

**COMPUTER MATCHING AGREEMENT
BETWEEN THE
OFFICE OF PERSONNEL MANAGEMENT
AND THE
SOCIAL SECURITY ADMINISTRATION
MATCHES #1005, #1019, #1020, #1021**

I. Purpose

This computer matching agreement (agreement) sets forth the terms, conditions, and safeguards under which the Office of Personnel Management (OPM) will disclose civil service benefit and payment data to the Social Security Administration (SSA). SSA is legally required to offset specific benefits by a percentage of civil service benefits received (Spousal and Survivors benefits, Supplemental Security Income (SSI) benefits, and Retirement and Disability Insurance Benefits are offset by a percentage of the recipients' Federal Government pension benefits). SSA administers the Old Age, Survivors, Disability Insurance (OASDI), SSI, and Special Veterans' Benefits (SVB) programs. SSA will use the match results under this agreement to meet its civil service benefit offset obligations. Appendices A, B, C, and D of this agreement contain specific information on the matching programs that SSA will conduct under this agreement. SSA's Office of the Chief Actuary (OCA) will also use OPM's data for statistical and research purposes in tracking the size of, and impact on, subpopulations of government annuitants affected by the Government Pension Offset (GPO), the Windfall Elimination Provision (WEP), and in cost estimates of proposals to change the two provisions.

II. Legal Authority

The legal authority for SSA to conduct this matching activity for SSI purposes is section 1631(e)(1)(B) and (f) of the Social Security Act (Act) (42 U.S.C. § 1383(e)(1)(B) and (f)), and for SVB purposes, is section 806 of the Act (42 U.S.C. § 1006). The legal authority for SSA to conduct this matching activity for OASDI includes Section 224 of the Act (42 U.S.C. § 424a), which provides for the reduction of Social Security disability benefits when the disabled worker is also entitled to a Public Disability Benefit (PBD). Also, Section 215a(7)(A) of the Act (42 U.S.C. § 415) requires a modification to the computation formula reducing the Primary Insurance Amount of a retired and disabled worker entitled to a pension from employment not covered under Social Security. Section 202k(5)(A) (42 U.S.C. § 402) provides for the reduction of spouse's and survivor's benefits by a percentage of a pension received based on work not covered by Social Security.

Section 1631(f) of the Act (42 U.S.C. § 1383(f)) requires Federal agencies to furnish SSA with information necessary to verify eligibility. Section 224(h)(1) of the Act (42 U.S.C. § 424a(h)(1)) requires any Federal agency to provide SSA with information in

its possession that SSA may require for the purposes of making a timely determination of the amount of reduction under section 224 of the Act (42 U.S.C. § 424a).

This agreement is executed in compliance with the Privacy Act of 1974 (5 U.S.C. § 552a), as amended by the Computer Matching and Privacy Protection Act of 1988, and the regulations and guidance promulgated thereunder.

III. Definitions

- A. "Civil service benefit and payment data" means the information pertaining to benefit payments issued by OPM based on the person's Federal Government employment. Benefit payments currently include Civil Service Retirement System payments.
- B. "Electronic file" means the wire transfer method used to exchange computerized data.
- C. "GPO" means the Government Pension Offset provision, section 334 of Public Law (Pub. L.) 95-216, which requires reduction of the Social Security spouse's benefit of certain beneficiaries who also receive a Federal, State, or local government pension based on their own work where no Social Security taxes were paid.
- D. "PDB" means Public Disability Benefit, which is a periodic disability benefit paid under a law or plan of the United States, a State, a political subdivision thereof, or an instrumentality of two or more States. A civil service disability benefit is a Federal PDB.
- E. "WEP" means the Windfall Elimination Provision, section 113 of Pub. L. 98-21, which provides for a modified Social Security benefit formula to be used in computing Social Security benefits for certain persons who receive both a civil service benefit and a Social Security benefit.

IV. Responsibilities of the Parties

- A. SSA Responsibilities
 - 1. SSA will provide Congress and the Office of Management and Budget (OMB) with notice of this matching program and will publish the required matching notice in the Federal Register (Fed. Reg.).
 - 2. SSA will conduct the match using the individual's Social Security number (SSN), name, and date of birth on both the OPM file and SSA's databases covered under the following SSA Systems of Records (SOR): the Master Files of Social Security Number (SSN) Holders and SSN Applications (Enumeration System), 60-0058; the Master Beneficiary Record (MBR), 60-0090; and the Supplemental Security Income Record and Special Veterans Benefits Record (SSR/SVB), 60-0103.

3. SSA will use the information to: (1) identify SSI and SVB recipients with unreported income from civil service pensions (Match #1005, Appendix A); (2) identify beneficiaries receiving Title II disability insurance benefits who are also receiving a Federal civil service disability benefit (Match #1019, Appendix B); (3) identify Title II beneficiaries receiving retirement or disability insurance benefits who are also receiving a Federal Government pension benefit (Match #1020, Appendix C); and (4) identify Title II beneficiaries receiving auxiliary or survivor Social Security benefits, who are also receiving Federal Government pension benefits as retired civil service employees (Match #1021, Appendix D). *See Appendices A-D.*
4. SSA's OCA will use OPM's monthly extract files for statistical and research purposes in tracking the size of, and impact on, subpopulations of government annuitants affected by the GPO, WEP, and in cost estimates of proposals to change the two provisions.

B. OPM Responsibilities

1. OPM will disclose civil service benefit and payment data to SSA.
2. OPM will provide SSA with monthly electronic files from the OPM SOR published as OPM/Central-1 (Civil Service Retirement and Insurance Records). The files will contain civil service benefit and payment data including: name; SSN; date of birth; civil service claim number; first potential month and year of eligibility; first month, day, and year of entitlement; and amount of current gross civil service benefits. OPM will also disclose date of death to SSA for the purposes captured in Appendices C and D.

