquiries or comments regarding this report may be addressed to Ms. Cindy L. Allard, Executive Secretary, Defense Data Integrity Board, 4800 Mark Center Drive, ATTN: DPCLTD, Mailbox #24, Alexandria, VA 22350-1700; by email: cindy.l.allard.civ@mail.mil; or (703) 571-0070.  

Sincerely,  

Joo Y. Chung  
Chair, Defense Data Integrity Board  

Enclosure  
As stated
In accordance with the reporting requirements established in the Office of Management and Budget Circular A-108, “Federal Agency Responsibilities for Review, Reporting, and Publication under the Privacy Act,” dated December 2, 2016, the following is provided:

a. Current information about the composition of the Data Integrity Board, including:
   
   (1) a list of the names and positions of the members of the Data Integrity Board;
   
   (2) the name and contact information of the Data Integrity Board’s secretary; and
   
   (3) any changes in membership or structure of the Data Integrity Board that occurred during the year.

   See Attachment A for the names and positions of the members of the Data Integrity Board and the name and contact information on the Data Integrity Board’s secretary. There was one change to the membership of the board during the past year; the General Counsel for the Office of Inspector General changed.

b. A list of each matching program in which the agency participated during the year. For each matching program, the report shall include:
   
   (1) A brief description of the matching program, including the names of all participating Federal and non-Federal agencies;

   See Attachment B.

   (2) The links to the matching notices and matching agreements posted on the agency’s website at:

   http://dpclld.defense.gov/privacy/matching-agreements

   (3) An account of whether the agency has fully adhered to the terms of the matching agreement.

   The DoD carefully reviews the authorities and required data elements associated with each matching agreement to ensure full compliance is met. Additionally, matching agreements are reviewed as scheduled to validate the authorities, required data elements, and to determine whether or not the matching agreement is still necessary.

   (4) An account of whether all disclosures of agency records for use in the matching program continue to be justified.

   The DoD carefully reviews each matching agreement upon establishment and renewal to help ensure only disclosures necessary to the matching agreement occur. For all external disclosures, DoD ensures appropriate Routine Uses are in place to only disclose information that is relevant necessary and maintains an accurate method for accounting of disclosures.
(5) An indication of whether a cost-benefit analysis was performed, the results of the cost-benefit analysis, and an explanation of why the agency proceeded with any matching program for which the results of the cost-benefit analysis did not demonstrate that the program is likely to be cost effective.

A cost benefit analysis was performed for seven of the nine matching programs. Of the seven, all were favorable. See Attachment B.

c. For each matching program for which the Data Integrity Board waived the requirement for a cost-benefit analysis, the reasons for the waiver.

The cost benefit analysis was waived for two of the nine matching agreements.

(1) HHS CMS matching agreement titled, “Determination of Eligibility for the Advance Premium Tax Credit and Sharing Reductions Under the Affordable Care Act” was waived because a cost benefit analysis is not required prior to the initial approval of a written agreement for a matching program that is specifically required by statute. 5 U.S.C. § 552a(u)(4)(C).

(2) Department of Health and Human Services (HHS), Centers for Medicare and Medicaid (CMS) matching agreement titled, “Disclosure of Enrollment Information for Military Health System Beneficiaries Who are Medicare Eligible (TRICARE Verification for Over and Under 65” was waived based on the rationale that Medicare information can only be obtained from HHS, and that matching must occur irrespective of the associated costs or anticipated benefits if DoD is to make eligibility determination as mandated by Congress, consistent with Public Law 106-398 §§ 711-12. DoD anticipates a cost-benefit analysis will be conducted prior to a subsequent re-establishment.

d. A description of any matching agreement that the Data Integrity Board disapproved and the reasons for the disapproval.

None.

e. A description of any violations of matching agreements that have been alleged or identified, and a discussion of any action taken in response.

None.

f. A discussion of any litigation involving the agency’s participation in a matching program.

None.

g. For any litigation based on allegation of inaccurate records, an explanation of the steps that the agency used to ensure the integrity of its records as well as the verification process it used in the matching program.

Not applicable.
DEPARTMENT OF DEFENSE
ANNUAL MATCHING ACTIVITY
REPORT

DATA INTEGRITY BOARD MEMBERS
For Calendar Year 2017

Chairman:
Ms. Joo Chung
Senior Agency Official for Privacy
Director of Oversight and Compliance
Office of the Deputy Chief Management Officer

Executive Secretary:
Ms. Cindy L. Allard
Chief, Defense Privacy, Civil Liberties, and Transparency Division
4800 Mark Center Drive
Mailbox #24
Alexandria, VA 22350-1700
Telephone (703) 571-0070
E-mail: cindy.l.allard.civ@mail.mil.

