DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of the Secretary

Assistant Secretary for Administration
Washington, D.C. 20201

MEMORANDUM

DEC 17 2010

TO: Members
HHS Data Integrity Board

FROM: E. J. Holland, Jr.
Chairperson, HHS Data Integrity Board

SUBJECT: Data Integrity Board Approval of a Computer Matching Agreement (CMA) wherein the Administration for Children and Families Serves as "Facilitator" in Agreements between the Department of Defense (DoD), Defense Manpower Data Center, "Verification of Continued Eligibility for Public Assistance II (PARIS-II)", HHS #1009

As indicated on the attached document, I have certified Data Integrity Board (DIB) approval of this computer matching agreement the Department of Defense (DoD) will execute. The Administration for Children and Families (ACF) will serve as Facilitator in accordance with DoD's request.

The purpose of this matching program is to provide the State Public Assistance Agencies (SPAAs) with data from Federal employee wage and pension files to determine eligibility and to ensure fair and equitable treatment in the delivery of benefits attributable to funds provided by the Federal Government. The SPAAs will use the DoD matched data to verify the continued eligibility of individuals to receive public assistance benefits and, if ineligible, to take such action as may be authorized by law and regulation. This matching program will result in the identification of personnel who are receiving both Federal compensation or pension benefits and public assistance benefits under Federal programs being administered by the States. As Facilitator, ACF will support each SPAA's efforts to ensure appropriate delivery of benefits by assisting with drafting the necessary agreements, helping arrange signatures to the agreements and acting as a central shipping point as necessary. ACF will not access the data.

In a memorandum to you, dated December 10, 2010, we submitted the agreement for DIB review and approval. All members of the DIB voted to approve the agreement.

If you wish more information about this approval, please contact Naomi T. Cook at 202-690-5522.

Attachment
Certification of Board Action

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES

DATA INTEGRITY BOARD

CERTIFICATION OF BOARD ACTION

Title: Verification of Continued Eligibility for Public Assistance II (PARIS-II)," HHS #1009

PARTIES TO THE AGREEMENT:

Recipient: Department of Defense (DoD)
Defense Manpower Data Center

Source: State Public Assistance Agencies (SPAAs)

Facilitator: Administration for Children and Families (ACF)

PURPOSE OF THE AGREEMENT:

The purpose of this matching program is to provide the SPAAs with data from Federal employee wage and pension files to determine eligibility and to ensure fair and equitable treatment in the delivery of benefits attributable to funds provided by the Federal Government. The SPAAs will use the DoD matched data to verify the continued eligibility of individuals to receive public assistance benefits and, if ineligible, to take such action as may be authorized by law and regulation. This matching program will result in the identification of personnel who are receiving both Federal compensation or pension benefits and public assistance benefits under Federal programs being administered by the States. As Facilitator, ACF will support each SPAA's efforts to ensure appropriate delivery of benefits by assisting with drafting the necessary agreements, helping arrange signatures to the agreements and acting as a central shipping point as necessary. ACF will not access the data.

Conditions of Approval:

There are no special conditions to approval of this agreement.

Action:

As Chairperson of the Data Integrity Board, I hereby certify Board approval of this computer matching agreement.

12/17/10
Date

E. J. Holland, Jr.
Chairperson, HHS Data Integrity Board

Computer Matching Agreement
Among The
Defense Manpower Data Center, The Department Of Defense,
The State Public Assistance Agencies
And The Administration for Children and Families
U.S. Department of Health & Human Services

I. Introduction and Background

A. Supersedure

This computer matching agreement supersedes all existing data exchange agreements or memoranda of understanding between the Department of Health and Human Services and the Department of Defense applicable to the exchange of personal data for purposes of identifying individuals who are receiving Federal compensation or pension payments and also are receiving payments pursuant to Federal benefit programs being administered by States.

B. Guidance

This agreement is executed to comply with the Privacy Act of 1974, as amended, 5 U.S.C. § 552a; Office of Management and Budget (OMB) Guidelines interpreting the provisions of the Privacy Act pertaining to computer matching at 54 FR 25818 (June 19, 1989) and 56 FR 18599 (April 23, 1991); and the computer matching portions of Appendix I to OMB Circular No. A-130 as amended at 61 Fed. Reg. 6428, February 20, 1996.

C. Abbreviations and Definitions

1. ACF: Administration for Children and Families, HHS.

2. DIB: Data Integrity Board.

3. HHS: Department of Health and Human Services.

4. DISCLOSE and DISCLOSURE: The release outside of Federal or State agencies of information or data, with or without consent of the individual or individuals to whom the data pertains.

5. DMDC: Defense Manpower Data Center, DoD.

6. DOD: Department of Defense.

7. FACILITATING AGENCY: Administration for Children and Families.

8. MATCHING PROGRAM: As defined in subsection (a) (8) of the Privacy Act.

9. OMB: Office of Management and Budget.

10. OPM: Office of Personnel Management.

11. PARIS: Public Assistance Reporting Information System.

12. PUBLIC ASSISTANCE: State administered Federal benefit programs, including Temporary Assistance for Needy Families (TANF), Medicaid, and the Supplemental Nutrition Assistance Program(SNAP), formerly known as Food Stamps.

13. PRIVACY ACT: The Privacy Act of 1974, as amended, 5 U.S.C §552a.

14. RECIPIENT AGENCIES: As defined by the Privacy Act at 5 U.S.C. §552a(a)(9) will mean DMDC, the agency receiving the records and actually performing the computer match, i.e., the matching agency.

15. SOURCE AGENCIES: As defined by the Privacy Act at 5 U.S.C. §552a(a)(11), will mean SPAA, the agencies initially disclosing their records, via the facilitating agency, for the purpose of a computer match.

16. SPAAs: State Public Assistance Agencies (Attachment 1).

17. SSN: Social Security Number.

D. Background

Since 1993, ACF has been working with SPAAs and with other Federal agencies to develop information-sharing projects that have proven useful in verifying the income of individuals receiving public assistance. ACF has sought to identify information-sharing opportunities, and to lead and coordinate the activities required to take advantage of these opportunities.

Congress recognized ACF's successful efforts in this regard by enacting Pub. L. 110-379, which amended section 1903(r) of the Social Security Act (the Act) to require that States have eligibility determination systems that provide for data matching through the Public Assistance Reporting Information System (PARIS) or a successor system. The provision took effect on October 1, 2009.

The matching program described in this agreement is similar to matching programs undertaken in prior years, and will result in the identification of individuals who are receiving both Federal compensation or pension benefits and public assistance benefits under Federal programs being administered by the States.

II. Purpose and Legal Authority

A. Purpose

This agreement establishes an arrangement for a periodic computer matching program between DoD as the matching agency, ACF as the facilitating agency, and the SPAAs as the source agencies who will use the data in their public assistance programs. The purpose of this matching program is to provide the SPAAs with data from DoD military and civilian pay files, the military retired pay files, survivor pay files and the OPM civilian retired pay files to determine eligibility and to ensure fair and equitable treatment in the delivery of benefits attributable to funds provided by the Federal Government. The SPAAs will use the matched data to verify the continued eligibility of individuals to receive public assistance benefits and, if ineligible, to take such action as may be authorized by law and regulation.

ACF, in its role as match facilitator, will support each SPAA's efforts to ensure appropriate delivery of benefits by assisting with drafting the necessary agreements, helping arrange signatures to the agreements and acting as a central shipping point as necessary.

This agreement sets forth the responsibility of the SPAAs with respect to information obtained pursuant to this agreement. Each SPAA match is expected to comply with pertinent requirements of the Privacy Act, including its implementing regulations and guidance.

B. Legal Authority

The legal authority for conducting the matching program is contained in sections 402, 1137, and 1903(r) of the Social Security Act (42 U.S.C. sections 602, a 1320b-7, and 1396b(r)).

III. Justification and Expected Results

A. Justification

States are required to verify client circumstances when determining an applicant's eligibility for public assistance benefits. The parties to this agreement have determined that a computer matching program is the most efficient, expeditious, and effective means of obtaining and processing the information needed to identify individuals who may be ineligible for public assistance benefits, i.e., to verify client declarations of income circumstances. The principal alternative to using a computer matching program for identifying such individuals would be to conduct a manual comparison of all DoD pay/retirement/ survivor pay files and the OPM civilian retired pay records with SPAA records of those individuals currently receiving public assistance under a Federal benefit program being administered by the State. Conducting a manual match, however, would clearly impose a considerable administrative burden, constitute a greater intrusion of the individual's privacy, and would result in additional delay in the eventual recovery of any outstanding debts. By contrast, when using the computer matching program, information on successful matches (hits) can be provided within 30 days of receipt of an electronic file of SPAA beneficiaries.

B. Expected Results

The GAO report PARIS PROJECT CAN HELP STATES REDUCE IMPROPER PAYMENT BENEFIT PAYMENTS, projects that if States include TANF, Medicaid and SNAP activities in their matching projects, the gross savings will result in a savings to cost ratio of 11:1 (GAO 01-935, pp. 14, 15). All savings are in program dollars, since there is no cost paid to either ACF or DMDC to participate in the match program.

The cost-benefit analysis (Attachment 2) demonstrates that the benefits to be obtained from the match will exceed the costs incurred in conducting the matching program.

IV. Description of the Match and Records Involved

A. Description of the Match

Each participating SPAA will send ACF an electronic file of eligible public assistance client information. These files are non-Federal computer records maintained by the States. ACF will then send this information on to DMDC. In the alternative, participating SPAAs can submit files to DMDC via the Social Security Administration's (SSA) "Connect Direct" portal. After DMDC receives the SPAA files, it will match the SPAA files against the DMDC database. The DMDC database consists of pay of DoD personnel and retirement records of non-postal Federal

civilian employees and military members, both active and retired and survivor annuitants. The matching activity will take place at DMDC and will use all nine digits of the SSN. Resulting "hits" or matches will be disclosed to the relevant SPAAs.

B. Number of Records and Data Elements Involved

1. The electronic files provided by each participating SPAA will contain data elements of the client's name, SSN, date of birth, address, sex, marital status, number of dependents, information regarding the specific public assistance benefit being received, and such other data as considered necessary on no more than 10,000,000 public assistance beneficiaries (Attachment 3).

2. The DMDC computer database file contains approximately 4.85 million records of active duty and retired military members, including the Reserve and Guard, and approximately 3.68 million records of active and retired non-postal Federal civilian employees. Employee or retiree records may include information on benefits payable to employee or retiree dependents and/or survivors.

3. DMDC will match the SSN on the SPAA file by computer against the DMDC database. Matching records, "hits" based on SSNs, will produce data elements of the individual's name; SSN; active or retired; if active, military service or employing agency, and current work or home address, and such other data as considered necessary (Attachment 3).

C. Privacy Act Systems of Records

Federal, but not State, agencies must publish system notices for "systems of records" pursuant to subsection (e) (4) of the Privacy Act and must identify "routine uses" pursuant to subsection (b) (3) of the Privacy Act for those systems of records from which they intend to disclose this information. The DoD system of records described below contains an appropriate routine use proviso which permits disclosure of information by DMDC as described in this Agreement.

DoD will use personal data from the record system identified as DMDC 01, entitled "Defense Manpower Data Center Base", 74 Federal Register at 39666, August 7, 2009. Attachment 4 is a copy of the published record system notice with the appropriate routine use (i.e., RU # 4) identified. Attachment 5 is a copy of the published system record notice 58VA21/22. As previously noted, the DoD records will be matched electronically against

records supplied by the SPAAs. No information will be disclosed from any systems of records maintained by ACF.

V. Records Accuracy Assessment

A. Matching Agency

DMDC records are extracts of Federal personnel records with data provided by the employee/service member/retiree. Experience with matching programs and analyses performed by DMDC show these records to be at least 95 percent accurate. DMDC has been diligent in withholding or flagging any records which might appear problematic and any information on records that do not match on two data elements (i.e., name and SSN). The Civil Service Retirement and Insurance File (CSRIF), which are provided by OPM, contain information on approximately 1.78 million on non-postal Federal civilian annuitants respectively. The CSRIF has been determined, through periodic verification of the accuracy of the social security numbers, to be accurate, complete, and reliable for more than 99% of the retirees identified in the records.

B. Source Agency

Information used by SPAAs in matching programs is provided by the individual when applying for public assistance benefits. Experience by SPAAs shows these records to be at least 82% accurate.

VI. Starting and Completion Dates

A. Transmittal Letter Begins Review Time

When this agreement is approved and signed by the Chairpersons of the respective Data Integrity Board, the DoD, as the matching agency, will submit this agreement and the proposed public notice of the match as attachments in duplicate via a transmittal letter to OMB and Congress for review. The time period for review begins as of the date of the transmittal letter.

B. Matching Notice Publication

DOD will forward a public notice of the proposed matching program for publication in the Federal Register, as required by subsection (e) (12) of the Privacy Act, at the same time the transmittal letter is forwarded to OMB and Congress. The matching notice will clearly identify the record systems and categories of records being used and state that the program is

subject to review by OMB and Congress. DoD will furnish copies of the published notice to ACF.