V. Procedures for Individualized Notices

A. Applicants

Both OPM and SSA will notify all applicants for benefits for their respective programs, that both agencies will conduct matching programs. OPM's notice consists of appropriate language printed on all application forms. SSA's notice consists of appropriate language printed on its application forms, annual reporting forms, Social Security Statements, and in the annual cost-of-living adjustment notices.

B. Retirees/Annuitants/Beneficiaries/Recipients

Both OPM and SSA will provide subsequent periodic notices of computer matching to their respective retirees, annuitants, beneficiaries, and recipients, as required. OPM's notice consists of appropriate language printed on annual mailings to all affected annuitants, survivor annuitants, and their representatives, describing OPM's matching activities. SSA's notice consists of a general notice in the Fed. Reg. and

periodic mailings to all beneficiaries and recipients describing SSA's matching activities.

VI. Procedures for Retention and Timely Destruction of Records

SSA will retain the benefit and payment data it receives from OPM only for the time required for any processing related to the matching program and will destroy all such data within 90 days of receipt from OPM. SSA may be required to retain the data to meet evidentiary requirements of the basis for SSA's actions on claims. SSA will retire the retained data in accordance with 44 U.S.C. § 3303a and the Federal Records Retention Schedule NI-47-95-4 that applies to the material in the file folders. SSA will retain OPM data used by SSA's OCA for statistical purposes in tracking the size of, and impact on, subpopulations of Government annuitants affected by the GPO, WEP, and in cost estimates of proposals to change the two provisions, in accordance with Federal Records Schedule DAA-0047-2013-0001-0007.

VII. Data Usage, Duplication, and Rediscovery Restrictions

SSA will adhere to the following limitations on the use, duplication, and disclosure of the electronic files and data provided by OPM under this agreement:

- A. SSA will use and access the data only for the purpose specifically set forth in this agreement.
- B. SSA will not create a permanent file(s) or a separate system comprised solely of the data provided by OPM, nor will SSA use the data to extract information concerning the annuitants for any purpose not specified in this agreement.
- C. SSA will not duplicate or disseminate the data, within or outside its agency, without the written permission of OPM, except as required by Federal law. OPM will not give such permission unless the law requires disclosure or the disclosure is essential to the matching program, and where the law does not require disclosure, the decision whether to grant permission shall be within the discretion of OPM, from whom such permission is sought. For such permission, SSA must specify in writing what data it is requesting be duplicated or disseminated and to whom, and the reasons that justify such duplication or dissemination.

VIII. Security Procedures

SSA and OPM will comply with the requirements of the Federal Information Security Management Act (FISMA), 44 U.S.C. Chapter 35, Subchapter II, as amended by the Federal Information Security Modernization Act of 2014 (Pub. L. 113-283); related OMB circulars and memoranda, such as Circular A-130, *Managing Federal Information as a Strategic Resource* (July 28, 2016), and Memorandum M-17-12, *Preparing for and Responding to a Breach of Personally Identifiable Information* (January 3, 2017);

National Institute of Standards and Technology (NIST) directives; and the Federal Acquisition Regulations, including any applicable amendments published after the effective date of this agreement. These laws, directives, and regulations include requirements for safeguarding Federal information systems and personally identifiable information (PII) used in Federal agency business processes, as well as related reporting requirements. Both agencies recognize, and will implement, the laws, regulations, NIST standards, and OMB directives including those published subsequent to the effective date of this agreement.

FISMA requirements apply to all Federal contractors, organizations, or entities that possess or use Federal information, or that operate, use, or have access to Federal information systems on behalf of an agency. Both agencies are responsible for oversight and compliance of their contractors and agents.

A. Incident Reporting

If either SSA or OPM experiences an incident involving the loss or breach of PII provided by SSA or OPM under the terms of this agreement, they will follow the incident reporting guidelines issued by OMB. In the event of a reportable incident under OMB guidance involving PII, the agency experiencing the incident is responsible for following its established procedures, including notification to the proper organizations (e.g., United States Computer Emergency Readiness Team and the agency's privacy office). In addition, the agency experiencing the incident (e.g., electronic or paper) will notify the other agency's Systems Security Contact named in this agreement. If OPM is unable to speak with the SSA Systems Security Contact within one hour or if for some other reason notifying the SSA Systems Security Contact is not practicable (e.g., it is outside of the normal business hours), OPM will call SSA's National Network Service Center toll free at 1-877-697-4889.

Within one hour of becoming aware of a possible incident involving OPM-provided PII, SSA will contact OPM IT Security Operations: cybersolutions@opm.gov; 844-377-6109.

B. Breach Notification

SSA and OPM will follow PII breach notification policies and related procedures issued by OMB. If the agency that experienced the breach determines that the risk of harm requires notification to affected individuals or other remedies, that agency will carry out these remedies without cost to the other agency.

C. Administrative Safeguards

SSA and OPM will restrict access to the data matched and to any data created by the match to only those users (e.g., employees, contractors, etc.) who need it to perform their official duties in connection with the uses of the data authorized in this

agreement. Further, SSA and OPM will advise all personnel who have access to the data matched and to any data created by the match of the confidential nature of the data, the safeguards required to protect the data, and the civil and criminal sanctions for noncompliance contained in the applicable Federal laws.

D. Physical Safeguards

SSA and OPM will store the data matched and any data created by the match in an area that is physically and technologically secure from access by unauthorized persons at all times (e.g., door locks, card keys, biometric identifiers, etc.). Only authorized personnel will transport the data matched and any data created by the match. SSA and OPM will establish appropriate safeguards for such data, as determined by a risk-based assessment of the circumstances involved.

E. Technical Safeguards

SSA and OPM will process the data matched and any data created by the match under the immediate supervision and control of authorized personnel in a manner that will protect the confidentiality of the data, so that unauthorized persons cannot retrieve any data by computer, remote terminal, or other means. Systems personnel must enter personal identification numbers when accessing data on the agencies' systems. SSA and OPM will strictly limit authorization to those electronic data areas necessary for the authorized analyst to perform his or her official duties.

