



OVERSIGHT AND
COMPLIANCE

OFFICE OF THE CHIEF MANAGEMENT OFFICER
9010 DEFENSE PENTAGON
WASHINGTON, DC 20301-9010

MAY 02 2019

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

Dear Ms. Rao:

Enclosed please find the Department of Defense Annual Matching Activity Report for calendar year 2018. This report is made pursuant to the Privacy Act of 1974, as amended by the Computer Matching and Privacy Protection Act of 1988, and Office of Management and Budget Circular No. A-108, "Federal Agency Responsibilities for Review, Reporting, and Publication under the Privacy Act."

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 at cindy.l.allard.civ@mail.mil; or by phone at (703) 571-0070.

Sincerely,

A handwritten signature in black ink, appearing to read "Joo Y. Chung".

Joo Y. Chung
Chair, Defense Data Integrity Board

Enclosure:
As stated

Department of Defense Annual Matching Activity Report

Description of Contents Calendar Year 2018

In accordance with the reporting requirements established in the Privacy Act of 1974, as amended by the Computer Matching and Privacy Protection Act of 1988, and Office of Management and Budget Circular No. A-108, "Federal Agency Responsibilities for Review, Reporting, and Publication under the Privacy Act," dated December 23, 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.

No changes in the membership or structure of the Data Integrity Board occurred in 2018. 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.

- 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://dpcl.d.defense.gov/privacy/matching-agreements>

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

The DoD periodically reviewed the agreements to ensure full compliance and to determine whether a renewal or re-establishment was 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 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 eight matching programs. Of the seven, all were favorable or resulted in a conclusion that the match was justified. 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 one of the eight matching agreements.

The matching agreement with the United States Postal Service (USPS) titled “TRICARE Reserve Select FEHB Eligibility Verification” was waived. The purpose of this agreement is to verify eligibility of Service members enrolling or enrolled in the TRICARE Reserve Select or the TRICARE Retired Reserve Programs. By statute, such coverage may be provided if the person is not eligible for the Federal Employees Health Benefits Program (FEHB). FEHB Program eligibility can only be obtained from USPS, and without this information, a determination of continued eligibility cannot be made. Matching must occur regardless of the associated cost or anticipated benefits. Accordingly, the cost benefit is waived.

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.

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**Data Integrity Board Members
Calendar Year 2018**

Chairwoman:

Ms. Joo Chung

Senior Agency Official for Privacy
Director of Oversight and Compliance
Office of the 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. Brian Yonish

Acting General Counsel
Office of Inspector General
Department of Defense

Mr. Steve Daughety

Department of the Navy
Office of the Chief Information Officer
Privacy and Information Sharing, Privacy Lead

Ms. Lytwaive Hutchinson

Deputy Director
Joint Service Provider

Mr. LaDonne L. White

Department of the Air Force
Air Force Privacy/Civil Liberties Officer

Mr. Michael V. Sorrento

Director
Defense Manpower Data Center

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

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Agency	Title of Match	Timelines	Purpose	DoD Source or Recipient	Cost Benefit Analysis (CBA)	Federal Register Citation
United States Postal Service	TRICARE Reserve Select FEHB Eligibility Verification CMA# 13	18 Month Agreement Started: 09/17/2016 Expired: 03/16/2018	To provide the DoD with the Federal Employees Health Benefits (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.	DoD Source Agency	Waived. Reason: By statute, TRS and TRR coverage may be provided if the person is not eligible for the FEHB Program. FEHB Program eligibility could only be obtained from USPS, and without that information, a determination of continued eligibility could not be made. Matching had to occur regardless of the associated cost or anticipated benefits.	81 FR 55241 August 18, 2016
Department of Education	Federal Pell Grant CMA# 14	18 Month Agreement Started: 08/26/2018 Expires: 02/25/2020	To identify Federal student aid applicants who meet the qualifications for increased Federal student financial assistance. Authorities: 20 U.S.C. 1087mm, Federal Perkins Loans (b)(3), Family Contribution; and 20 U.S.C. 1070h, Scholarships for Veteran's Dependents.	DoD Source Agency	Favorable	83 FR 35626 July 27, 2018

