



2025 Department of Health and Human Services (HHS)
Annual Computer Matching Report

A. Current Composition of the HHS Data Integrity Board (DIB)

1. Names and positions of the members of the DIB

- Clark Minor, Chairperson and Voting Member, HHS Chief Information Officer
- William H. Holzerland, Mandatory Voting Member, Deputy Agency Chief FOIA Officer
- Thomas March Bell, Mandatory Voting Member, HHS Inspector General

2. Name and Contact Information of the DIB Secretary

[currently vacant – contact the HHS Privacy Act Office]
200 Independence Ave., SW
Washington, D.C. 20201
HHSPrivacyActOffice@hhs.gov

3. Any Changes in Membership or Structure of the DIB

- Chairperson changed from Scott W. Rowell, Deputy Chief of Staff for Operations, to Clark Minor, HHS Chief Information Officer

B. Matching Agreements HHS Entered Into in 2025

• **CMA HHS #2501**

Participant Agencies: HHS's Administration for Children and Families (ACF), Office of Child Support Enforcement (OCSE) is the source agency and the Social Security Administration (SSA) is the recipient agency.

Title: "Verification of Eligibility for Extra Help (Low Income Subsidy) Under the Medicare Part D Prescription Drug Program"

Description: In this matching program, SSA provides names and Social Security Numbers of Extra Help Program applicants/beneficiaries to OCSE daily, which OCSE uses to provide quarterly wage and unemployment insurance information about the applicants/beneficiaries to SSA from ACF/OCSE's National Directory of New Hires (NDNH) system of records. The NDNH information assists SSA in determining new applicants' and existing beneficiaries' eligibility for low-income subsidy assistance (i.e., extra help) under the Medicare prescription drug plan and in administering the Extra Help program.

Link posted in the Agency's website:

Matching Notice: <https://www.federalregister.gov/documents/2025/04/11/2025-06167/privacy-act-of-1974-matching-program>

Matching Agreement:

https://www.ssa.gov/privacy/cma/3.27.25%20Match%201306%20Final%20Copy%20-%20Formatted_Executed_03.27.25.pdf

Please provide an account of whether the agency has fully adhered to the terms of the matching agreement. Yes, ACF has fully adhered to the terms of the matching agreement.

Please provide an account of whether all disclosures of agency records for use in the matching program continue to be justified. Yes, the disclosures made for use in the matching program continue to be justified.

Please indicate whether a cost-benefit analysis was performed, the results of the cost-benefit analysis, and an explanation of why the agency proceeded with any matching program for which the results of the cost-benefit analysis did not demonstrate that the program is likely to be cost effective. Yes, a cost-benefit analysis was performed by SSA. In their current CBA, they state that the benefit of conducting this matching operation is the increased accuracy of their subsidy determinations, and the cost-savings gained by reducing the need for manual verifications by Field Offices of all income and resource allegations on Medicare Part D subsidy initial and redetermination applications.

For Fiscal Year (FY) 2023, the total cost savings benefits realized from this matching operation total is approximately \$22,829,063.

- **CMA HHS #2502**

Participant Agencies: HHS's Administration for Children and Families (ACF)/Office of Child Support Enforcement (OCSE) is the source agency, and each participating state workforce agency (SWA) administering the Unemployment Compensation Program is a non-federal agency.

Title: "Administration of Unemployment Compensation Program"

Description: In this matching program, ACF/OCSE gives each participating state agency new hire and quarterly wage information from ACF/OCSE's National Directory of New Hires (NDNH) system of records, on a weekly basis, pertaining to individual applicants for or recipients of unemployment compensation (UC) benefits. The state agency uses the NDNH comparison results to establish or verify the individuals' eligibility for benefits or continuing compliance with statutory and regulatory requirements governing the UC program.

Link posted in the Agency's website:

Matching Notice: <https://www.federalregister.gov/documents/2025/06/17/2025-10981/privacy-act-of-1974-matching-program>

Matching Agreement: <https://www.hhs.gov/sites/default/files/hhs-swa-uc-cma-2502.pdf>

Please provide an account of whether the agency has fully adhered to the terms of the matching agreement. Yes, ACF/OCSE has fully adhered to the terms of the matching agreement.

