



ANNUAL COMPUTER MATCHING ACTIVITY REPORT

Calendar Year 2022

U.S. Department of Education
Data Integrity Board
July 2023

Data Integrity Board (DIB) Members – Calendar Year 2022

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Changes in DIB Membership

Since the Annual Computer Matching Activity Report for Calendar Year 2021, there have been two changes to the DIB's membership. Due to personnel changes, the DIB welcomed Nasser Paydar as Assistant Secretary for Postsecondary Education, who replaced Acting Assistant Secretary Michelle Asha Cooper. Additionally, Jason Gray, Chief Information Officer (CIO), was replaced by Gary Stevens, Acting CIO, who then was replaced by Luiz R. Lopez, CIO.

Title: Unregistered Federal Student Aid Applicants

Participating Agencies: Selective Service System (source agency) and the U.S. Department of Education (the Department) (recipient agency)

Purpose: To enable the Department 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: The Computer Matching Agreement (CMA) was re-established as an 18-month CMA that ran from January 2, 2020, to July 1, 2021. The CMA was renewed from July 2, 2021, to July 1, 2022, and has since been terminated as of July 1, 2022.

Cost-Benefit Analysis: The total cost for performing the match was \$271,645. The total savings from the matching program was \$18,273,648. The cost-benefit ratio for this was 0.015 (rounded), resulting in a favorable match.

Cost-Benefit Waivers: There were no cost-benefit waivers for this matching program.

Note: Pursuant to paragraph (2) of section 702(n) of division FF of Public Law 116–260, the FAFSA Simplification Act,¹ the Department engaged in early implementation of the

¹ It provides as follows: “Notwithstanding section 701(b) of this Act, sections 401(b)(6) and 484(r) of the Higher Education Act of 1965 (20 U.S.C. 1070a(b)(6); 1091(r)) as in effect on the date of enactment of this Act, and section 12(f) of the Military Selective Service Act (50 U.S.C. 3811(f)), the Secretary of Education may implement the amendments made by paragraph (1) of this subsection before (but not later than) July 1, 2023. The Secretary shall specify in a designation on what date, under what conditions, and for which award

FAFSA Simplification Act's removal of the Selective Service registration requirement for eligibility under title IV, Higher Education Act of 1965, as amended (HEA), with an effective date of June 17, 2021, and an implementation date of August 16, 2021. See: <https://www.federalregister.gov/documents/2021/06/17/2021-12762/early-implementation-of-the-fafsa-simplification-acts-removal-of-requirements-for-title-iv>. This implementation consisted of the Department issuing a notice that stated that failing to register with the Selective Service would no longer impact a student's eligibility for aid under title IV of the HEA and removing the Selective Service registration question from the Free Application for Federal Student Aid (FAFSA). Therefore, once the early implementation occurred, the Department no longer had the authority under the HEA to conduct a matching program with the Selective Service System. However, the Department inadvertently continued to engage in matching past that date without the requisite authority. The Department did not reestablish this matching program with the Selective Service System. All matching under this CMA has since been terminated as of July 1, 2022.

years the Secretary will implement such amendments prior to July 1, 2023. The Secretary shall publish any designation under this paragraph in the Federal Register at least 60 days before implementation.”

Title: Immigration Status Verification

Participating Agencies: U.S. Department of Homeland Security, U.S. Citizenship and Immigration Services (source agency), and the U.S. Department of Education (recipient agency)

Purpose: To enable the Department 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

09/13/19 – 84 FR 48333

Date and Citation of Current Matching Notice: March 16, 2022 – [87 FR 14844](#)

Effective Dates: The current CMA was re-established as an 18-month CMA and is running from April 21, 2022, to October 20, 2023.

Cost-Benefit Analysis: The total cost for performing the match was \$1,885,741. The total savings amount from the matching program was \$113,876,610. The cost-benefit ratio for this was 0.0166 (rounded), resulting in a favorable match.

Cost-Benefit Waivers: There were no cost-benefit waivers for this matching program.

Title: Drug Trafficking or Possession, Student Aid Denial

Participating Agencies: U.S. Department of Justice (DOJ) (source agency) and the U.S. Department of Education (recipient agency)

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

06/01/18 – 83 FR 25446

12/03/20 – 85 FR 78127

Date and Citation of Current Matching Notice: June 5, 2023 – [88 FR 36556](#)

Effective Dates: The previous CMA was renewed for an additional 12 months that ran from July 2, 2022 to July 1, 2023. The current CMA was re-established as an 18-month CMA and is running from July 2, 2023, to January 1, 2025.