C. Effective Date of Agreement

The effective date of the matching agreement and date when matching may actually begin shall be at the expiration of the 40-day review period for OMB and Congress, or 30 days after publication of the matching notice in the Federal Register, whichever date is later. The parties to this agreement may assume OMB and Congressional concurrence if no comments are received within 40 days of the date of the transmittal letter. The 40-day OMB and Congressional review period and the mandatory 30-day public comment period for the Federal Register publication of the notice will run concurrently.

D. Duration of the Agreement

This agreement shall be valid for 18 months from the effective date of the agreement and may be extended by the agencies for a period of time not to exceed 12 months, if each agency's program manager certifies to its respective Data Integrity Board that:

1. The matching program will be conducted without change; and
2. The matching program has been conducted in compliance with the original agreement.

It shall be the responsibility of DoD to draft the extension document(s). If either agency does not wish to extend this agreement, it will follow the termination processes described in section VI.F. This agreement may be modified at any time with the consent of each agency. The modification must be in writing, satisfy the requirements of the Privacy Act, and be approved by each Agency's respective Data Integrity Board.

E. Frequency of Matching

Matching will be conducted when the review/publication requirements have been satisfied and thereafter no more frequently than on a quarterly basis. On a quarterly basis, one or more of the SPAAs may elect not to participate in a scheduled match.

F. Termination

This agreement may be terminated at any time with the consent of both agencies. Either agency may unilaterally terminate this agreement upon written notice to the other agency requesting termination, in which case, the termination shall be effective 90 days after the date of the notice, or at a later date

specified in the notice so long as either date does not exceed the original or the extended completion date of the match.

VII. Notice Procedures to Record Subjects

A. Individual Notice

Subsection (O) (1) (D) of the Privacy Act requires an agency to implement procedures for providing individualized notice at the time of application, and notice periodically thereafter, to applicants for and recipients of financial assistance or payments under Federal benefit programs. The SPAAs agree to notify all individuals who apply for public assistance benefits that the information provided on the application is subject to computer matching with other agencies. The SPAAs will accomplish this by way of a notice printed on their application forms or, when necessary, by providing separate handouts containing appropriate language. Since 1988, the application for Federal civilian employment includes a notice advising the applicant that records of Federal civilian employees are subject to computer matching. The SPAAs will provide subsequent notice to their respective benefit recipients by notifying each recipient of the computer matching at the time a redetermination for eligibility is made.

B. Constructive Notice

Any deficiencies as to direct notice to the individual for the matching program in paragraph VII. A. are cured by the indirect or constructive notice that is afforded record subjects by agency publication in the Federal Register of both the (1) DMDC routine use notice, as required by subsection (e) (11) of the Privacy Act, permitting disclosures of Federal personnel information to ACF/SPAAs and (2) the proposed match notice, as required by subsection (e) (12) of the Privacy Act, announcing the agency's intent to conduct computer matching for purposes of determining an individual's continued eligibility for public assistance under Federal benefit programs being administered by the States.

VIII. Verification Procedures and Opportunity to Contest

A. Independent Investigation

1. The SPAAs agree that the occurrence of a match is not conclusive evidence that Federal personnel identified are in fact the individual receiving public assistance

benefits, but merely an indication that further examination is warranted.

2. SPAAs are responsible for verifying and determining if the data in the DMDC reply file are consistent with the data in SPAA public assistance files and for resolving any discrepancies or inconsistencies as to positive identification on an individual basis.

3. SPAAs will screen the initial data to verify that the matched individual is in fact the recipient of public assistance. SPAAs will do this by separately comparing the "hit" file with the SPAA public assistance files to verify the individual's identity and will conduct independent inquiries to resolve questionable identities.

4. Any discrepancies or inconsistencies in SPAA files, based on information furnished by DMDC, or developed as the result of the match, will be independently investigated and verified by SPAAs prior to their taking any adverse action against the individual.

B. Due Process and Opportunity to Contest

1. Before taking any adverse action based on the information received from the match, SPAAs agree to provide written notice with specific details to each individual for whom SPAAs decide adverse action may be necessary.

2. Written notices provided by the SPAAs will inform the individual that the SPAA has received information from DMDC, which indicates that the individual is receiving a Federal salary/payment/benefit, which may result in either an adjustment or termination of his or her public assistance benefit; possible collection action being initiated for any overpayment made; and/or possible other administrative/judicial action as authorized by Federal and/or State law or regulation. The notice must clearly explain the information the agency has its relevance to the individual's eligibility or benefit, and what action the agency will take in the event the individual fails to respond to the letter.

3. If SPAAs intend to reduce, suspend, terminate or deny benefits as a result of information provided from the match, the SPAAs must provide notice and the opportunity to respond at a hearing in accordance with 42 CFR 431.200-250 for the Medicaid Program, 7 CFR 273.15 for the Supplemental

Nutrition Assistance Program, and State established procedures for the Temporary Assistance for Needy Families Program.

4. Written notices provided by the SPAAs to each public assistance recipient who may be the subject of adverse action will advise that he or she has 30 days in which to respond to the information being provided by the SPAA. However, where relevant program statute(s) or regulation(s) establish a time period shorter than 30 days for an individual to respond to a notice proposing an adverse action, SPAAs may substitute such shorter time period. In addition, each individual who may be the subject of adverse action will be further advised that unless a response is received within 30 days of the date on which the written notice is mailed or otherwise provided to the individual, (or within a specified time period shorter than 30 days provided by program statute(s) or regulation(s)), the SPAA will infer that the information provided the individual is accurate and correct and will take appropriate action. Appropriate action may include adjustment to, or termination of, the public assistance benefit; initiation of action to collect any overpayments made; and/or possible instituting administrative and/or judicial action against the individual.

C. Final Authority

After independent verification and notice under subsection (p) of the Privacy Act, the SPAA will be the agency to make all final determinations and to take action as is considered warranted and appropriate.

IX. Security Procedures

A. The ACF/SPAAs and DMDC will safeguard each other's information as follows:

1. Each agency shall establish appropriate administrative, technical, and physical safeguards to ensure the security and confidentiality of records; to protect against any anticipated threats or hazards to their security or integrity, which could result in substantial harm, embarrassment, inconvenience, or unfairness to any individual on whom information is maintained; and to preclude remote terminal access by SPAA employees to the information being transferred under the terms of this agreement.

2. Access to the records matched and to any records created by the match will be restricted only to those authorized employees and officials who require them to perform their official duties in connection with the uses of the information authorized in this agreement.

3. The records matched and any records created by the match will be stored in an area that is physically safe from access by unauthorized persons during duty hours as well as non-duty hours or when not in use.

4. The records matched and any records created by the match will be transported and processed under the immediate supervision and control of authorized personnel in a manner which will protect the confidentiality of the records, and in such a manner that unauthorized persons cannot retrieve any such records by means of computer, remote terminal or other means.

5. Information systems used to store, access, process, or transmit records matched and information produced by the match will employ security controls consistent with those recommended by the U.S. Department of Commerce, National Institute of Standards and Technology (NIST), or will utilize a comparable risk management program. NIST-recommended security controls are described in the latest version of NIST Special Publication 800-53, "Recommended Security Controls for Federal Information Systems".

6. All personnel who will have access to the records matched and to any records created by the match will be advised of the confidential nature of the information and the civil and criminal sanctions for noncompliance contained in the applicable Federal laws.

B. ACF and DMDC may make on-site inspections or make other provisions to ensure that adequate safeguards are being maintained by both agencies and/or participating SPAAs.

X. Records Usage, Duplication, and Redisclosure Restrictions

A. Each agency agrees to the following limitations on access to, and disclosure and use of, electronic files, e.g., tapes, and information provided by the other agency:

1. That the electronic files provided as part of the matching program will remain the property of the agency furnishing

the files and will be destroyed after the matching program is completed, but not more than 6 months after receipt of the electronic files. Destruction will be accomplished by shredding, burning or electronic erasure.

2. That the data supplied by each agency and the records created by the match will be used solely for the purposes of, and to the extent necessary in the administration of, the matching program covered by this agreement and any applicable laws.

3. That the files provided by each agency will not be used to extract information concerning individuals therein for any purpose not specified in this agreement.

4. That the files provided by each agency will not be duplicated or disseminated within or outside the agency without the written authority of the agency which furnished the data. No agency shall give such permission unless the redisclosure is required by law or essential to the conduct of the matching program.

5. That information resulting from the matching program may be disclosed for follow-up and verification or for civil or criminal law enforcement investigation or prosecution if the match uncovers activity that warrants such action.

B. DMDC will not create a separate permanent file consisting of Information regarding those individuals involved in the matching program covered by this agreement except as necessary to monitor the results of the matching program. ACF/SPAAs will retain the identifiable records (hits) received from DMDC only for the period of time required for any processing related to the matching program and will then destroy the records unless the information must be retained in individual file folders to meet evidentiary requirements. In the latter instance, SPAAs will retire identifiable records in accordance with State law or regulation. Information about individuals verified as "non-hits" (record subjects are not both Federal personnel and public assistance beneficiaries) will be destroyed immediately upon such verification.

C. DMDC and SPAAs will keep an accurate accounting of disclosures from an individual's record as required by subsection (c) of the Privacy Act so as to permit record subjects to know how their personal information is being used; to enable the agency to inform past recipients of disputed or corrected information; and to provide an audit trail for any

subsequent reviews of agency compliance with subsection (b) of the Privacy Act pertaining to conditions of disclosure.

D. If records are to be disclosed to a ACF/SPAA contractor in order to accomplish the matching program's purpose, the ACF/SPAA will obtain the written agreement of the contractor to abide by the terms of this agreement, including the provisions of the Privacy Act (i.e., subsection (m), as implemented by Part 24 of the Federal Acquisition Regulation) before receiving records relating to the matching program.

XI. Access by the Comptroller General

The General Accountability Office (Comptroller General) may have access to any records as necessary to monitor and verify compliance with this agreement.

XII. Reimbursement for Matches

DMDC currently does not intend to seek reimbursement, but reserves the right to recover future personnel and computer costs for conducting the quarterly match. In such cases, ACF will be notified 90 days in advance so that it may initiate, should it wish to do so, action to terminate the agreement because of the proposed future charges.

XIII. Points of Contact

A. DMDC contact for program issues is:

Lauren Olerich
Defense Manpower Data Center
DOD Center, Monterey Bay
400 Gigling Road
Seaside, CA 93955-6771
(831) 583-2400, FAX (831) 583-2340

B. ACF contact for program issues is:

Thomas Miller
Administration for Children and Families
370 L'Enfant Promenade, S.W.
Washington, D.C. 20447
(202) 401-7237

XIV. Approval

A. Program Official(s) for DoD

The authorized program officials, whose signatures appear below, agree to the terms and conditions as set forth herein, affirm that no verbal agreements of any kind shall be binding or recognized, and hereby commit their respective organizations to the provisions of this agreement.

Mary Snavely-Dixon

Mary Snavely-Dixon
Director
Defense Manpower Data Center
DoD Center Monterey Bay
1600 North Wilson Blvd
Arlington, VA 22209 -2593
(703) 696 - 5816

12-07-10
Date

Michael L. Rhodes
Chair
Defense Data Integrity Board
Department of Defense

12.10.10
Date

B. Program Official(s) for HHS

B. Program Official(s) for HHS

The authorized program officials, whose signatures appear below, agree to the terms and conditions as set forth herein, affirm that no verbal agreements of any kind shall be binding or recognized, and hereby commit their respective organizations to the provisions of this agreement.

Oscar Tanner 12/13/2010

Oscar Tanner
Administration for Children and Families
370 L'Enfant Promenade, S.W.
Washington, D.C. 20447
(202) 401-5704

Date

C. Data Integrity Board

The respective Data Integrity Boards having reviewed this agreement and finding that it complies with applicable statutory and regulatory guidelines signify their respective approval thereof by the signature of the officials appearing below.