Please provide an account of whether all disclosures of agency records for use in the matching program continue to be justified. Yes, the disclosures made for use in the matching program continue to be justified. The Department of Labor (DOL) stated that access to the comprehensive wage and unemployment information maintained in the NDNH provides SWAs with information about whether UC claimants have returned to work and helps SWAs to prevent and recover improper overpayments

Please indicate whether a cost-benefit analysis was performed, the results of the cost-benefit analysis, and an explanation of why the agency proceeded with any matching program for which the results of the cost-benefit analysis did not demonstrate that the program is likely to be cost effective. Yes, DOL provided a cost-benefit analysis (FY23), which demonstrated the matching program is likely to be cost effective. The \$2.6M fees to access the NDNH are significantly less than the benefits, which was approximately \$57.4M in overpayments prevented and \$22.4M recovered overpayments. DOL reported the net benefit to SWAs that is attributable to the NDNH is estimated to be \$77.18M.

- **CMA HHS #2503**

Participant Agencies: HHS's Administration for Children and Families (ACF), Office of Child Support Enforcement (OCSE) is the source agency, and each participating state agency administering the Temporary Assistance for Needy Families (TANF) Program is a non-federal agency.

Title: "Verification of State Temporary Assistance for Needy Families Program (TANF) Eligibility"

Description: This matching program provides each participating state agency with new hire, quarterly wage, and unemployment insurance information from ACF/OCSE's National Directory of New Hires (NDNH) system of records, on a monthly basis, pertaining to individual applicants for or recipients of assistance under the TANF program. The state agency uses the match results to establish or verify applicants' and recipients' eligibility for assistance under the TANF program and for the additional purposes of updating applicants' and recipients' work activity information and contact information and updating their employers' contact information.

Link posted in the Agency's website:

Matching Notice: <https://www.federalregister.gov/documents/2025/06/18/2025-10985/privacy-act-of-1974-matching-program>

Matching Agreement <https://www.hhs.gov/sites/default/files/hhs-tanf-cma-2503.pdf>

Please provide an account of whether the agency has fully adhered to the terms of the matching agreement. Yes, ACF/OCSE has fully adhered to the terms of the matching agreement.

Please provide an account of whether all disclosures of agency records for use in the matching program continue to be justified. Yes, the disclosures made for use in the matching program continue to be justified. The NDNH helps state agencies with the administration of their TANF programs by establishing or verifying an individual's eligibility for TANF assistance, reducing agency payment errors and maintaining program integrity, including determining whether duplicate participation exists.

Please indicate whether a cost-benefit analysis was performed, the results of the cost-benefit analysis, and an explanation of why the agency proceeded with any matching program for which the results of the cost-benefit analysis did not demonstrate that the program is likely to be cost effective. Yes, ACF/OCSE prepared a cost-benefit analysis based on information reported by five of the eight participating state TANF agencies in FY23. Those five TANF agencies collectively avoided approximately \$358,119 in improper payments to TANF recipients with previously unknown earnings. The combined cost for the five states to participate in the TANF-NDNH computer matching program for federal fiscal year 2023 was \$237,838.

The actual cost avoidance may be even higher than reported because the report includes only the first month avoided costs. It is likely that several TANF recipients whose earnings were discovered through the match would have received an incorrect benefit amount over multiple months had the state not used the NDNH.

- **CMA HHS #2504**

Participant Agencies: HHS's Centers for Medicare & Medicaid Services (CMS) as the recipient agency and the State Based Administering Entities (AE) as the source agency.

Title: "Determining Eligibility for Enrollment in Applicable State Health Subsidy Programs under the Patient Protection and Affordable Care Act"

Description: In this matching program, CMS provides to each AE, through the Data Services Hub (Hub), data from CMS's HIX system of records, which CMS obtains from source federal agencies under other Marketplace-related matching programs for the AE to use in determining individuals' eligibility for state health subsidy programs. CMS provides such data to an AE in response to identifying information the AE submits to CMS through the Hub about applicants, enrollees, and other relevant individuals. To avoid dual enrollments, each AE shares data under this agreement with CMS and other AEs, verifying whether the individuals are enrolled in or eligible for Medicaid or the Children's Health Insurance Program (CHIP).

Link posted in the Agency's website:

Matching Notice: <https://www.federalregister.gov/documents/2025/11/28/2025-21394/privacy-act-of-1974-matching-program-correction>

Matching Agreement: [Pending Publication]

Please provide an account of whether the agency has fully adhered to the terms of the matching agreement. Yes, CMS has fully adhered to the terms of the matching agreement.

