May 30, 2025

Dominic Mancini
Acting Administrator
Office of Information and
Regulatory Affairs
Office of Management and Budget
New Executive Office Building, Room
10201725 17th Street, NW
Washington, DC 20503

Administrator Mancini:

Attached is the 2025 Social Security Administration (SSA) Annual Matching Activity
Report for calendar year 2024. SSA prepared the report in accordance with the Privacy Act
(5 U.S.C. § 552a(u)(3)(D)) and the Office of Management and Budget Circular No. A-108.

If you require additional information, please let me know. Please direct any staff questions to Neil
Etter at 410-965-8028 or Neil.Etter@ssa.gov.

Sincerely,

Matthew D. Ramsey
Chair
Data Integrity Board

Attachments

SOCIAL SECURITY ADMINISTRATION
2025 ANNUAL MATCHING ACTIVITY REPORT

Report on Agency Matching Activities
(Authority: 5 U.S.C. 552a(u)(3)(D))

I.   **Name and Address of Reporting Agency**

Social Security Administration (SSA)
6401 Security Boulevard
Baltimore, Maryland 21235-6401

II.   **Current Data Integrity Board (DIB) Members**

Mark Steffensen – Deputy Commissioner for Law and Policy and General Counsel;

Scott Coulter – Chief Information Officer;

Stephen G. Evangelista – Deputy Commissioner for Operations;

Hannibal Ware – Inspector General for Social Security;

Tom Holland – Deputy Commissioner for Mission Support;

Jeffrey M. Buckner – Acting Deputy Commissioner for External Affairs; and

Matthew D. Ramsey – DIB Chair and Executive Director, Office of Privacy and Disclosure, Office of Law and Policy.

III.   **Counsel to DIB**

Edward Tompsett – Acting Deputy Associate General Counsel for General Law, Office of the General Counsel, Office of Law and Policy

IV.   **Secretary to DIB**

Jennifer Karangelen
Acting Deputy Executive Director
Office of Privacy and Disclosure
Office of Law and Policy
6401 Security Boulevard
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V.   **Explanation of Changes in Board Membership or Structure**

Due to staffing and organizational changes since last year's report, SSA has the following

seven changes to its DIB membership:

(1) Tom Holland succeeded Sean Brune as Deputy Commissioner for Mission Support, a position previously referred to as the Deputy Commissioner for the Office of Budget, Finance, and Management;

(2) Hannibal Ware succeeded Gail S. Ennis as Inspector General for Social Security;

(3) Scott Coulter succeeded Marcela Escobar-Alava as Chief Information Officer;

(4) Mark Steffensen has succeeded Stephen G. Evangelista as Deputy Commissioner and also holds the position of General Counsel for the agency. The newly established Office of Law and Policy includes the former Office of the Deputy Commissioner for Retirement and Disability Policy and Office of the General Counsel.

(5) Jeffrey M. Buckner succeeded Tom Klouda as Acting Deputy Commissioner for External Affairs, a position previously referred to as the Deputy Commissioner for the Office of Legislation and Congressional Affairs; and

(6) Stephen G. Evangelista succeeded Michelle A. King as Deputy Commissioner for Operations.

(7) Jennifer Karangelen succeeded Michelle Christ as Acting Deputy Director for the Office of Privacy and Disclosure.

(8) Edward Tompsett succeeded Nancy Morales Gonzalez as Counsel to the DIB.

VI.   Disapproved Agreements

SSA's DIB did not disapprove any matching agreement during calendar year 2024.

VII.   Violations

Match 1051 - Department of Education (DoED)

DoED reported a minor incident to SSA in early January 2024 regarding the current '24-'25 Free Application for Federal Student Aid (FAFSA). SSA is assured that the incident has been resolved and that no additional action is required from either agency.

DoED provided the following language that will also to be included in their 2025 Annual Matching Activity Report to OMB:

"The Department sent a subset of third-party contributor information to SSA to assist

with the eligibility determination for the applicant, prior to consent being obtained and FSA ID creation. This match returns SSN validation in addition to citizenship information. The Department did not have consent from the third-party contributor prior to obtaining citizenship information or a routine use that allowed the Department to disclose the third-party contributor information for that purpose. Once this issue was identified, the Department stopped providing information to SSA as part of this matching program until a technical solution could be implemented. Once a technical solution was implemented, the Department continued sharing information with SSA as part of this matching program. Third-party contributor information is now sent as part of the FSA ID creation process, where consent is obtained prior to sharing with SSA."

VIII.   Cost-Benefit Requirements

A.   Cost-Benefit Analysis (CBA) Ratio

SSA typically requires a favorable cost-benefit ratio before initiating any matching programs; however, it did move forward with three agreements that had either an unfavorable or undetermined CBA, as detailed below.