F. Application of Policy and Procedures

SSA and OPM will adopt policies and procedures to ensure that each agency uses the information contained in their respective records or obtained from each other solely as provided in this agreement. SSA and OPM will comply with these guidelines and any subsequent revisions.

G. Security Assessments

NIST Special Publication 800-37, as revised, encourages agencies to accept each other's security assessments in order to reuse information system resources and/or to accept each other's assessed security posture in order to share information. NIST 800-37 further encourages that this type of reciprocity is best achieved when agencies are transparent and make available sufficient evidence regarding the security state of an information system so that an authorizing official from another organization can use that evidence to make credible, risk-based decisions regarding the operation and use of that system or the information it processes, stores, or transmits. Consistent with that guidance, the parties agree to make available to each other upon request system security evidence for the purpose of making risk-based decisions. Requests for this information may be made by either party at any time throughout the duration or any extension of this agreement.

IX. Comptroller General Access

The Government Accountability Office (Comptroller General) may have access to all OPM and SSA data, as necessary, to verify compliance with this agreement.

X. Reimbursement

SSA and OPM currently engage in several matching programs. The programmatic savings to each agency for these matches far outweigh the costs for each agency. SSA and OPM agree that the matching programs in this match are reciprocal, and each agency will bear its own costs. In the event of material changes to the matching programs between SSA and OPM requiring cost adjustments, SSA and OPM will make such cost adjustments, so that neither agency bears a disproportionate share of the costs, by entering into a reimbursable agreement.

XI. Duration, Modification, and Termination

A. Effective Date

The effective date of this agreement is September 11, 2021, provided that SSA reported the proposal to re-establish this matching program to the Congressional committees of jurisdiction and OMB in accordance with 5 U.S.C. § 552a(o)(2)(A) and OMB Circular A-108 (December 23, 2016), and SSA published notice of the matching program in the Fed. Reg. in accordance with 5 U.S.C. § 552a(e)(12).

B. Duration

This agreement will be in effect for a period of 18 months.

C. Renewal

The Data Integrity Boards (DIB) of OPM and SSA may, within 3 months prior to the expiration of this agreement, renew this agreement for a period not to exceed 12 months if OPM and SSA can certify to their DIBs that:

1. The matching program will be conducted without change; and
2. OPM and SSA have conducted the matching program in compliance with the original agreement.

If either party does not want to continue this program, it must provide written notification to the other party of its intention not to continue at least 90 days before the end of the period of the agreement.

D. Modification

The parties may modify this agreement at any time by a written modification, agreed to by both parties and approved by the DIB of each agency.

E. Termination

The parties may terminate this agreement at any time with the consent of both parties. Either party may unilaterally terminate this agreement upon written notice to the other party, in which case the termination shall be effective 90 days after the date of the notice, or at a later date specified in the notice, except that if the reason for the termination involves a possible incident involving PII, such termination may be effective within a shorter period of time as determined by the party whose information has possibly been breached.

XII. Dispute Resolution

Disputes related to this agreement will be resolved in accordance with instructions provided in the Treasury Financial Manual, Volume I, Part 2, Chapter 4700, Appendix 5, *Intragovernmental Transactions Guide*.

XIII. Persons to Contact

A. OPM

Matching Agreement Issues

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Program Issues

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Office of Personnel Management
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Computer System Issues

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Privacy Issues

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Chief Privacy Officer
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Systems Security Issues

Valerie T. Kokal
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Boyers, PA 16017
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B. SSA

Matching Agreement Issues

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Systems Security Issues

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Computer Systems Issues

Robin Ott, Division Director
OBIS/DSDRQ
Benefit Information Systems
Office of Systems
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6401 Security Boulevard
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Project Coordinator

Rona Demb
Office of Data Exchange and International Agreements
Office of Data Exchange, Policy Publications, and International Negotiations
Office of Retirement and Disability Policy
Social Security Administration
4-B-9-F Annex Building
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Baltimore, MD 21235
Telephone: (410) 965-7567
Email: Rona.Demb@ssa.gov

Program Policy Issues:

Supplemental Security Income Provision (Appendix A)

La'Tonya A. Anderson, Policy Analyst
Office of SSI and Program Integrity Policy
Office of Income Security Programs
Social Security Administration
2-C-19-B Robert M. Ball Building

6401 Security Boulevard
Baltimore, MD 21235
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Fax: (410) 966-0980
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Public Disability Benefit Offset Provision (Appendix B)

Sue Shinsky, Policy Analyst
Office of Applications and Electronic Services Support Policy
Office of Income Security Programs
Social Security Administration
2-H-15-F Robert M. Ball Building
6401 Security Boulevard
Baltimore, MD 21235
Telephone: (410) 594-0234
Email: Sue.Shinsky@ssa.gov

Windfall Elimination Provision (Appendix C) and Government Pension Offset Provision (Appendix D)

Sylvia Diaz, Policy Analyst
Office of Applications and Electronic Services Support Policy
Office of Income Security Programs
Social Security Administration
1029 Camino La Costa
Austin, TX 78752
Telephone: (866) 708-3250 ext. 28501
Email: Sylvia.Diaz@ssa.gov

XIV. Integration Clause

This agreement constitutes the entire agreement of the parties with respect to its subject matter and supersedes all other data exchange agreements between the parties that pertain to the disclosure of the specified civil service benefit and payment data between SSA and OPM for the purposes described in this agreement. SSA and OPM have made no representations, warranties, or promises outside of this agreement. This agreement takes precedence over any other documents that may be in conflict with it with respect to OPM's disclosure of civil service benefit and payment data to SSA in order for SSA to meet its civil service benefit offset obligations.

XV. Authorized Signatures

The signatories below warrant and represent that they have the competent authority on behalf of their respective agencies to enter into the obligations set forth in this agreement.

Electronic Signature Acknowledgement: The signatories may sign this document electronically by using an approved electronic signature process. Each signatory electronically signing this document agrees that his/her electronic signature has the same legal validity and effect as his/her handwritten signature on the document, and that it has the same meaning as his/her handwritten signature.

