

Document Purpose

This Practices Guide is a brief document that provides an overview describing the best practices, activities, attributes, and related templates, tools, information, and key terminology of industry-leading project management practices and their accompanying project management templates.

Background

The Department of Health and Human Services (HHS) Enterprise Performance Life Cycle (EPLC) is a framework to enhance Information Technology (IT) governance through rigorous application of sound investment and project management principles, and industry best practices. The EPLC provides the context for the governance process and describes interdependencies between its project management, investment management, and capital planning components. The EPLC framework establishes an environment in which HHS IT investments and projects consistently achieve successful outcomes that align with Department and Operating Division goals and objectives.

A Computer Match Agreement (CMA) is a written accord that establishes the conditions, safeguards, and procedures under which a Federal organization agrees to disclose data where there is a computerized comparison of two or more automated System of Records (SORs). In conjunction with a CMA, an Inter/Intra-agency Agreement (IA) is also prepared when the SOR(s) involved in the comparison are the responsibility of another Federal Agency.

Practice Overview

The Department of Health and Human Services (HHS) defines a “record” as any item, collection, or grouping of information about an individual that is maintained by an Agency. A System of Records (SOR) is a grouping of any records under the control of any Agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual, including, but not limited to:

- Name
- Education
- Criminal History
- Medical History
- Employment History
- Financial Transactions
- Any identifying number, symbol, or other identifier such as a finger print, voice print, or photograph

Computer matching occurs when Federal and/or State Agencies share information in identifiable form (IIF). A “matching program” is any computerized comparison of two or more SORs, or a SOR with non-Federal records for the purpose of:

- Establishing or verifying eligibility or compliance with laws or regulations of applicants or recipients/beneficiaries
- Recouping payments or overpayments

Practice Best Practices

When a CMA is Required

Agencies use computer matching to conduct many government functions, including establishing or verifying eligibility for Federal benefit programs, or identifying payments/debts owned to government Agencies. A CMA is a written contract that establishes the conditions, safeguards, and procedures under which Federal Agencies agree to disclose data where there is a computerized comparison of two or more automated SORs. The Computer Matching and Privacy Protection Act also require Agencies engaged in computer matching activities to:

- Provide notice to individuals if their Interchange File Format (IFF) is being computer matched
- Allow individuals the opportunity to refute adverse information before having a benefit denied or terminated
- Establish data integrity boards to oversee computer-matching activities

The CMA encompasses all IT projects. CMAs must be developed when any computerized comparison of two or more SORs will occur. In addition, CMAs must be developed when matches involve Federal personnel or payroll records. In concurrence with a CMA, a project must also prepare an Inter/Intra-Agency Agreement (IA) when the SOR(s) involved in the comparison are the responsibility of another Federal Agency.

An IA, also known as a reimbursable agreement, is a written compact in which a Federal agency agrees to provide to, purchase from, or exchange with another Federal agency services, supplies or equipment. An IA is the document with which the receiving agency agrees to reimburse the providing agency for the cost of the services, supplies, or equipment. In certain cases, two or more agencies may agree to exchange services, supplies, or equipment without a transfer of funds. Although an IA is usually between two agencies, on occasion, an IA may involve more than two agencies.

All funded IT projects must prepare an IA in order to provide to, purchase from, or exchange with another Federal agency services, supplies, or equipment.

Elements of a CMA

- Name
- Security classification
- Participating Agencies
- Authority for conducting matching program
- Categories of records and individuals covered by the match
- Inclusive dates of the match

Timeframe and Completion of the CMA

The HHS Enterprise Performance Life Cycle (EPLC) requires as part of a project's Design Phase that security documents (Certification and Accreditation [C&A], Privacy Impact Assessment [PIA], System of Record Notice [SORN], and Computer Match Agreement [CMA] be reviewed for completeness and accuracy. It is the responsibility of the IT Project Manager to ensure that the System Owner prepares and/or approves the initial CMA. The IT Project Manager and/or System Owner must then submit the CMA to the Office of the Chief Information Security Officer (OCISO) for formal review and clearance of the CMA.

Practice Activities

For software development projects the following practice activities are appropriate:

- **Identify** – Identify the need for a CMA
- **Document** – Document the fields / systems that will be exchanged
- **Develop Agreement** – Prepare the Inter/Intra-Agency Agreement (agreement between the sending and receiving agency)
- **Review** – Review the CMA for completeness and accuracy
- **Submit** – Submit the CMA to the OCISO for formal review and clearance