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Agency	Title of Match	Timelines	Purpose	DoD Source or Recipient	Cost Benefit Analysis (CBA)	Federal Register Citation
Department of Veterans Affairs	Montgomery GI Bill and Post 9/11 GI Bill CMA# 17	One Year Renewal Started: 03/28/2017 Expired: 03/27/2018 18 Month Agreement Started: 05/26/2018 Expires: 11/25/2019	To verify that individuals meet the conditions of military service and eligibility criteria for payment of benefits determined by Veterans Affairs under four enacted programs. Authorities: 10 U.S.C. Chapter 1606, Educational Assistance for Members of the Selected Reserve; 10 U.S.C. Chapter 1607, Educational Assistance for Reserve Component Members Supporting Contingency Operations and Certain Other Operations; 38 U.S.C. Chapter 30, All Volunteer Force Educational Assistance Program; and 38 U.S.C. Chapter 33, Post-9/11 Educational Assistance.	DoD Source Agency	Favorable	80 FR 52096 August 27, 2015 83 FR 18396 April 26, 2018
Health and Human Services / Centers for Medicare and Medicaid Services	Verification of Eligibility for Minimum Essential Coverage Under the Patient Protection and Affordable Care Act Through a Department of Defense Health Benefits Plan CMA# 18	One Year Renewal Started: 10/03/2017 Expired: 10/02/2018 18 Month Agreement Started: 11/30/2018 Expires: 05/29/2020	To assist CMS or a State-based exchange in determining eligibility for the following benefits: (1) advanced payment of the premium tax credit under 26 U.S.C. 236B; and (2) a cost-sharing reduction under Section 1402 of the ACA (42 U.S.C. 18071). 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; 42 U.S.C. 18071, Reduced cost-sharing for individuals enrolling in qualified health plans; 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; 45 CFR 155.330 - Eligibility redetermination during a benefit year, Options for conducting eligibility determinations; 45 C.F.R 305, Eligibility standards.	DoD Source Agency	Matching Program Justified. Reason: Matching program increases accuracy and timeliness of determinations, resulting in improved and more efficient eligibility determinations. Matching program is less costly than any alternative structure.	81 FR 11276 March 3, 2016 83 FR 54755 October 31, 2018

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Agency	Title of Match	Timelines	Purpose	DoD Source or Recipient	Cost Benefit Analysis (CBA)	Federal Register Citation
Health and Human Services / Administration for Children and Families	Verification of Continued Eligibility for Public Assistance Reporting Information System (PARIS) CMA# 86	18 Month Agreement Started: 07/29/2016 Ended: 01/28/2018 One Year Renewal Started: 01/29/2018 Expires: 01/28/2019	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 and to verify public assistance clients' declarations of income circumstances. Authorities: 42 U.S.C. Chapter 7, Social Security; 42 U.S.C. 602, Eligible States; State plan; 42 U.S.C. 1320b-7, Income and Eligibility Verification System; and 42 U. S. C. 1396b(r), Payment to States.	DoD Recipient Agency	Favorable	81 FR 42335 June 29, 2016
Veterans Administration	Disability Compensation Verification CMA# 87	18 Month Agreement Started: 10/09/2015 Ended: 04/08/2017 One Year Renewal Started: 04/09/2017 Expired: 04/08/2018	To verify an individual's continuing eligibility for VA benefits by identifying VA disability benefit recipients who return to active duty and to ensure that benefits are terminated if appropriate. Authorities: 38 U.S.C. 5106, Furnishing of Information By Other Agencies; and 38 U.S.C. 5304(c), Prohibition against duplication of benefits.	DoD Recipient Agency	Favorable	80 FR 54276 September 9, 2015

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Agency	Title of Match	Timelines	Purpose	DoD Source or Recipient	Cost Benefit Analysis (CBA)	Federal Register Citation
Social Security Administration	Verification of Eligibility of SSI/SVB CMA# 88	18 Month Agreement Started: 09/14/2016 Ended: 03/14/2018 One Year Renewal Started: 03/15/2018 Expires: 03/14/2019	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. Authorities: 42 U.S.C. 1006(b), Applications and furnishing of information, Verification requirement; 42 U.S.C. 1383(e)(1)(B), Administrative Requirements Prescribed By Commissioner; Criteria; Reduction of Benefits To Individual for Noncompliance With Requirements; Payment To Homeless; 42 U.S.C. 1383(f), Furnishing of Information by Federal Agencies; and 42 U.S.C. 1306(a), Disclosure of Information in Possession of Social Security Administration or Department of Health and Human Services; Disclosure prohibited; exceptions.	DoD Recipient Agency	Matching Program Justified. Reason: Matching is most efficient means of obtaining information needed for certain recipients / beneficiaries. Alternative of a manual record comparison would impose a considerable administrative burden, a greater intrusion on individual privacy, and result in benefit payment delays or recovery of improper payments / benefits. Net cost is relatively negligible.	Aug 10, 2016 81 FR 52943
Veterans Administration	Reserve Pay Reconciliation CMA# 89	18 Month Agreement Started: 11/11/2018 Expires: 05/10/2020	To verify eligibility for DoD/U.S. Coast Guard (USCG) members of the Reserve forces who receive Veterans Affairs (VA) disability compensation or pension to receive, in lieu and upon election, military pay and allowances when performing reserve duty. 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.	DoD Recipient Agency for initial match (FY17 data) after which DoD became the Source Agency	Favorable	October 12, 2018 83 FR 51673