



Department of Homeland Security

Computer Matching Activities Annual Report

Covering the period January 1, 2023 – December 31, 2023



Homeland
Security

Message from the Chief Privacy Officer



I am pleased to present the U.S. Department of Homeland Security (DHS or Department) Data Integrity Board's *Computer Matching Activities Annual Report Covering the period January 1, 2023 – December 31, 2023*. This report provides transparency into the Department's matching programs, use of computer matching agreements, and the activities of the DHS Data Integrity Board.

Computer matching agreements enable federal departments and agencies and non-federal agencies to compare data in two or more automated systems of records to help establish or verify an individual's eligibility for federal benefit programs or other specified purposes. These agreements also help detect and prevent waste, fraud, and abuse, creating significant cost savings. The DHS Data Integrity Board ensures these agreements safeguard individuals' privacy by establishing conditions, protections, and procedures under which data is shared and disclosed.

As Chair of the Data Integrity Board, I am proud of the Boards' work to ensure that its matching programs are carried out efficiently, effectively, and in a privacy preserving manner.

Sincerely,

A handwritten signature in cursive script that reads "Mason C. Clutter".

Mason C. Clutter
Chair, Data Integrity Board
Chief Privacy Officer
U.S. Department of Homeland Security



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I. Executive Summary

The Computer Matching and Privacy Protection Act of 1988 (the Matching Act) amended the Privacy Act of 1974, as amended, to provide that no record contained in a system of records may be disclosed to a recipient agency or non-Federal agency for use in a computer matching program except pursuant to a written agreement (hereinafter “computer matching agreement”).¹ A computer matching program is a computerized comparison of two or more automated systems of records or a system of records with non-Federal records for certain specified purposes.²

The U.S. Department of Homeland Security (DHS or the Department) governs and oversees the Department’s computer matching activities through the DHS Data Integrity Board. This report is the Data Integrity Board’s annual report for calendar year 2023.

The Matching Act requires review, approval, and maintenance of computer matching agreements by the Data Integrity Board. The Chief Privacy Officer chairs the Data Integrity Board, comprised of Department and DHS Component senior leader membership.

During 2023, DHS Components proposed the reestablishment or renewal of five computer matching agreements for Data Integrity Board consideration and approval.³ The Matching Act provides that computer matching agreements be established for a period of no more than 18 months.⁴ Established agreements can be renewed for an additional 12 months if the parties will conduct the matching program without any change and certify that the parties conducted the matching program in compliance with the original agreement.⁵ New or reestablished agreements require the performance of a cost-benefit analysis. Each of the Department’s reestablished agreement’s cost-benefit analysis demonstrated the agreement’s cost- effectiveness.

In addition to the reestablished and renewed computer matching agreements, DHS notified the Data Integrity Board that seven existing computer matching agreements would transition to memoranda of agreement in 2023.⁶

The Department estimates that U.S. taxpayers saved as much as \$420 million under DHS’s 2023 computer matching agreements. This total includes the savings estimates from three sources as presented in Section III of the report: 1) the savings estimated from the 2023 reestablished computer matching agreements; 2) the savings estimated from the original cost benefit analysis from the renewal computer matching agreements; and 3) the pro-rated share of savings from

¹ 5 U.S.C. § 552a(o)(1).

² 5 U.S.C. § 552a(a)(8).

³ DHS reestablished or renewed computer matching agreements with the Department of Education, the Department of Housing and Urban Development (two agreements), the Small Business Association, and the Social Security Administration.

⁴ 5 U.S.C. § 552a(o)(2)(C).

⁵ 5 U.S.C. § 552a(o)(2)(D).

⁶ DHS transitioned seven computer matching agreements to memoranda of agreement: the California Department of Social Services, the Centers for Medicare and Medicaid Services, the New York Department of Labor, the New Jersey Department of Labor and Workforce Development, the Massachusetts Department of Unemployment Assistance, California Department of Healthcare Services, Texas Workforce Commission.



seven computer matching agreements that transitioned to memoranda of agreement in 2023 also detailed in this report. The total does not include the government-wide savings of \$56 billion the Centers for Medicare and Medicaid Services estimate the Centers save from the electronic eligibility verification required by the Affordable Care Act. The Department is one of the agencies supporting eligibility verification, as required by statute.

