

June 1, 2021

Ms. Sharon Block Acting Administrator Office of Information and Regulatory Affairs Office of Management and Budget New Executive Office Building, Room 10201 725 17th Street, NW Washington, DC 20503

Dear Ms. Block:

Attached is the 2021 Social Security Administration (SSA) Annual Matching Activity Report for matching activity in calendar year 2020. SSA prepared the report in accordance with the Privacy Act (5 U.S.C. § 552a(u)(3)(D)) and the Office of Management and Budget Circular No. A-108.

If you need additional information, please let me know. Please direct any staff questions to Kay Welch at 410-965-0783 or Kay.Welch@ssa.gov.

Sincerely,

Matthew D. Ramsey

Chair

Data Integrity Board

Attachments

SOCIAL SECURITY ADMINISTRATION (SSA) 2020 ANNUAL MATCHING ACTIVITY REPORT

Report on Agency Matching Activities (Authority: 5 U.S.C. 552a(u)(3)(D))

I. Name and Address of Reporting Agency

Social Security Administration 6401 Security Boulevard Baltimore, Maryland 21235-6401

II. Data Integrity Board (DIB) Members

Kilolo Kijakazi - Deputy Commissioner for Retirement and Disability Policy;

Sean Brune - Deputy Commissioner for Systems and Chief Information Officer;

Grace M. Kim - Deputy Commissioner for Operations;

Gail S. Ennis - Inspector General for Social Security;

Michelle King - Deputy Commissioner for Budget, Finance, and Management;

Eric Skidmore - Deputy Commissioner for Legislation and Congressional Affairs (DCLCA); and

Matthew D. Ramsey - DIB Chair, Executive Director, Office of Privacy and Disclosure.

III. Counsel to the DIB

Mitchell Chitwood - Associate General Counsel for General Law, Office of the General Counsel.

IV. Secretary to the DIB

Mary Ann Zimmerman - Deputy Executive Director Office of Privacy and Disclosure Mail Stop: G-401 WHR 6401 Security Boulevard

Baltimore, Maryland 21235-6401 Telephone: (410) 966-4193

Email: Mary.Ann.Zimmerman@ssa.gov

V. Explanation of Changes in Board Membership or Structure

Since the last report in 2020, the DIB's membership changed.

Due to personnel changes, the agency has two new DIB members:

- (1) Kilolo Kijakazi replaced Mark J. Warshawsky as Deputy Commissioner for Retirement and Disability Policy; and
- (2) Sean Brune replaced Raiive Mathur as Deputy Commissioner for Systems and Chief Information Officer

VI. <u>Disapproved Agreements</u>

The DIB did not disapprove any matching agreement during calendar year 2020.

VII. Violations

SSA did not have an alleged or identified violation of a matching agreement during calendar year 2020.

VIII. <u>Cost-Benefit Requirements</u>

A. Cost-Benefit Ratio

The SSA DIB ordinarily requires a favorable cost benefit ratio before proceeding with a matching program. However, during this reporting period and as explained in further detail below, SSA proceeded with four matching programs for which there was an unfavorable or unmeasurable cost-benefit analysis.

Match 1004 with the Department of Defense (DoD)

SSA receives information from DoD about military retirement payments under the terms of this computer matching agreement (CMA) to determine if a recipient's Supplemental Security Income(SSI) or Special Veterans' Benefits (SVB) are affected. Even though the cost-benefit ratio for this CMA was 0.84:1, SSA proceeded with the matching program because, in the alternative, technicians would have had to conduct a manual comparison of the DoD payment records with a list of SSI and SVB recipients. A manual match would have imposed a considerable administrative burden on SSA, constituted a greater intrusion on the individual's privacy, and resulted in delays for SSA detecting improper payments.

There are efficiencies in conducting this match, which are not included in the computation of agency costs and benefits. For example, SSA is able to efficiently and effectively match all SSI applicants and recipients against DoD records. Neither SSA field offices nor DoD could handle this workload if performed manually. The estimated cost savings of performing this match on an automated basis as opposed to manually, while not easily quantifiable, would far exceed the amount necessary to demonstrate the cost-effectiveness of this computer match.

Despite the conservative cost-benefit ratio, this CMA is a valuable program integrity tool that mitigates improper payments.

Match 1018 with the Office of Personnel Management (OPM)

OPM has a statutory obligation to use post-1956 earnings data in re-determining and re-computing Civil Service Retirement System (CSRS) annuities and Federal Employee Retirement System (FERS) annuities with a CSRS component for annuitants and survivors whose computations are based in part on military service performed after December 1956. SSA is required by law to provide this information to OPM. The purpose of this match is to assure that annuitants and survivors receive the annuity payment to which they are legally entitled. The approximately 300 OPM annuitants / survivors served by this match began receiving benefits prior to 1982. Thus, their ranks are rapidly declining and the need for this match diminishes each year. Because SSA must, by law, provide this information to OPM, SSA proceeded with the matching program even though the cost-benefit analysis did not demonstrate a cost savings.