SOCIAL SECURITY ADMINISTRATION

**MARY
ZIMMERMAN**

Digitally signed by MARY
ZIMMERMAN
Date: 2021.01.26 14:10:22 -05'00'

Mary Ann Zimmerman
Deputy Executive Director
Office of Privacy and Disclosure
Office of the General Counsel

Date _____

Matthew Ramsey

Digitally signed by Matthew
Ramsey
Date: 2021.05.03 16:24:00 -04'00'

Matthew D. Ramsey
Chair, Data Integrity Board

Date _____

OFFICE OF PERSONNEL MANAGEMENT

**KENNETH
ZAWODNY**

Digitally signed by KENNETH
ZAWODNY
Date: 2021.01.20 08:26:39
-05'00'

Kenneth J. Zawodny, Jr.
Associate Director
Retirement Services

Date January 20, 2021

KELLIE RILEY

Digitally signed by KELLIE
RILEY
Date: 2021.04.28 07:46:58
-04'00'

Kellie Cosgrove Riley
Chair, Data Integrity Board

Date _____

APPENDIX A
Supplemental Security Income/Special Veterans' Benefits
Match #1005

I. Purpose

SSA will match OPM's data with SSA's records to verify the accuracy of information applicants and recipients furnished concerning eligibility for the Supplemental Security Income (SSI) program, as authorized by section 1631(e)(1)(B) and (f) of the Act (42 U.S.C. § 1383(e)(1)(B), and (f)), and for the Special Veterans' Benefits (SVB) program, as authorized by section 806 of the Act (42 U.S.C. § 1006). The SSI program provides payments to certain aged, blind, or disabled persons who have income and resources below levels established by law and regulations. The SVB program provides special benefits to certain World War II veterans.

II. Justification and Anticipated Results

A. Justification

Section 1631(e)(1)(B) of the Act requires SSA to verify the information provided by applicants and recipients for SSI payments before making a determination of eligibility or payment amount. Section 1631(f) of the Act requires Federal agencies to furnish SSA with information necessary to verify eligibility. Section 806(b) of the Act requires this same verification for SVB. Computer matching is the most cost effective and efficient way to verify the information from the applicants and recipients for SSI payments and SVB, with respect to these civil service benefits.

B. Anticipated Results

SSA estimates that the matching operation will result in gross savings of \$490,420 for SSA, with estimated SSA costs of \$11,629. The resulting benefit-to-cost ratio is 42.17 to 1. Matches related to SVB will not significantly affect the cost or anticipated results. OPM does not expect any savings for any OPM programs resulting from the matching program.

III. Description of the Records

A. Systems of Records (SOR)

OPM will provide SSA with an electronic file containing civil service benefit and payment data from the annuity and survivor master file. OPM's SOR applicable to this matching activity is OPM/Central-1 Civil Service Retirement and Insurance Records, as published at 73 Fed. Reg. 15013 (March 20, 2008), as amended at 80 Fed. Reg. 74815 (November 30, 2015). Pursuant to 5 U.S.C. § 552a(b)(3), OPM

established routine uses to disclose the subject information to SSA.

SSA will match each record on the OPM file for SSN verification using SSA's Enumeration System database. SSA's SOR applicable to the verification process is the Master Files of SSN Holders and SSN Applications (Enumeration System), 60-0058, as published at 75 Fed. Reg. 82121 (December 29, 2010), as amended at 78 Fed. Reg. 40542 (July 5, 2013), 79 Fed. Reg. 8780 (February 13, 2014), 83 Fed. Reg. 31250-31251 (July 3, 2018), and 83 Fed. Reg. 54969 (November 1, 2018). SSA will then match those verified records to SSA's SSI payment information maintained in the Supplemental Security Record (SSR). SSA's SOR applicable to the matching activity is the Supplemental Security Income Record and Special Veterans Benefits Record (SSR/SVB), 60-0103, as published at 71 Fed. Reg. 1830 (January 11, 2006), as amended at 72 Fed. Reg. 69723 (December 10, 2007), 83 Fed. Reg. 31250-31251 (July 3, 2018), and 83 Fed. Reg. 54969 (November 1, 2018).

B. Number of Records Involved

Each month, OPM will provide SSA with an electronic file that will include updated payment information for new civil service annuitants and annuitants whose civil service annuity has changed. This monthly file contains approximately 25,000 records. OPM will provide SSA with the entire master annuity file of approximately 2.7 million records once yearly for the month of the civil service cost-of-living allowance.

C. Specified Data Elements Used in the Match

1. OPM will furnish SSA with the following civil service benefit and payment data:
 - a. name;
 - b. SSN;
 - c. date of birth;
 - d. civil service claim number;
 - e. first potential month and year of eligibility;
 - f. first month, day, and year of entitlement;
 - g. amount of current gross civil service benefits; and
 - h. effective date (month, day, and year) of civil service amount.

2. OPM will also furnish SSA with the following additional civil service benefit and payment data:
 - a. SSNs for disabled children;
 - b. retroactive payments; and
 - c. payments that are currently coded 'special pay.'

3. Before SSA conducts the match, SSA will attempt to verify the SSNs furnished by OPM using the SSA Enumeration System database. SSA will only use verified SSNs in the match with the SSR. The verification process will proceed as follows:
 - a. If the individual's name, date of birth, and SSN combination provided by OPM match SSA's records, SSA will consider the SSN verified.
 - b. If OPM indicates a person is receiving civil service payments, but the individual has either failed to provide an SSN or provided the wrong SSN, SSA will attempt to identify the SSN via a search routine using the OPM-provided name and date of birth.
 - c. If SSA is able to match the name and date of birth combination with an SSN in its records, SSA will assume the SSN belongs to the person identified in the OPM-provided file. SSA will then treat the SSN obtained through this search routine as it would an OPM-provided SSN combination that initially matched its records.
4. SSA will match the SSN-verified OPM data against the SSR to identify SSI/SVB recipients who are also receiving a civil service pension.

