



BUREAU OF THE
Fiscal Service
U.S. DEPARTMENT OF THE TREASURY

Computer Matching Agreements: A Business Enabler for Do Not Pay

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Do Not Pay (DNP) Business Center
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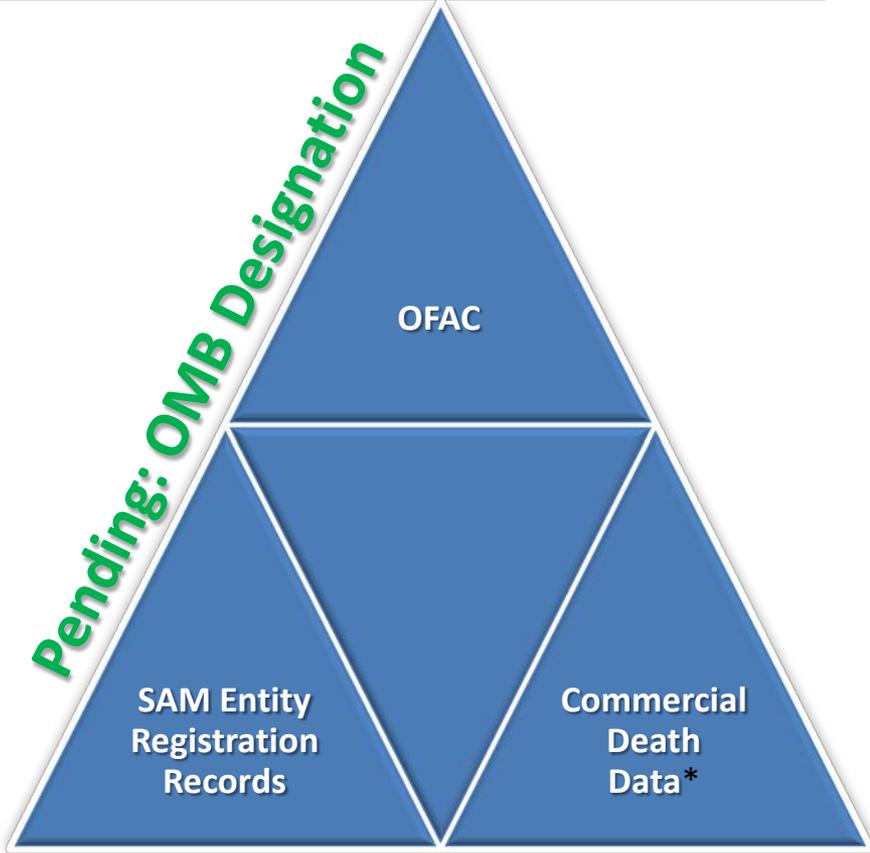
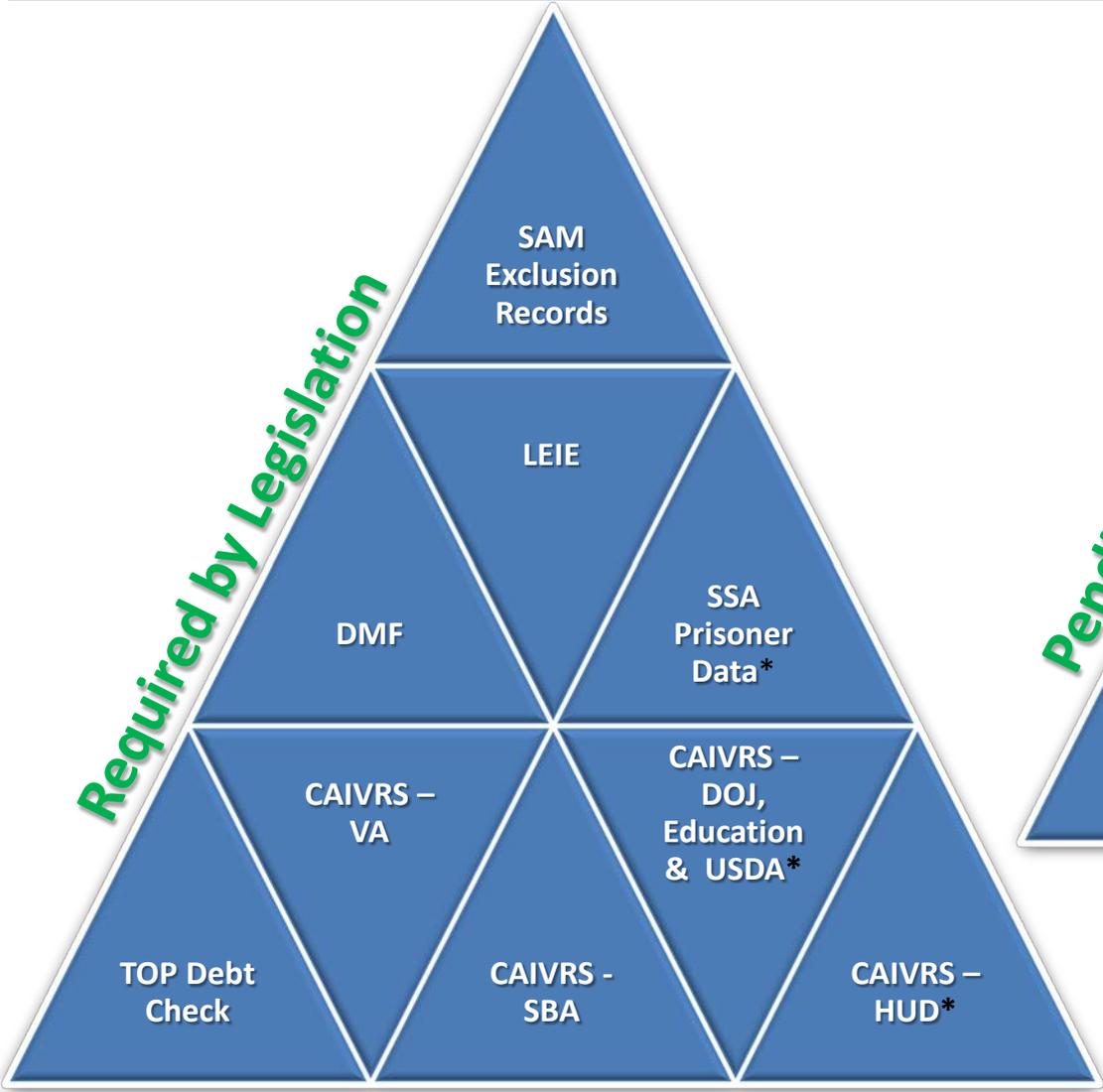
Agenda