This annual report satisfies the Matching Act's requirement that the Data Integrity Board submit an annual report to the Secretary of Homeland Security and the Office of Management and Budget and make the report available to the public to provide transparency into the Department's computer matching activities.

II. Introduction

In considering passage of the Computer Matching and Privacy Protection Act of 1988 (the Matching Act), Congress recognized the benefits of computer matching programs to federal agencies. Sharing and matching data enables agencies to reduce errors, improve program efficiency, find intended beneficiaries, evaluate program performance, and reduce public information collection burdens. Automated systems data comparison also serves as an efficient way to detect and prevent waste, fraud, and abuse.

Congress passed the Matching Act to address the need for greater oversight, transparency, and administrative controls for computer matching programs because the data exchanged by agencies through matching programs often contains personal information.

In passing the Matching Act of 1988, Congress amended the Privacy Act to place the Matching Act's requirements within the Privacy Act's context.⁷

The Matching Act defines a matching program as:

(A) any computerized comparison of –

(i) two or more automated systems of records or a system of records with non-Federal records for the purpose of—

(I) establishing or verifying the eligibility of, or continuing compliance with statutory and regulatory requirements by, applicants for, recipients or beneficiaries of, participants in, or providers of services with respect to, cash or in-kind assistance or payments under Federal benefit programs, or

(II) recouping payments or delinquent debts under such Federal benefit programs, or

(ii) two or more automated Federal personnel or payroll systems of records or a system of Federal personnel or payroll records with non-Federal records.⁸

⁷ 5 U.S.C. 552a

⁸ 5 U.S.C. § 552a(a)(8).



The Matching Act requires that agencies conducting or participating in a matching program establish a Data Integrity Board to oversee and govern the Department’s computer matching activities.⁹ The Data Integrity Board must be composed of certain designated officials, for example, the DHS Chief Privacy Officer and Inspector General serve on the Board. In addition, other senior officials, including non-statutory members, also serve on the Board. The Chief Privacy Officer chairs the Board and designates its non-statutory members.¹⁰

The Matching Act sets the specific conditions and processes under which a record in a system of records may be disclosed by a federal agency, as a source agency, to a recipient agency, i.e., a federal or non-federal agency, in a matching program.¹¹ The Matching Act requires that agencies complete written agreements specifying the terms under which matches are conducted and the duration period for the agreements. Computer matching agreements must include provisions related to the agreement’s purpose and authority, individual notice, matching verification procedures, retention procedures, and timely data destruction, among other requirements.¹²

Under the Department’s matching programs, DHS provides data to and receives data from other agencies, making DHS both a source and a recipient agency under the Matching Act. As a source and recipient agency, DHS uses data to ensure that it and other agencies do not duplicate or provide applicants benefits in error. Recipient agencies primarily use DHS data to help establish whether applicants for federal and state benefits are legally eligible to receive the benefits for which the applicants applied. The information matched typically includes names, Social Security Numbers, dates of birth, income information, immigration identifier data, and employment information data. This sensitive personal information must be appropriately safeguarded.

The Matching Act requires that each Data Integrity Board compile an annual report describing the matching activities and include the following.

- Matching programs in which the agency has participated as a source or recipient agency.
- Proposed matching agreements disapproved by the Data Integrity Board.
- Any changes in membership or structure of the Board in the preceding year.
- The reason for any waiver of the requirement for completion and submission of a cost-benefit analysis prior to the approval of a matching program.
- Any violations of matching agreements that have been alleged or identified and any corrective action taken.

⁹ 5 U.S.C. § 552a(u).

¹⁰ See DHS Delegation 13001, Delegation for the Chief Privacy Officer/Chief Information Officer, (June 6, 2020); DHS Directive 262-01, Computer Matching Agreements and the Data Integrity Board, (December 13, 2011).

¹¹ 5 U.S.C. § 552a(a)(10) (Defines non-Federal agencies as “any State or local government, or agency thereof, which receives records contained in a system of records from a source agency for use in a matching program.”)

¹² 5 U.S.C. § 552a(o).