IV. Verification Procedure and Opportunity to Contest

A. Verification Procedure

SSA will take no adverse action regarding SSI and SVB recipients identified through the matching process solely based on information obtained through this match. SSA will contact the recipient to verify the matching results, in accordance with the requirements of the Privacy Act and applicable Office of Management and Budget (OMB) guidelines.

The affected individual will have an opportunity to contest the accuracy of the information obtained through this match, as described in Article IV.B below. SSA will consider the information that OPM provides as accurate if the recipient does not contest it within 10 days after he or she receives notice of the proposed adverse action.

B. Opportunity to Contest

Before taking any adverse action based on the information received from the match, SSA will notify the applicant, recipient, or appropriate representative that SSA has received information pertaining to his or her receipt of a civil service benefit that indicates that an adverse action is necessary, and provide the individual an

opportunity to contest the accuracy of the information before SSA makes any adverse adjustment.

Under applicable SSI regulations, 20 C.F.R. § 416.1336, 10 days prior to taking any adverse action, SSA will notify the applicant or beneficiary, in writing, of the proposed adverse action. The notice will contain the following information:

1. that SSA has received information that indicates that the proposed adverse action is necessary; and
2. that the individual has 10 days to contest the proposed adverse action or SSA will conclude that the information provided by OPM is correct, and will make the necessary adjustment to the individual's payment.

V. Accuracy Assessments

Based on a sample review by OPM, OPM estimates its civil service benefit and payment data records to be 95 percent accurate. SSA does not have an accuracy assessment specific to the data elements listed in this appendix. However, SSA conducts assessments of the data in its Systems of Records as part of its ongoing financial integrity and internal control reviews in accordance with the guidelines established in OMB Management Procedures Memorandum No. 2016-03 – Additional Guidance for DATA Act Implementation: Implementing Data-Centric Approach for Reporting Federal Spending Information; OMB M-17-04 – Additional Guidance for DATA Act Implementation: Further Requirements for Reporting and Assuring Data Reliability; and OMB M-18-16 – Appendix A to OMB Circular No. A-123, Management of Reporting and Data Integrity Risk. Based on these reviews, which are certified by the agency's Senior Accountable Official (agency Chief Financial Officer) and by the unqualified audit opinion rendered by the agency's financial statement auditor, the agency has a reasonable assurance as to the accuracy and reliability of these data.

APPENDIX B
Public Disability Benefit Offset
Match #1019

I. Purpose

SSA will use OPM's data to administer the Public Disability Benefit (PDB) offset provision. SSA will match OPM's records of civil service disability benefit and payment data with SSA's records of Social Security disability insurance (DI) benefits to identify DI beneficiaries whose benefits SSA will reduce because the disabled worker is also receiving a civil service disability annuity benefit. SSA will match the OPM data to verify information provided (or identify information that should have been provided) by the disabled worker at the time of initially applying for Social Security benefits, and on a continuing basis, to ensure any reduction in Social Security disability benefits is based on the current civil service disability benefit amount.

II. Justification and Anticipated Results

A. Justification

The Act provides for the reduction of Social Security disability benefits if the disabled worker is also entitled to a PDB. SSA relies on the person to report entitlement to, or changes in, the public payment amount. However, SSA has found that some workers fail to make voluntary reports. Information from OPM is the only means available for verifying the receipt and amount of the civil service disability benefit. The most cost effective and efficient way to obtain information is via the computer match. Conducting a matching operation with OPM will permit proper payment of Social Security disability benefits and will prevent and detect overpayments and underpayments to those beneficiaries for whom SSA does not have correctly reported PDB data.

B. Anticipated Results

SSA estimates that the matching operation will result in gross savings of \$1,635,249 for SSA, with estimated SSA costs of \$174,365. The resulting benefit-to-cost ratio is 9.38 to 1. OPM does not expect any savings for any OPM programs resulting from this matching operation.

III. Description of the Records

A. System of Records (SOR)

OPM will provide SSA with an electronic file extracted from the annuity and survivor master files. The files will contain information about each new disability annuitant

and those annuitants whose disability benefits have changed. OPM's SOR applicable to this matching activity is OPM/Central-1 Civil Service Retirement and Insurance Records, as published at 73 Fed. Reg. 15013 (March 20, 2008), as amended at 80 Fed. Reg. 74815 (November 30, 2015). Pursuant to 5 U.S.C. § 552a(b)(3), OPM established routine uses to disclose the subject information to SSA.

SSA will match each record on the OPM file for SSN verification using SSA's Enumeration System database. SSA's SOR applicable to the verification process is the Master Files of SSN Holders and SSN Applications (Enumeration System), 60-0058, as published at 75 Fed. Reg. 82121 (December 29, 2010), as amended at 78 Fed. Reg. 40542 (July 5, 2013), 79 Fed. Reg. 8780 (February 13, 2014), 83 Fed. Reg. 31250-31251 (July 3, 2018), and 83 Fed. Reg. 54969 (November 1, 2018). SSA will then match those verified records to DI records on the Master Beneficiary Record (MBR) to identify DI beneficiaries who may be subject to PDB offset. SSA's SOR applicable to the matching activity is the MBR, 60-0090, as published at 71 Fed. Reg. 1826 (January 11, 2006), as amended at 72 Fed. Reg. 69723 (December 10, 2007), 78 Fed. Reg. 40542 (July 5, 2013), 83 Fed. Reg. 31250-31251 (July 3, 2018), and 83 Fed. Reg. 54969 (November 1, 2018).

B. Number of Records Involved

Each month, OPM will provide SSA with an electronic file, which will include updated payment information for new disability annuitants and annuitants whose civil service disability benefit amount has changed. This monthly file contains approximately 25,000 records. OPM will provide SSA with the entire OPM annuity master file of approximately 2.7 million records once yearly for the month of the civil service cost-of-living allowance.