- Key Terms
- Public vs. Restricted (a.k.a. Privacy Act protected) Data Sources
- Computer Matching Agreement (CMA) Process
- Roles & Responsibilities
- Next Steps
- Appendix

Key Terms and Concepts

- Treasury's Working System
- Public vs. Restricted (Privacy Act protected) Data Sources
- System of Records Notice (SORN)
- Computer Matching Agreement (CMA)
- Memoranda of Understanding (MOU)

Treasury's Working System



* Currently not available to customers as of 20 MAY 2015

Data Source Categorizations

Public

DMF

OFAC

Restricted

CAIVRS

SSA Prisoner Data

SAM Entity Registry Records

TOP Debt Check

Both

LEIE

SAM Exclusion Records

Example: Public vs. Restricted with SAM Exclusion Records

	January, 2014	February, 2014
Total Payments	\$191,225,037,880	\$155,985,536,614
SAM Exclusions- Public Matches	\$876,707,274	\$840,440,999
SAM Exclusions- Public Improper	\$3,838	\$2,698
Matches as % of Payments	0.4585%	0.5388%
Improper as % of Matches	0.0004%	0.0003%



	January, 2014	February, 2014
Total Payments	\$191,225,037,880	\$155,985,536,614
SAM Exclusions- Private Matches	\$1,593,129	\$2,638,512
SAM Exclusions- Private Improper		
Matches as % of Payments	0.001%	0.002%
Improper as % of Matches		