Defense Data Integrity Board Members:
Ms. Tracy Rogers
Department of the Army
Chief, FOIA/PA Office

Mr. Steve Daughety
Department of the Navy
Office of the DON CIO
Compliance Branch, Privacy Lead

Mr. LaDonne L. White
Department of the Air Force
Air Force Privacy/Civil Liberties Officer

Mr. Rodolph Morrison
Department of the Defense
Office of the DoD CIO
IE-PM, PIA Lead

Mr. Erik Ablin
Associate Deputy General Counsel
(Legal Counsel)
DoD Office of the General Counsel
Mr. Brian Yonish.
Acting General Counsel
Office of Inspector General
Department of Defense

Ms. Lytwaine Hutchinson
Deputy Director
Joint Service Provider

Mr. Michael V. Sorrento/Ms. Regina Rogers
Director
Defense Manpower Data Center
<table>
<thead>
<tr>
<th>Agency</th>
<th>Title of Match</th>
<th>Timelines</th>
<th>Purpose</th>
<th>DoD Source or Recipient</th>
<th>Cost Benefit Analysis</th>
<th>Federal Register Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department of Veterans Affairs</td>
<td>Montgomery GI Bill and Post 9/11 GI Bill</td>
<td>12 Month Renewal</td>
<td>To verify that individuals meet the conditions of benefits determined by the VA under four enacted programs (Montgomery GI Bill - Selected Reserve; Reserve Education Assistance Program - REAP; Montgomery GI Bill - Active Duty; and Post-9/11 GI Bill). To verify that individuals meet the conditions of military service and eligibility criteria for payment of benefits determined by the VA.</td>
<td>DoD Source Agency</td>
<td>Favorable</td>
<td>Aug 27, 2015 80 FR 52096</td>
</tr>
<tr>
<td></td>
<td>CMA# 17</td>
<td>18 Month Agreement</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Started: Mar 28, 2017</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Expires: Mar 27, 2018</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Started: Sep 28, 2015</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Expired: Mar 27, 2017</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Department of Education</td>
<td>Federal Pell Grant</td>
<td>12 Month Renewal</td>
<td>To identify Federal student aid applicants who meet the qualifications for increased Federal student financial assistance.</td>
<td>DoD Source Agency</td>
<td>Favorable</td>
<td>Jan 2, 2015 80 FR 37</td>
</tr>
<tr>
<td></td>
<td>CMA# 14</td>
<td>18 Month Agreement</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Started: Aug 1, 2016</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Expired: Jul 31, 2017</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Started: Feb 1, 2015</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Expired: Jul 31, 2016</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Agency</td>
<td>Title of Match</td>
<td>Timelines</td>
<td>Purpose</td>
<td>DoD Source or Recipient</td>
<td>Cost Benefit Analysis</td>
<td>Federal Register Citation</td>
</tr>
<tr>
<td>--------</td>
<td>----------------</td>
<td>-----------</td>
<td>---------</td>
<td>-------------------------</td>
<td>----------------------</td>
<td>--------------------------</td>
</tr>
</tbody>
</table>
| Health and Human Services/ Centers for Medicare and Medicaid Services | Disclosure of Enrollment and Eligibility Information for Military Health System Beneficiaries Who are Medicare Eligible (TRICARE Verification for the Under & Over 65) | 18 Month Agreement
Started: Apr 18, 2016
Expired: Oct 17, 2017 | The disclosure by CMS will provide TRICARE Management Activity (TMA) with the information necessary to determine if Military Health System (MHS) beneficiaries (other than dependents of active duty personnel), who are Medicare eligible, are eligible to receive continued military health care benefits. Authorities: 10 U.S.C. 1073 note, Implementation of TRICARE Senior Pharmacy Program; 10 U.S.C. 1086(d) Contracts for Health Benefits for Certain Members, Former Members, and Their Dependents; 10 U.S.C. 1095; Health Care Services Incurred on Behalf of Covered Beneficiaries: Collection From Third-Party Payers; and 10 U.S.C. 1097, Contracts for Medical Care For Retirees, Dependents, and Survivors: Alternative Delivery of Health Care. | DoD Recipient Agency | Cost Benefit Analysis Waived Reason: Based on the rationale that Medicare information can only be obtained from HHS, and that matching must occur irrespective of the associated costs or anticipated benefits if DoD is to make eligibility determinations as mandated by Congress, cost-benefit analysis was waived. DoD anticipates a cost-benefit analysis being conducted prior to a subsequent re-establishment. | Mar 18, 2016
81 FR 14852 |
| Health and Human Services/ Centers for Medicare and Medicaid Services | Determination of Eligibility for the Advance Premium Tax Credit and Cost Sharing Reductions under the Affordable Care Act | 12 Month Renewal
