Dear Ms. Block,


Any inquiries or comments regarding this report may be addressed to Ms. Lyn Kirby, Executive Secretary, Defense Data Integrity Board, 4800 Mark Center Drive, ATTN: DPCLTD, Mailbox #24, Alexandria, VA 22350-1700; or by email at lyn.m.kirby.civ@mail.mil.

Joo Y. Chung  
Chair, Defense Data Integrity Board

Enclosure:  
As stated
Department of Defense  
Annual Matching Activity Report  

Description of Contents  
Calendar Year 2020

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.

See Attachment A for the names and positions of the members of the Data Integrity Board, and the name and contact information of the Data Integrity Board’s secretary. There were two changes to the Data Integrity Board in 2020: the Executive Secretary and the DIB member representing the U.S. Air Force changed.

b. A list of matching agreements in effect during 2020 for matching programs in which the agency participated, including:

(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:

https://dpcld.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 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 ensure only disclosures of Privacy Act-covered records that are 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 each of the eight matching programs, and 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.

A cost-benefit analysis was performed for all eight matching programs. For the two programs for which the cost-benefit analysis did not show a favorable ratio, the matches were determined to be justified. See Attachment B.

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.

During 2020, the Department of Education (ED) notified DoD that certain DoD information received by ED pursuant to a matching agreement between the agencies had been re-disclosed within ED to other ED systems in contravention of the terms of the matching agreement. The violations were investigated, confirmed, and rectified by ED by terminating the unwarranted re-disclosures. In addition, the re-established agreement between the agencies (effective 3/21/2021) identified all relevant ED systems authorized to receive DoD information.

The Department of Health and Human Services (HHS) and DoD also identified a violation that involved the continuation of matching activities following the expiration of a matching agreement. Corrective action to re-establish the lapsed matching agreement is under way and expected to be completed later this year. Discussion between the agencies about other appropriate remedial action is ongoing.
In addition to the above matters, non-significant changes and clarifications to agreements were identified in renewal agreements, including one matching agreement between DoD and State Public Assistance Agencies (and facilitated by HHS) for which the renewal clarified certain statistical uses of data and the Defense Manpower Data Center’s role as a non-party service provider on related agreements.
Attachment A

Department of Defense
Annual Matching Activity Report

Data Integrity Board Members
Calendar Year 2020

Chairwoman:
Ms. Joo Chung
Senior Agency Official for Privacy
Director of Oversight and Compliance
Office of the Director for Administration and Management

Executive Secretary:
Ms. Lyn Kirby
Chief, Defense Privacy, Civil Liberties, and Transparency Division
Directorate of Oversight and Compliance
4800 Mark Center Drive
Mailbox #24
Alexandria, VA 22350-1700
E-mail: lyn.m.kirby.civ@mail.mil

Defense Data Integrity Board Members:

Mr. Myron Wong  
Department of the Army  
Chief, Army Privacy and Civil Liberties Office

Mr. Steve Daughety  
Department of the Navy  
Office of the Chief Information Officer  
Cybersecurity and Privacy, Privacy Lead

Mr. William Feeney  
Department of the Air Force  
Privacy and Civil Liberties Officer

Mr. Rodolph Morrison  
Department of the Defense  
Office of the DoD Chief Information Officer  
Deputy DoD Records Officer

Mr. Erik Ablin  
Associate Deputy General Counsel  
(Legal Counsel)  
DoD Office of the General Counsel

Mr. Paul Hadjiyane  
General Counsel  
Office of Inspector General  
Department of Defense  
(Advisory Capacity Only)

Mr. Michael V. Sorrento  
Director  
Defense Manpower Data Center
# Department of Defense
## Annual Matching Activity Report
### Calendar Year 2020