C. Specified Data Elements Used in the Match

1. OPM will furnish SSA with the following civil service and benefit payment data:
 - a. payment status code;
 - b. name;
 - c. SSN;
 - d. date of birth;
 - e. claim number;
 - f. first month, day, and year of entitlement;
 - g. disability indicator;
 - h. Federal Insurance Contributions Act (FICA) covered month indicator;
 - i. total service months;
 - j. amount of current gross benefit; and
 - k. effective date (month, day, and year) of the current gross benefit amount.

2. Before SSA conducts the match, SSA will attempt to verify the SSNs furnished by OPM using the SSA Enumeration System database. SSA will only use verified SSNs in the match with the MBR. The verification process will proceed as follows:
 - a. If the individual's name, date of birth, and SSN combination provided by OPM match SSA's records, SSA will consider the SSN verified.
 - b. If OPM indicates a person is receiving civil service payments, but the individual has either failed to provide an SSN or provided the wrong SSN, SSA will attempt to identify the SSN via a search routine using the OPM-provided name and date of birth.
 - c. If SSA is able to match the name and date of birth combination with an SSN in its records, SSA will assume the SSN belongs to the person named in the OPM-provided file. SSA will then treat the SSN obtained through this search routine as it would an OPM-provided SSN combination that initially matched its records.
3. SSA will match the SSN-verified OPM data against the MBR to identify individuals who may be subject to PDB offset.

IV. Verification and Opportunity to Contest

A. Verification

In certain situations, the information provided by OPM is not sufficient to determine if a reduction in SSA benefits is applicable. In these situations, SSA will attempt to contact the disabled worker and OPM. In all cases, no adjustment will occur until SSA has attempted to confirm the information with the disabled worker via the advance notice process described in Article IV.B, below.

B. Opportunity to Contest

Before taking any adverse action based on the information received from the match, or through verification with OPM, SSA will provide each beneficiary for whom SSA decides such adverse action is necessary with a notice containing the following information:

1. The disabled worker will always be advised that SSA has received information from OPM that the worker is receiving a specific PDB which requires a reduction in the worker's or the worker's family's Social Security benefit;
2. The effective date of the proposed Social Security benefit adjustment;

3. The beneficiary has 30 days from the date of the notice to contest the proposed adverse action;
4. SSA will consider failure to respond to the notice as verification that the information received from OPM is correct and will justify the adverse action described in the notice;
5. SSA will advise any affected beneficiary, other than the disabled worker, that SSA has received information from OPM that the disabled worker is receiving a PDB, which requires a reduction in the beneficiary's Social Security benefit;
6. The effective date of the Social Security benefit adjustment; and
7. The beneficiary has 30 days from the date of the notice to contest the adverse action.

V. Accuracy Assessments

Based on a sample review by OPM, OPM estimates its civil service disability benefit and payment data records to be 95 percent accurate. SSA does not have an accuracy assessment specific to the data elements listed in this appendix. However, SSA conducts assessments of the data in its Systems of Records as part of its ongoing financial integrity and internal control reviews in accordance with the guidelines established in OMB Management Procedures Memorandum No. 2016-03 – Additional Guidance for DATA Act Implementation: Implementing Data-Centric Approach for Reporting Federal Spending Information; OMB M-17-04 – Additional Guidance for DATA Act Implementation: Further Requirements for Reporting and Assuring Data Reliability; and OMB M-18-16 – Appendix A to OMB Circular No. A-123, Management of Reporting and Data Integrity Risk. Based on these reviews, which are certified by the agency's Senior Accountable Official (agency Chief Financial Officer) and by the unqualified audit opinion rendered by the agency's financial statement auditor, the agency has a reasonable assurance as to the accuracy and reliability of these data.

APPENDIX C
Windfall Elimination Provision
Match #1020

I. Purpose

SSA will use OPM's data to administer the Windfall Elimination Provision (WEP). SSA will match OPM's civil service benefit and payment data, including death data, with SSA's records of Social Security retirement and disability benefits to identify those beneficiaries whose benefits SSA will reduce because the beneficiary is also entitled to a civil service annuity benefit. These beneficiaries may be subject to the use of a modified benefit computation formula used by SSA for certain persons who receive both a civil service benefit and a Social Security retirement or disability benefit. SSA will use the OPM data to verify the pension or annuity information provided (or to identify such information that should have been provided) directly to SSA by the retirees/annuitants.

II. Justification and Anticipated Results

A. Justification

SSA is required by the Act to reduce retirement or disability benefits for a worker who is also entitled to a pension based on noncovered earnings. SSA must rely on the beneficiary to report entitlement to a noncovered pension. Information from OPM is the only means available for verifying entitlement to and the amount of civil service pensions. The information received via this matching activity reduces the need for lengthy development and in many cases allows SSA to adjust benefit amounts for current beneficiaries based on information exchanged in the match, where no conflict exists in file. The most cost effective and efficient way to verify civil service benefit and payment data is via the computer match.

B. Anticipated Results

SSA estimates that the matching operation will result in gross savings of \$26,024,068 for SSA, with estimated SSA costs of \$1,329,440. The resulting benefit-to-cost ratio is 19.6 to 1. OPM does not expect any savings for any OPM programs resulting from the matching program.

III. Description of the Records

A. Systems of Records (SOR)

OPM will disclose the necessary civil service benefit and payment data from the annuity and survivor master file. OPM's SOR applicable to this matching activity is OPM/Central-1 Civil Service Retirement and Insurance Records, as published at 73 Fed. Reg. 15013 (March 20, 2008), as amended at 80 Fed. Reg. 74815 (November 30,

2015). Pursuant to 5 U.S.C. § 552a(b)(3), OPM established routine uses to disclose the subject information to SSA.