Started: Oct 3, 2017
Expires: Oct 2, 2018
18 Month Agreement
Started: Apr 2, 2016
Expired: Oct 2, 2017 | To assist CMS or a State based exchange in determining eligibility for the following benefits: (1) advanced payment of the premium tax credit (APTC) under 26 USC 236B; and (2) a cost-sharing reduction (CSR) under Section 1402 of the ACA. Authorities: 26 U.S.C. 36B, Refundable credit for coverage under a qualified health plan; 26 U.S.C. 5000A, Requirement to maintain minimum essential coverage; 45 C.F.R 155.320(d), Verification related to enrollment in an eligible employer-sponsored plan and eligibility for qualifying in an eligible employer-sponsored plan; and 45 CFR 155.330 - Eligibility redetermination during a benefit year; 45 C.F.R 155.302, Options for conducting eligibility determinations; 45 C.F.R 305, Eligibility standards. | DoD Source Agency | Cost Benefit Analysis Waived Reason: It is not required prior to the initial approval of a written agreement for a matching program that is specifically required by statute. | Mar 3 2016
81 FR 11276 |
<table>
<thead>
<tr>
<th>Agency</th>
<th>Title of Match</th>
<th>Timelines</th>
<th>Purpose</th>
<th>DoD Source or Recipient</th>
<th>Cost Benefit Analysis</th>
<th>Federal Register Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>United States Postal Service</td>
<td>TRICARE Reserve Select FEHB Eligibility Verification CMA# 13</td>
<td>18 Month Agreement Started: Sep 19, 2016 Expires: Mar 18, 2018</td>
<td>To provide the DoD with the FEHB program eligibility and Federal employment information necessary to either verify the eligibility to enroll or verify the continuing eligibility of enrolled Service members for premium based TRICARE health plans, such as the TRICARE Reserve Select (TRS) Program and the TRICARE Retired Reserve (TRR) Program. Authorities: 10 U.S.C. 1076d, TRICARE Program: TRICARE Standard Coverage for Certain Members of the Selected Reserve; and 10 U.S.C. 1076e, TRICARE Program: TRICARE Standard coverage for certain members of the Retired Reserve who are qualified for a non-regular retirement but are not yet age 60; 39 U.S.C. 201, United States Postal Service; and 39 U.S.C. 411, Cooperation with other Government agencies.</td>
<td>DoD Source Agency Favorable</td>
<td>Aug 18, 2016 81 FR 55241</td>
<td></td>
</tr>
<tr>
<td>Veterans Administration</td>
<td>Reserve Pay Reconciliation CMA# 89</td>
<td>18 Month Agreement Started: Apr 3, 2016 Expires: Oct 3, 2017</td>
<td>To obtain an accurate reconciliation between DoD and VA as to the correct pay and allowance entitlements to be paid by the military services to their reserve forces personnel and the proper pension or disability compensation to be paid to, or waived by personnel in the Reserve Forces. Authorities: 10 U.S.C. 12316, Payment of certain Reserves while on duty; and 38 U.S.C. 5304(c), Prohibition against duplication of benefits.</td>
<td>DoD Recipient Agency Favorable</td>
<td>Mar 4, 2016 81 FR 11528</td>
<td></td>
</tr>
<tr>
<td>Agency</td>
<td>Title of Match</td>
<td>Timelines</td>
<td>Purpose</td>
<td>DoD Source or Recipient</td>
<td>Cost Benefit Analysis</td>
<td>Federal Register Citation</td>
</tr>
<tr>
<td>--------</td>
<td>----------------</td>
<td>-----------</td>
<td>---------</td>
<td>-------------------------</td>
<td>----------------------</td>
<td>--------------------------</td>
</tr>
<tr>
<td>Health and Human Services/ Administration for Children and Families</td>
<td>PARIS (Public Assistance Reporting Information System) CMA# 86</td>
<td><strong>12 Month Renewal</strong> Started: Jan 29, 2018 Expires: Jan 28, 2019</td>
<td>To identify Federal personnel who are receiving both Federal compensation or pension benefits and public assistance benefits under Federal programs being administered by the States.</td>
<td>DoD Recipient Agency</td>
<td>Favorable</td>
<td>June 29, 2016 81 FR 42335</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>18 Month Agreement</strong> Started: July 29, 2016 Expires: Jan 28, 2018</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Social Security Administration</td>
<td>Verification of Eligibility of SSI/SVB CMA# 88</td>
<td><strong>18 Month Agreement</strong> Started: Sep 14, 2016 Expires: Mar 14, 2018</td>
<td>To verify information of applicants for and recipients of Supplement Security Income payments and Special Veterans Benefits with respect to determination of eligibility and calculating payment amounts.</td>
<td>DoD Recipient Agency</td>
<td>Favorable</td>
<td>Aug 10, 2016 81 FR 52943</td>
</tr>
</tbody>
</table>