- *Match 1004 - Department of Defense (DOD), Military Retirement (unfavorable CBA)*

  Although the current CBA ratio for this matching program stands at a negative .24:1, SSA and DOD have concluded that a computer matching program represents the most efficient and effective method for acquiring and processing the information required by SSA to confirm the eligibility or entitlement of, as well as to verify the payment and benefit amounts, for specific applicants, recipients, and beneficiaries of Supplemental Security Income (SSI) and Special Veterans Benefits (SVB). This exchange will also provide SSA with data needed to calculate and make necessary adjustments of SSI payments and SVB benefits.

  An alternative approach to utilizing a computer matching program would involve performing a manual review of DOD and Defense Manpower Data Center military retirement and survivor benefit payment records against a list of applicants, recipients, and beneficiaries of SSI and SVB. This manual matching process would create a significant administrative workload, lead to a more substantial invasion of individual privacy, and cause delays in the disbursement of SSI payments and SVB benefits, as well as in the recovery of any unauthorized or incorrect payments or benefits.

  Therefore, SSA's DIB recommends the continuation of this matching program.

- *Match 1052* - Department of Veterans Administration (VA) (unfavorable cost-benefit analysis)

  VA is legally obligated to verify the income data submitted by applicants for medical care, and SSA supplies verified income information to the VA at no cost,

as stipulated in 38 U.S.C. § 5106. Additionally, federal legislation permits SSA to share specific tax return information with the VA, as outlined in 26 U.S.C. § 6103(l)(7). Although the current CBA ratio for this matching program stands at a negative .267:1, it is still regarded as the most effective, economic, and thorough approach for gathering, comparing, and transferring this necessary information, given that no other administrative process can efficiently perform these verifications and disclosures.

Therefore, SSA's DIB recommends the continuation of this matching program.

- *Match 1097 - Department of Health and Human Services, Centers for Medicare and Medicaid Services (CMS) (indeterminate cost-benefit analysis)*

  Section 1413 of the Patient Protection and Affordable Care Act (PPACA) requires the implementation of a matching program to facilitate the streamlined application process mandated by Congress. Consequently, this ongoing matching program aids in making accurate eligibility determinations, which helps prevent improper payments.

  Similar to the previous year, there is no available data to quantify the number of improper payments that have been avoided. Currently, the results of the matching process are not utilized to identify or recover any past improper payments. Therefore, there are no estimates available regarding avoided or recovered improper payments in the CBA to offset the associated costs.

  The CBA indicated that the operational costs for the eight Marketplace matching programs were approximately $58.9 million, but it does not provide sufficient quantification of direct government cost savings to counterbalance these expenses, as the Marketplace matching programs are not designed to prevent or recover improper payments. Subsequently, the CBA does not establish that the matching program is likely to be cost-effective. As long as the PPACA remains unchanged, we do not anticipate any modifications to any forthcoming agreement reestablishments.

  Therefore, SSA's DIB recommends the continuation of this matching program.

B. **Waiver of Cost-Benefit Analysis (CBA)**

SSA granted the following agreements a waiver to the usual CBA requirement pursuant to 5 U.S.C. § 552a(u)(4)(B):

- *Match 1007 - Railroad Retirement Board (RRB)*

  Since 1992, the Disability Insurance Benefits of both SSA and RRB have consistently determined that a CBA is not required for this matching program. This matching process is crucial for the effective administration of the two benefit programs. Furthermore, the data provided by SSA to RRB cannot be

sourced from alternative avenues, making a cost-benefit analysis irrelevant in the context of this information exchange.

- *Matches 6000, 6003, & 6004 – State Agencies[1] Model Agreements for State Data Exchanges*

  The requirement for a CBA has been waived for ongoing matches between state agencies since 2008, and this exemption continues to be applicable. Additionally, new matches such as those that include tribal agencies are incorporated as they facilitate the efficient management of state and tribal benefit programs. The information provided by SSA to state agencies is not available from other sources; consequently, a CBA does not affect the determination of whether this exchange takes place.

IX.   Adherence to Terms

SSA fully adhered to the terms of each matching program in which it participated during the calendar year 2024.

X.   Justification

All disclosures of SSA records utilized in matching programs throughout the calendar year 2024 were, and continue to be, warranted.

XI.   Links to Matching Notices and Matching Agreements

Find a comprehensive list of all active SSA matching programs, including links to their respective matching notices and agreements, on SSA's Privacy webpage at https://www.ssa.gov/privacy/computer_matching_programs.html.

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[1] Includes various State agencies and departments, tribal agencies, and U.S. territories collectively referred to as ''State Agencies.''