12/17/10

E. J. Holland, Jr.
Chair
Data Integrity Board
Department of Health and Human Services

Date

Attachments

1. Participating SPAAs
2. Cost-Benefit Analysis
3. Data Elements
4. DMDC System notice DMDC 01
5. VA System notice 58VA21/22

Attachment 1

Participating State Public Assistance Agencies

1. Alabama Dept. of Public Health & Human Services
2. Alaska Department of Health and Social Services
3. Arizona Health Cost Containment System
4. Arkansas Department of Health and Human Services
5. California Department of Health Care Services
6. Colorado Department of Human Services
7. Connecticut Department of Social Services
8. Delaware Health and Social Services
9. District of Columbia Department of Social Services
10. Florida Department for Children and Families
11. Georgia Department of Community Health
12. Hawaii Department of Human Services
13. Idaho Department of Health and Welfare
14. Illinois Department of Public Aid
15. Iowa Department of Human Services
16. Indiana Family and Social Services
17. Kansas Department of Social and Rehabilitation Services
18. Kentucky Cabinet for Families and Children
19. Louisiana Department of Social Services
20. Maine Department of Health and Human Services
21. Maryland Department of Human Resources
22. Massachusetts Department of Transitional Assistance
23. Michigan Department of Human Services
24. Minnesota Department of Human Services
25. Mississippi Department of Human Services
26. Missouri Department of Social Services
27. Montana Department of Public Health and Human Services
28. Nebraska Department of Social Services
29. Nevada Department of Health and Human Services
30. New Hampshire Department of Health & Human Services
31. New Jersey Division of Family Development
32. New Mexico Human Services Department
33. New York Department of Social Services
34. North Carolina Department of Human Resources
35. North Dakota Department of Human Services
36. Ohio Department of Job and Family Services
37. Oklahoma Department of Human Services
38. Oregon Department of Human Services
39. Pennsylvania Department of Public Welfare
40. Puerto Rico Department of Family
41. Rhode Island Department of Human Services
42. South Carolina Department of Health and Human Services

43. South Dakota Department of Social Services
44. Tennessee Department of Health
45. Texas Health and Human Services Commission
46. Utah Department of Workforce Services
47. Vermont Agency of Human Services
48. Virginia Department of Social Services
49. Washington Department of Social and Health Services
50. West Virginia Department of Health and Human Resources
51. Wisconsin Department of Health and Family Services
52. Wyoming Department of Family Services

Attachment 2

COST BENEFIT ANALYSIS OF COMPUTER MATCHING AMONG THE DEPARTMENT OF HEALTH AND HUMAN SERVICES, ADMINISTRATION FOR CHILDREN AND FAMILIES (ACF), STATE PUBLIC ASSISTANCE AGENCIES (SPAAs), AND THE DEPARTMENT OF DEFENSE, DEFENSE MANPOWER DATA CENTER (DMDC), FOR VERIFYING PUBLIC ASSISTANCE CLIENT CIRCUMSTANCES AND DEBT COLLECTION

A. BACKGROUND

Since 1993, ACF has been working with State Public Assistance Agencies (SPAAs) and other Federal agencies to develop information-sharing projects that have proven useful in verifying public assistance client circumstances. This work constitutes the Public Assistance Reporting Information System (PARIS). Under PARIS, ACF has sought to identify information-sharing opportunities and lead and coordinate the activities required to take advantage of these opportunities. As a result, ACF has been able to provide SPAAs with information from the Department of Veterans Affairs (VA) compensation and pension payment records as well as interstate public assistance benefit payments. Starting in August of 1999, the Defense Manpower Data Center (DMDC) began providing computer resources to support the development and operation of PARIS information exchange initiatives. In addition, DMDC made available to ACF and State public assistance agencies, for statistical matching purposes, Federal benefit and earnings databases. This cost benefit analysis (CBA) supports a Federal data exchange agreement to allow State public assistance agencies to receive information from the DMDC databases. The States will use this information to verify public assistance client reporting of income and benefit circumstances for the purposes of a more accurate determination of program eligibility and payment, and recouping erroneous payments.

B. SUMMARY OF BENEFITS

Direct Benefits: Savings attributable to unqualified applicants;

- Denial of benefits to unqualified applicants;
- Cessation of benefits to unqualified recipients
- Recouping payment made to unqualified recipients

Computer matches are an effective way for States to verify the income circumstances of applicants, and ensure that payments and services are not provided to ineligible applicants. Results of

the DMDC and State agencies data files statistical match indicate that with information from this match, States will be able to recoup a substantial amount of funds paid to recipients who were not qualified for benefits, and stop payments and services to unqualified recipients. This CBA focuses on the latter, which is the most immediate benefit to the States.

Indirect Benefits: Greater Public Confidence and Program Support: Automation promotes cost efficiencies and program integrity so that the taxpaying public may have confidence that efforts to recover funds and prevent further liability on the part of the States and Federal Government is subject to every reasonable effort. Reductions in erroneous payments and increase collections enable States and the Federal Government to devote more dollars to recipients.

The following States, the District of Columbia, and Puerto Rico participated in the last PARIS FEDERAL match in August 2010.

Alabama	Maryland	Puerto Rico
Alaska	Massachusetts	Rhode Island
Arizona	Michigan	South Dakota
California	Mississippi	Tennessee
Colorado	Missouri	Utah
Connecticut	Montana	Washington
Delaware	Nebraska	Wisconsin
District of Columbia	Nevada	Wyoming
Florida	New Hampshire	
Idaho	New Mexico	
Indiana	New York	
Kansas	North Dakota	
Kansas	Ohio	
Kentucky	Oklahoma	
Louisiana	Oregon	
Maine	Pennsylvania	

FILENAME	**# of MATCHES**
Non-Appropriate Fund	2260
Military Reserve	18154
Military Retired	8755
Military Active Duty	8974
Civilian Retired	22290
Civilian DOD	3039
Total Matches	63472

Comparative Data for the four previous matches indicate a substantial amount of PARIS FEDERAL match activity:

May 2010	60,188
Feb 2010	54,030
Nov 2009	43,786
Aug 2009	51,084

In 2007, the Administration for Children and Families (ACF) of the U.S. Department of Health and Human Services (DHHS) contracted with Altarum Institute (Altarum) to conduct a cost-benefit analysis of the Public Assistance Reporting Information System (PARIS). The purpose of this study was to develop and populate cost-benefit models that could be used to assess the potential impact of PARIS on State program expenditures and integrity. The PARIS Cost-Benefit Analysis Final Report is posted on the PARIS website.

The diversity of States' approaches to PARIS, combined with a lack of tracking results, made it difficult to create a single uniform approach to calculating PARIS costs and benefits. However, models were developed that would allow States to use a consistent approach to calculating costs and benefits for specific PARIS activities, such as managing clients who moved from one State to another but did not report the move, or clients that did not report income from Federal sources.

At a national-level, the PARIS project will produce a positive return on investment, and this conclusion appears robust under varying conditions designed to test the sensitivity of these results and to more accurately reflect the current scope of PARIS activities. National-level cost benefit results are presented in terms of returns on investment (ROI) and in terms of actual net savings for each file and program, as well as overall. Sensitivity analysis is used to test the impact of assumptions about the time required to work a match, the percent of cases closed due to PARIS matches, and the number of States that actually conduct follow-up investigations of PARIS matches.

Table of Costs and Benefits assuming 100 percent closure rate.

	Nov 07	Feb 08	May 08	Aug 08	Total
National Cost	**$945,320**	**$791,088**	**$758,847**	**$1,224,921**	**$3,720,177**
			Benefits		
National Benefit Total	**$63,530,495**	**$38,243,935**	**$38,817,272**	**$80,781,314**	**$221,427,015**

SNAP	$4,458,013	$3,710,736	$3,879,230	$608,859	$1,627,712
TANF	$304,359	$369,878	$344,617	$72,597,800	$200,176,669
Medicaid	$58,768,122	$34,163,321	$34,647,426	$72,597,800	$200,176,669

However, for most States, ongoing costs of PARIS operations are not commonly tracked, as most States incorporate PARIS activities into a more general, higher-level compliance activity. None of the States included in our analysis had a tracking system that would allow one to track costs specifically to PARIS activities. However, some States were able to provide estimates of the amount of time needed to create the files, submit the match, and filter and distribute the results. These estimates were averaged to approximate the annual costs per State, which are: systems processing cost of $8,000 annually (if submitting for all four quarters), annual program specialist cost of $22,265, and administrative and supervisory cost of $10,810 annually.

It is important to note that Improper Payments that are avoided in the Medicaid Program would accrue to the States, savings from the Medicaid program would accrue to both the States and the Federal Government, and saving from the Supplemental Nutrition Assistance Program (formerly known as the Food Stamp Program) would generally accrue to the Federal Government.

Success Stories of States currently participating in the PARIS program located on the PARIS website cite the following experiences with the PARIS Project with regard to benefits accrued from their participation in the program.

> **New York State**, in State Fiscal Year 2009 (April 2009 through March 2010), closed or removed from active Public Assistance cases 10,411 individuals identified on the PARIS Match. The cost savings for these individuals was $62,481,000.
>
> These savings are calculated by determining the average annual cost of an individual in each of the following case types - Federally funded TANF PA cases (which can include Medicaid and Food Stamps Benefits), New York funded Safety Net PA cases (which can include Medicaid and Food Stamps Benefits), and FS Only cases. We track the number of individuals closed by the PARIS Match for each of these case types. To obtain an annual cost savings for each case type, we simply multiply the number of closed individuals by the annual average cost savings for that case type. The

sum of those calculations is the total annual savings for the fiscal year - over $62,000,000.

The breakdown of the 2009 year's annual cost savings is as follows: $44,675,580 was saved in Public Assistance (includes Food Stamps and Medicaid Benefits issued through Public Assistance cases) (includes TANF and NY Safety Net case types), and $17,805,420 in Food Stamps Only cases.

*Beginning with the 12/18/06 PARIS Match, New York no longer provides cost avoidance figures for MA Only matches. MA Only matches are sent to the Department of Health and they are responsible for reporting any cost savings. In addition, we no longer supply cost avoidance figures for MA-SSI cases.

Pennsylvania has participated in the PARIS Interstate and VA Matches since their inception. The results speak for themselves:

- As of May 2008 - $67,105,882 in annualized savings from 33 Interstate Matches. From these matches, 58,330 cases were worked resulting in 12,612 individuals being removed from cases.
- As of May 2008 - $27,877,420 in annualized savings from 9 VA Matches. From these matches, 40,769 cases were worked resulting in 4,448 cases closed or benefits reduced.

Total annualized savings due to PARIS: $94,983,302.

Washington State The Veteran's (VA) Benefit Enhancement Project (VBE) is the result of a partnership between the Washington State Department of Social and Health Services (DSHS) and the Washington State Department of Veteran's Affairs (WDVA). Together, the partnership identifies and facilitates veterans and their dependents, who are receiving state social and health services, to access the maximum federal benefits for which they are eligible. The project has facilitated increased benefits for thousands of Medicaid clients. This has resulted in reduced DSHS

expenditures and a savings to Washington State. Aside from the Medicaid savings, the focus of the partnership is outreach, enrollment and advocacy of VA/military related benefits to expand the number of Medicaid clients that are eligible for VA and military related benefits and enhance the benefits for those not receiving their maximum entitlement.

The DSHS VA Benefit Enhancement Project uses Department of Defense and Veteran's Administration data from the Public Assistance Reporting Information System (PARIS) to identify DSHS clients who are veterans and the potentially eligible survivors who may qualify for federal benefits. The DSHS Veteran Project team refers clients who may be eligible for VA benefits or potentially eligible for increased VA entitlements to the WDVA. The WDVA team reviews the referred DSHS clients to determine the possible eligibility for an initial benefit clam and for eligibility of an increase in their current monthly entitlement. The initial target is the Medicaid population receiving long term care related services. These Medicaid clients are subject to estate recovery for all of their Medicaid long term care related services. Additionally, the WDVA recently released data that suggested that 50% of all males 65 years of age and older are veterans.

In the recent FY08 (Half-Yearly Report) Update, the project reported the following:

- The project has facilitated cash monthly benefit enhancements for 745 Medicaid veteran related clients;
- This has generated a six month savings of $1,143,166.00 in cost avoidance dollars;
- The project has facilitated 1,582 TRICARE/CHAMPVA enrollments (Utilizing PARIS Federal File);
- This has generated a six month savings of $964,812.69;
- The project has enrolled 1,459 Medicaid veterans into the VA Healthcare System;
- The project has been able to facilitate total VA care for 25 Medicaid veterans;
- The total six month cost avoidance savings is $2,107,979.00. The 12 month legislative savings target is $2,295.000;
- In the first 6 months of FY08, PARIS data identified 559 Medicaid clients that warranted a Veteran's referral for increased benefit enhancement;
- 342 new, project related claims were developed and

submitted in the 1st two quarters by the WDVA to the VA Regional Office;
• 678 previously submitted project related claims are currently awaiting adjudication in the VA Regional Office;
• The WDVA reports that $501,227.00 in monthly Federal revenue has been generated by the project in the first two quarters of FY08;

Other specific project objectives:

• Improve outreach to the general public regarding veteran's benefits; educate veterans and dependents about the availability and eligibility requirements for veterans and military related benefits;
• Improve data sharing between agencies who have common objectives and who share similar client caseloads;
• Determine the need of educating DSHS field staff about the multitude of benefits available to certain veteran population groups (veterans with service connected disabilities and those eligible for and not receiving Aid and Attendance or Housebound benefits);
• Streamline the identification and communication of federal benefits for veterans who are currently receiving state social and health services;
• Connect veterans who are receiving social and health services, to richer federal benefits to minimize the impact of estate recovery for veterans who qualify for federal medical and health care coverage.

DMDC FUNCTION: Routine Automated Matching:

A GS-12 Information Technologist receives the state submissions through the Connect: Direct process or from HHS (tapes). The data is edited and reformatted for consistency between states. The data is then run through a series of programs to match the SSN and create output files for each match (Interstate, Veteran, and Federal) and each participating state. This process takes approximately 2 weeks from start to finish.