- Any other information required by the Office of Management and Budget.¹³

The subsequent sections of this report address each of the Matching Act’s report requirements.

III. DHS Matching Programs, Computer Matching Agreements, and Transitions to Memoranda of Agreement

The Department did not establish any new matching programs or computer matching agreements in 2023.¹⁴ The Department reestablished or renewed matching programs in computer matching agreements with the U.S. Department of Education, the U.S. Department of Housing and Urban Development (two agreements), the Small Business Administration, and the Social Security Administration.

Recent information system modernization and changes in certain verification procedures led the Department to assess whether some verification processes required computer matching agreements. The Department determined, and notified the Data Integrity Board, that some activities no longer constituted matching programs requiring computer matching agreements.

Accordingly, the Department transitioned seven computer matching agreements in 2023 to memoranda of agreement. The memoranda of agreement are with the California Department of Social Services, the Centers for Medicare and Medicaid Services, the New York Department of Labor, the New Jersey Department of Labor and Workforce Development, the Massachusetts Department of Unemployment Assistance, the California Department of Healthcare Services, and the Texas Workforce Commission. The Department required the inclusion of privacy safeguards comparable to those in the previous computer matching agreements within the transitioned agreements.

The following tables provide additional information about each of the Department’s matching programs and the associated computer matching agreements, including the required cost-benefit analysis for reestablished agreements. Renewal agreements do not require a cost-benefit analysis for the renewal.¹⁵ Information about the result of the original cost-benefit analysis is included for the renewal agreements. The agreements and associated *Federal Register* notices are available at: <https://www.dhs.gov/publication/computer-matching-agreements-and-notices>.

A subsequent section provides information about the DHS computer matching agreements that transitioned in 2023 to memoranda of agreement.

¹³ 5 U.S.C. § 552a(u)(3)(D); *See also* Office of Management and Budget Circular No. A-108, Federal Agency Responsibilities for Review, Reporting and Publication under the Privacy Act, Section 14, Annual Matching activity Review and Report.

¹⁴ The Federal Register Notices for the reestablished agreements publish the agreements as “new” agreements. The Department characterizes the agreements as “reestablished” rather than new because the programs have been continuous.

¹⁵ 5 U.S.C. §552a(o)(2)(D).



Matching Programs and Computer Matching Agreements

DHS and U.S. Department of Education Matching Program (Renewal)	
Program Purpose:	To confirm immigration status of noncitizen applicants and recipients of financial assistance under Title IV of the Higher Education Act of 1965.
Agencies/Components involved:	DHS/U.S. Citizenship and Immigration Services and the U.S. Department of Education
Initial execution date	March 12, 2010
Original Cost Benefit Analysis Results	Favorable: Annual savings of \$11.3 million
FR Notice:	87 FR 14844
Type of Agreement in 2023:	12-month renewal agreement
Effective date:	October 21, 2023, to October 20, 2024
Initiate the reestablishment of the 18-month computer matching agreement:	Reestablish as an 18-month computer matching agreement.
Statutory Terms of Agreement:	Immigration Reform and Control Act of 1986, § 121; Immigration and Nationality Act, as amended, 8 U.S.C. § 1103, § 103; Illegal Immigration Reform and Immigrant Responsibility Act of 1996, as amended, 8 U.S.C. § 1373(c); Higher Education Act of 1965, § 484(g), as amended (HEA), 20 U.S.C. § 1091(g), consistent with the requirements of § 484(a)(5), 20 U.S.C. § 1091(a)(5).



