

PROCEDURES FOR COMPUTER MATCHING PROGRAMS

1. **REASON FOR ISSUE:** To revise VA Handbook 6300.7, Procedures for Computer Matching Programs.
2. **SUMMARY OF CONTENTS/MAJOR CHANGES:** This handbook updates organizational titles.
3. **RESPONSIBLE OFFICE:** Information Management Service (045A4), Office of Information and Technology.
4. **RELATED DIRECTIVE AND HANDBOOKS:** VA Directive 6300, Records and Information Management, and VA Handbooks 6300.1, Records Management Procedures, and 6300.4, Procedures for Processing Requests for Records Subject to the Privacy Act.
5. **RESCISSION:** None.

CERTIFIED BY:

BY DIRECTION OF THE
ACTING SECRETARY OF
VETERANS AFFAIRS:



Acting Principal Deputy Assistant Secretary
for Information and Technology

Robert P. Bubniak
Acting Principal Deputy Assistant Secretary
for Information and Technology

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- (a) Perform a benefit/cost analysis and share that analysis with the source agency.
 - (b) Negotiate and draft the matching agreement
 - (c) Publish the required notice in the Federal *Register* and report the matching program to OMB and specified Congressional Committees.
- (2) When VA is the recipient agency but not the beneficiary of a match with another Federal agency, the component proposing the match will:
- (a) Negotiate with the beneficiary agency for reimbursement of the costs incurred in publishing a notice in the *Federal Register*.
 - (b) Negotiate with the beneficiary agency the responsibility for performing the benefit/cost analysis.
- c. **Source Agency.** A Federal agency that discloses automated records from a system of records to another Federal agency or to a State or local governmental agency to be used in a matching program; or a State or local governmental agency that discloses records to a Federal agency to be used in a matching program.
- (1) When VA is the source agency and the beneficiary of a match with another Federal agency, the component proposing the match will:
- (a) Perform a benefit/cost analysis and share that analysis with the recipient agency.
 - (b) Negotiate and draft the matching agreement,
 - (c) Negotiate reimbursement to the recipient agency for the costs incurred in publishing notice of the match in the *Federal Register*.
- (2) When VA is the source agency but not the beneficiary of the match, the component proposing the match will:
- (a) Participate in negotiating the matching agreement.
 - (b) Review the recipient agency's benefit/cost analysis and supplement the analysis with VA data, as appropriate, for DIB review.
- d. **Non-Federal Agency.** A State or local governmental agency that receives records contained in a system of records from a Federal agency to be used in a matching program. When VA is a source agency for a match with a non-Federal agency:
- (1) The VA component proposing the match will be responsible for publishing the notice in the *Federal Register* and reporting the match to OMB and Congress.
 - (2) The non-Federal agency will provide the data needed for VA to carry out its reporting responsibilities, including benefit/cost analysis.
- e. **Federal Benefit Program.** Any program funded or administered by the Federal government, or by any agent or State on behalf of the Federal government, that provides cash or in-kind assistance in the form of payments, grants, loan, or loan guarantees to U.S. citizens or aliens lawfully admitted for permanent residence.

3. VA DATA INTEGRITY BOARD (DIB)

The DIB oversees and coordinates the VA computer matching program. The board reviews and approves ongoing matching programs, proposed matches, pilot matches, exclusions, extensions, and renewals.

a. Composition and Operation

(1) Membership includes the [VA Chief Information Officer (CIO)], the Under Secretary for Benefits, the Under Secretary for Health, the Inspector General, and the Privacy Act Officer. The [VA CIO] is the Chairperson of the DIB. The Director, Information Management Service (Privacy Act Officer), serves as the Executive Secretary of the DIB and provides staff support. GC provides legal advice and assistance to the DIB.

(2) The DIB meets to review and approve matching agreements, pilot matches, and requests for exclusion, and perform other duties. Meetings are scheduled when the head of the component proposing a match submits a written request to the Chairperson identifying the match to be reviewed. Much of the detail work of the DIB may be delegated; however, the approval of matching agreements is by vote of the DIB. While each principal DIB member may delegate his or her voting authority, or proxy, the actual decision on whether to approve a matching agreement is made by the DIB member.

b. Responsibilities. The DIB reviews, approves or disapproves, and maintains matching agreements or, in the case of internal matches subject to the Act, Memorandums of Understanding for each matching program in which VA will be a participant. DIB action is based upon assessment of the adequacy of a matching agreement to ensure compliance with Privacy Act subsection (o), and all relevant statutes, regulations and guidelines. The reasons for approving or disapproving a match must be documented.

(1) Review of Proposals. The DIB will ensure that matching agreements and programs are in conformance with provisions of the Act as well as other relevant statutes, regulations, or guidelines, and will assess the benefits and costs of such programs. Matching agreements should remain in force only as long as necessary to accomplish the specific purpose of the match. Agreements automatically expire after 18 months unless: (a) the agreement or the DIB specifies a shorter period, or (b) within three months prior to the actual expiration date, the DIB approves an extension not to exceed one year.

(2) Extensions. The component participating in the match must provide the DIB with certification from each party to the agreement that the program has been conducted in compliance with the agreement and that it will be conducted without change during the extension. Additional information should include the reasons that the match should be extended, including any updated benefit/cost information. GC concurrence will be obtained. The DIB must make its decision to extend a match within three months prior to the expiration date.

(3) Renewals. Renewals are treated as initial agreements and require the same documentation. Each benefit/cost analysis must contain updated information based on the actual experience of the match. All documentation must be submitted to the DIB at least two full months prior to expiration of the match.

(4) Compression of Processing Steps. Should a proposal be made that a match compress the due process steps of verification and notice and wait (paragraphs 4f(1) and 4f(2) of this handbook) into a single step, the component seeking such compression must provide supporting documentation to justify compression when submitting the matching agreement for DIB review. The DIB will determine whether compression of these steps is appropriate. Justifying