Cost - $2890.00

Miscellaneous Development and Programming Tasks:

Periodically, a computer program must be written or modified to maintain/update match programs. With analysis, testing and audit, if necessary, costs for several episodes are as indicated.
Once a year cost =$2890.00.
$2890.00 / 4 = $722.50

Cost - $722.50

Preparation of Matching Agreement:

Any preparations, negotiations, reviews, and concurrences are handled by various levels within the DMDC. This consumes at least 20 hours of work at an average GS-14 grade level. The agreement will last for 30 months (18 months original and 12 month extension), therefore the cost is spread out over approximately 10 matches.

$1015.00 / 10 = $101.50

Cost - $101.50

Computer Processing:

The computer being used for the processing of the PARIS match is located at the Naval Postgraduate School in Monterey California. The primary usage for this mainframe computer is to process other DOD applications not related to the PARIS match. DMDC will not keep any data submitted by the states, and will discard the

data as prescribed in the Computer Matching Agreement negotiated by the Defense Privacy Office DPO. Costs for the computer processing are $6742.50 per quarterly match.
(CPU based on: 22 states for Interstate=54 min., 18 states for Veteran=40 min. and 20 states for Federal=61 min @ $43.50 per min)
Cost $6742.50

Cost Summary

- Total DMDC cost per cycle = $10,456.50 / 196,398 projected individual cases = **$.05** per case (per state match found). (Individual cases based on Feb '05 interstate=86,692; Veteran=80,289; Aug. '04 Federal=29,417)
- Total DMDC cost per year = $10,456.50 * 4 matching cycles per year = **$41,826.00**

1. **Total DMDC cost per year = $41,826.00**
2. **Total DMDC cost per cycle = $10,456.50**
3. **Total DMDC cost per case = $.05**

ACF per cycle costs for PARIS oversight

Function

Preparation of Matching Agreement
Computer matching agreements are handled and reviewed by numerous ACF employees. We will assume that the preparation, negotiations, reviews, and concurrence by various levels within the ACF and the Data Integrity Board members and staff consume at least 40 hours of work at an average GS-14 grade level. The agreement will last for 30 months (18 months original and 12 month extension), therefore, the cost is spread out over approximately 10 matches. **$1962.00/10 = $196.20**
COST $196.20

PARIS Coordinator
A GS-14 Management Analyst spends about 10% of their time coordinating PARIS activities. Each cycle would be $2502.58. There are four cycles in a year.

Cost Summary
221,476 (number of actual cases obtained in the last 4 matches (November 2009-August 2010) divided by four = an average of 55,369 cases per cycle.

Total ACF cost per cycle $2,698.78/55369 = **$.05 per case**
Total ACF cost per year $2698.78 times 4 matching cycles per year = **$10,795.12**

Total ACF cost per year $10,795.12
Total ACF cost per cycle = $2,698.78
Total ACF cost per case = $.05

The total estimated cost for both DMDC and ACF = $.10 per matched case. This amount is insignificant when compared to the estimated savings illustrated above from the States cited.

Overall Costs:
Average State Cost to close a case (secondary verification, client notice, hearings and appeals, etc.) is estimated at $500, average DOD cost per case is $. 05 and average ACF cost per case is $.05 for a total of $500.10.

Alternatives
The alternatives to computer matching are far more expensive and, in most cases, impractical. Manual comparison of millions of payroll and retirement records with State records would take an enormous amount of human resources and time.

Attachment 3

PARIS FEDERAL OUTPUT RECORD FORMAT

```
STARTING Aug 2007
*****************************************************************
** PARIS.FEDERAL(OUTPUT)
** THIS IS THE FORMAT FOR THE OUTPUT OF THE COMBINED FEDERAL FILES.
** STATE DATA IS FIRST THEN THE DMDC DATA.
** RECORD TYPE = CD     DOD CIVILIAN
** RECORD TYPE = CO     OPM CIVILIAN
** RECORD TYPE = CR     OPM CIVIL SERVICE RETIREMENT
** RECORD TYPE = MA     MILITARY ACTIVE DUTY
** RECORD TYPE = MR     MILITARY RETIRED PAY
** RECORD TYPE = MV     MILITARY RESERVES
** RECORD TYPE = NF     NON-APPROPRIATED FUNDS
*****************************************************************
```

DATA ELEMENT	POSITION	LENGTH	TYPE
SSN	001-009	9	character
STATE DATA *(SEE LAYOUT BELOW)*	010-129	120	character
RECORD TYPE	130-131	2	character
FILE DATE	132-137	6	character
DATE OF BIRTH	138-145	8	numeric
LAST NAME	146-171	26	character
FIRST NAME	172-186	15	character
MIDDLE NAME	187-201	15	character
SUFFIX NAME	202-205	4	character
SEX	206-206	1	character
GROSSPAY	207-215	9.2	numeric
UNIT ID CODE (UIC)	216-223	8	character
AGENCY	224-227	4	character
PAY PLAN	228-229	2	character
PAY GRADE	230-233	4	character
PAY STEP	234-235	2	numeric
BASIC SALARY	236-244	9.2	numeric
STATE RESIDENCE	245-246	2	character
FEDERAL TAXABLE WAGES	247-255	9	numeric
FEDERAL TAX WITHHELD	256-264	9	numeric
STATE TAXABLE WAGES	265-273	9	numeric
STATE TAX WITHHELD	274-282	9	numeric
EMPLOYEE STATUS CODE	283-322	40	character
PAYROLL OFFICE NUMBER	323-362	40	character
PERSONNEL OFFICE ID	363-366	4	character
PAY BASIC CODE	367-368	2	character
PAY PERIOD END DATE (YYYYMMDD)	369-376	8	numeric
DISBURSING DATE (YYYYMMDD)	377-384	8	numeric
PAY STATUS (P=ACTIVE N=INACTIVE)	385-385	1	character
CATAGORY CD	386-386	1	character

TOTAL BASE PAY ALL DRILLS	387-395	9	numeric
MARITAL STATUS CODE	396-396	1	character
DEPENDENTS QUANTITY	397-398	2	numeric
OFF DUTY MILITARY CODE	399-399	1	character
WELFARE TO WORK HIRE CODE	400-400	1	character
CITY	401-413	13	character
STATE	414-415	2	character
ZIP	416-424	9	character

PARIS FEDERAL OUTPUT RECORD FORMAT

DATA ELEMENT	POSITION	LENGTH	TYPE
ADDRESS LINE 1	425-451	27	character
ADDRESS LINE 2	452-478	27	character
ADDRESS LINE 3	479-500	22	character
ADDRESS LINE 4	501-522	22	character
ADDRESS LINE 5	523-544	22	character
ADDRESS LINE 6	545-566	22	character
MAILING ADDRESS EFFECTIVE CALENDAR DATE	567-572	6	numeric
CLAIM NUMBER	573-581	9	character
RETIRED PAY ENTITLMT EFFECTIVE DATE	582-589	8	numeric
COMMENT1	590-728	139	character
COMMENT2	729-955	227	character
COMMENT3	956-1091	136	character
COMMENT4	1092-1318	227	character

STATE DATA (1-129)		
SSN	01-09	9
LAST NAME	10-24	15
FIRST NAME	25-39	15
DATE OF BIRTH	40-47	8
FILLER/BLANK	48-48	1
FILE DATE	49-54	6
STATE NAME	55-56	2
OPTIONAL	57-116	60
LOCATION CODE	117-119	3
CASE NUMBER	120-129	10

Attachment 4

DMDC 01

System name:

Defense Manpower Data Center Data Base (August 7, 2009, 74 FR 39666)

System location:

Naval Postgraduate School Computer Center, Naval Postgraduate School, Monterey, CA 93943-5000.

Categories of individuals covered by the system:

All Army, Navy, Air Force, and Marine Corps officer and enlisted personnel who served on active duty from July 1, 1968, and after or who have been a member of a reserve component since July 1975; retired Army, Navy, Air Force, and Marine Corps officer and enlisted personnel; active and retired Coast Guard personnel; active and retired members of the commissioned corps of the National Oceanic and Atmospheric Administration; active and retired members of the commissioned corps of the Public Health Service; participants in Project 100,000 and Project Transition, and the evaluation control groups for these programs. All individuals examined to determine eligibility for military service at an Armed Forces Entrance and Examining Station from July 1, 1970, and later.

Current and former DoD civilian employees since January 1, 1972. All veterans who have used the GI Bill education and training employment services office since January 1, 1971. All veterans who have used GI Bill education and training entitlements, who visited a state employment service office since January 1, 1971, or who participated in a Department of Labor special program since July 1, 1971. All individuals who ever participated in an educational program sponsored by the U.S. Armed Forces Institute and all individuals who ever participated in the Armed Forces Vocational Aptitude Testing Programs at the high school level since September 1969.

Participants in the Department of Health and Human Services National Longitudinal Survey.

Survivors of retired military personnel who are eligible for or currently receiving disability payments or disability income

compensation from the Department of Veteran Affairs; surviving spouses of active or retired deceased military personnel; 100% disabled veterans and their survivors; survivors of retired Coast Guard personnel; and survivors of retired officers of the National Oceanic and Atmospheric Administration and the Public Health Service who are eligible for or are currently receiving Federal payments due to the death of the retiree.

Individuals receiving disability compensation from the Department of Veteran Affairs or who are covered by a Department of Veteran Affairs' insurance or benefit program; dependents of active and retired members of the Uniformed Services, selective service registrants.

Individuals receiving a security background investigation as identified in the Defense Central Index of Investigation. Former military and civilian personnel who are employed by DoD contractors and are subject to the provisions of 10 U.S.C. 2397.

All Federal civilian retirees.

All non appropriated funded individuals who are employed by the Department of Defense.

Individuals who were or may have been the subject of tests involving chemical or biological human subject testing; and individuals who have inquired or provided information to the Department of Defense concerning such testing.

Individuals who are authorized web access to DMDC computer systems and databases.

Categories of records in the system:

Computerized personnel/employment/pay records consisting of name, Service Number, Selective Service Number, Social Security Number (SSN), citizenship data, compensation data, demographic information such as home town, age, sex, race, and educational level; civilian occupational information; performance ratings of DoD civilian employees and military members; reasons given for leaving military service or DoD civilian service; civilian and military acquisition work force warrant location, training and job specialty information; military personnel information such as rank, assignment/deployment, length of service, military occupation, aptitude scores, post service education, training, and employment information for veterans; participation in various in-service education and training programs; date of

award of certification of military experience and training; military hospitalization and medical treatment, immunization, and pharmaceutical dosage records; home and work addresses; and identities of individuals involved in incidents of child and spouse abuse, and information about the nature of the abuse and services provided.

CHAMPUS claim records containing enrollee, patient and health care facility, provided data such as cause of treatment, amount of payment, name and Social Security or tax identification number of providers or potential providers of care.

Selective Service System registration data.

Index fingerprints of Military Entrance Processing Command (MEPCOM) applicants.

Privacy Act audit logs.

Department of Veteran Affairs disability payment records.

Credit or financial data as required for security background investigations.

Criminal history information on individuals who subsequently enter the military.

Office of Personnel Management (OPM) Central Personnel Data File (CPDF), an extract from OPM/GOVT-1, General Personnel Records, containing employment/personnel data on all Federal employees consisting of name, Social Security Number (SSN), date of birth, sex, work schedule (full time, part time, intermittent), annual salary rate (but not actual earnings), occupational series, position occupied, agency identifier, geographic location of duty station, metropolitan statistical area, and personnel office identifier. Extract from Office of Personnel Management (OPM) OPM/CENTRAL-1, Civil Service Retirement and Insurance Records, including postal workers covered by Civil Service Retirement, containing Civil Service Claim number, date of birth, name, provision of law retired under, gross annuity, length of service, annuity commencing date, former employing agency and home address. These records provided by OPM for approved computer matching.

Non appropriated fund employment/personnel records consist of Social Security Number (SSN), name, and work address.

Military drug test records containing the Social Security Number (SSN), date of specimen collection, date test results reported, reason for test, test results, base/area code, unit, service, status (active/reserve), and location code of testing laboratory.

Names of individuals, as well as DMDC assigned identification numbers, and other user-identifying data, such as organization, Social Security Number (SSN), email address, phone number, of those having web access to DMDC computer systems and databases, to include dates and times of access.

Authority for maintenance of the system:

5 U.S.C. 301, Departmental Regulations; 5 U.S.C. App. 3 (Pub.L. 95-452, as amended (Inspector General Act of 1978)); 10 U.S.C. 136, Under Secretary of Defense for Personnel and Readiness; 10 U.S.C. 1562, Database on Domestic Violence Incidents; 20 U.S.C. 1070(f)(4), Higher Education Opportunity Act; Pub.L. 106-265, Federal Long-Term Care Insurance; 10 U.S.C. 2358, Research and Development Projects; and E.O. 9397 (SSN).