DHS and the U.S. Department of Housing and Urban Development Matching Program (Renewal and Reestablishment)	
Purpose:	Transition U.S. Department of Housing and Urban Development housing recipients, whose homes are uninhabitable due to a declared disaster or emergency with Individual Assistance authorized, from emergency sheltering or Federal Emergency Management Agency housing assistance back into U.S. Department of Housing and Urban Development assisted housing. 2. To allow U.S. Department of Housing and Urban Development to develop the funding formulas to allocate funding for Community Development Block Grant for Disaster Recovery grant awards and request additional appropriations from Congress. 3. Allow Community Development Block Grant for Disaster Recovery Grantees to develop action plans and marketing for their Community Development Block Grant for Disaster Recovery grant-funded programs. 4. To support duplication of benefit checks conducted by Community Development Block Grant for Disaster Recovery grantees for Community Development Block Grant for Disaster Recovery grant-funded programs.
Agencies/Components involved:	DHS/Federal Emergency Management Agency and the U.S. Department of Housing and Urban Development
Cost of Computer Matching Agreement:	This computer matching program has an average annual cost of \$113,084.
Benefits of Computer Matching Agreement:	The total annual tangible benefit is \$121.4 million, the sum of the U.S. Department of Housing and Urban Development benefits from Community Development Block Grant for Disaster Recovery grantees avoiding duplication of benefits and the Federal Emergency Management Agency benefits from avoiding improper rent payments.
Result:	Favorable: the analysis indicates that the U.S. Department of Housing and Urban Development will realize a net benefit of approximately \$119,370,000 annually, and the Federal Emergency Management Agency will realize a net benefit of approximately \$919,000 annually.
Initial execution date	October 14, 2016
FR Notice:	87 FR 7859
Type of Agreement in 2023	Renewed the 12-month agreement from September 15, 2023 to September 14, 2024 (to prevent an agreement lapse).



DHS and the U.S. Department of Housing and Urban Development Matching Program (Renewal and Reestablishment)	
	In December 2023, the Data Integrity Board approved the reestablishment of an 18-month agreement that took effect on March 11, 2024.
Effective date: 2023	September 15, 2023 to September 14, 2024 (renewal) March 11, 2024 to September 1, 2025 (reestablishment)
Status if continued in 2024	The 12-month agreement was in effect until the 18-month agreement took effect on March 11, 2024.
Justification:	The computer matching agreement enables the Federal Emergency Management Agency to continue interagency data sharing to re-house disaster survivors, support U.S. Department of Housing and Urban Development benefits from Community Development Block Grant for Disaster Recovery allocation process, assist U.S. Department of Housing and Urban Development benefits from Community Development Block Grant for Disaster Recovery grantees with implementing their grant-funded programs. Additionally, help U.S. Department of Housing and Urban Development Community Development Block Grant for Disaster Recovery grantees check for the duplication of benefits while administering their grant-funded programs.
Statutory Terms of Agreement:	Robert T. Stafford Disaster and Emergency Assistance Act, as amended at 42 U.S.C. § 5121 et seq. [specifically §§ 5174(i), 5174(f)(2)]; Debt Collection Improvement Act of 1996, 31 U.S.C. §§ 3325(d), 7701(c)(1)); 31 U.S.C. § 7701; 6 U.S.C. §§ 776-777; Omnibus Appropriations Act of 2009, section 239; Department of Housing and Urban Development Regulations at 24 C.F.R. § 982.35(c).

DHS and Small Business Administration Matching Program (Renewal)	
Purpose:	To ensure that applicants for Small Business Administration Disaster Loans and applicants for DHS/Federal Emergency Management Agency programs that provide Other Needs Assistance and Housing Assistance meet the criteria of eligibility for assistance and do not receive duplicate benefits.
Agencies/Components involved:	DHS/Federal Emergency Management Agency and the Small Business Administration