Title of Match	Matching Agency	Purpose	Effective Date	Federal Register (FR) Notice	Cost-Benefit Ratio
1003 – Department of Labor (DOL) Black LungPart C Benefit Payments	DOL	SSA uses DOL Part C Black Lung benefit datato verify disability benefit amounts.	11/25/2024	89 FR 80621	2.12:1
1004 – Department of Defense (DOD) DefenseManpower Data Center Military Retirement	DOD	SSA uses military retirement and survivor payments to determine eligibility and benefit payment amounts for SSI and SVB.	5/28/2024	89 FR 31789	.24:1 Un-favorable * See Section VIII above.
1005 – Office of Personnel Management (OPM) (Consolidated Matches)	OPM	SSA uses OPM civil service pension data to verify eligibility and benefit payment amounts of SSA disability and SVB applicants and beneficiaries.	3/14/2024	89 FR 9891	A - 17.7:1 B - 2.6:1 C - 2.8:1 D - 7.13:1
1006 – Railroad Board (RRB) Combined health Insurance Check Writing(CHICO)	RRB	SSA uses the RRB CHICO information to verify eligibility and benefit payments for SSI and SVB applicants and beneficiaries.	9/02/2023	88 FR 15113	34.4:1
1007 – RRB/SSA Wage and Benefit Match (Consolidated Matches)	RRB	The RRB uses data exchanged under this agreement to properly administer section 23lf(b)(2)(D) of the Railroad Retirement Act of 1974 (45 U.S.C. § 231f(b)(2)(D)).	7/22/2023	88 FR 8921	Waived. *See Section VIII above.

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[2] SSA had only reestablishments of existing matches during the 2024 calendar year.

1008 – Veterans Administration (VA) Adjustment of SSI and SVB Benefits	VA	SSA uses VA data to: (1) Identify certain SSI & SVB recipients, who receive VA benefits and (2) identify income limits of certain individuals to determine their potential eligibility for the Medicare Savings Program.	9/15/2023	88 FR 63639	34.3:1
1010 – Department of Homeland Security (DHS) Noncitizens Suspension & Recovery	DHS	SSA uses the information provided by DHS to identify noncitizens ineligible for Supplemental Security Income payments due to their absence or removal from the United States; and to identify noncitizens ineligible for Retirement, Survivors, and Disability Insurance benefits because of removal from the United States.	1/19/2025	89 FR 58868	7.96:1
1012 – Corporations for National and CommunityServices (CNCS) Social Security Number Verification	CNCS	SSA verifies SSNs and provides citizenship status to CNCS for individuals applying to serve in approved national service positions.	10/01/2023	88 FR 42343	34.19:1
1015 –DOL Black LungPart B Data	DOL	SSA verifies that recipients of Part B are receiving the correct amount of SSI Payments.	11/4/2024	89 FR 80622	4.62:1

1016 – Internal Revenue Service (IRS) Disclosure of Information to Federal, State, and Local Agencies (DISFLA)	Department of Treasury (DOT)	SSA uses the return information provided by the IRS to verify eligibility, and determine the benefit payment amount for Medicare and SSI.	7/1/2023	88 FR 22079	4.13:1
1030 – VA Income Dependent Extract	VA	SSA verifies SSNs provided by the VA and provides SSA benefit data. The VA uses the SSA information to verify their benefit payment amounts.	3/12/2025	89 FR 82678	VA estimates $119 million in savings between 2025 & 2029 *VA did not provide us with an actual ratio.
1038 – Bureau of the Fiscal Service (Fiscal Service) Savings Bond Match	DOT	SSA uses Fiscal Service's Savings Security data to determine continued eligibility and/or correct benefit amounts for SSI applicants and recipients who did not report or incorrectly reported ownership of savings securities.	3/30/2025	89 FR 80623	43.6:1
1045 – OPM Earnings for Disability	OPM	SSA discloses return information to OPM to verify factors affecting certain disability eligibilities and amounts under their CSRS and FERS programs.	4/20/2024	89 FR 17529	20.5:1

1050 – IRS Earnings of VA Income Dependent Beneficiaries	VA	The Veterans Benefits Administration uses tax return information from SSA's Earnings Recording and Self-Employment Income system of records to update the master records of VA applicants and Beneficiaries.	3/15/2023	[88 FR 8048](#)	2.62:1
1051 – Department of Education (DoED) Verification of SSN and Citizenship Status for Financial Aid	DoED	DoED uses SSA information to verify SSNs and confirm citizenship at time of application for financial assistance under Title IV of the Higher Education Act.	10/11/2023	[88 FR 62069](#)	24.9:1
1052 – VA Earnings Information	VA	SSA discloses return information to VA to verify earnings data provided directly by medical care applicants.	5/28/2023	[88 FR 13516](#)	.267:1 Un-favorable *See Section VIII above.
1061 – Housing and Urban Development (HUD) Tenant ReportedIncome	HUD	Match helps HUD identify HUD tenants who are ineligible or who have overpaid rental assistance benefits.	11/15/2024	[89 FR 83037](#)	59.34:1
1071 – OPM Benefit Data (Consolidated Matches)	OPM	OPM uses SSA Title II and Title XVI benefit and earnings data to verify certain FERS retirement or survivors' benefit, eligibility, and payment amounts.	4/27/2024	[89 FR 17528](#)	A - 158:1 B - 4,228:1 C - 1480:1
1074 – Office of Child Support Enforcement (OCSE) Quarterly SSI Match and Online Query Agreement	HHS	SSA uses the data from OCSE to verify eligibility and payment amounts for SSI and DI benefits.	1/29/2025	[89 FR 10672](#)	4.04:1