Please provide an account of whether all disclosures of agency records for use in the matching program continue to be justified. All disclosures continue to be justified, as non-discretionary under the PPACA (i.e., as necessary in order to provide a single, streamlined application process that will maximize enrollments in Qualified Health Plans under the PPACA).

Please indicate whether a cost-benefit analysis was performed, the results of the cost-benefit analysis, and an explanation of why the agency proceeded with any matching program for which the results of the cost-benefit analysis did not demonstrate that the program is likely to be cost effective. A cost benefit analysis was prepared by CMS which covers all eight PPACA Marketplace matching programs; it estimates that the total cost for agencies to conduct the eight Marketplace matching programs exceeds \$58.9M per year. The analysis explains that the matching programs do not avoid or recover improper payments with which to offset the cost to conduct them but are justified for the following reasons:

1. The Marketplace matching programs have resulted in efficient and accurate consumer eligibility determinations and MEC checks, and substantially reduce the administrative burden on CMS and AEs.
2. The matching programs provide a significant benefit to the public by allowing CMS and AEs to determine consumer eligibility quickly and accurately for QHPS and IAPs while minimizing consumer burden.
3. An efficient eligibility and enrollment process contributes to greater numbers of consumers enrolling in Marketplace QHPs, resulting in a reduction of the uninsured population, therefore improving overall health care delivery.

Continuing to use the current matching program structure, which is less costly than any alternative structure, is expected to increase the public's trust in the participating agencies as stewards of taxpayer dollars.

C. Other HHS Privacy Act-Governed Matching Agreements in Effect in 2025

See 2024 Annual HHS Matching Activity Report:

- CMA HHS #2401 - effective 8/16/24-2/15/26; renewed to 2/15/27
- CMA HHS #2402 - effective 11/7/24-5/6/26; renewed to 5/6/27
- CMA HHS #2403 - effective 6/24/24-12/23/25; renewed 12/23/26
- CMA HHS #2404 - effective 4/5/25-10/4/26; to be renewed to 10/4/27
- CMA HHS #2405 - effective 1/2/25-7/1/26; to be renewed to 7/1/27
- CMA HHS #2406 - effective 2/6/25-8/5/26; to be renewed to 8/5/27

See 2023 Annual HHS Matching Activity Report:

- VA-PARIS - effective 3/25/23-9/25/24; renewed to 9/25/25
- CMA HHS #2301 - effective 9/9/23-3/8/25; renewed to 3/8/26
- CMA HHS #2302 - effective 6/23/23-12/22/24; renewed to 12/22/25
- MOU HHS #2303 - effective 10/20/23-4/19/25; to be renewed 4/19/25

- **CMA HHS #2304** - effective 11/2/23-5/1/25; to be renewed to 5/1/26
- **CMA HHS #2306** - effective 12/8/23-6/7/25; to be renewed to 6/7/26
- **CMA HHS #2307** - effective 10/15/23-4/14/25; renewed to 4/14/26
- **CMA HHS #2308** - effective 1/1/24-6/30/25; to be renewed to 6/30/26
- **CMA HHS #2309** - effective 12/20/23-6/19/25; to be renewed to 6/19/26
- **CMA HHS #2310** - effective 11/30/23-5/29/25; to be renewed to 5/29/26
- **CMA HHS #2311** - effective 2/13/24-8/12/25; to be renewed to 8/12/26
- **CMA HHS #2314** - effective 11/14/23-5/13/25; proposed for renewal to 5/13/26 but has been replaced by HHS #2504
- **CMA HHS #2315** - effective 3/9/24-9/8/25; to be renewed to 9/8/26

See 2022 Annual HHS Matching Activity Report:

- **CMA HHS #2202** - expired 4/4/25; replaced by HHS #2404
- **CMA HHS #2203** - expired 2/5/25; replaced by HHS #2406
- **CMA HHS #2304** - expired 1/1/25; replaced by HHS #2405
- **CMA HHS #2205** - expires 7/18/25; to be replaced by HHS #2502
- **CMA HHS #2206** - expires 7/18/25; to be replaced by HHS #2503
- **CMA HHS #2207** - expires 5/25/25; to be replaced by HHS #2501

See 2020 Annual HHS Matching Activity Report:

- **CMA HHS #2004** - effective 10/19/20-10/19/23; renewed to 10/19/26

D. Programs Where Cost/Benefit Analysis was waived

N/A

E. Matching Agreements the DIB Disapproved

N/A

F. Any Violations of Matching Agreements that Have Been Alleged or Identified

N/A