DHS and Small Business Administration Matching Program (Renewal)	
Original Cost-Benefit Analysis Results:	Favorable: The cost/benefits analysis indicated the agreement will have a tangible savings to the Small Business Administration of approximately \$2.5 million, annually.
Initial execution date	May 21, 2010
FR Notice:	86 FR 48461
Type of Agreement in 2023:	Renewed the 12-month agreement from March 3, 2023 to March 2, 2024. [NOTE: In January 2024, the Data Integrity Board approved the reestablishment of an 18-month agreement that took effect in March 2024. This agreement will be reported on in the 2024 Annual Report.]
Effective date:	March 3, 2023 to March 2, 2024 [March 3, 2024 to September 2, 2025, reestablished agreement is in effect.]
Status if continued in 2024:	Renewal in effect until March 2, 2024 at which point an 18-month reestablished agreement took effect (see note above).
Justification:	DHS/Federal Emergency Management Agency and Small Business Administration provide benefits for the same type of assistance: personal property damage, moving and storage expenses, and transportation assistance. The amount of aid provided by the Small Business Administration impacts the amount of assistance the Federal Emergency Management Agency provides. This matching program ensures that both agencies confirm disaster survivor eligibility of assistance and that disaster survivors are not receiving duplicative benefits from both agencies.
Statutory Terms of Agreement:	<ul style="list-style-type: none"> • The Privacy Act of 1974 (5 U.S.C. § 552a), as amended by the Computer Matching and Privacy Protection Act of 1988 (Pub. L. 100-503) and the Computer Matching and Privacy Protection Amendments of 1990 (Pub. L. 101-508) (Privacy Act). • The Small Business Act, codified at 15 U.S.C. § 636(b)(1), Section 7(b)(1). • The Robert T. Stafford Disaster Relief and Emergency Assistance Act, codified at 42 U.S.C. § 5155, Section 312. • The Debt Collection Improvement Act of 1996, 31 U.S.C. 3325(d) and 7701(c)(1). • Executive Order 13411, Improving Assistance for Disaster Victims, 71 Fed. Reg. 52729 (Aug 29, 2006).



DHS and Social Security Administration Matching Program (Renewal)	
Purpose:	To identify noncitizens who either voluntarily leave the United States or are removed from the United States to determine whether suspension or nonpayment of their social security benefits is applicable.
Agencies/Components involved:	DHS/U.S. Citizenship and Immigration Services, U.S. Immigration and Customs Enforcement, and Social Security Administration
Initial execution date:	June 12, 2007
Original Cost Benefit Analysis Results	Favorable: Annual savings of \$242,206
FR Notice:	87 FR 30321
Type of Agreement in 2023:	Renew the 12-month computer matching agreement.
Effective date:	January 19, 2024 to January 18, 2025
Status if continued in 2024:	Initiate the reestablishment of the 18-month computer matching agreement.
Statutory Terms of Agreement:	42 U.S.C. §§ 402(n), 1382(f), 1382(c)(a)(1), 1383(e)(1)(B) and (f); 8 U.S.C. §§ 1611 and 1612.



Memoranda of Agreement

The following tables provide information about the memoranda of agreement the Department and its partners transitioned from computer matching agreements in 2023.

DHS and California Department of Social Services Memorandum of Agreement	
Purpose:	To determine benefits eligibility for immigrants under the Temporary Assistance to Needy Families and Supplemental Nutrition Assistance Program administered by the California Department of Social Services.
Agencies/Components involved:	DHS/U.S. Citizenship and Immigration Services and the California Department of Social Services
Initial execution date	May 10, 2013
FR Notice:	85 FR 78346
Type of Agreement in 2023:	Transitioned from a computer matching agreement to a memorandum of agreement on April 19, 2023
Effective date:	April 19, 2023
Status if continued in 2024:	Memorandum of agreement
Statutory Terms of Agreement:	Immigration Reform and Control Act § 121; 42 U.S.C. § 1320b-7(a); 42 U.S.C. § 1320b-7(a); Personal Responsibility and Work Reconciliation Act of 1996 § 840; Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), § 642(c), codified at 8 U.S.C. § 1373(c); Section 213A of the Immigration and Nationality Act (8 U.S.C. §§ 1183a and 1631); California Welfare and Institutions Code §§ 11104.1, 14007.5, 14011.2.



DHS and Centers for Medicare & Medicaid Services Memorandum of Agreement	
Purpose:	To verify eligibility requirements for Qualified Health Plans.
Agencies/Components involved:	DHS/U.S. Citizenship and Immigration Services to the Centers for Medicare & Medicaid Services, Health and Human Services.
Initial execution date	August 15, 2013
FR Notice:	86 FR 14123
Type of Agreement in 2023:	Transitioned from a computer matching agreement to a memorandum of agreement on August 16, 2023
Effective date:	August 16, 2023
Status if continued in 2024:	Memorandum of agreement
Statutory Terms of Agreement:	Patient Protection and Affordable Care Act, codified at 42 U.S.C. § 18001 et seq. (2010), §§ 1311(d)(4)(H), 1312(f)(3), 1331(e), 1411, 1413, 2201, 2501(c); Social Security Act, §§ 1137(d), 1902(a)(46)(B), and 1903(x), 2501(c), 1943(b); Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), §§ 401, 402, 403, 421, and 431; Children’s Health Insurance Program Reauthorization Act of 2009.