Purpose(s):

The purpose of the system of records is to provide a single central facility within the Department of Defense to assess manpower trends, support personnel and readiness functions, to perform longitudinal statistical analyses, identify current and former DoD civilian and military personnel for purposes of detecting fraud and abuse of pay and benefit programs, to register current and former DoD civilian and military personnel and their authorized dependents for purposes of obtaining medical examination, treatment or other benefits to which they are qualified.

To collect debts owed to the United States Government and state and local governments.

Information will be used by agency officials and employees, or authorized contractors, and other DoD Components in the preparation of studies and policy as related to the health and well-being of current and past military and DoD affiliated personnel; to respond to Congressional and Executive branch inquiries; and to provide data or documentation relevant to the testing or exposure of individuals.

Military drug test records will be maintained and used to conduct longitudinal, statistical, and analytical studies and computing demographic reports on military personnel. No personal identifiers will be included in the demographic data reports. All requests for Service specific drug testing demographic data will be approved by the Service designated drug testing program office. All requests for DoD wide drug testing demographic data will be approved by the DoD Coordinator for Drug Enforcement Policy and Support, 1510 Defense Pentagon, Washington, DC 20301-1510.

DMDC web usage data will be used to validate continued need for user access to DMDC computer systems and databases, to address problems associated with web access, and to ensure that access is only for official purposes.

Routine uses of records maintained in the system, including categories of users and the purposes of such uses:

In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act of 1974, these records may specifically be disclosed outside the DoD as a routine use pursuant to 5 U.S.C. 552a(b)(3) as follows:

1. To the Department of Veteran Affairs (DVA):

a. To provide military personnel and pay data for present and former military personnel for the purpose of evaluating use of veterans benefits, validating benefit eligibility and maintaining the health and well being of veterans and their family members.

b. To provide identifying military personnel data to the DVA and its insurance program contractor for the purpose of notifying separating eligible Reservists of their right to apply for Veteran's Group Life Insurance coverage under the Veterans Benefits Improvement Act of 1996 (38 U.S.C. 1968).

c. To register eligible veterans and their dependents for DVA programs.

d. Providing identification of former military personnel and survivor's financial benefit data to DVA for the purpose of identifying military retired pay and survivor benefit payments for use in the administration of the DVA's Compensation and Pension program (38 U.S.C. 5106). The information is to be used to process all DVA award actions more efficiently, reduce

subsequent overpayment collection actions, and minimize erroneous payments.

e. To conduct computer matching programs regulated by the Privacy Act of 1974, as amended (5 U.S.C. 552a), for the purpose of:

(1) Providing full identification of active duty military personnel, including full time National Guard/Reserve support personnel, for use in the administration of DVA's Compensation and Pension benefit program. The information is used to determine continued eligibility for DVA disability compensation to recipients who have returned to active duty so that benefits can be adjusted or terminated as required and steps taken by DVA to collect any resulting over payment (38 U.S.C. 5304(c)).

(2) Providing military personnel and financial data to the Veterans Benefits Administration, DVA for the purpose of determining initial eligibility and any changes in eligibility status to insure proper payment of benefits for GI Bill education and training benefits by the DVA under the Montgomery GI Bill (Title 10 U.S.C., Chapter 1606 - Selected Reserve and Title 38 U.S.C., Chapter 30 - Active Duty). The administrative responsibilities designated to both agencies by the law require that data be exchanged in administering the programs.

(3) Providing identification of reserve duty, including full time support National Guard/Reserve military personnel, to the DVA, for the purpose of deducting reserve time served from any DVA disability compensation paid or waiver of VA benefit. The law (10 U.S.C. 12316) prohibits receipt of reserve pay and DVA compensation for the same time period, however, it does permit waiver of DVA compensation to draw reserve pay.

(4) Providing identification of former active duty military personnel who received separation payments to the DVA for the purpose of deducting such repayment from any DVA disability compensation paid. The law requires recoupment of severance payments before DVA disability compensation can be paid (10 U.S.C. 1174).

f. To provide identifying military personnel data to the DVA for the purpose of notifying such personnel of information relating to educational assistance as required by the Veterans Programs Enhancement Act of 1998 (38 U.S.C. 3011 and 3034).

2. To the Office of Personnel Management (OPM):

a. Consisting of personnel/employment/financial data for the purpose of carrying out OPM's management functions. Records disclosed concern pay, benefits, retirement deductions and any other information necessary for those management functions required by law (Pub.L. 83-598, 84-356, 86-724, 94-455 and 5 U.S.C. 1302, 2951, 3301, 3372, 4118, 8347).

b. To conduct computer matching programs regulated by the Privacy Act of 1974, as amended (5 U.S.C. 552a) for the purpose of:

(1) Exchanging personnel and financial data to identify individuals who are improperly receiving military retired pay and credit for military service in their civil service annuities, or annuities based on the 'guaranteed minimum' disability formula. The match will identify and/or prevent erroneous payments under the Civil Service Retirement Act (CSRA) 5 U.S.C. 8331 and the Federal Employees' Retirement System Act (FERSA) 5 U.S.C. 8411. DOD's legal authority for monitoring retired pay is 10 U.S.C. 1401.

(2) Exchanging civil service and Reserve military personnel data to identify those individuals of the Reserve forces who are employed by the Federal government in a civilian position. The purpose of the match is to identify those particular individuals occupying critical positions as civilians and cannot be released for extended active duty in the event of mobilization. Employing Federal agencies are informed of the reserve status of those affected personnel so that a choice of terminating the position or the reserve assignment can be made by the individual concerned. The authority for conducting the computer match is contained in E.O. 11190, Providing for the Screening of the Ready Reserve of the Armed Services.

c. Matching for administrative purposes to include updated employer addresses of Federal civil service employees who are reservists and demographic data on civil service employees who are reservists.

3. To the Internal Revenue Service (IRS) for the purpose of obtaining home addresses to contact Reserve component members for mobilization purposes and for tax administration. For the purpose of conducting aggregate statistical analyses on the impact of DoD personnel of actual changes in the tax laws and to conduct aggregate statistical analyses to lifestream earnings of current and former military personnel to be used in studying the comparability of civilian and military pay benefits. To aid in

administration of Federal Income Tax laws and regulations, to identify non compliance and delinquent filers.

4. To the Department of Health and Human Services (DHHS):

a. To the Office of the Inspector General, DHHS, for the purpose of identification and investigation of DoD employees and military members who may be improperly receiving funds under the Aid to Families of Dependent Children Program.

b. To the Office of Child Support Enforcement, Federal Parent Locator Service, DHHS, pursuant to 42 U.S.C. 653 and 653a; to assist in locating individuals for the purpose of establishing parentage; establishing, setting the amount of, modifying, or enforcing child support obligations; or enforcing child custody or visitation orders; and for conducting computer matching as authorized by E.O. 12953 to facilitate the enforcement of child support owed by delinquent obligors within the entire civilian Federal government and the Uniformed Services work force (active and retired). Identifying delinquent obligors will allow State Child Support Enforcement agencies to commence wage withholding or other enforcement actions against the obligors.

NOTE 1: Information requested by DHHS is not disclosed when it would contravene U.S. national policy or security interests (42 U.S.C. 653(e)).

NOTE 2: Quarterly wage information is not disclosed for those individuals performing intelligence or counter intelligence functions and a determination is made that disclosure could endanger the safety of the individual or compromise an ongoing investigation or intelligence mission (42 U.S.C. 653(n)).

c. To the Health Care Financing Administration (HCFA), DHHS for the purpose of monitoring HCFA reimbursement to civilian hospitals for Medicare patient treatment. The data will ensure no Department of Defense physicians, interns, or residents are counted for HCFA reimbursement to hospitals.

d. To the Center for Disease Control and the National Institutes of Mental Health, DHHS, for the purpose of conducting studies concerned with the health and well being of active duty, reserve, and retired personnel or veterans, to include family members.

e. To conduct computer matching programs regulated by the Privacy Act of 1974, as amended (5 U.S.C. 552a), for the purpose

of determining continued eligibility and help eliminate fraud and abuse in benefit programs by identifying individuals who are receiving Federal compensation or pension payments and also are receiving payments pursuant to Federal benefit programs being administered by the States.

5. To the Social Security Administration (SSA):

a. To the Office of Research and Statistics for the purpose of

(1) conducting statistical analyses of impact of military service and use of GI Bill benefits on long term earnings, and

(2) obtaining current earnings data on individuals who have voluntarily left military service or DoD civil employment so that analytical personnel studies regarding pay, retention and benefits may be conducted.

NOTE 3: Earnings data obtained from the SSA and used by DoD does not contain any information that identifies the individual about whom the earnings data pertains.

b. To the Bureau of Supplemental Security Income for the purpose of verifying information provided to the SSA by applicants and recipients/beneficiaries, who are retired members of the Uniformed Services or their survivors, for Supplemental Security Income (SSI) or Special Veterans' Benefits (SVB). By law (42 U.S.C. 1006 and 1383), the SSA is required to verify eligibility factors and other relevant information provided by the SSI or SVB applicant from independent or collateral sources and obtain additional information as necessary before making SSI or SVB determinations of eligibility, payment amounts, or adjustments thereto.

c. To the Client Identification Branch for the purpose of validating the assigned Social Security Number for individuals in DoD personnel and pay files, using the SSA Enumeration Verification System (EVS).

d. To the Office of Disability and Insurance Security Programs, for the purpose of expediting disability processing of wounded military service members and veterans.

6. To the Selective Service System (SSS) for the purpose of facilitating compliance of members and former members of the Armed Forces, both active and reserve, with the provisions of

the Selective Service registration regulations (50 U.S.C. App. 451 and E.O. 11623).

7. To the Department of Labor (DOL) to reconcile the accuracy of unemployment compensation payments made to former DoD civilian employees and military members by the states. To the Department of Labor to survey military separations to determine the effectiveness of programs assisting veterans to obtain employment.

8. To Federal and Quasi Federal agencies, territorial, state, and local governments to support personnel functions requiring data on prior military service credit for their employees or for job applications. Information released includes name, Social Security Number, and military or civilian address of individuals. To detect fraud, waste and abuse pursuant to the authority contained in the Inspector General Act of 1978, as amended (Pub.L. 95-452) for the purpose of determining eligibility for, and/or continued compliance with, any Federal benefit program requirements.

9. To consumer reporting agencies to obtain current addresses of separated military personnel to notify them of potential benefits eligibility.

10. To state and local law enforcement investigative agencies to obtain criminal history information for the purpose of evaluating military service performance and security clearance procedures (10 U.S.C. 2358).

11. To Federal and Quasi Federal agencies, territorial, state and local governments, and contractors and grantees for the purpose of supporting research studies concerned with the health and well being of active duty, reserve, and retired personnel or veterans, to include family members. DMDC will disclose information from this system of records for research purposes when DMDC:

a. has determined that the use or disclosure does not violate legal or policy limitations under which the record was provided, collected, or obtained;

b. has determined that the research purpose (1) cannot be reasonably accomplished unless the record is provided in individually identifiable form, and (2) warrants the risk to the privacy of the individual that additional exposure of the record might bring;

c. has required the recipient to (1) establish reasonable administrative, technical, and physical safeguards to prevent unauthorized use or disclosure of the record, and (2) remove or destroy the information that identifies the individual at the earliest time at which removal or destruction can be accomplished consistent with the purpose of the research project, unless the recipient has presented adequate justification of a research or health nature for retaining such information, and (3) make no further use or disclosure of the record except (A) in emergency circumstances affecting the health or safety of any individual, (B) for use in another research project, under these same conditions, and with written authorization of the Department, (C) for disclosure to a properly identified person for the purpose of an audit related to the research project, if information that would enable research subjects to be identified is removed or destroyed at the earliest opportunity consistent with the purpose of the audit, or (D) when required by law;

d. has secured a written statement attesting to the recipient's understanding of, and willingness to abide by these provisions.

12. To the Educational Testing Service, American College Testing, and like organizations for purposes of obtaining testing, academic, socioeconomic, and related demographic data so that analytical personnel studies of the Department of Defense civilian and military workforce can be conducted.

NOTE 4: Data obtained from such organizations and used by DoD does not contain any information that identifies the individual about whom the data pertains.

13. To Federal and State agencies for purposes of obtaining socioeconomic information on Armed Forces personnel so that analytical studies can be conducted with a view to assessing the present needs and future requirements of such personnel.

14. To Federal and state agencies for purposes of validating demographic data (e.g., Social Security Number, citizenship status, date and place of birth, etc.) for individuals in DoD personnel and pay files so that accurate information is available in support of DoD requirements.

15. To the Bureau of Citizenship and Immigration Services, Department of Homeland Security, for purposes of facilitating the verification of individuals who may be eligible for

expedited naturalization (Pub.L. 108-136, Section 1701, and E.O. 13269, Expedited Naturalization).

16. To Federal and State agencies, as well as their contractors and grantees, for purposes of providing military wage, training, and educational information so that Federal-reporting requirements, as mandated by statute, such as the Workforce Investment Act (29 U.S.C. 2801, et. seq.) and the Carl D. Perkins Vocational and Applied Technology Act (20 U.S.C. 2301, et. seq.) can be satisfied.