Cost-Benefit Analysis: The total cost for performing the match was \$7,609. The total savings amount from the matching program was \$258,608. The cost-benefit ratio for this was 0.029 (rounded), resulting in a favorable match.

Cost-Benefit Waivers: There were no cost-benefit waivers for this matching program.

Title: Credit Alert Interactive Voice Response System (CAIVRS)

Participating Agencies: The U.S. Department of Education (source agency) and the U.S. Department of Housing and Urban Development (HUD) (recipient agency)

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: The CMA was re-established as an 18-month CMA that ran from April 3, 2020, to October 2, 2021. The CMA was renewed and ran from October 3, 2021, to October 2, 2022. The CMA was suspended for the remainder of 2022 following the expiration of the CMA due to the [Fresh Start Program](#).

Cost-Benefit Analysis: The Department performed a cost-benefit analysis and determined that the CMA has given the Department an effective way to monitor its credit programs and reduce the credit extended to individuals with outstanding delinquencies on Federal debts. The total savings across the two agencies from the matching program was \$62,000,000, resulting in a favorable match.

Cost-Benefit Waivers: There were no cost-benefit waivers for this matching program.

Note: HUD is currently working on re-establishing this CMA. HUD will continue to function as the recipient agency coordinating the CMA between the two agencies.

Title: Match #1051 – Verification of SSN and Citizenship Status for Financial Aid

Participating Agencies: U.S. Social Security Administration (source agency) and the U.S. Department of Education (recipient agency)

Purpose: To verify SSN, citizenship status, and death indicators (when applicable) of Federal student aid applicants and parent(s) of dependent students to ensure that applicants (and the parents of dependent applicants) for student financial assistance under title IV of the HEA satisfy the requisite eligibility requirements.

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

09/11/18 – 83 FR 45910

Date and Citation of Current Matching Notice: March 8, 2021 – [86 FR 13355](#)

Effective Dates: The CMA was re-established as an 18-month CMA that ran from April 11, 2021, to October 10, 2022. The CMA was renewed and is currently running from October 11, 2022, to October 10, 2023.

Cost-Benefit Analysis: The total cost for performing the match was \$26,014,176. The total savings from the matching program was \$947,995,384. The cost-benefit ratio for this matching program was 0.0274 (rounded), resulting in a favorable match.

Cost-Benefit Waivers: There were no cost-benefit waivers for this matching program.

Note: The Department has recently discovered that it did not fully adhere to the terms of this CMA by sending a broader set of records than the set covered by the CMA itself. At this time, the Department does not have a mechanism to determine whether an individual seeking an FSA Identification number (FSA ID) is an “applicant” under the terms of the CMA or not; as such, the Department sent to SSA sets of records that contained at least some records on individuals who were not defined as being

“applicants”² in the CMA. Specifically, the Department sent records to SSA that consisted of a pool of individuals (e.g., endorsers, third-party preparers) who were not applying for financial assistance under title IV of the HEA) who were applying for an FSA ID. Relatedly, the Department sent records to SSA on such individuals for a different purpose than the purpose that is listed in the CMA. The stated purpose of the matching program in the CMA is: “to assist the U.S. Department of Education in its obligation to ensure that applicants for student financial assistance under title IV of the Higher Education Act of 1965, as amended (HEA) (20 U.S.C. § 1070 et seq.), satisfy eligibility requirements.” However, the Department sent the broader set of records on individuals to SSA for the purpose of both ensuring eligibility, where applicable, and broader identity verification, which was not defined as a purpose of the matching program. In addition, because this was not an anticipated purpose, the Cost-Benefit Analysis did not reflect the additional costs and benefits of including these individuals and purposes. The Department is currently working with SSA on the re-establishment of this CMA and will either expand the scope of the match to include additional individuals and purposes or will discontinue the unauthorized matching.

² The term “applicant” is defined in the CMA as meaning: “an applicant (and for a dependent student the applicant’s parents) for financial assistance under applicable programs administered under the authority of title IV of the HEA (20 U.S.C. § 1070, et seq.)”

Title: Federal Student Aid Application

Participating Agencies: U.S. Department of Veterans Affairs (source agency) and the U.S. Department of Education (recipient agency)

Purpose: To verify the veteran status of Federal student aid applicants who indicate that they are veterans on the 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

12/04/18 – 83 FR 62568

Date and Citation of Current Matching Notice: May 6, 2021 – [86 FR 24394](#)

Effective Dates: The CMA was re-established as an 18-month CMA that ran from July 3, 2021, to January 2, 2023. The CMA was renewed and is currently running from January 3, 2023, to January 2, 2024.