DHS and the New York Department of Labor Memorandum of Agreement	
Purpose:	To determine benefits eligibility for immigrants under Unemployment Compensation administered by the New York Department of Labor.
Agencies/Components involved:	DHS/U.S. Citizenship and Immigration Services to the New York Department of Labor.
Initial execution date	January 16, 2009
FR Notice:	86 FR 69669
Type of Agreement in 2023:	Transitioned from a computer matching agreement to a memorandum of agreement on May 17, 2023
Effective date:	May 17, 2023
Status if continued in 2024:	Memorandum of agreement
Statutory Terms of Agreement:	Immigration Reform and Control Act § 121; 42 U.S.C. § 1320b-7(a); New York Unemployment Insurance Law, Article 18, Title 7, § 590; Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), § 642(c), codified at 8 U.S.C. § 1373(c).



DHS and the New Jersey Department of Labor & Workforce Development Memorandum of Agreement	
Purpose:	To determine benefits eligibility for immigrants under Unemployment Compensation administered by New Jersey Department of Labor & Workforce Development.
Agencies/Components involved:	DHS/U.S. Citizenship and Immigration Services to New Jersey Department of Labor & Workforce Development.
Initial execution date	January 2005
FR Notice:	86 FR 70142
Type of Agreement in 2023:	Transitioned from a computer matching agreement to a memorandum of agreement on May 19, 2023
Effective date:	May 19, 2023
Status if continued in 2024:	Memorandum of agreement
Statutory Terms of Agreement:	Immigration Reform and Control Act § 121; 42 U.S.C. § 1320b-7(a); 42 U.S.C. § 1320b-7; New Jersey Statute 43:21-4; Illegal Immigration Reform and Immigrant Responsibility Act of 1996), § 642(a), codified at 8 U.S.C. § 1373(a).



DHS and the Massachusetts Department of Unemployment Assistance Memorandum of Agreement	
Purpose:	To determine benefits eligibility for immigrants under Unemployment Compensation administered by the Massachusetts Department of Unemployment Assistance.
Agencies/Components involved:	DHS/U.S. Citizenship and Immigration Services and the Massachusetts Department of Unemployment Assistance
Initial execution date	January 16, 2009
FR Notice:	86 FR 68509
Type of Agreement in 2023:	Transitioned from a computer matching agreement to memorandum of agreement on May 17, 2023.
Effective date:	May 17, 2023
Status if continued in 2024:	Memorandum of agreement
Statutory Terms of Agreement:	Immigration Reform and Control Act § 121; 42 U.S.C. 1320b-7(a); Mass. Gen. Laws ch. 151a § 25(h); Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), § 642(c), codified at 8 U.S.C. § 1373(c).



DHS and California Department of Healthcare Services Memorandum of Agreement	
Purpose:	To determine benefits eligibility for immigrants under Medicaid Programs administered by the California Department of Healthcare Services
Agencies/Components involved:	DHS/U.S. Citizenship and Immigration Services and the California Department of Healthcare Services
Initial execution date	June 18, 2009
FR Notice:	86 FR 67483
Type of Agreement in 2023:	Transitioned from a computer matching agreement to a memorandum of agreement on May 1, 2023
Effective date:	May 1, 2023
Status if continued in 2024:	Memorandum of agreement
Statutory Terms of Agreement:	Immigration Reform and Control Act § 121; 42 U.S.C. § 1320b-7(a); Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), § 642(c), codified at 8 U.S.C. § 1373(c); California Welfare and Institutions Code §§ 11104.1, 14007.5, 14011.2.