Reduction in Matches 99.75%

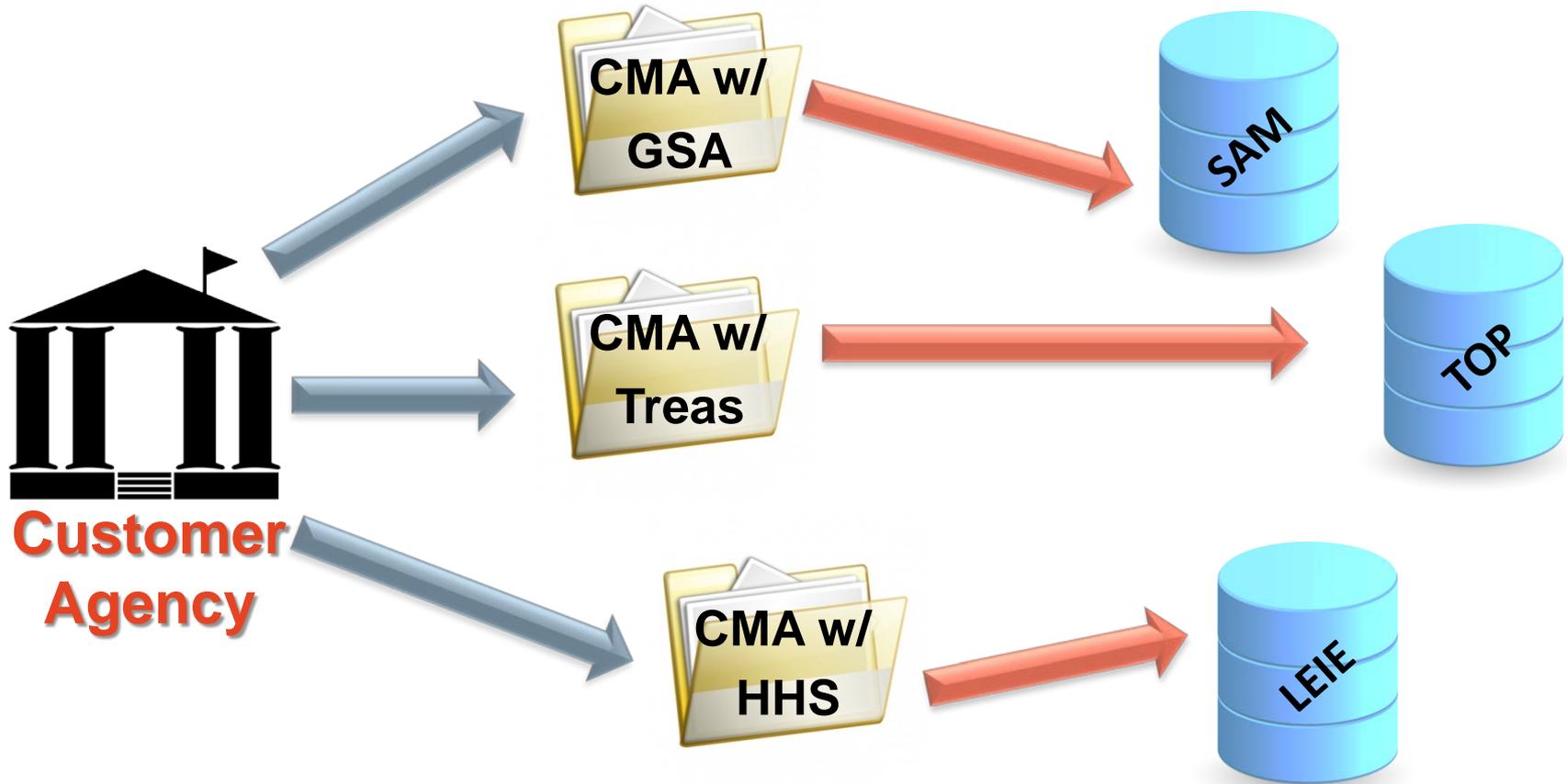
PACER			
Name	TIN	State	Payment
John Smith	123456789	CA	\$100.00