17. To Federal Agencies, including the Department of Education, to conduct computer matching programs regulated by the Privacy Act of 1974, as amended (5 U.S.C. 552a), for the purpose of identifying dependent children of those military members killed in Operation Iraq Freedom and Operation Enduring Freedom (OIF/OEF) Afghanistan Only for possible benefits.

The DoD 'Blanket Routine Uses' set forth at the beginning of the OSD compilation of systems of records notices apply to this system.

NOTE 5: Military drug test information involving individuals participating in a drug abuse rehabilitation program shall be confidential and be disclosed only for the purposes and under the circumstances expressly authorized in 42 U.S.C. 290dd-2. This statute takes precedence over the Privacy Act of 1974, in regard to accessibility of such records except to the individual to whom the record pertains. The DoD 'Blanket Routine Uses' do not apply to these types records.

Policies and practices for storing, retrieving, accessing, retaining, and disposing of records in the system:

Storage:

Electronic storage media.

Retrievability:

Retrieved by name, Social Security Number (SSN), occupation, or any other data element contained in system.

Safeguards:

Access to personal information is restricted to those who require the records in the performance of their official duties.

Access to personal information is further restricted by the use of Common Access Cards (CAC). Physical entry is restricted by the use of locks, guards, and administrative procedures. All individuals granted access to this system of records are to have taken Information Assurance and Privacy Act training; all have been through the vetting process and have ADP ratings.

Retention and disposal:

The records are used to provide a centralized system within the Department of Defense to assess manpower trends, support personnel functions, perform longitudinal statistical analyses, and conduct scientific studies or medical follow-up programs and other related studies/analyses. Records are retained as follows:

(1) Input/source records are deleted or destroyed after data have been entered into the master file or when no longer needed for operational purposes, whichever is later. Exception: Apply NARA-approved disposition instructions to the data files residing in other DMDC data bases.

(2) The Master File is retained permanently. At the end of the fiscal year, a snapshot is taken and transferred to the National Archives in accordance with 36 CFR part 1228.270 and 36 CFR part 1234.

(3) Outputs records (electronic or paper summary reports) are deleted or destroyed when no longer needed for operational purposes. Note: This disposition instruction applies only to record keeping copies of the reports retained by DMDC. The DoD office requiring creation of the report should maintain its record keeping copy in accordance with NARA approved disposition instructions for such reports.

(4) System documentation (codebooks, record layouts, and other system documentation) are retained permanently and transferred to the National Archives along with the master file in accordance with 36 CFR part 1228.270 and 36 CFR part 1234.

System manager(s) and address:

Deputy Director, Defense Manpower Data Center, DoD Center Monterey Bay, 400 Gigling Road, Seaside, CA 93955-6771.

Notification procedure:

Individuals seeking to determine whether information about themselves is contained in this system should address written inquiries to the Privacy Act Officer, Office of Freedom of Information, Washington Headquarters Services, 1155 Defense Pentagon, Washington, DC 20301-1155.

Written requests should contain the full name, Social Security Number (SSN), date of birth, current address, and telephone number of the individual.

Record access procedures:

Individuals seeking access to information about themselves contained in this system should address written inquiries to the Office of the Secretary of Defense/Joint Staff Freedom of Information Act Requester Service Center, 1155 Defense Pentagon, Washington, DC 20301-1155.

Written requests should contain the name and number of this system of records notice along with the full name, Social Security Number(SSN), date of birth, current address, and telephone number of the individual and be signed.

Contesting record procedures:

The Office of the Secretary of Defense rules for accessing records, for contesting contents and appealing initial agency determinations are published in Office of the Secretary of Defense Administrative Instruction 81; 32 CFR part 311; or may be obtained from the system manager.

Record source categories:

Record sources are individuals via survey questionnaires, the military services, the Department of Veteran Affairs, the U. S. Coast Guard, the National Oceanic and Atmospheric Administration, the Public Health Service, the Office of Personnel Management, Environmental Protection Agency, Department of Health and Human Services, Department of Energy, Executive Office of the President, and the Selective Service System.

Exemptions claimed for the system:

None.

Attachment 5

58VA21/22

Compensation, Pension, Education, and Rehabilitation Records-VA

System location:

Records are maintained at the VA regional offices, the VA Records Processing Center, St. Louis, Missouri and the Data Processing Center at Hines, Illinois, with subsidiary accounts receivable records located at the Data Processing Center at St. Paul, Minnesota. Active records are generally maintained by the regional offices having jurisdiction over the domicile of the claimant. Address locations are listed in the VA Appendix I. The automated individual employee productivity records are temporarily maintained at the VA data processing facility serving the office in which the employee is located. The paper record is maintained at the VA regional office having jurisdiction over the employee who processed the claim. Records provided to the Department of Housing and Urban Development (HUD) for inclusion on its Credit Alert Interactive Voice Response System (CAIVRS) are located at a data processing center under contract to HUD at Reston, Virginia.

Categories of individuals covered by the system:

The following categories of individuals will be covered by this system.

1. Veterans who have applied for compensation for service- connected disability under 38 U.S.C. Chapter 11.
2. Veterans who have applied for nonservice-connected disability under 38 U.S.C. chapter 23.
3. Veterans entitled to burial benefits under 38 U.S.C. chapter 15.
4. Surviving spouses and children who have claimed pension based on service-connected death of a veteran under 38 U.S.C. chapter 15.
5. Surviving spouses and children who have claimed pension based on service-connected death of a veteran under 38 U.S.C. chapter 11.
6. Surviving spouses and children who have claimed dependency and indemnity compensation for service-connected death of a veteran under 38 U.S.C. chapter 13.
7. Parents who have applied for death compensation based on service-connected death of a veteran under 38 U.S.C. chapter 11.
8. Parents who have applied for dependency and indemnity compensation for service-connected death of a veteran under 38 U.S.C. chapter 13.
9. Veterans who have applied for VA educational benefits under 38 U.S.C. chapters 31, 32, and 34.
10. Spouses, surviving spouses and children of veterans who have applied for VA educational benefits under 38 U.S.C. chapter 35.
11. Service members who have applied for educational benefits under 38 U.S.C. chapters 34 and 35.

12. Service members who have contributed money from their military pay to the Post-Vietnam Era Veterans Education Account under 38 U.S.C. chapter 32.
13. Individuals who have applied for title 38 benefits but who do not meet the requirements under 38 U.S.C. to receive such benefits.
14. Veterans, service members, spouses, surviving spouses and dependent children who have applied for benefits under the Educational Assistance Test program under sections 901 and 903 of Pub. L. 96-342.
15. Veterans who apply for training and employers who apply for approval of their programs under the provisions of the Emergency Veterans' Job Training Act of 1983, Pub. L. 98-77.
16. Veterans, service members and eligible reservists who apply for benefits under 38 U.S.C. chapter 30.
17. Eligible members of the Selected Reserve who apply for benefits under 10 U.S.C. chapter 106.
18. Any VA employee who generates or finalizes adjudicative actions using the TARGET computer processing.
19. Veterans who apply for training and employers who apply for approval of their programs under the provisions of the Service Members Occupational Conversion and Training Act of 1992, Pub. L. 102-484.
20. Representatives of individuals covered by the system.

Categories of records in the system:

The record, or information contained in the record, may include identifying information (e.g., name, address, social security number); military service and active duty separation information (e.g., name, service number, date of birth, rank, sex, total amount of active service, branch of service, character of service, pay grade, assigned separation reason, whether veteran was discharged with a disability, served in Vietnam Conflict, reenlisted, received a Purple Heart of other military decoration); payment information (e.g., veteran payee name, address, dollar amount of readjustment service pay, amount of disability or pension payments number of nonpaydays, any amount of indebtedness (accounts receivable) arising from title 38 U.S.C. benefits and which are owed to the VA); medical information (e.g., medical and dental treatment in the Armed Forces including type of service-connected disability, medical facilities or by VA health care personnel or received from private hospitals and health care personnel relating to a claim for VA disability benefits or medical or dental treatment); personal information (e.g., martial status, name and address of dependents, occupation, amount of education of a veteran or a dependent, dependent's relationship to veteran); education benefit information (e.g., information arising from utilization or training benefits such as a veteran trainee's induction, reentrance or dismissal from a program or progress and attendance in an education or training program); applications for compensation, pension, education and rehabilitation benefits and training which may contain identifying information, military service and active duty separation information, payment information, medical and dental information, personal and education benefit information relating to a veteran or beneficiary's incarceration in a penal institution (e.g., name of incarcerated veteran or beneficiary, claims file number, name and address of penal institution, date of commitment, type of offense, scheduled release date, veteran's date of birth, beneficiary relationship

to veteran and whether veteran or beneficiary is in a work release or half way house program, on parole or has been released from incarceration).

The VA employee's Target Access Card number, the number and kind of actions generated and/or finalized by each such employee, the compilation of cases returned for each employee.

Authority for maintenance of the system:
Title 38, United States Code, section 501(a) and Chapters 11, 13, 15, 18, 23,30, 31, 32, 34, 35, 36, 39, 51, 53, 55.

Purpose(s):
Veterans, and their survivors and dependents, file claims for a wide variety of Federal veteran's benefits administered by VA at VA facilities located throughout the nation. See the statutory provisions cited in "Authority for maintenance of the system. VA gathers, or creates, these records in order to enable it to administer these statutory benefits programs.

Routine uses of records maintained in the system, including categories of users and the purposes of such uses:

1. The record of an individual who is covered by this system may be disclosed to a member of Congress or staff person acting for the member when the member or staff person requests the record on behalf of and at the request of that individual.
2. Any information in this system may be disclosed to a Federal agency, upon its official request, to the extent that it is relevant and necessary to that agency's decision regarding: The hiring, retention or transfer of an employee; the issuance of a security clearance, the letting of a contract, or the issuance or continuance of a license, grant or other benefit given by that agency. However, in accordance with an agreement with the U.S. Postal Service, disclosures to the U.S. Postal Service for decisions concerning the employment of veterans will only be made with the veteran's prior written consent.
3. Any written information in this system may be disclosed to a State or local agency, upon official request, to the extent that it is relevant and necessary to that agency's decision on: The hiring, retention or transfer of an employee, the issuance of a security clearance, the letting of a contract, or the issuance or continuance of a license, grant or other benefit by that agency; provided, that if the information pertains to a veteran, the name and address of the veteran will not be disclosed unless the name and address is provided first by the requesting State or local agency.
4. Any information in this system, except for the name and address of a veteran, which is relevant to a suspected violation or reasonably imminent violation of law, whether civil, criminal or regulatory in nature and whether arising by general or program statute or by regulation, rule or order issued pursuant thereto, may be disclosed to a Federal, State, local or foreign agency charged with the responsibility of investigating or prosecuting such violation, or charged with enforcing or implementing the statute, rule, regulation or order issued pursuant thereto.

5. The name and address of a veteran, which is relevant to a suspected violation or reasonably imminent violation of law, whether civil, criminal or regulatory in nature and whether arising by general or program statute or by regulation, rule or order issued pursuant thereto, may be disclosed to a Federal agency charged with the responsibility of investigation or prosecuting such violation or charged with enforcing or implementing the statute, regulation, rule or order issued pursuant thereto, in response to its official request.
6. The name and address of a veteran, which is relevant to a suspected violation or reasonably imminent violation of law concerning public health or safety, whether civil, criminal or regulatory in nature and whether arising by general or program statute or by regulation, rule or order issued pursuant thereto, may be disclosed to any foreign, State or local governmental agency or instrumentality charged under applicable law with the protection of the public health or safety if a qualified representative of such organization, agency or instrumentality has made a written request that such name and address be provided for a purpose authorized by law.
7. The name, address, entitlement code (e.g., compensation or pension), period(s) of service, sex, and date(s) of discharge may be disclosed to any nonprofit organization if the release is directly connected with the conduct of programs and the utilization of benefits under title 38 U.S.C. Disclosures may be in the form of a computerized list.
8. Any information in this system, except for the name and address of a veteran, may be disclosed to a Federal agency in order for the VA to obtain information relevant to the issuance of a benefit under title 38 U.S.C. The name and address of a veteran may be disclosed to a Federal agency under this routine use if they are required by the Federal agency to respond to the VA inquiry.
9. Any information in this system may be disclosed in connection with any proceeding for the collection of an amount owed to the United States by virtue of a person's participation in any benefit program administered by the Veterans Administration when in the judgment of the Administrator, or official generally delegated such authority under standard agency delegation of authority rules (38 CFR 2.6), such disclosure is deemed necessary and proper, in accordance with 38 U.S.C. 3301(b)(6).
10. The name and address of a veteran, and other information as is reasonably necessary to identify such veteran, may be disclosed to a consumer reporting agency for the purpose of locating the veteran, or, obtaining a consumer report to determine the ability of the veteran to repay an indebtedness to the United States arising by virtue of the veteran's participation in a benefits program administered by the VA, provided that the requirements of 38 U.S.C. 3301(g)(2) have been met.
11. The name and address of a veteran, other information as is reasonably necessary to identify such veteran, including personal information obtained from other Federal agencies through computer matching programs, and any information concerning the veteran's indebtedness to the United States by virtue of the person's participation in a benefits program administered by the VA may be disclosed to a consumer reporting agency for purposes of assisting in the collection of such indebtedness, provided that the provision of 38 U.S.C. 3301(g)(4) have been met.