SSA will match each record on the OPM file for SSN verification using SSA's Enumeration System database. SSA's SOR applicable to the verification process is the Master Files of SSN Holders and SSN Applications (Enumeration System), 60-0058, as published at 75 Fed. Reg. 82121 (December 29, 2010), as amended at 78 Fed. Reg. 40542 (July 5, 2013), 79 Fed. Reg. 8780 (February 13, 2014), 83 Fed. Reg. 31250-31251 (July 3, 2018), and 83 Fed. Reg. 54969 (November 1, 2018). SSA will then match those verified records to the Master Beneficiary Record (MBR). SSA's SOR applicable to the matching activity is the MBR, 60-0090, as published at 71 Fed. Reg. 1826 (January 11, 2006), as amended at 72 Fed. Reg. 69723 (December 10, 2007), 78 Fed. Reg. 40542 (July 5, 2013), 83 Fed. Reg. 31250-31251 (July 3, 2018), and 83 Fed. Reg. 54969 (November 1, 2018).

B. Number of Records Involved

Each month, OPM will provide SSA with an electronic file which will include updated payment information for new civil service annuitants and annuitants whose civil service annuity has changed. This monthly file contains approximately 25,000 records. OPM will provide SSA with the entire annuity master file of approximately 2.7 million records once yearly for the month of the civil service cost-of-living allowance.

C. Specified Data Elements Used in the Match

1. OPM will furnish SSA with the following civil service benefit and payment data:
 - a. case status code;
 - b. prefix;
 - c. claim number;
 - d. SSN;
 - e. Social Security verification code;
 - f. name;
 - g. date of birth;
 - h. award date;
 - i. first potential month and year of eligibility;
 - j. date of eligibility indicator;
 - k. first month, day, and year of entitlement;
 - l. FICA covered months indicator;
 - m. total service months;
 - n. current gross effective date;
 - o. current gross amount; and
 - p. date of death.

2. OPM will also furnish SSA with the following additional civil service and benefit payment data:
 - a. OPM code that indicates OPM used pre-1957 military service in the benefit computations;
 - b. actual military service dates that OPM used in computing the OPM pension amount;
 - c. OPM code for voluntary contributions;
 - d. amount of the pension from voluntary contributions;
 - e. months of employment after 1956 not covered by Social Security that are used to determine the pension;
 - f. period of employment upon which the pension is based; and
 - g. Federal Employees Retirement System (FERS) transfer case data.
3. Before SSA conducts the match, SSA will attempt to verify the SSNs furnished by OPM using the SSA Enumeration System database. SSA will only use verified SSNs in the match with the MBR. The verification process will proceed as follows:
 - a. If the individual's name, date of birth, and SSN combination provided by OPM match SSA's records, SSA will consider the SSN verified.
 - b. If OPM indicates a person is receiving civil service payments, but the individual has either failed to provide an SSN or provided the wrong SSN, SSA will attempt to identify the SSN via a search routine using the OPM-provided name and date of birth.
 - c. If SSA is able to match the name and date of birth combination with an SSN in its records, SSA will assume the SSN belongs to the person named in the OPM-provided file. SSA will then treat the SSN obtained through this search routine as it would an OPM-provided SSN combination that initially matched its records.
4. SSA will match the SSN-verified OPM data against the MBR to identify beneficiaries subject to a Federal pension offset.

IV. Verification and Opportunity to Contest

A. Verification

SSA will attempt to contact the beneficiary to develop necessary evidence to verify the match results before taking adverse action. SSA will consider the information provided by OPM to be verified if the beneficiary does not respond within 30 days after he or she is notified of the proposed adverse action. The beneficiary will be advised that failure to respond within 30 days will provide a valid basis for

concluding that the data provided by OPM are correct. Where the beneficiary fails to respond, SSA will not take any adverse action before 30 days have elapsed from the date of the notice.

B. Opportunity to Contest

Before taking any adverse action based on the information received from the match, SSA will provide all the beneficiaries for whom SSA decides such adverse action is necessary with the following information:

1. SSA has received civil service benefit and payment data indicating that the beneficiary is receiving a specific civil service annuity which may require a reduction in the beneficiary's Social Security benefit;
2. The effective date of the Social Security benefit adjustment;
3. The beneficiary has 30 days from the date that the notice is prepared to contest the adverse decision; and
4. Failure to respond to the notice within 30 days of the date of the notice will be considered verification that the information received from the match is correct and will justify the adverse action described in the notice.

V. Accuracy Assessments

Based on a sample review by OPM, OPM estimates its civil service benefit and payment data records to be 95 percent accurate. SSA does not have an accuracy assessment specific to the data elements listed in this appendix. However, SSA conducts assessments of the data in its Systems of Records as part of its ongoing financial integrity and internal control reviews in accordance with the guidelines established in OMB Management Procedures Memorandum No. 2016-03 – Additional Guidance for DATA Act Implementation: Implementing Data-Centric Approach for Reporting Federal Spending Information; OMB M-17-04 – Additional Guidance for DATA Act Implementation: Further Requirements for Reporting and Assuring Data Reliability; and OMB M-18-16 – Appendix A to OMB Circular No. A-123, Management of Reporting and Data Integrity Risk. Based on these reviews, which are certified by the agency's Senior Accountable Official (agency Chief Financial Officer) and by the unqualified audit opinion rendered by the agency's financial statement auditor, the agency has a reasonable assurance as to the accuracy and reliability of these data.

APPENDIX D
Government Pension Offset
Match #1021

I. Purpose

SSA will use OPM's data to administer the Government Pension Offset (GPO) provision. SSA will match OPM's civil service benefit and payment data, including death data, with SSA's records of beneficiaries receiving Social Security spouse's benefits. These beneficiaries may be subject to reduction of their benefit when the beneficiary is also receiving a government pension based on employment not covered under Social Security. SSA will match the OPM data to verify information provided (or identify information that should have been provided) by the SSA beneficiary at the time of initially applying for Social Security benefits, and on a continuing basis, to ensure that any reduction in Social Security benefits is based on the current pension amount.

II. Justification and Anticipated Results

A. Justification

SSA is required by the Act to reduce spouse's benefits of certain beneficiaries who receive a government pension based on their own noncovered earnings. SSA must rely on the beneficiary to report the receipt of a pension, as well as increases in the pension amount. Information from OPM is the only means available for verifying receipt and amount of civil service pensions. The most cost effective and efficient way to obtain pension information is via the computer match.

