

Management Instruction

Computer Matching Programs

This management instruction (1) provides procedural instructions for requesting and approving computer matching programs; and (2) describes and delineates the membership and responsibilities of the Postal Service Data Integrity Board.

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Explanation

Computer matching is a term used to describe the automated comparison of databases containing records about individuals. Purposes for matching include the following:

- Verifying the accuracy of data.
- Uncovering waste, fraud, or abuse in federal programs.
- Locating specific individuals (e.g., absent parents owing child support or persons indebted to the government).
- Determining eligibility for federal or state benefits.

Most matching programs in which the Postal Service™ participates:

- Originate with an agency that has management responsibility for a program relating to one of these matching purposes.
- Involve a comparison of employee data from Privacy Act system USPS 100.400 Personnel Compensation and Payroll Records (see the Appendix to Handbook AS-353, *Guide to Privacy and Freedom of Information Act*).

Disclosure of information is limited to that needed to accomplish the matching purpose.

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Requesting and Approving Computer Matching Programs

Definition

A computer matching program compares the following:

1. A Postal Service automated system of records with an automated system of records of another federal agency, or with nonfederal records, for the purpose of:
 - a. Establishing or verifying the eligibility of individuals, or their continuing compliance with statutory and regulatory requirements, for cash or in-kind assistance, or payments under federal benefit programs.
 - b. Recouping payments or delinquent debts under such federal benefit programs.
2. A Postal Service automated personnel or payroll system of records with another automated personnel or payroll system of records of the Postal Service or another federal agency or with nonfederal records.

Legal Requirements

Under the Privacy Act of 1974, the Postal Service must do the following:

1. Publish in the *Federal Register* and forward to Congress and the Office of Management and Budget (OMB) adequate advance notice of any proposal to establish or modify, or alter the uses of, any system of records that contains information about persons.
2. Comply with certain requirements for the collection, use, disclosure, and safeguarding of information about individuals.
3. Permit an individual to:
 - a. Determine which records the Postal Service has filed or cross-indexed under that individual's name.
 - b. Gain access to and have a copy made of the pertinent information in those records.
 - c. Amend or correct the records.
 - d. Determine the use and disclosures made of the records.

More specifically, under the procedural requirements of the Privacy Act, as amended by the Computer Matching and Privacy Protection Act of 1988, agencies that plan to compare their records must do the following:

1. Execute computer matching agreements.
2. Establish a Data Integrity Board to oversee agency computer matching activities.

3. Publish in the *Federal Register* and forward to Congress and OMB advance notice of its intent to establish, substantially revise, or renew a computer matching program, unless such notice is published by another participant agency. Agencies must publish notice in accordance with the Privacy Act of 1974, as amended prior to:
 - a. Initiation of any matching activity carried out under a new or substantially revised program.
 - b. Expiration of an existing agreement.

Congress and OMB must receive notification of the computer matching program in advance of its becoming effective in accordance with the Privacy Act of 1974, as amended.

Records may not be exchanged for a matching program until *all* of the following requirements of the Privacy Act and OMB implementing guidelines have been met:

1. Disclosure may occur only if permitted by the Privacy Act or as a *routine use* of the system of records. The manager of the Records Office will advise on the applicability of a routine use.
2. The Postal Service Data Integrity Board has approved a written agreement specifying the terms under which a matching program will be accomplished.
3. Advance notice has been published in the *Federal Register* and forwarded to Congress and OMB.

Procedures

Submitting a Proposal

Any agency or Postal Service organization that wishes to use records from a Postal Service automated system of records in a computerized comparison with other records must submit its proposal to the Postal Service manager of the Records Office. For proposal specifications, see below under Concluding and Submitting a Computer Matching Agreement.

The initiating agency or Postal Service organization should submit the proposal at least three months in advance of the anticipated starting date to allow time to meet Privacy Act publication and review requirements. All proposals, whether from Postal Service organizations or other governmental agencies, must be submitted to:

MANAGER RECORDS OFFICE
POSTAL SERVICE
475 L'ENFANT PLAZA SW
WASHINGTON DC 20260-5846

The Postal Inspection Service must submit its proposals for matching programs to the manager of the Records Office through:

COUNSEL
POSTAL INSPECTION SERVICE
475 L'ENFANT PLAZA SW
WASHINGTON DC 20260-2181

Concluding and Submitting a Computer Matching Agreement

Participants in a computer matching program must conclude a written agreement specifying the terms under which they will accomplish the matching program. The participants will then submit this agreement to the Postal Service Data Integrity Board for review.

