



OVERSIGHT AND  
COMPLIANCE

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

MAY 11 2017

The Honorable Dominic J. Mancini  
Acting Administrator, Office of Information and Regulatory Affairs  
725 17<sup>th</sup> Street NW  
Washington, D.C. 20503

Dear Mr. Mancini:

Enclosed please find the Department of Defense Annual Matching Activity Report for calendar year 2016. This report is made pursuant to the Office of Management and Budget Circular A-108, "Federal Agencies Responsibilities for Review, Reporting, and Publication under the Privacy Act," dated December 23, 2016.

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,

**CHUNG.JOO**  
**.Y.15123065**  
**07**  
Joo Y. Chung  
Chair, Defense Data Integrity Board

Digitally signed by  
CHUNG.JOO.Y.1512306507  
DN: c=US, o=U.S. Government,  
ou=DoD, ou=PKI, ou=OSD,  
cn=CHUNGJOO.Y.1512306507  
Date: 2017.05.10 17:02:17 -0400

Enclosure  
As stated

**ENCLOSURE**

Department of Defense Annual Matching  
Description of Contents for Activity Report  
Calendar Year: 2016

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 were two changes to the membership of the board during the past year. First, the Director of the Defense Manpower Data Center changed and second, during a review of the DoD's issuing guidance, it was determined that DoD had not officially established the requirement for a representative from Personnel & Readiness, Office of Legal Policy and the position was removed.

- 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.

Yes, for the one agreement that ended/terminated during the reporting period, the Veterans Administration and the DoD agreed the matching agreement titled, "Veterans Administration Inspector General, Verification of VA Compensation and Pension (C&P) Benefits" was no longer required and was not renewed. No matches have occurred after the date of expiration.

- (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 on initiation, renewal, and extension to ensure only disclosures endemic to the matching agreement occur.

- (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 six of the nine matching programs. Out of the six, all were favorable.

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 three of the nine matching agreements.

(1) 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 because Medicare information can only be obtained from HHS, and the matching must occur irrespective of the associated costs or anticipated benefits if DoD is to make eligibility determination as mandated by Congress.

(2) 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.

(3) United States Postal Services (USPS) matching agreement titled, "TRICARE Reserve Select FEHB Eligibility Verification" was waived because the 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.

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.

# ATTACHMENT A

DEPARTMENT OF DEFENSE  
ANNUAL MATCHING ACTIVITY  
REPORT

DATA INTEGRITY BOARD MEMBERS  
For Calendar Year 2016

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  
RA-IPM, PIA Lead

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

Mr. Henry C. Shelley, Jr.  
General Counsel  
Office of Inspector General  
Department of Defense

Ms. Lytwaive Hutchinson  
Deputy Director  
Joint Service Provider

Mr. Michael V. Sorrento/Ms. Regina Rogers  
Director  
Defense Manpower Data Center



## **ATTACHMENT B**

Agency	Title of Match	Timelines	Purpose	DoD Source or Recipient	Cost Benefit Analysis	Federal Register Citation
Department of Veterans Affairs	Montgomery GI Bill and Post 9/11 GI Bill	18 Month Agreement Started: Sep 28, 2015 Expires: Mar 27, 2017	To verify that individuals meet the conditions of benefits determined by the VA under three enacted programs. To verify that individuals meet the conditions of military service and eligibility criteria for payment of benefits determined by the VA under the Post 9/11 Education Assistance Program.  <b>Authorities:</b> 10 U.S.C. Chapter 1606, Educational Assistance for Members of the Selected Reserve; 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	Aug 27, 2015 80 FR 52096
Department of Education	Federal Pell Grant	12 Month Agreement Started: Aug 1, 2016 Expires: Jul 31, 2017  18 Month Recertification Started: Feb 1, 2015 Expired: Jul 31, 2016	To identify Federal student aid applicants who meet the qualifications for increased Federal student financial assistance.  <b>Authorities:</b> 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	Jan 2, 2015 80 FR 37
Health and Human Services/ Centers for Medicare and Medicaid	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 Expires: Oct 17, 2017  12 Month Recertification Started: Mar 31 2015 Expired: Mar 31, 2016	The disclosure by CMS will provide 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.  <b>Authorities:</b> 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 Source Agency	Cost Benefit Analysis Waived Reason: Medicare information can only be obtained from HHS, matching must occur irrespective of the associated costs or anticipated benefits if DoD is to make eligibility determinations as mandated by Congress.	Mar 18, 2016 81 FR 14852

