

# <u>SOCIAL SECURITY</u> Office of the General Counsel

May 26, 2022

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 2022 Social Security Administration (SSA) Annual Matching Activity Report for matching activity in calendar year 2021. 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 Neil Etter at (410) 965-8028 or <u>Neil.Etter@ssa.gov</u>.

Sincerely,

Matthe D. Damey

Matthew D. Ramsey Chair Data Integrity Board

Attachments

SOCIAL SECURITY ADMINISTRATION BALTIMORE MD 21235-0001

# SOCIAL SECURITY ADMINISTRATION (SSA) 2022 ANNUAL MATCHINGACTIVITY 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

Stephen G. Evangelista - Deputy Commissioner for Retirement and Disability Policy;

Sean P. 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;

Tom Klouda - Deputy Commissioner for Legislation and Congressional Affairs; and

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

### III. <u>Counsel to the DIB</u>

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

### IV. <u>Secretary to the DIB</u>

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: <u>Mary.Ann.Zimmerman@ssa.gov</u>

### V. Explanation of Changes in Board Membership or Structure

Due to staffing changes since last year's report, the agency has the following two new DIB members:

- (1) Stephen G. Evangelista replaced Kilolo Kijakazi as Deputy Commissioner for Retirement and Disability Policy; and
- (2) Tom Klouda\_replaced Eric R. Skidmore as Deputy Commissioner for Legislation and Congressional Affairs

#### VI. <u>Disapproved Agreements</u>

The DIB did not disapprove any matching agreement during calendar year 2021.

#### VII. <u>Violations</u>

SSA did not have an alleged or identified violation of a matching agreement during calendar year 2021.

#### 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 three matching programs for which there was an unfavorable or unmeasurable cost-benefit analysis.

• Match 1018 with the Office of Personnel Management (OPM)

OPM has a statutory obligation to use post-1956 earnings data in redetermining 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 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. Therefore, the DIB continues to recommend the continuation of this matching program. Please note the attachment below.



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

The cost-benefit analysis for CMA #1097 compared 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 documentationto 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. Therefore, the DIB continues to recommend the continuation of this matching program.

• 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 subsidizedMedicare prescription drug coverage. SSA and VA determined that a computer matching program is the most efficient, expeditious, and effectivemeans for SSA to obtain and process the income and resource information from VA to verify self-certified income and resource information submittedfor initial applications and redeterminations. Therefore, the DIB continues to recommend the continuation of this matching program.

#### B. Waiver of Cost-Benefit Analysis (CBA)

A cost-benefit analysis for each of the exchanges made under the following agreements is not required in accordance with the determination by the SSA DIB to waive such analysis pursuant to 5 U.S.C. \$552a(u)(4)(B):

• 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. 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 CBA is not a factor in determining whether this exchange occurs. Therefore, the DIB continues to recommend the continuation of this matching program and waiving the CBA. • Matches 6000 and 6003 for State/State Agency Model Agreements for StateData Exchange

The waiver for these matches begin in March 2008. The matches assure the effective administration of state benefit programs. The information SSA furnishes to state agencies is not available from other sources, so a CBA is not a factor in determining whether this exchange occurs. Therefore, the DIB continues to recommend the continuation of this matching program and waiving the CBA.

## IX. Adherence to Terms

SSA fully adhered to the terms of each matching program in which it participated during calendar year 2021.

### X. <u>Justification</u>

All disclosures of SSA records used in matching programs during calendar year 2021 were, and remain, justified.

## XI. Links to Matching Notices and Matching Agreements

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

# SSA 2021 ANNUAL MATCHING ACTIVITY REPORTACTIVE AGREEMENTS

Title of Match	Matching Agency	Purpose	Effective Date	Federal Register (FR) Notice	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.	11/18/2021	<u>86 FR 57726</u>	2.06:1
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.	09/11/2021	86 FR 33011	42.17:1.
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.	03/02/2021	<u>85 FR 67087</u>	39.8:1
1007 – RRB/SSA Wage and Benefit Match	RRB	The RRB uses data exchanged under this agreement to properly administer section 23lf(b)(2)(D) of the Railroad Retirement Act of 1974 (45 U.S.C. § 23lf(b)(2)(D)).	01/22/2021	85 FR 83632	See Section VIII above.
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 determinetheir potential eligibility for the MedicareSavings Program.		<u>84 FR 54715</u>	51.9:1