The proposal and agreement must specify the following:

1. The purpose and legal authority for conducting the program.
2. The justification for the program and the anticipated results, including a specific estimate of any savings in terms of expected costs and benefits, when appropriate. Cost-benefit data must be in sufficient detail for the Data Integrity Board to make an informed decision.
3. A description of the records that will be matched, including the data elements to be used, the approximate number of records, and the projected starting and completion dates of the matching program.
4. Procedures for providing individualized notice that information provided by individuals may be subject to verification through matching programs.
5. Procedures for verifying information produced in a matching program. (An agency may not take adverse action against an individual as a result of information produced by a matching program until the agency has independently verified the information.)
6. Procedures for ensuring the administrative, technical, and physical security of the records matched; for the retention and timely destruction of records created by the matching program; and for the use and return or destruction of records used in the program.
7. Prohibitions concerning duplication and redisclosure of records exchanges, except where required by law or essential to the conduct of the matching program.
8. Information on assessments that have been made on the accuracy of records to be used in the matching program.
9. A statement that the Comptroller General may have access to all records of the participating agencies in order to monitor compliance with the agreement.

Review and Approval of Agreements

Before the Postal Service may participate in a computer matching program, the Postal Service Data Integrity Board must review the proposed matching program and unanimously approve the matching agreement. The Chair executes approved agreements. If the Board disapproves a matching agreement, any party may appeal within 30 days following the Board's written disapproval by writing to:

DIRECTOR
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON DC 20505-0001

Effective Dates

The agreement will become effective in accordance with the date in the matching agreement and as provided to Congress and OMB and published in the *Federal Register*. The agreement may remain in effect only as long as necessary to accomplish the specific matching purpose, but this period may not exceed 18 months. The Postal Service Data Integrity Board may extend an agreement for one additional year, without further review, if within 3 months prior to expiration of the 18-month period it finds that the matching program will be conducted without change and if each party to the agreement certifies that the program has been conducted in compliance with the matching agreement. Renewal of a matching program requires execution of a new computer matching agreement that has received Board review and approval.

Accounting of Disclosure Requirements

If the other agency performs the physical computer comparison, and if records about *all* individuals within a system of records are disclosed outside of the Postal Service, the accounting of disclosure may be in the form of a memo to the file or other media, but must indicate the following:

- The date of disclosure.
- The data elements disclosed about each individual (e.g., name and Social Security number).
- The systems of records from which records were disclosed.
- The matching program.
- The name and address of the agency or person to whom the disclosure was made.

If the Postal Service performs the physical computer comparison, and if records about *specific* individuals (e.g., individuals common to both automated files) within a system of records are disclosed outside of the Postal Service, an exact copy of the tape or document containing the disclosed information must be kept with the name and address of the agency or person to whom disclosure was made.

Fees

The Postal Service may participate in computer matches on a cost-reimbursable basis whenever, in its opinion, the level of effort warrants. The Postal Service will notify the agency to be charged, in writing, of the approximate costs before they are incurred. The schedule in Chapter 4 of Handbook AS-353 directs how to calculate the costs.

Postal Service Data Integrity Board

Role and Membership

The Postal Service Data Integrity Board oversees and coordinates Postal Service computer matching activities. Its principle function is to review and approve all written agreements for receipt or disclosure of Postal Service records for matching programs and to ensure compliance with the Privacy Act. The Privacy Act requires that the senior official responsible for implementation of Postal Service policy and the Inspector General serve on the Board. The Board's membership consists as follows:

Vice President, Consumer Advocate (Chairman).

Executive Vice President, Chief Human Resources Officer

Chief Postal Inspector.

Inspector General.

General Counsel.

Chief Privacy Officer (Secretary).

Responsibilities

The Board:

1. Reviews, approves, and maintains all written agreements for receipt or disclosure of Postal Service records for matching programs to ensure compliance with the Privacy Act and with all relevant statutes, regulations, and guidelines.
2. Reviews all matching programs in which the Postal Service has participated during the year; determines compliance with applicable laws, regulations, guidelines, and agency agreements; and assesses the costs and benefits of such programs.
3. Reviews all recurring matching programs in which the Postal Service has participated during the year for continued justification for such disclosures.
4. Compiles a biannual report, to be submitted to the Postmaster General and the OMB and made available to the public on request, describing the matching activities of the Postal Service.

This report must include the following:

- a. Matching programs in which the Postal Service has participated.
 - b. Proposed matching agreements that the Board disapproved.
 - c. Any changes in membership or structure of the Board in the preceding year.
 - d. The reasons for any waiver of the requirement for a cost-benefit analysis.
 - e. Any alleged or identified violations of matching agreements and any corrective action taken.
 - f. Any other information that the director of the OMB requires to be included in such report.
5. Serves as a clearinghouse for receiving and providing information on the accuracy, completeness, and reliability of records used in matching programs.
 6. Provides interpretation and guidance to Postal Service components and personnel on the requirements of this section for matching programs.
 7. Reviews recordkeeping and disposal policies and practices for matching programs to assure compliance with this section.
 8. Reviews and reports on any matching activities that are not matching programs.

Meetings

The Board will meet often enough to ensure that matching programs are carried out efficiently, expeditiously, and in conformance with statutory requirements.