Cost-Benefit Analysis: The total cost for performing the match was \$257,120. The total savings from the matching program was \$4,779,943. The cost ratio for this matching program was 0.0538 (rounded), resulting in a favorable match.

Cost-Benefit Waivers: There were no cost-benefit waivers for this matching program.

Title: Match #14 – Federal Pell Grant

Participating Agencies: U.S. Department of Defense (source agency) and the U.S. Department of Education (recipient agency)

Purpose: To provide the Department 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, 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

07/27/18 – 83 FR 35626

Date and Citation of Current Matching Notice: January 29, 2021 – [86 FR 7547](#)

Effective Dates: The CMA was re-established as an 18-month CMA that ran from March 1, 2021, to August 31, 2022. The CMA was renewed and is currently running from September 1, 2022, to August 31, 2023.

Cost-Benefit Analysis: The total cost for performing the match was \$20,815. The total savings from the matching program was \$627,908. The cost-benefit ratio for this matching program was 0.033 (rounded), resulting in a favorable match.

Cost-Benefit Waivers: There were no cost-benefit waivers for this matching program.

Title: Match #1100 – Medical Improvement Not Expected (MINE) Disability Data

Participating Agencies: U.S. Social Security Administration (SSA) (source agency) and the U.S. Department of Education (recipient agency)

Purpose: To enable the Department to proactively send notices to certain borrowers who have balances on loans under title IV of the HEA, or who have had a title IV loan written off due to default and to recipients who have an outstanding service or repayment obligation under a Teacher Education Assistance for College and Higher Education (TEACH) Grant whom SSA identifies as disabled. The Department's notices inform these borrowers or recipients that the Department will discharge their title IV loans or TEACH Grant service or repayment obligations no earlier than 61 days from the date that the Department sends the notification to them unless the borrower or recipient chooses to have their loans or service obligations discharged earlier or chooses to opt out of the Total and Permanent Disability (TPD) discharge within 60 days from the date that the Department sends the notification to the borrower or recipient. The notices also will inform these borrowers and recipients that the Department has accepted their matched Medical Improvement Not Expected (MINE) disability data from SSA, in lieu of their submission of a MINE award letter with their TPD application, thereby simplifying the TPD discharge process for them.

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

Reissued Matching Notice:

07/19/18 – 83 FR 34126

Date and Citation of Current Matching Notice: August 23, 2021 – [86 FR 47092](#)

Effective Dates: The current CMA was re-established as an 18-month CMA that ran from September 30, 2021, to March 29, 2023. The CMA was renewed and is currently running from March 30, 2023, to March 29, 2024.

Cost-Benefit Analysis: The total cost for performing the match was \$23,919. The total savings from the matching program was \$1,797,587. The cost-benefit ratio for this matching program was 0.013 (rounded), resulting in a favorable match.

Cost-Benefit Waivers: There were no cost-benefit waivers for this matching program.

Title: Total and Permanent Disability (TPD) Discharge Benefits

Participating Agencies: U.S. Department of Veterans Affairs (VA) (source agency) and the U.S. Department of Education (recipient agency)

Purpose: This matching program assists the Department in its obligation to ensure that borrowers of title IV Loans or TEACH Grant service obligations more efficiently and effectively apply for TPD discharge of their title IV Loans or TEACH Grant service obligations. The Department proactively send notices to borrowers who VA has designated as (1) having a service-connected disability rating that is 100% disabling, or (2) being totally disabled based on an individual unemployability rating, informing them that they may be eligible for a TPD discharge. The notices also inform these borrowers that the Department will accept VA data matched information in lieu of the borrower's submission of a VA Statement with the borrower's TPD loan discharge application, thereby making it easier for these borrowers to submit a TPD loan discharge application to the Department.

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

Reissued Matching Notices:

10/10/18 – 83 FR 50903

Date and Citation of Current Matching Notice: April 29, 2021 - [86 FR 22640](#)

Effective Dates: The CMA was re-established as an 18-month CMA that ran from May 31, 2021, to November 30, 2022. The CMA was renewed and is currently running from December 1, 2022, to November 30, 2023.

Cost-Benefit Analysis: The total cost for performing the match was \$19,251. The total savings from the matching program was \$760,518. The cost-benefit ratio for this was 0.025 (rounded), resulting in a favorable match.

Cost-Benefit Waivers: There were no cost-benefit waivers for this matching program.

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

Participating Agencies: U.S. Department of Defense (source agency) and the U.S. Department of Education (recipient agency)

Purpose: To enable the Department to provide no-interest accrual benefits on qualifying loans made under title IV of the HEA to service members who were deployed to locations qualifying for IDP and HFP.

