



ANNUAL COMPUTER MATCHING ACTIVITY REPORT

Calendar Year 2020

Data Integrity Board
June 2021

Data Integrity Board (DIB) Members – Calendar Year 2020

BOARD CHAIRMAN

Senior Agency Official for Privacy (SAOP)

Ann Kim, Deputy Chief Information Officer
(January 1, 2020 – August 12, 2020)

Kevin Herms, Director, Student Privacy Policy Office
(August 13, 2020 – December 31, 2020)

BOARD SECRETARY

Kristen Lefevre – Privacy Lead

Office of Planning, Evaluation and Policy Development
Student Privacy Policy Office
400 Maryland Avenue, SW
Washington, DC 20202
Kristen.Lefevre@ed.gov

BOARD MEMBERS

Inspector General (IG)

Sandra D. Bruce, Acting Inspector General

Office of Postsecondary Education (OPE)

Robert King, Assistant Secretary for OPE

Office of the General Counsel

Bucky Methfessel, Senior Counsel for Information and Technology

Chief Information Officer (CIO)

Jason Gray, CIO

Federal Student Aid (FSA)

Joe Lindsey, Deputy Chief Operating Officer (COO)

Changes in DIB Membership

Since the Annual Report for calendar year 2019, there has been one change to the DIB's membership. Due to personnel changes, the DIB welcomed a new SAOP.

- The SAOP and Board Chairman, Ann Kim, was replaced by the newly hired Director of the Student Privacy Policy Office, Kevin Herms.

Title: Unregistered Federal Student Aid Applicants

Participating Agencies: Selective Service System and the Department of Education

Purpose: To enable the Department of Education (ED) to identify federal student aid applicants who are ineligible because they have not registered with the Selective Service.

Initial Matching Notice: November 20, 1989, 54 FR 48045

Reissued Matching Notices:

05/14/92 – 57 FR 20724

11/18/94 – 59 FR 59815

05/22/97 – 62 FR 28096

11/15/99 – 64 FR 61957

05/08/02 – 67 FR 30992

11/04/04 – 69 FR 64353

06/01/07 – 72 FR 30657

11/23/09 – 74 FR 61198

05/09/12 – 77 FR 27263

11/25/14 – 79 FR 70264

05/31/17 – 82 FR 25041

Date and Citation of Current Matching Notice: November 21, 2019 – 84 FR 64308

Effective Dates: January 2, 2020 – July 1, 2021

Note: unless amended, Congress eliminated the authority for this matching program in the FAFSA Simplification Act, which will take effect on July 1, 2023, and shall apply with respect to award year 2023–2024, and each subsequent award year, as determined under the Higher Education Act of 1965, as amended.

Title: Verification Division DHS-USCIS-ED

Participating Agencies: Department of Homeland Security, Citizenship and Immigration Services and the Department of Education

Purpose: To enable ED to identify alien students who may be ineligible to receive federal student aid.

Initial Matching Notice: February 20, 1990, 55 FR 5904

Reissued Matching Notices:

09/24/92 – 57 FR 44209

03/23/95 – 60 FR 15428

09/29/97 – 62 FR 50994

03/01/00 – 65 FR 11043

09/19/02 – 67 FR 59056

03/16/05 – 70 FR 12856

09/18/07 – 72 FR 53235

03/15/10 – 75 FR 12226

09/14/12 – 77 FR 56824

09/16/14 – 79 FR 55441

03/20/17 – 82 FR 14355

Date and Citation of Current Matching Notice: September 13, 2019 [82 FR 48333](#)

Effective Dates: October 21, 2019 – April 20, 2021

Title: Drug Trafficking or Possession, Student Aid Denial

Participating Agencies: Department of Justice and the Department of Education

Purpose: To detect individuals convicted of drug trafficking or possession who had their right to federal student financial assistance denied by the court.

Initial Matching Notice: February 5, 1992, 57 FR 4542.