DHS and Texas Workforce Commission Memorandum of Agreement	
Purpose:	To determine benefits eligibility for immigrants under Unemployment Compensation administered by the Texas Workforce Commission.
Agencies/Components involved Computer Matching Agreement:	DHS/U.S. Citizenship and Immigration Services and the Texas Workforce Commission.
Initial execution date	June 8, 2009
FR Notice:	86 FR 67072
Type of Agreement in 2023:	Transitioned from a computer matching agreement to a memorandum of agreement on May 15, 2023.
Effective date:	May 15, 2023
Status if continued in 2024:	Memorandum of agreement
Statutory Terms of Agreement:	Immigration Reform and Control Act § 121; 42 U.S.C. § 1320b-7(a); Texas Labor Code § 207.043; Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), § 642(c), codified at 8 U.S.C. § 1373(c).

IV. Proposed Matching Agreements Disapproved by the Data Integrity Board

The Data Integrity Board did not disapprove any proposed matching programs in 2023.

V. Data Integrity Board Membership or Structural Changes

The Matching Act requires a description of any changes in membership or structure of the Data Integrity Board. In 2023, the following individuals oversaw the Department’s Computer Matching Agreement Program as members of the DHS Data Integrity Board.

DHS Data Integrity Board membership as of December 2023:

- Chairperson: Mason C. Clutter, DHS Chief Privacy Officer
- Executive Director: Bradley White, Senior Director, Policy and Oversight, Privacy Office
- Counsel: Alexander Wood, Supervisory Attorney-Advisor for DHS Privacy and Information Law, Legal Counsel Division, Office of the General Counsel
- Joseph V. Cuffari, Ph.D., DHS Inspector General
- Peter Mina, Deputy Officer for Programs and Compliance, DHS Office for Civil Rights and Civil Liberties
- Michael Weissman, Acting Chief Data Officer, DHS Office of the Chief Information Officer
- Jennifer Higgins, Deputy Director, U.S. Citizenship and Immigration Services



- Julie Waters, Ph.D., Senior Technical Advisor for Data & Analytics, Office of Policy and Program Analysis, Federal Emergency Management Administration
- Kenneth Clark, Ph.D., Assistant Director, U.S. Immigration and Customs Enforcement

Changes to the Data Integrity Board membership in 2023, include:

- Lynn Parker Dupree, Data Integrity Board Chair and DHS Chief Privacy Officer, left the Board to be replaced by then-Acting DHS Chief Privacy Officer Mason C. Clutter in February 2023.
- Mike Horton, Chief Data Officer, Office of the Chief Information Officer, left the Board to be replaced by Garth White, Acting Chief Data Officer, OCIO in June 2023
- Paul Judson, Deputy Associate Administrator, Office of Policy and Program Analysis, Federal Emergency Management Agency left the Board to be replaced by Julie Waters, Ph.D., Senior Technical Advisor for Data & Analytics, Office of Policy and Program Analysis, Federal Emergency Management Agency in November 2023
- Garth White, DHS Acting Chief Data Officer, Office of the Chief Information Officer left the Board to be replaced by Michael Weissman, DHS Acting Chief Data Officer, Office of the Chief Information Officer in December of 2023

VI. Waivers to the Cost Benefit Analysis Requirement

The Board did not grant any waivers to the cost-benefit analysis requirement in 2023. All reestablished agreements approved by the Data Integrity Board in 2023 were accompanied by a cost benefit analysis showing that the agreements are cost-effective. Renewal agreements do not require a cost benefit analysis. The DHS Data Integrity Board may, without additional review, renew the matching agreement for a current, ongoing matching program if the program will be conducted without change and the parties certify to the Board that the program has been conducted in compliance with the agreement.¹⁶

VII. Computer Matching Program Violations and Agreement Review

There were no violations of computer matching agreements reported to the Data Integrity Board in 2023. In addition, the Data Integrity Board conducted an Annual Review on December 6, 2023 to ensure DHS and partner agencies in each respective computer matching agreement adhere to the requirements in the applicable agreement and that the disclosure of agency records continues to be justified.

VIII. Conclusion

The Data Integrity Board actively oversees the Department's matching programs, including the reestablishment or renewal of the computer matching agreements for five DHS matching

¹⁶ 5 U.S.C. §552a(o)(2)(D).



Homeland Security

Computer Matching Activities 2023 Annual Report

programs. The Board reviews all computer matching activities and ensures that the Department's computer matching agreements meet the requirements of the Computer Matching and Privacy Protection Act while providing cost savings to the government and preventing and detecting possible fraud, waste, or abuse.