



ASSISTANT TO THE SECRETARY OF DEFENSE FOR
PRIVACY, CIVIL LIBERTIES, AND TRANSPARENCY

1155 DEFENSE PENTAGON
WASHINGTON, DC 20301-1155

May 15, 2025

The Honorable Jeffrey Bossert Clark, Sr.
Acting Administrator
Office of Information and Regulatory Affairs
725 17th Street NW
Washington, DC 20503

Dear Mr. Clark:

Enclosed please find the Department of Defense Annual Matching Activity Report for Calendar Year 2024. 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.

Sincerely,

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Joo Y. Chung
Chair, Defense Data Integrity Board

Enclosure:
As stated

Department of Defense Annual Matching Activity Report



**Report for
Calendar Year 2024**

Department of Defense (DoD) Annual Matching Activity Report for Calendar Year 2024

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.*

Defense Data Integrity Board Chair:

Ms. Joo Chung

Assistant to the Secretary of Defense
for Privacy, Civil Liberties, and Transparency
Senior Agency Official for Privacy

Defense Data Integrity Board Executive Secretary:

Ms. Rahwa Keleta

Director for Privacy and Civil Liberties
Office of the Assistant to the Secretary of Defense
for Privacy, Civil Liberties, and Transparency
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Defense Data Integrity Board 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

Mr. James Bishop

Department of the Air Force
Chief Information Security Officer

Mr. Rodolph Morrison

Office of the Secretary of Defense
Office of the DoD Chief Information Officer
Deputy Director, CIO Statutory Implementation

Mr. Erik Ablin

Office of the Secretary of Defense
DoD Office of the General Counsel
Associate Deputy General Counsel

Ms. Katie Griffin

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

Mr. Paul Hadjiyane (*Advisory Capacity Only*)

Office of the Secretary of Defense
Office of Inspector General
General Counsel

There were no changes to the Data Integrity Board in 2024. In 2025, the representatives for the Department of the Navy and DMDC 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 DoD reviewed its matching agreements to ensure compliance and determine whether a renewal or re-establishment was necessary. During a time within the reporting period when CMA #89 with the Department of Veterans Affairs (VA) was

lapsed, VA conducted matching activity using data transmitted by DMDC prior to the lapse of the agreement. Additional details, including remediation actions, are provided in Section e. below.

During this reporting period there were also lapses on three other agreements as detailed in Appendix A. DMDC and the Data Integrity Board verified no matching activity occurred during the lapse of any other agreement during calendar year 2024. 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 DoD 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, DoD 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, substantially reduced administrative burdens, provided significant benefit to the public by determining benefit eligibility more quickly while minimizing consumer burden, 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 Data Integrity Board.

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

One violation of the Privacy Act's matching provisions occurred during calendar year 2024. CMA #89 with the VA lapsed on December 7, 2023, and VA conducted a match on January 3, 2024 using data provided by DMDC in October 2023 while the agreement was still active. The Chair of the Data Integrity Board and the DoD Program Official were notified upon discovery. DoD subsequently informed the VA that conducting a match while an agreement is lapsed does not accord with the matching program provisions of the Privacy Act. The 18 Month Re-Establishment Agreements for both CMA #87 and CMA #89 with the VA were updated to expressly prohibit matching data while an agreement is suspended, lapsed, or otherwise not in effect. The parties agreed to these terms prior to the re-establishment of both matching programs in 2024.

DoD Annual Matching Activity Report for Calendar Year 2024

Agency	Title of Match	Timelines	Purpose	DoD 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: 08/10/2021 Expired: 02/09/2023 One Year Renewal Started: 02/10/2023 Expired: 02/09/2024 18 Month Agreement¹ Started: 02/13/2024 Expires: 08/12/2025 <i>(Briefly lapsed on 02/10/2024, resumed on 02/13/2024)</i>	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	86 FR 36261 July 9, 2021 89 FR 1910 January 11, 2024
Department of Education	Federal Pell Grant CMA #14	18 Month Agreement Started: 09/02/2023 Expired: 09/30/2024 ²	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	88 FR 51306 August 3, 2023

¹ Dates updated to align with method for computing effective dates established in 1 C.F.R. § 18.17.