B. Anticipated Results

SSA estimates that the matching operation will result in gross savings of \$10,978,730 for SSA, with estimated SSA costs of \$844,065. The resulting benefit-to-cost ratio is 13 to 1. OPM does not expect any savings for any OPM programs resulting from the matching program.

III. Description of the Records

A. Systems of Records (SOR)

OPM will provide SSA with an electronic file extracted from the annuity and survivor master file. The extracted file will contain information about new annuitants and current annuitants whose pension amount has changed. OPM's SOR applicable to this matching activity is OPM/Central-1 Civil Service Retirement and Insurance Records, as published at 73 Fed. Reg. 15013 (March 20, 2008), as amended at 80 Fed. Reg. 74815 (November 30, 2015). Pursuant to 5 U.S.C. § 552a(b)(3), OPM established routine uses to disclose the subject information to SSA.

SSA will match each record on the OPM file for SSN verification using SSA's Enumeration System database. SSA's SOR applicable to the verification process is the Master Files of SSN Holders and SSN Applications (Enumeration System), 60-0058, as published at 75 Fed. Reg. 82121 (December 29, 2010), as amended at 78 Fed. Reg. 40542 (July 5, 2013), 79 Fed. Reg. 8780 (February 13, 2014), 83 Fed. Reg. 31250-31251 (July 3, 2018), and 83 Fed. Reg. 54969 (November 1, 2018). SSA will then match those verified records to SSA's Master Beneficiary Record (MBR) to identify spouses who are potentially subject to GPO. SSA's SOR applicable to the matching activity is the MBR, 60-0090, as published at 71 Fed. Reg. 1826 (January 11, 2006), as amended at 72 Fed. Reg. 69723 (December 10, 2007), 78 Fed. Reg. 40542 (July 5, 2013), 83 Fed. Reg. 31250-31251 (July 3, 2018), and 83 Fed. Reg. 54969 (November 1, 2018).

B. Number of Records Involved

Each month, OPM will provide SSA with an electronic file which will include updated payment information for new civil service annuitants and annuitants whose civil service annuity has changed. This monthly file contains approximately 25,000 records. OPM will provide SSA with the entire master annuity file of approximately 2.7 million records once yearly for the month of the civil service cost-of-living allowance.

C. Specified Data Elements Used in the Match

1. OPM will furnish SSA with the following civil service benefit and payment data:
 - a. case status code;
 - b. prefix;
 - c. claim number;
 - d. SSN;
 - e. Social Security verification code;
 - f. name;
 - g. date of birth;
 - h. award date;
 - i. first potential month and year of eligibility;
 - j. date of eligibility indicator;
 - k. first month, day, and year of entitlement;
 - l. FICA covered months indicator;
 - m. total service months;
 - n. current gross effective date;
 - o. current gross amount; and
 - p. date of death.

2. OPM will also furnish SSA with the following additional civil service benefit and payment data:
 - a. FERS transfer case data;
 - b. OPM code for voluntary contributions; and
 - c. amount of pension from voluntary contributions.
3. Before SSA conducts the match, SSA will attempt to verify the SSNs furnished by OPM using the SSA Enumeration System database. SSA will only use verified SSNs in the match with the MBR. The verification process will proceed as follows:
 - a. If the individual's name, date of birth, and SSN combination provided by OPM match SSA's records, SSA will consider the SSN verified.
 - b. If OPM indicates a person is receiving civil service payments, but the individual has either failed to provide an SSN or provided the wrong SSN, SSA will attempt to identify the SSN via a search routine using the OPM-provided name and date of birth.
 - c. If SSA is able to match the name and date of birth combination with an SSN in its records, SSA will assume the SSN belongs to the person named in the OPM-provided file. SSA will then treat the SSN obtained through the search routine as it would an OPM-provided SSN combination that initially matched its records.
4. SSA will match the SSN-verified OPM data against the MBR to identify beneficiaries subject to a Federal pension offset.

IV. Verification and Opportunity to Contest

A. Verification

SSA will attempt to contact the beneficiary to develop necessary evidence to verify the match results before taking adverse action. SSA will consider the information provided by OPM to be verified if the beneficiary does not respond within 30 days after he or she is notified of the proposed adverse action. The beneficiary will be advised that failure to respond within 30 days will provide a valid basis for concluding that the data provided by OPM are correct. Where the beneficiary fails to respond, SSA will not take any adverse action before 30 days have elapsed from the date of the notice.

B. Opportunity to Contest

Before taking any adverse action based on the information received from the match, SSA will provide all the beneficiaries for whom SSA decides such adverse action is necessary with the following information:

1. SSA has received civil service benefit and payment data indicating that the beneficiary is receiving a specific civil service annuity based on his or her own noncovered earnings which, by law, requires a reduction in the Social Security spouse's benefit;
2. The effective date of the Social Security benefit adjustment;
3. The beneficiary has 30 days to contest the adverse decision; and
4. Failure to respond to the notice within 30 days of the date of the notice will be considered verification that the information received from the match is correct and will justify the adverse action described in the notice.

V. Accuracy Assessments

Based on a sample review by OPM, OPM estimates its civil service benefit and payment data records to be 95 percent accurate. SSA does not have an accuracy assessment specific to the data elements listed in this appendix. However, SSA conducts assessments of the data in its Systems of Records as part of its ongoing financial integrity and internal control reviews in accordance with the guidelines established in OMB Management Procedures Memorandum No. 2016-03 – Additional Guidance for DATA Act Implementation: Implementing Data-Centric Approach for Reporting Federal Spending Information; OMB M-17-04 – Additional Guidance for DATA Act Implementation: Further Requirements for Reporting and Assuring Data Reliability; and OMB M-18-16 – Appendix A to OMB Circular No. A-123, Management of Reporting and Data Integrity Risk. Based on these reviews, which are certified by the agency's Senior Accountable Official (agency Chief Financial Officer) and by the unqualified audit opinion rendered by the agency's financial statement auditor, the agency has a reasonable assurance as to the accuracy and reliability of these data.