Reissued Matching Notices:

11/03/94 – 59 FR 55084

06/24/97 – 62 FR 34047

03/08/00 – 65 FR 12222

05/13/03 – 68 FR 25585

10/25/05 – 70 FR 61608

05/09/08 – 73 FR 26377

11/16/10 – 75 FR 69988

05/21/13 – 78 FR 29748

11/16/15 – 80 FR 70768

Date and Citation of Current Matching Notice: June 1, 2018 - [83 FR 25446](#)

Effective Dates (with 12-month extension): June 1, 2018 – January 1, 2021

Title: Credit Alert Interactive Voice Response System (CAIVRS)

Participating Agencies: Department of Housing and Urban Development and the Department of Education

Purpose: To detect individuals with delinquent student loan obligations who attempt to obtain federal loans.

Initial Matching Notice: September 24, 1992, 57 FR 44195

Reissued Matching Notices:

06/19/95 – 60 FR 32019

01/05/98 – 63 FR 247

08/16/00 – 65 FR 49995

02/26/03 – 68 FR 8920

06/29/05 – 70 FR 37423

06/18/08 – 73 FR 34780

07/05/11 – 76 FR 39119

07/21/16 – 81 FR 47403

Date and Citation of Current Matching Notice: March 04, 2020, [85 FR 12801](#)

Effective Dates: April 3, 2020 – October 2, 2021

Note: this CMA lapsed in February 2019 and was reestablished as a new matching program on April 3, 2020.

Title: Social Security Number and Citizenship Status

Participating Agencies: Social Security Administration and the Department of Education

Purpose: To verify social security number and citizenship status and death indicators (when applicable) of federal student aid applicants and parent(s) of dependent students.

Initial Matching Notice: June 7, 1994, 59 FR 29431

Reissued Matching Notices:

12/01/95 – 60 FR 61687

07/14/98 – 63 FR 38064

02/12/01 – 66 FR 9825

08/29/03 – 68 FR 52011

02/22/06 – 71 FR 9109

08/08/08 – 73 FR 46253

03/02/11 – 76 FR 11435

09/06/13 – 78 FR 54875

03/01/16 – 81 FR 10609

Date and Citation of Current Matching Notice: September 11, 2018, [83 FR 45910](#)

Effective Dates (with 12-month extension): April 11, 2020 – April 10, 2021

Title: Veteran Status

Participating Agencies: Department of Veterans Affairs and the Department of Education

Purpose: To verify the veteran status of federal student aid applicants who indicate that they are veterans on the Free Application for Federal Student Aid (FAFSA®).

Initial Matching Notice: October 14, 1998, 63 FR 55100

Reissued Matching Notices:

04/24/01 – 66 FR 20644

10/30/03 – 68 FR 61795

05/03/06 – 71 FR 26078

11/10/08 – 73 FR 66604

05/31/11 – 76 FR 31317

11/29/13 – 78 FR 71591

06/01/16 – 81 FR 35003

Date and Citation of Current Matching Notice: December 4, 2018, [83 FR 62568](#)

Effective Dates (with 12-month extension): January 3, 2019 – July 2, 2021

Title: Children of military personnel who have died as a result of U.S. military service in Iraq or Afghanistan since September 11, 2001

Participating Agencies: Department of Defense and the Department of Education

Purpose: To provide ED with information to identify children whose parent or guardian was a member of the Armed Forces of the United States and died as a result of performing military service in Iraq or Afghanistan after September 11, 2001 in order to determine if they are eligible for a greater amount of financial assistance under Title IV of the HEA.