SAM Exclusions Public		
Name	TIN	State
John A. Smith	-	AL
John B. Smith	-	AZ
John C. Smith	-	AR
John D. Smith	-	DE
John E. Smith	-	HI
John F. Smith	-	IL
John G. Smith	-	IA
John H. Smith	-	IN
John I. Smith	-	MO
John J. Smith	-	OH
John K. Smith	-	CA
John L. Smith	-	UT
John M. Smith	-	ID
John N. Smith	-	TN
John O. Smith	-	KY
John P. Smith	-	FL
John Q. Smith	-	GA
John R. Smith	-	RI
John S. Smith	-	VT
John T. Smith	-	MA
John U. Smith	-	PA

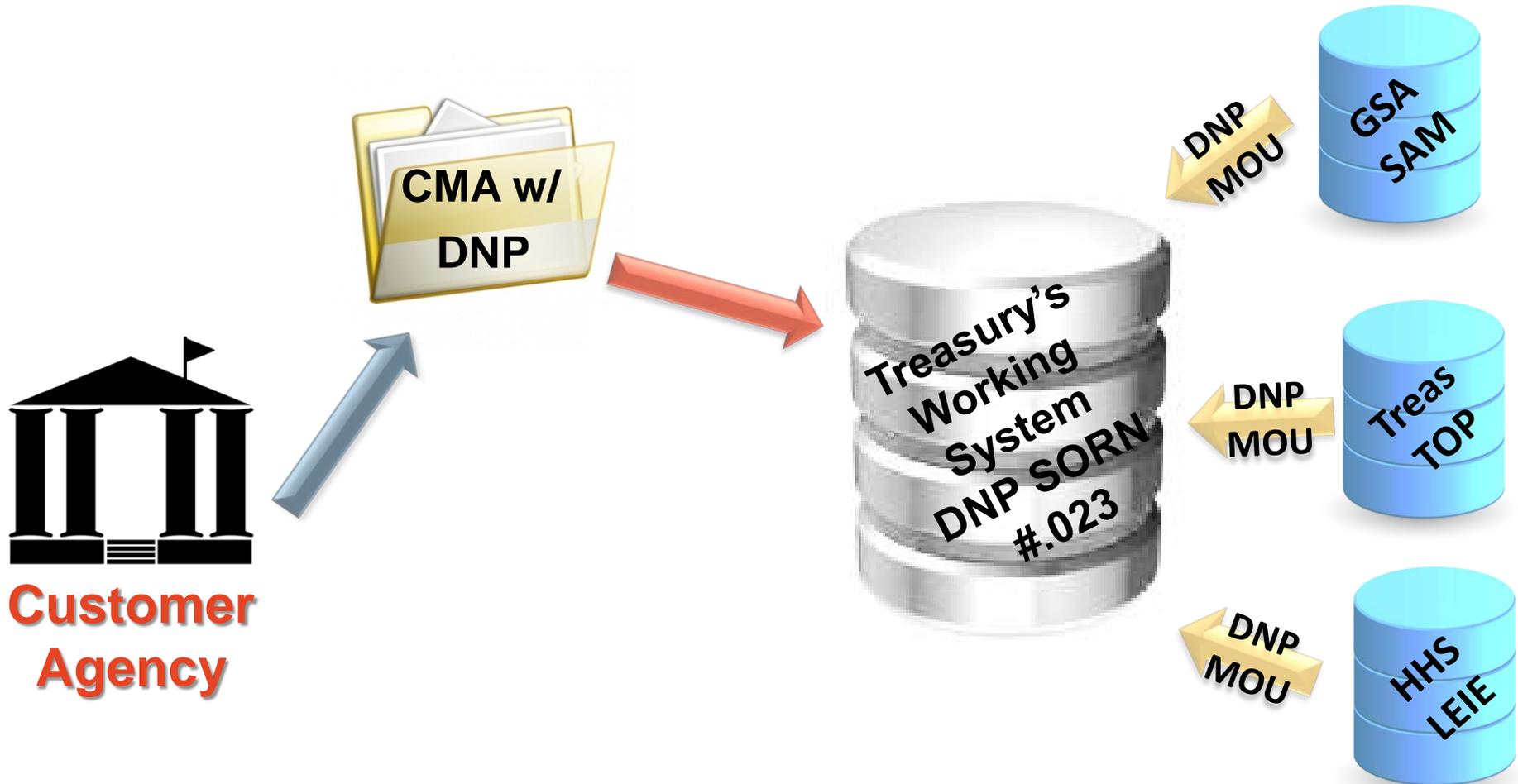
PACER			
Name	TIN	State	Payment
John Smith	123456789	CA	\$100.00