Initial Matching Notice: November 20, 2019, 84 FR 64052

Date and Citation of Current Matching Notice: April 4, 2023 – [88 FR 19941](#)

Effective Dates: The CMA was initially established as an 18-month CMA that ran from December 20, 2019, to June 19, 2021. The CMA was renewed and ran from June 20, 2021, to June 19, 2022. The CMA expired on June 19, 2022, and the current CMA was re-established as an 18-month CMA that will run from May 4, 2023, to November 3, 2024.

Cost-Benefit Analysis: The total cost for performing the match was \$15,823.73. The total savings from the matching program was \$1,854,793. The cost-benefit ratio for this was 0.004 (rounded), resulting in a favorable match.

Cost-Benefit Waivers: There were no cost-benefit waivers for this matching program.

Note: The CMA expired on June 19, 2022 and was re-established as an 18-month CMA that will run from May 4, 2023, to November 3, 2024. The CMA was not re-established for the remainder of 2022 following its expiration. The gap between the expiration of the previous CMA and the re-establishment of the CMA in 2023 was due to higher Department priorities.

Calendar Year 2022

1. For each of the ten matching programs that were active in the Calendar Year 2022, the Department fully adhered to the terms of the matching agreements, except for the Selective Service CMA and the Social Security Administration CMA (Match #1051), as detailed below.
2. For each of the Department's ten matching programs that were active in the Calendar Year 2022, disclosures of agency records for use in, and the purposes of, the matching programs continued to be justified, except the Selective Service CMA and the Social Security Administration CMA (Match #1051), as detailed below.
3. For each of the Department's ten matching programs that were active in the Calendar Year 2022, 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. The Department may have violated the terms of the Selective Service CMA in August 2021 after the Department's early implementation of provisions of the FAFSA Simplification Act (P.L. 116-2600) specific to student eligibility (i.e., requirements related to Selective Service registration and drug-related convictions) under title IV of the HEA. Congress provided the Department with the authority (paragraph (2) of section 702(n) of division FF of Public Law 116-260, the FAFSA Simplification Act) to implement such provisions early by publishing a notice in the Federal Register (published in June 2021, 86 FR 32252) regarding the early implementation that would remove the student eligibility requirements for title IV aid 60 days after publication. This notice stated that failing to register with the Selective Service would no longer impact a student's eligibility for aid under title IV of the HEA and removing the Selective Service registration question from the Free Application for Federal Student Aid (FAFSA). Therefore, once the early implementation occurred, the Department no longer had the authority under the HEA to conduct a matching program with the Selective Service System. However, the Department inadvertently continued to engage in matching past that date without the requisite authority. However, the Department did not make a determination to terminate the matching program with the Selective Service System (SSS) until Spring 2022 when the Department initiated standard procedures to renew the CMA with SSS during the ongoing implementation of the FAFSA Simplification Act and FUTURE Act. Once the Department became fully aware of the effects of implementing the FAFSA Simplification Act early by removing the Selective Service requirement, the Department concluded that the matching program with SSS was no longer authorized. However, the Department inadvertently violated the agreement by continuing to engage in matching for roughly one year (from August 2021 until July 2022) without the requisite authority. The Department did not re-establish this matching program, terminating the CMA as of July 1, 2022.
7. The Department has recently discovered that it did not fully adhere to the terms of the

SSA CMA (#1051) by sending a broader set of records than the set covered by the CMA itself. At this time, the Department does not have a mechanism to determine whether an individual seeking an FSA Identification number (FSA ID) is an “applicant” under the terms of the CMA or not; as such, the Department sent to SSA sets of records that contained at least some records on individuals who were not defined as being “applicants” in the CMA. Specifically, the Department sent records to SSA that consisted of a pool of individuals (e.g., endorsers, third-party preparers) who were not applying for financial assistance under title IV of the HEA) who were applying for an FSA ID. Relatedly, the Department sent records to SSA on such individuals for a different purpose than the purpose that is listed in the CMA. The stated purpose of the matching program in the CMA is: “to assist the U.S. Department of Education in its obligation to ensure that applicants for student financial assistance under title IV of the Higher Education Act of 1965, as amended (HEA) (20 U.S.C. § 1070 et seq.), satisfy eligibility requirements.” However, the Department sent the broader set of records on individuals to SSA for the purpose of both ensuring eligibility, where applicable, and broader identity verification, which was not defined as a purpose of the matching program. In addition, because this was not an anticipated purpose, the Cost-Benefit Analysis did not reflect the additional costs and benefits of including these individuals and purposes. The Department is currently working with SSA on the re-establishment of this CMA and will either expand the scope of the match to include additional individuals and purposes or will discontinue the unauthorized matching.