Initial Matching Notice: November 19, 2009, 74 FR 59969

Reissued Matching Notices:

06/28/12 – 77 FR 38610

01/02/15 – 80 FR 37

06/30/17 – 82 FR 29856

Date and Citation of Current Matching Notice: July 27, 2018, [83 FR 35626](#)

Effective Dates (with 12-month extension): August 28, 2018 – February 26, 2021

Title: Total and Permanent Disability Discharge Benefits

Participating Agencies: Social Security Administration and the Department of Education

Purpose: To verify that borrowers with disabilities who have loans can more efficiently and effectively apply for total and permanent disability (TPD) discharge of their student loans.

Initial Matching Notice: November 6, 2015, 80 FR 68865

Date and Citation of Current Matching Notice: July 19, 2018, [83 FR 34126](#)

Effective Dates (with 12-month extension): August 20, 2018 – February 19, 2021

Title: Total and Permanent Disability Discharge Benefits

Participating Agencies: Department of Veterans Affairs and the Department of Education

Purpose: To verify that veterans with disabilities who have loans can more efficiently and effectively apply for total and permanent disability (TPD) discharge of their student loans.

Initial Matching Notice: December 7, 2016, 81 FR 88235

Date and Citation of Current Matching Notice: October 10, 2018, [83 FR 50903](#)

Effective Dates (with 12-month extension): November 9, 2018 - May 8, 2021

Note: this CMA lapsed in July 2018 and was reestablished on November 9, 2018.

Title: Benefit Eligibility for Imminent Danger Pay (IDP) and Hostile Fire Pay (HFP)

Participating Agencies: Department of Defense and the Department of Education

Purpose: To enable the Department to provide no-interest accrual benefits on qualifying loans made under title IV of the Higher Education Act of 1965, as amended, during the time those service members were deployed to locations qualifying for imminent danger pay (IDP) and hostile fire pay (HFP).

Date and Citation of Current Matching Notice: November 20, 2019, [84 FR 64052](#)

Effective Dates: December 20, 2019 – June 19, 2021

Calendar Year 2020

1. The Data Integrity Board received information that the Department of Education (Department) did not fully adhere to the terms of three matching agreements of the ten that were active in calendar year 2020. There were (1) two violations in ED's computer matching agreement with the Department of Defense (DoD) which identified children of military personnel who have died as a result of U.S. military service in Iraq or Afghanistan since September 11, 2001, (2) one violation in ED's computer matching agreement with the Social Security Administration (SSA), which verified social security number, citizenship status and death indicators (when applicable) of federal student aid applicants and parent(s) of dependent students, and (3) one violation in ED's computer matching agreement with the Selective Service System (SSS) which identified federal student aid applicants who were ineligible because they did not register with the Selective Service. The Department identified unnecessary redisclosures of data to two Department analytics systems, the National Student Loan Data System and Enterprise Data Warehouse and Analytics (EDWA). The Department investigated and confirmed the violations. Through Business Operation Change Requests, the Department stopped sharing both DoD and SSA data with these systems, and SSS data with the EDWA system, ceased the redisclosures, removed DoD's and SSA's existing data elements from both systems and SSA's from EDWA, and removed system references in the computer matching agreements (as applicable), eliminating the violations by 12/31/2020. The DIB is investigating further to analyze the incidents and determine the root cause of these unauthorized redisclosures. Based on the findings, the DIB will work with FSA to formulate a solution and establish appropriate controls that are designed to help prevent further redisclosures that do not adhere to the terms of ED's matching agreements.
2. For each of the Department's ten matching programs that were active in calendar year 2020, disclosures of agency records for use in, and the purposes of, the matching programs continued to be justified.
3. For each of the Department's ten matching programs that were active in calendar year 2020, a cost/benefit analysis was performed, and each resulted in a favorable ratio.
4. The Data Integrity Board did not waive a cost/benefit analysis for any of the matching programs.
5. The Data Integrity Board did not reject any matching agreements.
6. No violations of matching agreements were alleged or identified, except those listed above related to the agreements with DoD, SSA, and SSS.
7. A complete list of the Department's matching activities can be found at <https://www2.ed.gov/about/offices/list/om/pirms/cma.html>.