SAM Exclusions Private		
Name	TIN	State
John A. Smith	-	AL
John B. Smith	012345678	AZ
John C. Smith	234567890	AR
John D. Smith	345678910	DE
John E. Smith	456789012	HI
John F. Smith	567890123	IL
John G. Smith	678901234	IA
John H. Smith	789012345	IN
John I. Smith	890123456	MO
John J. Smith	-	OH
John K. Smith	102030405	CA
John L. Smith	901234567	UT
John M. Smith	987654321	ID
John N. Smith	987654321	TN
John O. Smith	-	KY
John P. Smith	-	FL
John Q. Smith	765432108	GA
John R. Smith	654321098	RI
John S. Smith	543210987	VT
John T. Smith	432109876	MA
John U. Smith	032109875	PA

Typical CMA Process without DNP SORN



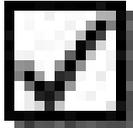
CMA Process with DNP SORN



CMA Triggers



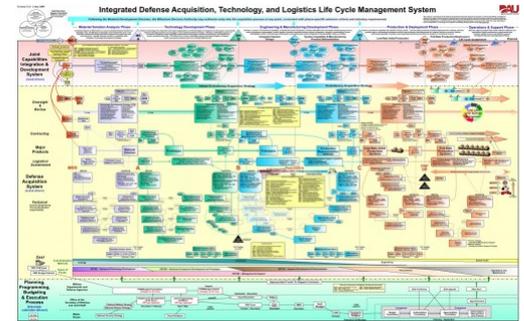
U.S. Citizen



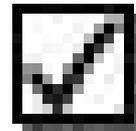
Deceased



CMA Triggers



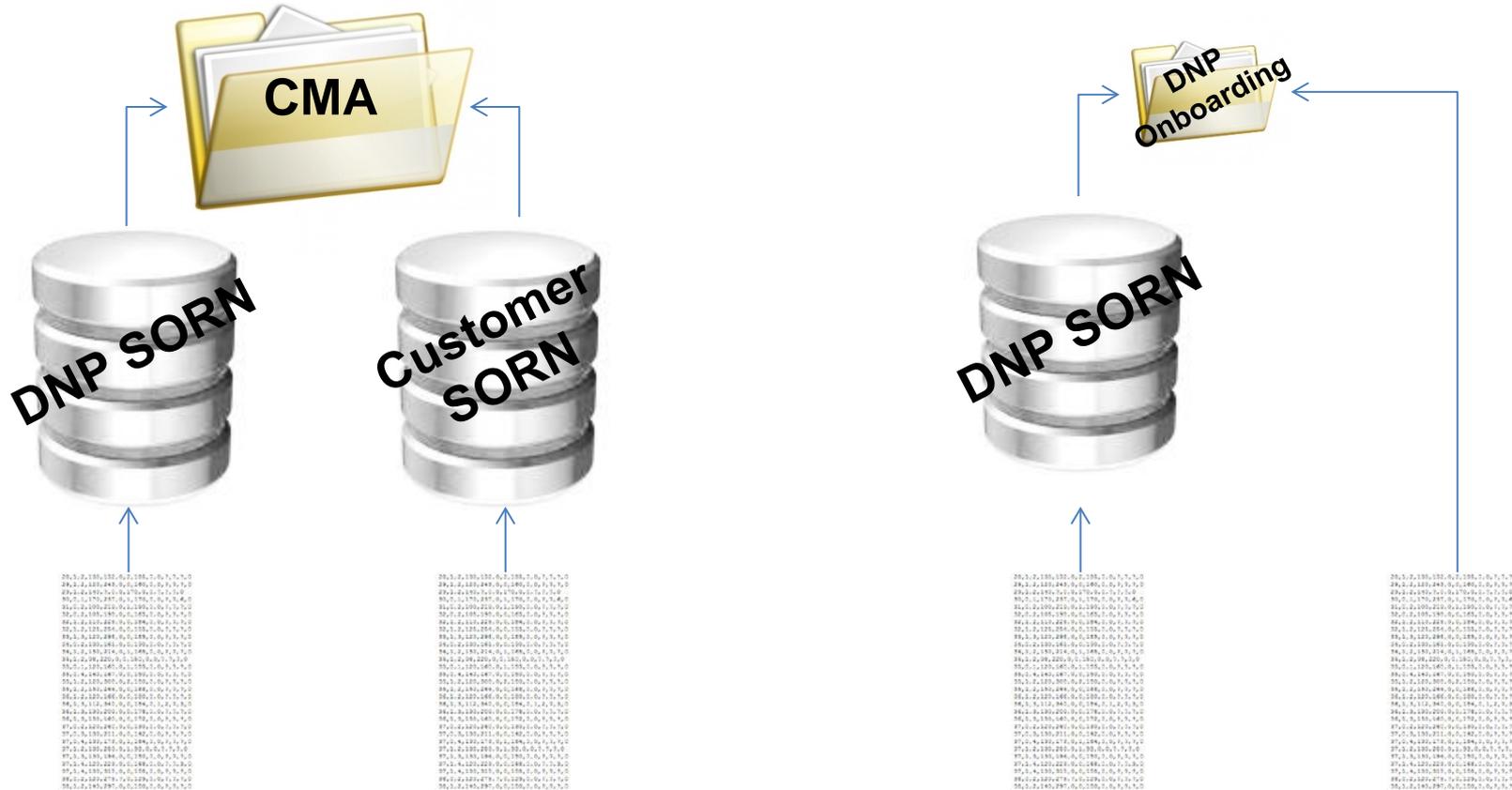
Matching to provide cash or in-kind assistance for Federal benefit programs