Match 1097 with the Department of Health and Human Services, Centers for Medicare and Medicaid Services (CMS)

The cost-benefit analysis for CMA #1097 compares the costs and benefits of performing eligibility verifications manually without computer matching (i.e., without the single, streamlined computer system mandated by the Affordable Care Act (ACA) that depends on use of computer matching), versus electronically (i.e., with computer matching). The hypothetical manual process is one in which no electronic data would be used for verification and consumers would be required to submit paper documentation to verify data, as specified in the ACA. CMS and SSA must use computer matching to comply with the ACA mandate to provide a single, streamlined computerized eligibility verification process.

Match 1309 with the Department of Veterans Affairs (VA), Veterans Benefits Administration (VBA)

While the most recent cost-benefit analysis determined this match was not cost-effective, Section 1144 of the Social Security Act requires SSA to conduct outreach efforts for the Medicare Savings Programs and subsidized Medicare prescription drug coverage. SSA and VA determined that a computer matching program is the most efficient, expeditious, and effective means for SSA to obtain and process the income and resource information from VA to verify self-certified income and resource information submitted for initial applications and redeterminations. Therefore, the DIB recommended the continuation of this matching program.

B. Waiver of Cost-Benefit Analysis

The DIB waived the requirement for a cost-benefit analysis for the following computer matching programs:

Match 1007 with the Railroad Retirement Board (RRB)

HHS/SSA and RRB DIBs granted this waiver in 1992 when SSA was part of the Department of Health and Human Services. As stated in the Office of Management and Budget's (OMB) guidelines issued pursuant to 5 U.S.C. 552a (u)(4)(B), "...because matching is done for a variety of reasons, not all matching programs are appropriate candidates for benefit-cost analysis." This match between RRB and SSA systems is just such a match. The match assures the effective administration of the two benefit programs. The information SSA furnishes to RRB is not available from other sources, so a cost-benefit analysis is not a factor in determining whether this exchange occurs.

Matches 6000 and 6003 for State/State Agency Model Agreements for State Data Exchange

SSA received this waiver in March 2008. As stated in OMB's guidelines issued pursuant to 5 U.S.C. 552a (u)(4)(B), "...because matching is done for a variety of reasons, not all matching programs are appropriate candidates for benefit-cost analysis." This match between SSA and state agencies is just such a match. The match assures the effective administration of state benefit programs. The information SSA furnishes to state agencies is not available from other sources, so a cost-benefit analysis is not a factor in determining whether this exchange occurs.

IX. Adherence to Terms

SSA fully adhered to the terms of each matching program in which it participated during calendar year 2020.

X. Justification

All disclosures of SSA records used in matching programs during calendar year 2020 were, and remain, justified.

XI. <u>Links to Matching Notices and Matching Agreements</u>

Find a list of all of SSA's active matching programs, along with links to their corresponding matchingnotices and matching agreements, on SSA's Privacy webpage at https://www.ssa.gov/privacy/.

SSA 2020 ANNUAL MATCHING ACTIVITY REPORT ACTIVE AGREEMENTS

Title of Match	Matching Agency	Purpose	Effective Date	Federal Register Notice (FR)	Cost- Benefit Ratio
1003 – Department of Labor (DOL) Black Lung Part C Benefit Payments	DOL	SSA uses DOL Part C Black Lung benefit data to verify disability benefit amounts	11/25/2019	84 FR 56885	4.08:1
1004 – Department of Defense (DoD) Military Retirement	DoD/Defense Manpower Data Center	SSA uses military retirement and survivor payments to determine eligibility and benefit payment amounts for SSI and SVB	05/18/2019	84 FR 16133	See Section VIII
1005 – Office of Personnel Management (OPM) Consolidated Matches	OPM	SSA uses OPM civil service pension data to verify eligibility and benefit payment amounts of SSA Disability and SVB applicants and beneficiaries	03/11/2019	84 FR 2292	7.02:1
1006 – Railroad Board (RRB) Combined health Insurance Check Writing (CHICO)	RRB	SSA uses the RRB CHICO information to verify eligibility and benefit payments for SSI and SVB applicants and beneficiaries	09/02/2018	83 FR 26739	47.6:1
1007 – RRB/SSA Wage and Benefit Match	RRB	The RRB uses data exchanged under this agreement to properly administer section 23 lf(b)(2)(D) of the Railroad Retirement Act of 1974 (RRA) (45 U.S.C. § 231f(b)(2)(D))	07/20/2018	83 FR 28471	See Section VIII
1008 – Veterans Administration (VA) Adjustment of SSI and SVB Benefits	VA/Veterans Benefits Administration	SSA uses VA data to: (1) identify certain SSI & SVB recipients, who receive VA benefits and (2) identify income limits of certain individuals to determine their potential eligibility for the Medicare Savings Program	11/11/2019	84 FR 54715	51.9:1