12. Any information in this system, including available identifying information regarding the debtor, such as name of debtor, last known address or debtor, VA insurance number, VA loan number, VA claim number, place of birth, date of birth of debtor, name and address of debtor's employer or firm and dates of employment may be disclosed, under this routine use, except to consumer reporting agencies, to a third party in order to obtain current name, address, locator, and credit report in connection with any proceeding for the collection of an amount owed to the United States by virtue of a person's participation in any VA benefit program when in the judgment of the Administrator such disclosure is deemed necessary and proper. This purpose is consistent with the Federal Claims Collection Act of 1966 (Pub. L. 89-508, 37 U.S.C. 951-953 and 4 CFR parts 101-105 and 38 U.S.C. 3301(b)(6).
13. Any information in this system, including the nature and amount of a financial obligation, may be disclosed to a debtor's employing agency or commanding officer so that the debtor-employee may be counseled by his or her Federal employer or commanding officer and to assist in the collection of unpaid financial obligations owed the VA. This purpose is consistent with 5 U.S.C. 5514, 4 CFR 102.5, and section 206 of Executive Order 11222 of May 8, 1965 (30 FR 6469).
14. Payment information may be disclosed to the Department of the Treasury, in accordance with its official request, to permit delivery of benefit checks to veteran-payees.
15. Military service and active duty separation information, and identifying information may be disclosed to a State unemployment compensation agency to the extent required to determine eligibility for its benefits, provided the name and address of the individual to whom the record pertains are provided by the State agency. The purpose for this disclosure is consistent with 5 U.S.C. 8523.
16. Medical information may be disclosed in response to a request from the superintendent of a State hospital for psychotic patients, a commissioner or head of a State department of mental hygiene, or a head of a State, county or city health department or any fee basis physician or sharing institution in direct connection with authorized treatment for a veteran provided the name of the individual to whom the record pertains is given and the information will be treated as confidential, as is customary in civilian professional medical practice.
17. The name, address, VA file number, effective date of compensation or pension, current and historical benefit pay amounts for compensation or pension, service information, date of birth, competency payment status, incarceration status, and social security number of veterans and their surviving spouses may be disclosed to the following agencies upon their official request: Department of Defense, Defense Manpower Data Center; Marine Corps; Department of Transportation (Coast Guard); PHS (Public Health Service), NOAA (National Oceanic and Atmospheric Administration), Commissioned Officer Corps in order for these departments and agencies and VA to reconcile the amount and/or waiver of service, department and retired pay. These records may also be disclosed as a part of an ongoing computer matching program to accomplish these purposes. This purpose is consistent with 10 U.S.C. 684, 38 U.S.C. 3101, 38 U.S.C. 3104 and 38 U.S.C. 3301.

18. The amount of pension, compensation, dependency and indemnity compensation, educational assistance allowance, retirement pay and subsistence allowance of any veteran identified to the VA may be disclosed to any person who applies for such information.
19. Identifying, personal, payment and medical information may be disclosed to a Federal, State, or local government agency at the request of a veteran in order to assist the veteran and insure that all of the title 38 U.S.C. or other benefits to which the veteran is entitled are received. This information may also be disclosed without a request from the veteran, to a Federal agency, upon its official request or to a State or local agency provided the name and address of the veteran is given beforehand by the State or local agency in order to assist the veteran in obtaining a non-title 38 U.S.C. benefit to which the veteran is entitled.
20. Any information in this system which directly affects payment or potential payment of benefits to contesting claimants, including parties claiming an apportioned share of benefits, may be coequally disclosed to each affected claimant upon request from that claimant in conjunction with the claim for benefits sought or received.
21. Any information in this system such as identifying information, nature of a claim, amount of benefit payments, percentage of disability, income and medical expense information maintained by VA which is used to determine the amount payable to recipients of VA income dependent benefits and personal information, may be disclosed to the Social Security Administration, Bureau of Supplemental Security Income, upon its official request, in order for that agency to determine eligibility regarding amounts of social security benefits, or to verify other information with respect thereto. These records may also be disclosed as part of an ongoing computer matching program to accomplish this purpose.
22. Identifying information in this system may be disclosed at the request of a veteran to a third party having information relevant to a claim, such as an employer or school, in order to obtain information from the third party to the extent necessary to develop a veteran's claim for VA benefits.
23. Medical data (excluding the name and address of a veteran unless the name and address are furnished by the requestor) may be disclosed to epidemiological and other research facilities approved by the Chief Medical Director to obtain data from those facilities necessary to assist in medical studies on veterans for the Veterans Administration or for any research purposes determined to be necessary and proper by the Chief Medical Director.
24. The name(s) and address(es) of a veteran may be disclosed to another Federal agency or to a contractor of that agency, at the written request of the head of that agency or designee of the head of that agency for the purpose of conducting government research necessary to accomplish a statutory purpose of that agency.
25. Any information in this system relevant to a veteran's claim such as the name, address, the basis and nature of a claim, amount of benefit payment information, medical information and military service and active duty separation information may be disclosed at the request of the veteran to accredited service organizations, VA- approved claims agents and attorneys acting under a declaration of representation so that these individuals can aid veterans in the preparation, presentation and prosecution of claims under the laws administered by the VA. The name and address of a veteran will not, however, be disclosed to these individuals under

this routine use if the veteran has not requested the assistance of an accredited service organization, claims agent or an attorney.

26. Identifying and payment information may be disclosed, upon the request of a Federal agency, to a State or local government agency, to determine a beneficiary's eligibility under programs provided for under Federal legislation and for which the requesting Federal agency has responsibility. These records may also be disclosed as a part of an ongoing computer matching program to accomplish these purposes. This purpose is consistent with 38 U.S.C. 3301.
27. Any information in this system such as the amount of benefit or disability payments and medical information may be disclosed in the course of presenting evidence to a court, magistrate, or administrative authority, in matters of guardianship, inquests, and commitments, to private attorneys representing veterans rated incompetent in conjunction with issuance of Certificates of Incompetency, and to probation and parole officers in connection with court-required duties.
28. Any information in this system including medical information, the basis and nature of claim, the amount of benefits and personal information may be disclosed to a VA Federal fiduciary or a guardian ad litem in relation to his or her representation of a veteran only to the extent necessary to fulfill the duties of the VA Federal fiduciary or the guardian ad litem.
29. Any relevant information (including changes in disability ratings) may be disclosed to the Department of Justice and United States Attorneys in the defense or prosecution of litigation involving the United States, and to Federal agencies upon their request in connection with review of administrative tort claims and potential tort claims filed under the Federal Tort Claims Act, 28 U.S.C. 2672, the Military Claims Act, 10 U.S.C. 2733, and other similar claims statutes.
30. Any information in this system may be disclosed to a Federal grand jury, a Federal court or a party in litigation, or a Federal agency or party to an administrative proceeding being conducted by a Federal agency, in order for the VA to respond to and comply with the issuance of a Federal subpoena.
31. Any information in this system may be disclosed to a State or municipal grand jury, a State or municipal court or a party in litigation, or to a State or municipal administrative agency functioning in a quasi-judicial capacity or a party to a proceeding being conducted by such agency, in order for the VA to respond to and comply with the issuance of a State or municipal subpoena; provided, that any disclosure of claimant information made under this routine use must comply with the provisions of 38 CFR 1.511.
32. Any information in this system including the name, social security number, date of birth, delimiting date and remaining entitlement of VA educational benefits, may be disclosed to the ED (Department of Education), upon its official request, or contractor thereof, for specific use by the ED to validate information regarding entitlement to VA benefits which is submitted by applicants who request educational assistance grants from the ED. Such information will not be used for any other purpose by the ED or contractor thereof.
33. VA educational forms and letters which contain identifying information about a veteran may be disclosed at the request of the veteran to a VA-approved education or training establishment to assist the veteran in the completion of claims forms or for the VA to obtain further

information from the educational or training establishments as may be necessary for the VA to properly process the veteran trainee's claim or to monitor the trainee's progress.

34. Identifying and payment information may be disclosed to a VA- approved educational or training establishment at the request of the veteran in order for the VA to obtain sufficient information necessary to pay the veteran or the educational or training establishment the correct monetary amounts in an expeditious manner. However, this information will not be provided under this routine use to an educational or training establishment when the request is clearly an attempt by that establishment to seek assistance in collection attempts against the veteran.
35. Identifying information and information regarding the induction, reentrance and dismissal of a disabled veteran from a vocational rehabilitation program may be disclosed at the request of the veteran to a VA-approved vocational rehabilitation training establishment to insure that the trainee receives the maximum benefit from training.
36. Identifying information and information regarding the extent and nature of a veteran's disabilities with respect to any limitations to be imposed on the veteran's vocational programs may be disclosed at the request of the veteran to a VA-approved vocational rehabilitation training establishment to insure that the trainee receives the maximum benefit from training.
37. Information regarding the type and amount of training/ education received, and the name and address of a veteran, may be disclosed at the request of a veteran to local and State agencies and to prospective employers in order to assist the veteran in obtaining employment or further training.
38. The name, claims file number and any other information relating to a veteran's or beneficiary's incarceration in a penal institution and information regarding a dependent's right to a special apportionment of the incarcerated individual's VA benefit payment may be disclosed to those dependents who may be eligible for entitlement to such apportionment in accordance with 38 U.S.C. 504, 1682, 1780, and 3113.
39. The name, claims file number and any other information relating to a veteran or beneficiary who may be incarcerated in a penal institution may, pursuant to an arrangement, be disclosed to penal institutions or to correctional authorities in order to verify information concerning the veteran's or beneficiary's incarceration status. The disclosure of this information is necessary to determine that individual's continuing eligibility as authorized under 38 U.S.C. 504, 1682, 1780 and 3113.
40. Names and addresses, and other identifying data including the Social Security number, of surviving spouses, children and parents of deceased veterans may be released from this system of records to the Department of Defense (DOD) upon its official request in order for DOD to identify individuals eligible for health care benefits administered by the DOD, or to collect or verify information necessary for DOD facility planning, personnel studies, capitalization budgeting and post exchange, commissary and housing studies.
41. Identifying information including names and addresses, entitlement code, payee social security number, file number, payee number, regional office number, income for VA pension-determination purposes and pension net award may be released to the Department of Agriculture upon its official request for the purpose of a matching program designated

USDA/OIG-6 for verification by the Department of Agriculture of applicants' eligibility for food stamps to reduce unauthorized payments in the food stamp program, and to collect debts owed to the United States Government. This anti-fraud matching program is being performed pursuant to the Department of Agriculture's Inspector General authority under Pub. L. 95-452, section 4(a), to detect and prevent fraud and abuse.

42. Any information concerning the veteran's indebtedness to the United States by virtue of a person's participation in a benefits program administered by the VA, including personal information obtained from other Federal agencies through computer matching programs, may be disclosed to any third party, except consumer reporting agencies, in connection with any proceeding for the collection of any amount owed to the United States. Purposes of these disclosures may be to (a) assist the VA in collection of title 38 benefit overpayments overdue indebtedness, and/or costs of services provided individuals not entitled to such services, and (b) initiate legal actions for prosecuting individuals who willfully or fraudulently obtain title 38 benefits without entitlement. This disclosure is consistent with 38 U.S.C. 3301(b)(6).
43. Identifying information, except for the name and address of a veteran, may be disclosed to a State agency for the purpose of conducting a computer match to determine if income and employment data are being properly reported to the VA and to detect the unwarranted payment of benefits under title 38 U.S.C.
44. Identifying, disability, and award (type, amount and reasons for award) information may be released to the DOL (Department of Labor) in order for the DOL to conduct a computer matching program against the `Office of Workers' Compensation Programs Federal Employees Compensation File, DOL/ESA-13,` published in 46 FR 12357 on February 13, 1981. This match will permit the DOL to verify a person's eligibility for DOL payments as well as to detect situations where recipients may be erroneously receiving concurrent multiple payments from the DOL and the VA, to identify areas where legislative and regulatory amendments directed toward preventing overpayments are needed, and to collect debts owned to the United States Government. This matching program is performed pursuant to the DOL Inspector General's authority under Pub. L. 95-452, section 4(a) to detect and prevent fraud and abuse. This disclosure is consistent with 38 U.S.C. 3301(b)(3).
45. The beneficiary's name, address, social security number and the amount (excluding interest) of any indebtedness waived under 38 U.S.C. 3102, or compromised under 4 CFR part 103 may be disclosed to the Treasury Department, Internal Revenue Service, as a report of income under 26 U.S.C. 61(a)(12).
46. Identifying information, including social security number, concerning veterans and the dependents of veterans, except for the name and address, may be disclosed to a Federal, State, County or Municipal agency for the purpose of conducting computer matches to obtain information to validate the entitlement of a veteran or a dependent of a disabled or deceased veteran, who is receiving or has received veterans benefits under Title 38, United States Code. The name and address of veterans may also be disclosed to a Federal agency under this routine use if required by the Federal agency in order to provide information.
47. Identifying information, including the initials and abbreviated surname, the social security number, the date of birth and coding indicating the category of the individual's records, the

degree of disability, the benefit program under which benefits program under which benefits are being paid and the computed amount of VA benefits for a calendar year may be released to the Department of the Treasury, Internal Revenue Service (IRS) in order for IRS to conduct a computer matching program against the Internal Revenue Service's Forms 1040, Schedule R, Credit for the Elderly and the Permanently and Totally Disabled. This match will permit IRS to determine the eligibility for and the proper amount of Elderly and Disabled Credits claimed on IRS Form 1040, Schedule R. This matching program is performed pursuant to the provisions of Internal Revenue Code Section 7602. This disclosure is consistent with 38 U.S.C. 3301(b)(3).