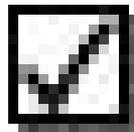
Matching to make procurement decisions



CMA Triggers



Matching files each of which is aligned to a SORN



Matching a file that is aligned to a SORN to another file not covered by a SORN



Applicability of CMAs to DNP Services

Not Applicable



Payment Integration

Single Online Search

For Consideration



Analytics

Batch

Continuous Monitoring

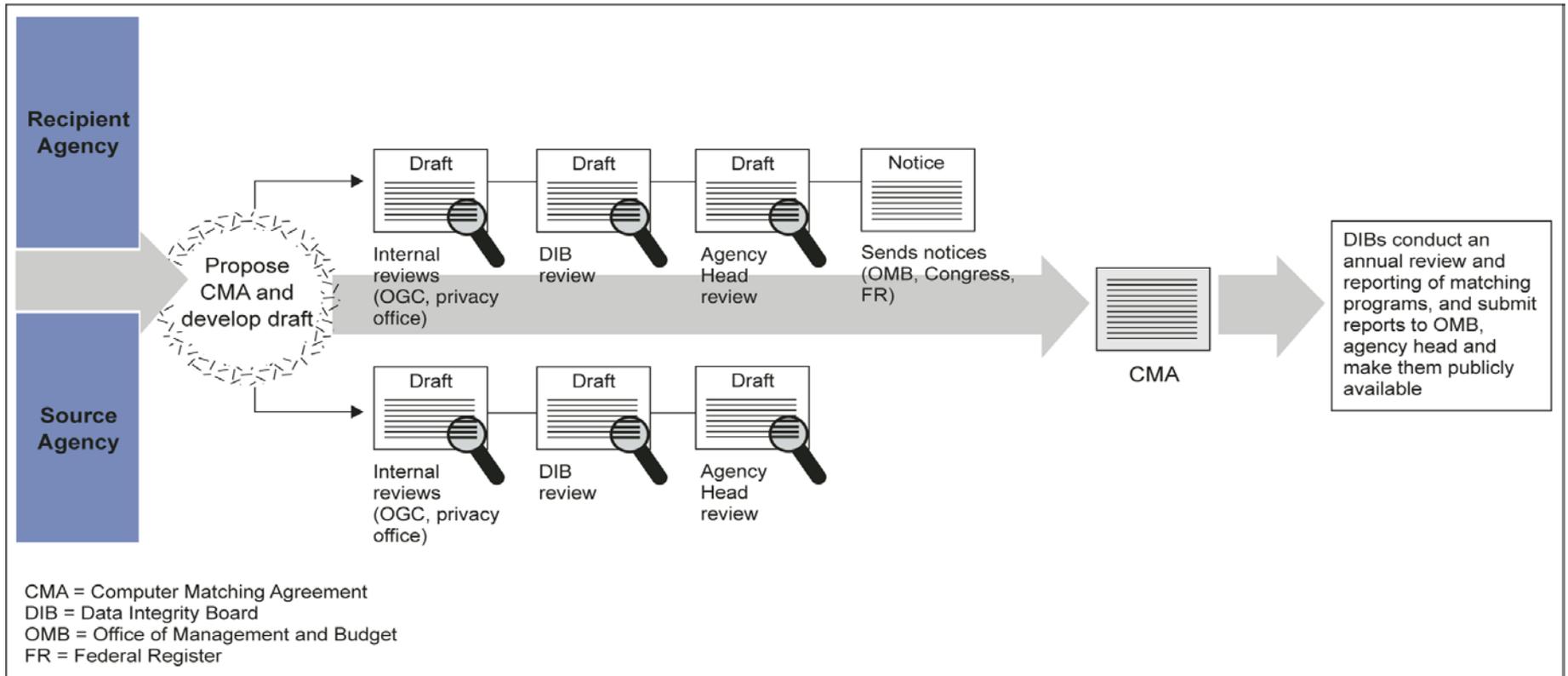
CMA Process – OMB M-13-20

Highlights of OMB M-13-20 (16 AUG 2013), Protecting Privacy while Reducing Improper Payments with the Do Not Pay Initiative:

Topic	Excerpt
CMA Lifespan	Matching programs have a termination date of less than three years. Agencies may renew these CMAs for a maximum of three years.
Review Period	Data Integrity Boards (DIBs) have a 60-day deadline for review of a CMA. If circumstances do not permit the DIB to approve or disapprove the DNP matching program within 60 days, the DIB shall provide a brief memorandum to the head of the agency (or to the Inspector General in cases where the Inspector General proposed the matching program) describing the necessity for the delay.
Cost Benefit Analysis	Agencies' cost-benefit analyses for a DNP matching program need not contain a specific estimate of any savings.

CMA Process - Documentation

Recipient Agency = DNP Customers
Source Agency = Treasury's DNP



Source: GAO analysis of Privacy Act requirements and agency documentation.

Roles & Responsibilities – DNP

Role	Responsibility
Relationship Managers	<ol style="list-style-type: none">1. Identify CMA candidates of existing batch and ConMon users2. Direct questions on CMA template to DNP3. Increase awareness of potential benefits of matching against restricted data sources4. Maintain current onboarding documentation that reflects CMAs in effect
DNP Senior Privacy Analyst	<ol style="list-style-type: none">1. Shepherd CMAs thru Treasury's DIB review process2. Work with recipient agencies to populate CMA template3. Brief recipient agency DIBs on specific requirements of DNP CMAs, as requested
DNP Legal	<ol style="list-style-type: none">1. Put MOUs in place for remaining restricted data sources of Treasury's Working System2. Confirm that access is authorized to match against data sources cited in CMAs3. Continue reviewing and approving onboarding documentation (e.g., legal questionnaire)

Roles & Responsibilities – DIBs

OMB M-13-20 specific requirements:

Topic	Excerpt
Question Period	If DIBs have questions about a CMA that has been submitted for review and approval, those questions shall be submitted to agency officials by day 30 of the 60-day period, if possible. Agency officials shall answer any questions from DIBs in a timely manner.
Decisional Documentation	When making a determination, DIBs shall document in writing their reasons for approving or disapproving a matching program. This documentation shall be provided to the appropriate agency officials.