<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 (CBA)</th>
<th>Federal Register Citation</th>
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</table>
| **Health and Human Services**   | Disclosure of Enrollment and Eligibility Information for Military Health System Beneficiaries Who are Medicare Eligible CMA# 12 | 18 Month Agreement (previously lapsed) Re-establishment pending final signatures and submission to the Federal Register | To verify the eligibility of Military Health System (MHS) beneficiaries who are Medicare eligible to receive TRICARE benefits. 10 U.S.C. § 1086(d) requires DoD to discontinue military health care benefits for MHS beneficiaries when they become eligible for Medicare Part A unless they enroll in Medicare Part A and Medicare Part B. This also applies to MHS beneficiaries under the age of 65 who are eligible for Medicare Part A.  
**Authorities:** 10 U.S.C. § 1086. | DoD Recipient Agency | Favorable | TBD |
| **Department of Education**     | Federal Pell Grant CMA# 14 | 18 Month Agreement  
*Started: 08/29/2018  
*Expired: 02/28/2020*  
**One Year Renewal**  
*Started: 02/29/2020  
*Expired: 02/28/2021*  
**18 Month Agreement**  
*Started: 03/01/2021  
*Expires: 08/31/2022* | To fulfill the requirements of section 473(b)(3) of the Higher Education Act of 1965, as amended (HEA) (20 U.S.C. §1087mm(b)(3)), which requires the Secretary of Defense to provide the Secretary of Education with information to identify children whose parent or guardian was a member of the Armed Forces of the United States and died as a result of performing military service in Iraq or Afghanistan after September 11, 2001. Under the provisions of sections 473(b) and 420R of the HEA (20 U.S.C. §1070h), such persons may be eligible for increased amounts of student assistance authorized under Title IV of the HEA.  
**Authorities:** 20 U.S.C. 1087mm, Family Contribution; and 20 U.S.C. 1070h, Scholarships for Veteran’s Dependents. | DoD Source Agency | Favorable | 83 FR 35626 July 27, 2018  
86 FR 7547 January 29, 2021 |
# Department of Defense
## Annual Matching Activity Report
### Calendar Year 2020

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<tr>
<td><strong>Department of Veterans Affairs (VA)</strong></td>
<td>Montgomery GI Bill and Post 9/11 GI Bill CMA# 17</td>
<td><strong>18 Month Agreement</strong>&lt;br&gt;Started: 05/26/2018&lt;br&gt;Expired: 11/25/2019</td>
<td>To verify that individuals meet the conditions of military service and eligibility criteria for payment of benefits determined by VA under three enacted programs.&lt;br&gt;&lt;br&gt;<strong>Authorities:</strong> 10 U.S.C. 16131, 16131a, 16132, 16132a, 16133 and 16136 (Montgomery GI Bill – Selected Reserve); 38 U.S.C. 3011, 3012, 3018A and 3018B (Montgomery GI Bill – Active Duty); 38 U.S.C. 3301, 3311, 3312, and 3313 (Post-9/11 GI Bill); Public Law 114-315 (Jeff Miller and Richard Blumenthal Veterans Health Care and Benefits Improvement Act of 2016 ); Public Law 115-48 (Harry W. Colmery Veterans Educational Assistance Act of 2017); and Public Law 115-407 (Veterans Benefits and Transition Act of 2018).</td>
<td>DoD Source Agency</td>
<td>Favorable</td>
<td>83 FR 18396 April 26, 2018</td>
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<td><strong>One Year Renewal</strong>&lt;br&gt;Started: 11/26/2019&lt;br&gt;Expired: 11/25/2020</td>
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<td><strong>18 Month Agreement</strong>&lt;br&gt;Started: 11/26/2020&lt;br&gt;Expires: 05/25/2022</td>
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Page 2
### Health and Human Services / Centers for Medicare and Medicaid Services (CMS)