DoD Matching Agreements  
CY 2016  
Attachment B

Agency	Title of Match	Timelines	Purpose	DoD Source or Recipient	Cost Benefit Analysis	Federal Register Citation
Human Services/ Centers for Medicare and Medicaid	Determination of Eligibility for the Advance Premium Tax Credit and Cost Sharing Reductions under the Affordable Care Act	<p><b>18 Month Agreement</b> Started: Apr 2, 2016 Expires: Oct 2, 2017</p> <p><b>12 Month Recertification</b> Started: Apr 1, 2015 Expired: Apr 1, 2016</p>	<p>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.</p> <p><b>Authorities:</b> 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. 1306, Disclosure of Information in Possession of Social Security Administration or Department of Health and Human Services; 42 U.S.C. 18001 note, Patient Protection and Affordable Care Act of 2010; 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; 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.</p>	DoD Source Agency	<p>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.</p>	Mar 18, 2016 81 FR 14852
United States Postal Service	TRICARE Reserve Select FEHB Eligibility Verification	<p><b>18 Month Agreement</b> Started: Sep 19, 2016 Expires: Mar 18, 2018</p>	<p>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.</p> <p><b>Authorities:</b> 5 U.S.C. Chapter 89, Health Insurance; 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.</p>	DoD Source Agency	<p>Cost Benefit Analysis Waived Reason: 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.</p>	Aug 18, 2016 81 FR 55241

DoD Matching Agreements  
CY 2016  
Attachment B

Agency	Title of Match	Timelines	Purpose	DoD Source or Recipient	Cost Benefit Analysis	Federal Register Citation
Veterans Administration	Disability Compensation Verification	18 Month Agreement Started: Oct 9, 2015 Expires: Apr 9, 2017	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.  <b>Authorities:</b> 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	Sept 9, 2016 80 FR 54276
Veterans Administration	Reserve Pay Reconciliation	18 Month Agreement Started: Apr 3, 2016 Expires: Oct 3, 2017	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.  <b>Authorities:</b> 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	Favorable	Mar 4, 2016 81 FR 11528
Health and Human Services	PARIS (Public Assistance Reporting Information System)	18 Month Agreement Started: July 29, 2016 Expires: Jan 28, 2018  12 Month Recertification Started: Feb 28, 2015 Expired Feb 28, 2016	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.  <b>Authorities:</b> 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(f), Payment to States.	DoD Recipient Agency	Favorable	June 29, 2016 81 FR 42335

DOD Matching Agreements  
CY 2016  
Attachment B

Agency	Title of Match	Timelines	Purpose	DOD Source or Recipient	Cost Benefit Analysis	Federal Register Citation
Social Security Administration	Verification of Eligibility of SSI/SVB	<p><b>18 Month Agreement</b> Started: Sep 14, 2016 Expires: Mar 14, 2018</p> <p><b>12 Month Recertification</b> Started: Sep 14, 2015 Expired: Sept 14, 2016</p>	<p>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.</p> <p><b>Authorities:</b> 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.</p>	DOD Recipient Agency	Favorable	Aug 10, 2016 81 FR 52943
Veterans Administration Inspector General	Verification of VA Comp and Pension (C&P) Benefits (TERMINATED)	<p><b>12 Month Recertification</b> Started: Jul 9, 2015 Expired: Jul 9, 2016</p> <p><b>18 Month Agreement</b> Started: Jan 9, 2013 Expired: Jul 9, 2015</p>	<p>To verify eligibility for VA Compensation and Pension benefits by matching veteran's records of those benefits for themselves or their beneficiaries.</p> <p><b>Authorities:</b> 5. U.S.C. Appendix 3, the Inspector General Act of 1978.</p>	DOD Recipient Agency	Favorable	Dec 9, 2013 78 FR 73851