Roles & Responsibilities – DNP Customers

Dependent on internal protocols and organizational structure

Role	Responsibility
Privacy Professional	<ol style="list-style-type: none"> 1. Determine if a CMA would benefit your agency <ol style="list-style-type: none"> a) What's the impact on existing batch/ConMon activities using PACER when automatic matching against PAM commences with R3.0? 2. If a CMA would be advantageous, what SORN aligns to the file that you wish to match against? 3. Will existing SORN routine uses permit disclosure to DNP? <ol style="list-style-type: none"> a) If yes, populate CMA template and release to DNP b) If not, amend SORN c) Not sure, ask your Legal department
System Owners or Program Managers	<ol style="list-style-type: none"> 1. Work with Privacy Professional to document data transfer requirements 2. Identify systems associated with files being considered for matching programs
Legal	<ol style="list-style-type: none"> 1. Support CMA development efforts, as appropriate 2. If a Shared Service Provider (SSP), determine who maintains the records (SSP or their customers)? Whose SORs (SSP or their customers) are aligned to the records? <ol style="list-style-type: none"> a) If their customer, determine if existing Reimbursable Service Agreement sufficiently covers records disclosure in order to perform matching to Treasury's Working System with their customers' data? b) If SSP, confirm Privacy Act responsibilities have been sufficiently delegated.

Next Steps & Resources

- Please contact your Relationship Manager or DNP Senior Agency Liaison if you think a CMA would benefit your agency
- DNP Privacy site with SORN & future CMAs
 - <http://www.donotpay.treas.gov/Privacy.htm>
- Marcela Souaya, DNP Senior Privacy Analyst
 - 202.504.3525 or marcela.souaya@fiscal.treasury.gov

Appendix

Original Source Agencies & System Acronyms

TREASURY'S WORKING SYSTEM

1. Credit Alert System or Credit Alert Interactive Voice Response System (CAIVRS)
System inputs from DOJ, Education, VA, SBA, HUD & USDA
2. Dept. of Health and Human Services' (HHS) Office of Inspector General (OIG)
List of Excluded Individuals & Entities (LEIE)
3. General Services Administration's (GSA) System for Award Management (SAM)
Entity Registry Records
4. GSA SAM Exclusion Records
5. Social Security Administration's (SSA) Death Master File (DMF)
6. SSA Prisoner Data
7. Treasury's Office of Foreign Assets Control (OFAC)
8. Treasury Offset Program (TOP) Debt Check

Overview of Data Source Functions

1. **CAIVRS (Restricted)** - Verify whether an individual is a delinquent Federal borrower
2. **DMF (Public)** - Verify whether a payee is deceased
3. **LEIE (Public & Restricted)** - Verify whether payments are to entities excluded from participating in Federal health care programs
4. **SAM Entity Registry Records (Restricted)** – Verify that a vendor seeking to do business with the Federal Government has registered in accordance with the Federal Acquisition Regulation (FAR) by providing basic information relevant to procurement and financial transactions
5. **SAM Exclusion Records (Public & Restricted)** - Verify whether payments are to debarred individuals
6. **TOP Debt Check (Restricted)** - Verify whether payee owes delinquent non-tax debts to Federal Government (and participating States)
7. **OFAC (Public)** – Verify the identification of individuals and entities that are prohibited from entering into financial transactions with U.S. financial institutions and the U.S. Government
8. **SSA Prisoner Data (Restricted)** - Verify whether an individual is incarcerated