



OFFICE OF THE DIRECTOR OF ADMINISTRATION AND MANAGEMENT
1950 DEFENSE PENTAGON
WASHINGTON, DC 20301-1950

May 31, 2026

The Honorable Mark Paoletta
Acting Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street NW
Washington, D.C. 20503

Dear Mr. Paoletta,

Enclosed please find the Department of War Annual Matching Activity Report for Calendar Year 2025. 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. Rahwa Keleta, Executive Secretary, Defense Data Integrity Board, 4800 Mark Center Drive, ATTN: PCLD, Mailbox #24, Alexandria, VA 22350-1700; or by email at rahwa.a.keleta.civ@mail.mil.

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KREMLACEK.MICHAEL
Date: 2026.05.31 09:34:20 -0400

Michael Kremlacek
Acting Chair
Defense Data Integrity Board

Enclosure:
As stated

**Department of War
Annual Matching Activity Report**



**Report for
Calendar Year 2025**

**Department of War (DoW)
Annual Matching Activity Report
for Calendar Year 2025**

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, DoW¹ provides the following:

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.*

Defense Data Integrity Board (DIB) Chair:

Mr. Michael Kremlacek

Acting Director of Oversight and Compliance
Office of the Director of Administration and Management
Senior Agency Official for Privacy

Defense DIB Executive Secretary:

Ms. Rahwa Keleta

Chief, Privacy and Civil Liberties Division
Oversight and Compliance Directorate
Office of the Director of Administration and Management
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agreements@mail.mil

Defense DIB Members:

Ms. Joyce Luton

Department of the Army
Director, Army Records Management Directorate

Ms. Viki Halabuk

Department of the Navy
Office of the Chief Information Officer / Senior Component Official for Privacy
Privacy Lead and Civil Liberties Officer

¹ DoW is a secondary title for the Department of Defense (DoD) pursuant to Executive Order 14347, Restoring the United States Department of War (Sept. 5, 2025).

Mr. Robert Bivens

Department of the Air Force
Chief Information Security Officer

Mr. Rodolph Morrison

Office of the Secretary of War
Office of the DoW Chief Information Officer
Deputy Director, Chief Information Officer Statutory Implementation

Mr. Erik Ablin

Office of the Secretary of War
DoW Office of the General Counsel
Acting Director, Office of Information Counsel

Ms. Katie Griffin

Office of the Secretary of War
Director, Defense Manpower Data Center (DMDC)

Mr. David Bennett (*Advisory Capacity Only*)

Office of the Secretary of War
Office of Inspector General
General Counsel

The Defense DIB Chair changed in 2025. In 2026, the representatives for the Department of the Air Force and 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 Appendix A.

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

<https://pclt.defense.gov/DIRECTORATES/Privacy-and-Civil-Liberties-Directorate/Privacy/Matching-Agreements/>

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

The DoW reviewed its matching agreements to ensure compliance and determine whether a renewal or re-establishment was necessary. During this reporting period, Computer Matching Agreement (CMA) #17 and CMA #19 lapsed. CMA#17 was re-established in 2026, and CMA #19 is currently being re-established. DMDC and the

DIB verified no matching activity is occurring during the lapse of any matching agreement. Non-significant changes and clarifications may be noted in renewal agreements.

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

The DoW 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. When necessary, DoW ensures appropriate routine uses are in place for external disclosures 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 matching programs, and all were favorable or resulted in a conclusion that the match was nonetheless justified. See Appendix A and the response to section c below.

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

None. A cost-benefit analysis was performed for all matching programs. In two cases, the requirement of a cost-benefit analysis showing the matching program *as likely to be cost-effective* was waived. The requirement was waived for CMA #18 because the program nonetheless resulted in efficient and accurate consumer eligibility determinations, minimized administrative burdens, provided a benefit to the public by accurately determining eligibility, increased public trust in participating agencies, and improved overall health care delivery. The requirement was waived for CMA #88 because the program remains the most efficient and comprehensive method of collecting and comparing the information, and there is currently no other administrative activity that can effectively provide the information.

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

None. No agreements were disapproved by the DIB.

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.