1076 – Centers for Medicare and MedicaidServices (CMS) Disclosure of Health Facility Admission Information	HHS	SSA uses CMS data to identify SSI recipients who enter skilled nursing home facilities to adjust, suspend, or terminate SSI payments; and to verify entitlement and benefit amounts, for some World War II veterans under Title VIII.	12/20/2023	[88 FR 75636](#)	6.06:1
1094 – CMS Medicare Non-Utilization	HHS	SSA uses CMS data on Medicare enrollees whose records have been inactive for three or more years as an indicator to select and prioritize cases for continued Title II eligibility review.	1/1/2025	[89 FR 95893](#)	6.03:1
1097 – CMS Affordable Care Act (ACA) Enrollment/Eligibility	HHS	SSA discloses information to CMS to administer the Insurance Affordability Program under the Patient Protection and ACA of 2010.	9/9/2022	[88 FR 45427](#)	Un-determined. *See Section VIII above.
1098 – OCSE Title II National Directory of New Hires Agreement	HHS	SSA uses OCSE's quarterly wage and unemployment insurance data to verify eligibility and identify potential overpayments to DI recipients.	6/23/2023	[88 FR 15849](#)	15.6:1
1100 – DoED Medical Improvement Not Expected (MINE) Disability Data	DoED	DoED will use SSA MINE information to inform persons with loans and permanent disabilities who may qualify for loan discharges.	3/30/2024	[89 FR 2216](#)	61:1
1111 – Department of State, Office of Retirement (DOS) Foreign Service Disability Annuity	DOS	DOS uses Title II benefit information to determine the offset amount for Foreign Service Disability Annuity payments.	6/18/2024	[89 FR 25687](#)	DOS projects $127,000 in net savings resulting from the data exchange for FY23 through

					FY29. *DOS did not provide an actual ratio.
1304 – Fiscal Service Medicare Part D Prescription Drug Subsidy	DOT	SSA uses Fiscal Service's ownership of Savings Securities data to verify an applicant's self-certification of eligibility for prescription drug subsidy assistance.	10/2/2023	88 FR 58431	63.6:1
1305 – IRS Medicare Part D Prescription DrugSubsidy	DOT	SSA uses certain IRS return data to verify an applicant's self-certification of eligibility for prescription drug subsidy assistance.	11/27/2022	87 FR 61115	2.7:1
1306 – OCSE Medicare Part D Prescription Drug Subsidy	HHS	SSA uses OCSE quarterly wage, new hire, and unemployment data to verify an applicant's self-certification of eligibility for prescription drug assistance.	11/27/2022	87 FR 60234	28.3:1
1307 – OPM Medicare Part D Prescription Drug Subsidy	OPM	SSA uses OPM civil service benefit and payment data to verify an applicant's self-certification of eligibility for prescription drug subsidy assistance.	3/16/2024	89 FR 11331	119.9:1
1308 – RRB Medicare Part D Prescription Drug Subsidy	RRB	SSA uses RRB annuity payment information to verify an applicant's self-certification of eligibility for prescription drug subsidy assistance.	3/30/2025	89 FR 80623	43.6:1

1310 – IRS Medicare Parts B & D Premium Subsidy	DOT	SSA uses IRS return information to establish the correct amount of premium subsidy adjustments for Medicare Parts B & D.	4/01/2023	88 FR 9947	17365:1
6000 – Model betweenSSA and the State	States	SSA provides data and SSN verification to States administrating federally funded benefit programs under various provisions of the Social Security Act (Act) including state-funded programs under Title XVI of the Act.	11/14/2024	89 FR 83071	See Section VIII above.
6003 – Model between SSA and the State Agency	State Agency	Provides SSA data and SSN verification to State Agencies administering federally funded benefit programs under various provisions of the Act, including state-funded programs under Title VXI of the Act.	11/14/2024	89 FR 83071	See Section VIII above.
6004 – Model between SSA and the Tribal Agency	Tribal Agency	Provides SSA data and SSN verification to Tribal Agencies administering federally funded benefit programs under various provisions of the Act, including state-funded programs under Title VXI of the Act.	11/14/2024	89 FR 83071	See Section VIII above.