² The intention of the matching program is to match applicants seeking eligibility for the DoD Iraq Afghanistan Service Grant only through Award Year 2023–2024. The period between July 1 and September 30, 2024, was only for “reconciliation” transactions for Award Year 2023–2024 applicants, who are subject to the pre-FAFSA Simplification Act requirements of the HEA.

Agency	Title of Match	Timelines	Purpose	DoD Source or Recipient	Cost Benefit Analysis (CBA)	Federal Register Citation
Department of Veterans Affairs (VA) / Veterans Benefits Administration (VBA)	Montgomery GI Bill and Post 9/11 GI Bill CMA #17	18 Month Agreement ³ Started: 08/07/2023 Expired: 02/06/2025 One Year Renewal Started: 02/07/2025 Expires: 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 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).	DoD Source Agency	Favorable	88 FR 43422 July 7, 2023

³ Dates updated to align with method for computing effective dates established in 1 C.F.R. § 18.17.

Agency	Title of Match	Timelines	Purpose	DoD 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 Agreement⁴ Started: 12/04/2023 Expires: 06/03/2025	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). 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).	DoD 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 and substantially reduced the administrative burden of HHS and administering entities - provides a significant benefit to the public by determining eligibility quicker while minimizing consumer burden -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

⁴ Dates updated to align with method for computing effective dates established in 1 C.F.R. § 18.17.

Agency	Title of Match	Timelines	Purpose	DoD Source or Recipient	Cost Benefit Analysis (CBA)	Federal Register Citation
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 Expires: 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.)	DoD Source Agency	Favorable	88 FR 19941 April 4, 2023
State Public Assistance Agencies (Non-Federal Agencies) HHS / Administration for Children and Families (Facilitating Agency)	Verification of Continued Eligibility for Public Assistance Reporting Information System (PARIS)⁵ CMA #86	18 Month Agreement Started: 10/04/2021 Expired: 04/03/2023 One Year Renewal Started: 04/04/2023 Expired: 04/03/2024 (approximate) ⁶	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 (Sec. 402 of Social Security Act); State plan; 42 U.S.C. 1320b-7, Income and Eligibility Verification System (Sec. 1137 of Social Security Act); 42 U. S. C. 1396b(r), Payment to States (Sec. 1903 of Social Security Act).	DoD Source Agency	Favorable	86 FR 49333 September 2, 2021
VA / VBA	Verification of Disability Compensation and Pension CMA #87	18 Month Agreement Started: 01/10/2022 Expired: 07/09/2023 One Year Renewal Started: 07/10/2023 Expired: 07/09/2024 18 Month Agreement Started: 12/31/2024 Expires: 06/30/2026 <i>(Lapsed on 07/10/2024, resumed on 12/31/2024)</i>	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; 38 U.S.C. 5304(c), Prohibition against duplication of benefits.	DoD Source Agency	Favorable	86 FR 70162 December 9, 2021 89 FR 94882 November 29, 2024

⁵ CMA #86 was a voluntary matching program which concluded in 2024 and will not be re-established.

⁶ Approximate dates provided due to inconsistency with Partner Agency tracked date.

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: 11/18/2021 Expired: 05/17/2023 One Year Renewal Started: 05/18/2023 Expired: 05/17/2024 18 Month Agreement Started: 05/29/2024 Expires: 11/28/2025 <i>(Briefly lapsed on 05/18/2024, resumed on 05/29/2024)</i>	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. 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.	DoD 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	86 FR 57726 October 18, 2021 89 FR 31789 April 25, 2024
VA / VBA	Reserve Pay Reconciliation CMA #89	18 Month Agreement Started: 06/07/2021 Expired: 12/06/2022 One Year Renewal Started: 12/07/2022 Expired: 12/06/2023 18 Month Agreement Started: 11/19/2024 Expires: 05/18/2026 <i>(Lapsed on 12/07/2023, resumed on 11/19/2024)</i>	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. 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 Source Agency	Favorable	86 FR 24695 May 7, 2021 89 FR 83952 October 18, 2024