Title of Match	Matching Agency	Purpose	Effective Date	Federal Register Notice (FR)	Cost- Benefit Ratio
1010 – Department of Homeland Security (DHS) Resident Alien	DHS	SSA uses the information provided by DHS to identify aliens ineligible for SSI payments due to their absence or removal from the United States; and to identify aliens ineligible for RSDI benefits because of removal from the United States	01/19/2020	84 FR 68537	17.5:1
1012 – Corporations for National and Community Services (CNCS) Social Security Number (SSN) Verification	CNCS	SSA verifies SSNs and provides citizenship status to CNCS for individuals applying to serve in approved national service positions	10/01/2018	83 FR 44031	34.19:1
1015 – Department of Labor (DOL) Black Lung Part B Data	DOL	SSA verifies that recipients of Part B are receiving the correct amount of SSI payments	11/25/2019	84 FR 56885	3.19:1
1016 – Internal Revenue Service (IRS) Disclosure of Information to Federal, State, and Local Agencies (DISFLA)	Department of Treasury/IRS	SSA uses the return information provided by the IRS to verify eligibility, and determine the benefit payment amount for Medicare and SSI	07/01/2018	83 FR 9881	6.37:1
1018 – Office of Personnel Management (OPM) Post 1956 Military Match	OPM	OPM uses return and benefit information provided by SSA to avoid duplicate SSA and federal retirement benefits for persons with post 1956 military service	04/19/2019	84 FR 10132	See Section VIII
1030 – Veterans Administration (VA) Income Dependent Extract	VA	SSA verifies SSNs provided by the VA and provides SSA benefit data. The VA uses the SSA information to verify their benefit payment amounts	03/12/2020	85 FR 7618	279.0:1

Title of Match	Matching Agency	Purpose	Effective Date	Federal Register Notice (FR)	Cost- Benefit Ratio
1038 – Bureau of the Fiscal Service (Fiscal Service) Savings Bond Match	Fiscal Service	SSA uses Fiscal Service's Savings Security data to determine continued eligibility and/or correct benefit amounts for SSI applicants and recipients who did not report or incorrectly reported ownership of savings securities	12/26/2018	83 FR 55446	4.86:1
1045 – Office of Personnel Management (OPM) Earnings for Disability	OPM	SSA discloses return information to OPM to verify factors affecting certain disability eligibilities and amounts under their Civil Service Retirement System and Federal Employee Retirement System (FERS) programs	04/20/2019	84 FR 10342	15.97:1
1050 – Internal Revenue Service Earnings of Veterans Administration (VA) Income Dependent Beneficiaries	VA	The Veterans Benefits Administration uses tax return information from SSA's Earnings Recording and Self- Employment Income system of records (SOR) to update the master records of VA applicants and beneficiaries	09/15/2020	85 FR 50069	4.43:1
1051 – Department of Education (DoED) Verification of SSN and Citizenship Status for Financial Aid	DoED	DoED uses SSA information to verify SSNs and confirm citizenship at time of application for financial assistance under Title IV of the Higher Education Act	10/10/2018	83 FR 45910	51.88:1
1052 – Veterans Administration (VA) Earnings Information	VA	SSA discloses return information to VA to verify earnings data provided directly by medical care applicants	11/28/2020	85 FR 68419	2.2:1
1061 – Housing and Urban Development (HUD) Tenant Reported Income	HUD	Identifies HUD tenants who are ineligible or who have overpaid rental assistance benefits	05/08/2019	84 FR 11321	119.0:1