DoW Annual Matching Activity Report for Calendar Year 2025

Agency	Title of Match	Timelines	Purpose	DoW Source or Recipient	Cost Benefit Analysis (CBA)	Federal Register Citation
Health and Human Services (HHS) / Centers for Medicare and Medicaid Services (CMS)	Disclosure of Enrollment and Eligibility Information for Military Health System Beneficiaries Who are Medicare Eligible CMA #12	18 Month Agreement Started: 02/13/2024 Expired: 08/12/2025 One Year Renewal Started: 08/13/2025 Expires: 08/12/2026	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 DoW 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.	DoW Recipient Agency	Favorable	89 FR 1910 January 11, 2024
Department of Veterans Affairs (VA) / Veterans Benefits Administration (VBA)	Montgomery GI Bill and Post 9/11 GI Bill CMA #17	18 Month Agreement Started: 08/07/2023 Expired: 02/06/2025 One Year Renewal Started: 02/07/2025 Expired: 02/06/2026	To verify that individuals meet the conditions of military service and eligibility criteria for payment of benefits determined by VA under three enacted Federal benefit programs. Authorities: 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); Public Law 115-407 (Veterans Benefits and Transition Act of 2018). See also 38 U.S.C. 5106 and 3684A(a)(1).	DoW Source Agency	Favorable	88 FR 43422 July 7, 2023

Agency	Title of Match	Timelines	Purpose	DoW Source or Recipient	Cost Benefit Analysis (CBA)	Federal Register Citation
HHS / CMS	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	18 Month Agreement Started: 12/04/2023 Expired: 06/03/2025 One Year Renewal Started: 06/04/2025 Expires: 06/03/2026	To verify an Applicant's or Enrollee's eligibility for Minimum Essential Coverage through a qualifying TRICARE Health Program to assist CMS or a State-based exchange in determining eligibility for insurance affordability programs including: (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). Authorities: 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); 45 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).	DoW Source Agency	CBA was conducted but did not show program likely to be cost-effective. Matching Program found to be justified and the requirement of CBA showing program as likely to be cost-effective waived. Reason: matching program - resulted in efficient and accurate consumer eligibility determinations while minimizing the administrative burden of HHS and administering entities - provides a benefit to the public by accurately determining eligibility -increases public trust in participating agencies by continuing to use the current matching program, which is less costly than any alternative structure - improves overall health care delivery	88 FR 74998 November 1, 2023
Department of Education	Benefit Eligibility for Imminent Danger Pay (IDP) or Hostile Fire Pay (HFP) CMA #19	18 Month Agreement Started: 05/04/2023 Expired: 11/03/2024 One Year Renewal Started: 11/04/2024 Expired: 11/03/2025	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. Authorities: 20 U.S.C. § 1087e(o) (Section 455(o) of the Higher Education Act of 1965, as amended.)	DoW Source Agency	Favorable	88 FR 19941 April 4, 2023

Agency	Title of Match	Timelines	Purpose	DoW Source or Recipient	Cost Benefit Analysis (CBA)	Federal Register Citation
VA / VBA	Verification of Disability Compensation and Pension CMA #87	18 Month Agreement Started: 12/31/2024 Expires: 06/30/2026	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 or adjusted when appropriate. Authorities: 38 U.S.C. 5106, Furnishing of Information By Other Agencies; 38 U.S.C. 5304(c), Prohibition against duplication of benefits.	DoW Source Agency	Favorable	89 FR 94882 November 29, 2024
Social Security Administration	Verification of Eligibility of SSI/SVB CMA #88	18 Month Agreement Started: 05/29/2024 Expired: 11/28/2025 One Year Renewal Started: 11/29/2025 Expires: 11/28/2026	To verify information provided by applicants, recipients, deemors (i.e., someone other than the eligible individual or eligible spouse whose income and resources are considered), and beneficiaries of Supplemental 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), Procedure for Payment of Benefits, Administrative Requirements Prescribed By Commissioner; Criteria; Reduction of Benefits To Individual for Noncompliance With Requirements; Payment To Homeless; 42 U.S.C. 1383(f), Procedure for Payment of Benefits, Furnishing of Information by Federal Agencies; 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.	DoW Source Agency	CBA was conducted but did not show program likely to be cost-effective. Matching Program found to be justified and the requirement of CBA showing program as likely to be cost-effective waived. Reason: - the matching program is the most efficient and comprehensive method of collecting and comparing information - there is no other administrative activity that can effectively provide the information	89 FR 31789 April 25, 2024
VA / VBA	Reserve Pay Reconciliation CMA #89	18 Month Agreement Started: 11/19/2024 Expires: 05/18/2026	To verify eligibility for DoW/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. 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.	DoW Source Agency	Favorable	89 FR 83952 October 18, 2024