Title of Match	Matching Agency	Purpose	Effective Date	Federal Register (FR) Notice	Cost- Benefit Ratio
1010 – Department of Homeland Security (DHS) Noncitizens Suspension & Recovery	DHS	SSA uses the information provided by DHS to identify noncitizens ineligible for Supplemental Security Income payments due to their absence or removal from the United States; and to identify noncitizens ineligible for RSDI benefits because of removal from the United States.		<u>84 FR 68537</u>	17.5:1
1012 – Corporations for National and Community Services (CNCS) Social Security Number Verification	CNCS	SSA verifies SSNs and provides citizenship status to CNCS for individuals applying to serve in approved national service positions.	04/01/2021	<u>86 FR 7714</u>	34.19:1
1015 –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 (DOT)	SSA uses the return information provided by the IRS to verify eligibility, and determine the benefit payment amount for Medicare and SSI.	01/01/2021	<u>85 FR 64605</u>	6.41:1
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	<u>84 FR 10132</u>	See Section VIII above.
1030 – 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	<u>85 FR 7618</u>	279.0:1

Title of Match	Matching Agency	Purpose	Effective Date	Federal Register (FR) Notice	Cost- Benefit Ratio
1038 – Bureau of the Fiscal Service (Fiscal Service) Savings Bond Match	DOT	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.	6/26/2021	<u>86 FR 20781</u>	1.3:1
1045 –OPM Earnings for Disability	OPM	SSA discloses return information to OPM to verify factors affecting certain disability eligibilities and amounts under their CSRS and FERS programs.	10/20/2021	<u>86 FR 49577</u>	1:0.05
1050 – IRS Earnings of 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 to update the master records of VA applicants and Beneficiaries.	09/15/2020	<u>85 FR 50069</u>	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.	4/11/2021	<u>86 FR 16195</u>	36:44
1052 – VA Earnings Information	VA	SSA discloses return information to VA to verify earnings data provided directly by medical care applicants.	11/28/2020	<u>85 FR 68419</u>	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	<u>84 FR 11321</u>	119.0:1

Title of Match	Matching Agency	Purpose	Effective Date	Federal Register (FR) Notice	Cost- Benefit Ratio
1071 – 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.	10/27/2021	86 FR 49578	Appen- dices: A-158:1 B-4,228:1 C-1480:1
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 67412	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.		86 FR 21430	8.94:1
1094 – CMS Medicare Non-Utilization	CMS	SSA uses CMS data on Medicare enrollees whose records have been inactive for three or more years as an indicator to select and prioritize cases for continued Title II eligibility review.		79 FR 41437	24.0:1
1097 – CMS Affordable Care Act (ACA) Enrollment/Eligibility	CMS	SSA discloses information to CMS to administer the Insurance AffordabilityProgram under the Patient Protection and ACA of 2010.	03/09/2021	<u>85 FR 73719</u>	See Section VIII above.
1098 – OCSE Title II National Directory of New Hires Agreement	OCSE	SSA uses OCSE's quarterly wage and unemployment insurance data to verifyeligibility 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 (FR) Notice	Cost- Benefit Ratio
1100 – 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.	9/30/2021	<u>86 FR 47092</u>	0.013
1304 – Fiscal Service Medicare Part D Prescription Drug Subsidy	Department of Treasury	SSA uses Fiscal Service's ownership of Savings Securities data to verify an applicant's self-certification of eligibility for prescription drug subsidy assistance.	4/2/2021	<u>85 FR 82025</u>	41.7:1
1305 – 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	<u>85 FR 5271</u>	9.4:1
1306 – OCSE Medicare Part D Prescription Drug Subsidy	OCSE	SSA uses OCSE quarterly wage, new hire, and unemploymentdata to verify an applicant's self-certification of eligibility for prescription drug assistance.	05/27/2020	<u>85 FR 19790</u>	4.35:1
1307 – OPM Medicare Part D Prescription Drug Subsidy	OPM	SSA uses OPM civil service benefit and payment data to verifyan applicant's self- certification of eligibility for prescription drug subsidy assistance.	9/14/2021	<u>86 FR 44464</u>	42:1
1308 – 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	<u>84 FR 51218</u>	49.8:1

Title of Match	Matching Agency	Purpose	Effective Date	Federal Register (FR) Notice	Cost- Benefit Ratio
1309 – 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 subsidy under the Medicare Prescription Drug Plan Costs Program. It also helps identify those who may qualify for Medicare outreach efforts.	09/06/2020	<u>85 FR 45291</u>	0.28:1
1310 – 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	<u>85 FR 47837</u>	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 whoare fleeing fugitive felons, parole violators,or probation violators and who are also SSI recipients, RSDI beneficiaries, SVB beneficiaries, and representative payees for SSI recipients, RSDI Beneficiaries, or SVB beneficiaries.	04/10/2022	<u>86 FR 57725</u>	2.51:1
6000 – Model between SSA and the State	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	Section VIII above.
6003 – Model between SSA and the State Agency	State Agency	Provides SSA data and SSN verification to State Agencies admini- stering federally funded benefit programs under various provisions of the Act, including state- funded programs under	01/01/2020	<u>84 FR 21890</u>	See Section VIII above.

	Title VXI of the Act.		