Title of Match	Matching Agency	Purpose	Effective Date	Federal Register Notice (FR)	Cost- Benefit Ratio
1071 – Office of Personnel Management (OPM) Benefit Data	OPM	OPM uses SSA Title II and Title XVI benefit and earnings data to verify certain FERS retirement or survivors benefit, eligibility, and payment amounts	04/27/2019	84 FR 11580	15.6:1
1074 – Office of Child Support Enforcement (OCSE) Quarterly SSI Match and Online Query Agreement	OCSE	SSA uses the data from OCSE to verify eligibility and payment amounts for SSI and DI benefits	02/06/2020	85 FR 546	4.02:1
1076 – Centers for Medicare and Medicaid Services (CMS) Disclosure of Health Facility Admission Information	CMS	SSA uses CMS data to identify SSI recipients who enter skilled nursing home facilities to adjust, suspend, or terminate SSI payments; and to verify entitlement and benefit amounts, for some World War II veterans under Title VIII.	12/20/2018	83 FR 58317	4.26:1
1094 – Centers for Medicare and Medicaid Services (CMS) Medicare Non-Utilization	CMS	SSA uses CMS data on Medicare enrollees whose records have been inactive for 3 or more years as an indicator to select and prioritize cases for continued Title II eligibility review	01/01/2020	79 FR 41437	24.0:1
1097 – Centers for Medicare and Medicaid Services (CMS) Affordable Care Act (ACA) Enrollment/Eligibility	CMS	SSA discloses information to CMS to administer the Insurance Affordability Program under the Patient Protection and ACA of 2010	09/09/2018	83 FR 38696	See Section VIII
1098 – Office of Child Support Enforcement (OCSE) Title II National Directory of New Hires Agreement	OCSE	SSA uses OCSE's quarterly wage and unemployment insurance data to verify eligibility and identify potential overpayments to DI recipients	12/22/2020	85 FR 67412	12.6:1

Title of Match	Matching Agency	Purpose	Effective Date	Federal Register Notice (FR)	Cost- Benefit Ratio
1100 – Department of Education (DoED) Medical Improvement Not Expected (MINE) Disability Data	DoED	DoED will use SSA MINE information to inform persons with loans and permanent disabilities who may qualify for loan discharges	08/20/2018	83 FR 34126	39.79:1
1304 – Fiscal Service Medicare Part D Prescription Drug Subsidy	Department of Treasury, Bureau of Fiscal Service	SSA uses Fiscal Service's ownership of Savings Securities data to verify an applicant's self-certification of eligibility for prescription drug subsidy assistance	10/01/2018	83 FR 44687	41.7:1
1305 – Internal Revenue Service (IRS) Medicare Part D Prescription Drug Subsidy	IRS	SSA uses certain IRS return data to verify an applicant's self- certification of eligibility for prescription drug subsidy assistance	05/27/2020	82 FR 49691	26.0:1
1306 – Office of Child Support Enforcement (OCSE) Medicare Part D Prescription Drug Subsidy	OCSE	SSA uses OCSE quarterly wage, new hire, and unemployment data to verify an applicant's self- certification of eligibility for prescription drug assistance	05/27/2020	85 FR 19790	4.35:1
1307 – Office of Personnel Management (OPM) Medicare Part D Prescription Drug Subsidy	OPM	SSA uses OPM civil service benefit and payment data to verify an applicant's self-certification of eligibility for prescription drug subsidy assistance	03/19/2019	84 FR 2941	8.14:1
1308 – Railroad Board (RRB) Medicare Part D Prescription Drug Subsidy	RRB	SSA uses RRB annuity payment information to verify an applicant's self-certification of eligibility for prescription drug subsidy assistance	03/31/2020	84 FR 51218	49.8:1

Title of Match	Matching Agency	Purpose	Effective Date	Federal Register Notice (FR)	Cost- Benefit Ratio
1309 – Veterans Administration (VA) Medicare Part D Prescription Drug Subsidy	VA	SSA uses VA compensation and pension payment data to verify an applicant's self-certification of eligibility for the Extra Help with Medicare Prescription Drug Plan Costs Program, and identify those who may qualify, and for outreach efforts	09/06/2020	85 FR 45291	See Section VIII
1310 – Internal Revenue Service (IRS) Medicare Parts B & D Premium Subsidy	IRS	SSA uses IRS return information to establish the correct amount of premium subsidy adjustments for Medicare Parts B & D	10/01/2020	85 FR 47837	22.614:1
5001 – Fugitive, Felons, Parole Violators or Probation Violators	Individual Law Enforcement Agencies and Source Jurisdiction	SSA identifies individuals in the Source Jurisdiction who are fleeing fugitives felons, parole violators, or probation violators and who are also SSI recipients RSDI beneficiaries SVB beneficiaries payees for SSI recipients RSDI beneficiaries or SVB beneficiaries or SVB beneficiaries	10/10/2019	84 FR 21889	3.27:1
6000 – Model between SSA and the States	States	SSA provides data and SSN verification to States administrating federally funded benefit programs under various provisions of the Social Security Act (Act) including state-funded programs under Title XVI of the Act	01/01/2020	84 FR 21890	