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<tr>
<td></td>
<td>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</td>
<td>18 Month Agreement Started: 11/30/2018 Expired: 05/29/2020 One Year Renewal Started: 05/30/2020 Expired: 05/29/2021 18 Month Agreement Started: 5/30/2021 Expires: 11/29/2022</td>
<td>To verify an Applicant’s or Enrollee’s eligibility for Minimum Essential Coverage through a TRICARE Health Program 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. 36B; and (2) a cost-sharing reduction under Section 1402 of the ACA (42 U.S.C. 18071). <strong>Authorities:</strong> Patient Protection and Affordable Care Act of 2010 (ACA) (Public Law 111-148), as amended by the Health Care and Education Reconciliation Act of 2010 (Public Law No. 111-152) (ACA); 26 U.S.C. 36B, Refundable credit for coverage under a qualified health plan (Sec. 1401 of ACA); 26 U.S.C. 5000A, Requirement to maintain minimum essential coverage (Sec. 1501 of ACA); 42 U.S.C. 18071, Reduced cost-sharing for individuals enrolling in qualified health plans (Sec. 1402 of ACA); 42 U.S.C. 18051, State flexibility to establish basic health programs for low-income individuals not eligible for Medicaid (Sec. 1331 of ACA); 42 U.S.C. 18081, Procedures for determining eligibility for Exchange participation, premium tax credits and reduced cost-sharing, and individual responsibility exemptions (Sec. 1411 of ACA); 42 U.S.C. 18031, Affordable choices of health benefit plans (Sec. 1311 of ACA); 42 U.S.C. 18041, State flexibility in operation and enforcement of Exchanges and related requirements (Sec. 1321 of ACA); 445 CFR Subpart D - Exchange Functions in the Individual Market: Eligibility Determinations for Exchange Participation and Insurance Affordability Programs (45 C.F.R. 155.300-355).</td>
<td>DoD Source Agency</td>
<td>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.</td>
<td>83 FR 54755 October 31, 2018 86 FR 16217 March 26, 2021</td>
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<td>Agency</td>
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<td>Department of Education</td>
<td>Benefit Eligibility for Inherent Danger Pay (IDP) or Hostile Fire Pay (HFP)</td>
<td>18 Month Agreement: 12/20/2019,</td>
<td>To provide eligible service members with no-interest accrual benefits on qualifying Title IV loans made under the Higher Education Act of 1965, as amended, during the time those service members were deployed to qualifying locations.</td>
<td>DoD Source Agency</td>
<td>Favorable</td>
<td>84 FR 64052 November 20, 2019</td>
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<td>CMA# 19</td>
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<td><strong>Authorities: 20 U.S.C. § 1087e(o) (Section 455(o) of the Higher Education Act of 1965, as amended.)</strong></td>
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<td>Health and Human Services</td>
<td>Verification of Continued Eligibility for Public Assistance Reporting Information System (PARIS)</td>
<td>18 Month Agreement: 03/30/2019,</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 and to verify public assistance clients’ declarations of income circumstances.</td>
<td>DoD Recipient Agency</td>
<td>Favorable</td>
<td>84 FR 6388 February 27, 2019</td>
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<td>for Children and Families</td>
<td>CMA# 86</td>
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<td>Department of Veterans Affairs</td>
<td>Disability Compensation Verification</td>
<td>18 Month Agreement: 06/13/2019,</td>
<td>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.</td>
<td>DoD Source Agency</td>
<td>Favorable</td>
<td>84 FR 20968 May 13, 2019</td>
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<td><strong>Authorities: 38 U.S.C. 5106, Furnishing of Information By Other Agencies; and 38 U.S.C. 5304(c), Prohibition against duplication of benefits.</strong></td>
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## Department of Defense
### Annual Matching Activity Report
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<tr>
<td>Social Security Administration</td>
<td>Verification of Eligibility of SSI/SVB</td>
<td>18 Month Agreement</td>
<td>To verify information of applicants for and recipients of Supplemental Security Income payments and Special Veterans Benefits with respect to determination of eligibility and calculating payment amounts.</td>
<td>DoD Source Agency</td>
<td>Matching Program Justified. Reason: matching is the 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 small.</td>
<td>84 FR 16133 April 17, 2019</td>
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<tr>
<td>Department of Veterans Affairs</td>
<td>Reserve Pay Reconciliation</td>
<td>18 Month Agreement</td>
<td>To verify eligibility for DoD/U.S. Coast Guard members of the Reserve forces who receive VA disability compensation or pension to receive, in lieu and upon election, military pay and allowances when performing reserve duty.</td>
<td>DoD Source Agency</td>
<td>Favorable</td>
<td>83 FR 51673 October 12, 2018</td>
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<td>86 FR 24695 May 7, 2021</td>
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