48. Identifying information, such as name, social security number, VA claim number, date and place of birth, etc., in this system may be disclosed to an employer or school having information relevant to a claim in order to obtain information from the employer or school to the extent necessary to determine that eligibility for VA compensation or pension benefits continues to exist or to verify that there has been an overpayment of VA compensation or pension benefits. Any information in this system also may be disclosed to any of the above-entitled individuals or entities as part of ongoing computer matching programs to accomplish these purposes.
49. The name of a veteran, or other beneficiary, other information as is reasonably necessary to identify such individual, and any other information concerning the individual's indebtedness by virtue of a person's participation in a benefits program administered by the VA, may be disclosed to the Treasury Department, Internal Revenue Service, for the collection of Title 38, U.S.C. benefit overpayments, overdue indebtedness, and/or costs of services provided to an individual not entitled to such services, by the withholding of all or a portion of the person's Federal income tax refund.
50. Veterans' addresses which are contained in this system of records may be disclosed to the Department of Defense Manpower Data Center, upon its official request, for military recruiting command needs, Department of Defense civilian personnel offices' mobilization studies and mobilization information, debt collection, and Individual Ready Reserve (IRR) Units' locator services.
51. The name, address, VA file number, date of birth, date of death, social security number, and service information may be disclosed to the Defense Manpower Data Center. The Department of Defense will use this information to identify retired veterans and dependent members of their families who have entitlement to Department of Defense benefits but who are not identified in the Department of Defense Enrollment Eligibility Reporting System (DEERS) program and to assist in determining eligibility for Civilian Health and Medical Program of the Uniformed Services (CHAMPUS) benefits. This purpose is consistent with 38 U.S.C. 3301. These records may also be disclosed as part of an ongoing computer matching program to accomplish this purpose.
52. The name, address, VA file number, social security number, sex of veteran, date(s) of birth of the veteran and dependents, current benefit pay amounts for compensation or pension, pay status, check amount, aid and attendance status, veteran and spouse annual income amounts and type and combined degree of disability will be disclosed to the Department of Health and

Human Services. The Social Security Administration will use the data in the administration of the supplemental security income (SSI) payment system as prescribed by Pub. L. 92-603. These records may also be disclosed as part of an ongoing computer matching program to accomplish these purposes. This purpose is consistent with 38 U.S.C. 3301.

53. The names and current addresses of VA beneficiaries who are identified by finance centers of individual uniformed services of the Department of Defense and the Department of Transportation (Coast Guard) as responsible for the payment of Survivor Benefit Plan (SBP) premium payments to be released from this system of records to them upon their official written request for such information for their use in attempting to recover amounts owed for SBP premium payments.
54. This routine use authorizes VA to compile lists of the social security numbers and loan account numbers of all persons with VA- guaranteed and portfolio loans in default, or VA loans on which there has been a foreclosure and the Department paid a claim and provide these records to the Department of Housing and Urban Development for inclusion in its Credit Alert Interactive Voice Response System (CAIVRS). Information included in this system may be disclosed to all participating agencies and lenders who participate in the agencies' programs to enable them to verify information provided by new loan applicants and evaluate the creditworthiness of applicants. These records may also be disclosed as part of an ongoing computer matching program to accomplish these purposes.
55. Identifying information including social security number, abbreviated surname, first and middle initial, date of birth, sex and claim number, and excluding the full name and address, may be disclosed to the Social Security Administration for the purpose of conducting a computer match to obtain information to validate the social security number maintained in VA records.
56. Any information contained in the files of veterans whose claims were referred to VA Central Office for an advisory opinion concerning their claims that their disabilities were incurred secondary to occupational radiation exposure may be disclosed to the Department of the Navy. The information to be furnished to the Navy would include the medical opinions, dose estimates, advisory opinions, and rating decisions including veterans' names, addresses, VA claim numbers, Social Security numbers and medical information. The requested information may be disclosed to the Department of the Navy upon receipt of their official written request for such information for their use in the review and assessment of their occupational radiation exposure controls and training.
57. A veteran's claims file number and folder location may be disclosed to a court of proper jurisdiction which has issued a garnishment order for that veteran under 42 U.S.C. 659 through 662.
58. The name and address of a prospective, present, or former accredited representative, claims agent or attorney and any information concerning such individual which is relevant to a refusal to grant access privileges to automated veterans claims records, or a potential or past suspension or termination of such access privileges may be disclosed to the entity employing the individual to represent veterans on claims for veterans benefits.

59. The name and address of a former accredited representative, claim agent or attorney, and any information concerning such individual, except a veteran's name and home address, which is relevant to a revocation of such access privileges may be disclosed to an appropriate governmental licensing organization where VA determines that the individual's conduct which resulted in revocation merits reporting.
60. A record from this system (other than the address of the beneficiary) may be disclosed to a former representative of a beneficiary to the extent necessary to develop and adjudicate a claim for payment of attorney fees to such representative from past-due benefits under 38 U.S.C. 5904(d) or to review a fee agreement between such representative and the beneficiary for reasonableness under 38 U.S.C. 5904(c)(2).
61. Disclosure of tax returns and return information received from the Internal Revenue Service may be made only as provided by 26 U.S.C. 6103 (an IRS confidentiality statute) also covering any IRS tax return information provided as part of an ongoing computer matching program.
62. Where VA determines that there is good cause to question the legality or ethical propriety of the conduct of a person or organization representing a person in a matter before VA, a record from this system may be disclosed, on VA's initiative, to any or all of the following: (1) Applicable civil or criminal law enforcement authorities and (2) a person or entity responsible for the licensing, supervision, or professional discipline of the person or organization acting as representative. Name and home addresses of veterans and their dependents will be released on VA's initiative under this routine use only to Federal entities.
63. The name and address of a VA beneficiary, and other information as is reasonably necessary to identify such beneficiary, who has been adjudicated as incompetent under 38 CFR 3.353, may be provided to the Attorney General of the United States or his/her designee, for use by the Department of Justice in the National Instant Criminal Background Check System (NICS) mandated by the Brady Handgun Violence Prevention Act, Pub. L. 103-159.

Policies and practices for storing, retrieving, accessing, retaining, and disposing of records in the system:

Storage:

Records (or information contained in records) are maintained on paper documents in claims file folders (e.g., ``C'' file folders, educational file folders and vocational rehabilitation folders) and on automated storage media (e.g., microfilm, microfiche, magnetic tape and disks.) Such information may be accessed through a data telecommunication terminal system designated the Benefits Delivery Network (BDN). BDN terminal locations include VA Central Office, VA regional offices, VA health care facilities, VISN offices, Department of Defense Finance and Accounting Service Centers and the U.S. Coast Guard Pay and Personnel Center.

Remote on-line access is also made available to authorized representatives of claimants and to attorneys of record for claimants. A VA claimant must execute a prior written consent or a power of attorney authorizing access to his or her claims records before VA will allow the representative or

attorney to have access to the claimant's automated claims records. Access by representatives and attorneys of record is to be used solely for the purpose of assisting an individual claimant whose records are accessed in a claim for benefits administered by VA.

Information relating to receivable accounts owed to VA, designated the Centralized Accounts Receivable System (CARS), is maintained on magnetic tape, microfiche and microfilm. CARS is accessed through a data telecommunications terminal system at St. Paul, Minnesota.

Retrievability:

Claims file folders are indexed by name of the veteran and VA file number. Automated records are indexed by name, VA file number, payee name and type of benefit. Automated Records of employee productivity cannot be accessed. At the conclusion of a monthly reporting period, the generated listing is indexed by employee TAC number. Records in CAIVRS may only be retrieved by social security number.

Safeguards:

1. Physical Security:
    a. Access to working spaces and claims folder file storage areas in VA regional offices and centers is restricted to VA employees on a need-to-know basis. Generally, file areas are locked after normal duty hours and the offices and centers are protected from outside access by the Federal Protective Service or other security personnel. Employee claims file records and claims file records of public figures are stored in separate locked files. Strict control measures are enforced to ensure that access to and disclosure from these claims file records are limited to a need-to- know basis.
    b. Access to BDN data telecommunications network is by authorization controlled by the site security officer who is responsible for authorizing access to the BDN by a claimant's representative or attorney approved for access in accordance with VA regulations. The site security officer is responsible for ensuring that the hardware, software and security practices of a representative or attorney satisfy VA security requirements before granting access. The security requirements applicable to access to automated claims files by VA employees also apply to access to automated claims files by claimants' representatives or attorneys. The security officer is assigned responsibility for privacy-security measures, especially for review of violation logs, information logs and control of password distribution, including password distribution for claimants' representatives.
    c. Access to data processing centers is generally restricted to center employees, custodial personnel, Federal Protective Service and other security personnel. Access to computer rooms is restricted to authorized operational personnel through electronic locking devices. All other persons provided access to computer rooms are escorted.
    d. Employee production records are identified by the confidential BDN access number, not name, and are protected by management/supervisory personnel from

unauthorized disclosure in the same manner as other confidential records maintained by supervisors.

2. BDN System Security:
   a. Usage of the BDN system is protected by the usage of ``login'' identification passwords and authorized function passwords. The passwords are changed periodically. These same protections apply to remote access users.
   b. At the data processing centers, identification of magnetic tapes and disks containing data is rigidly enforced using labeling techniques. Automated storage media which are not in use are stored in tape libraries which are secured in locked rooms. Access to programs is controlled at three levels: Programming, auditing and operations. Access to the data processing centers where HUD maintains CAIVRS is generally restricted to center employees and authorized subcontractors. Access to computer rooms is restricted to center employees and authorized operational personnel through electronic locking devices. All other persons granted access to computer rooms are escorted.

      Files in CAIVRS use social security numbers as identifiers. Access to information files is restricted to authorized employees of participating agencies and authorized employees of lenders who participate in the agencies' programs. Access is controlled by agency distribution of passwords. Information in the system may be accessed by use of a touch-tone telephone by authorized agency and lender employees on a ``need-to-know'' basis.

Retention and disposal:

Individual claims file folders and the compensation, pension, rehabilitation and education claims records contained therein are retained at the servicing regional office for the life of the veteran. At the death of the veteran, these records are sent to the Federal Records Center (FRC), maintained by the FRC for 75 years and thereafter destroyed. Rehabilitation and education counseling records are maintained until the exhaustion of a veteran's maximum entitlement or upon the exceeding of a veteran's delimiting date of eligibility (generally, ten or twelve years from discharge or release from active duty), whichever occurs first, and then destroyed. Automated storage media containing temporary working information are retained until a claim is processed to determination. All other automated storage media are retained and disposed of in accordance with disposition authorization approved by the Archivist of the United States. Employee productivity records are maintained for two years after which they are destroyed by shredding or burning. File information for CAIVRS is provided to HUD by VA on magnetic tape. After information from the tapes has been read into the computer the tapes are returned to VA for updating. HUD does not keep separate copies of the tapes.

System manager(s) and address:
Director: Compensation and Pension Service (21), Director, Vocational Rehabilitation and Counseling Service (22), VA Central Office, Washington, DC 20420.

Notification procedure:
An individual who wishes to determine whether a record is being maintained in this system under his or her name or other personal identifier, or wants to determine the contents of such record, should submit a written request or apply in person to the nearest VA regional office or center. Address locations are listed in VA Appendix 1 at the end of this document. VA employees wishing to inquire whether the system of records contains employee productivity information about themselves should contact their supervisor at the regional office of employment.

Record access procedures:
Individuals seeking information regarding access to and contesting of VA records may write, call or visit the nearest Veterans Administration regional office. Address locations are listed in VA Appendix 1.

Contesting record procedures:
(See Record access procedures above.)

Record source categories:
The veteran, dependents and other beneficiaries of the veteran, accredited service organizations, VA-supervised fiduciaries (i.e., VA Federal fiduciaries, court-appointed fiduciaries), military service departments, VA medical facilities and physicians, private medical facilities and physicians, education and rehabilitation training establishments, State and local agencies, other Federal agencies, State, local and county courts and clerks, Federal, State and local penal institutions and correctional facilities, other third parties and other VA records.