

**COMPUTER MATCHING AGREEMENT BETWEEN
U.S. SMALL BUSINESS ADMINISTRATION
AND
DEPARTMENT OF VETERANS AFFAIRS**

I. INTRODUCTION

The SMALL BUSINESS ADMINISTRATION (SBA), as the recipient agency, and the DEPARTMENT OF VETERANS AFFAIRS (VA), as the source agency, have entered into this Computer Matching Agreement (Agreement) pursuant to section (o) of the Privacy Act of 1974, (Privacy Act), 5 U.S.C. § 552a, as amended by the Computer Matching and Privacy Protection Act of 1988 (Pub. L. 100-503), and as amended by the Computer Matching Privacy Protection Act Amendments of 1990 (Pub. L. 101-508, 5 U.S.C. § 552a(p) (1990)). The purpose of this Agreement is to disclose VA records about veteran status to SBA so that SBA can determine eligibility of applicants to the Veterans Small Business Certification Program (VSBC). SBA will match VA data in SBA's certification database, a computer information system maintained by SBA. The terms and conditions of this Agreement ensure that VA discloses data from its Privacy Act system of records that shows the status of individuals as veterans or service-disabled veterans (qualifying veterans), and that SBA uses disclosed data in accordance with the requirements of the Privacy Act of 1974, as amended by the Computer Matching and Privacy Protection Act (CMPPA) of 1988, 5 U.S.C. § 552a.

II. PURPOSE AND LEGAL AUTHORITY

A. Purpose of the Matching Program

This Agreement establishes the Computer Matching program between VA and SBA. The Computer Matching program seeks to ensure that applicants for SBA Veteran Small Business Certification Program are eligible as qualifying veterans. This will be accomplished by matching specific VA data with SBA data to determine what applicants and participants meet SBA's Veteran Small Business Certification Program criteria.

This Agreement is necessary because Section 862 of the National Defense Authorization Act for Fiscal Year 2021, Public Law 116-283, 134 Stat. 3388 (January 1, 2021), amended 38 U.S.C § 8127 and transferred the responsibility for certification of Veteran-Owned Small Businesses (VOSB) and Service-Disabled Veteran-Owned Small Businesses (SDVOSB) to SBA as of January 1, 2023 (Transfer Date).

To be eligible for certification in SBA's Veteran Small Business Certification Program, an applicant's small business must be owned and controlled by one or more qualifying veterans. A "qualifying veteran" is a veteran as defined by 38 U.S.C. 101(2) or a service-disabled veteran. A service-disabled veteran is an individual that possesses either a valid disability rating letter issued by VA, establishing a service-connected rating between 0 and 100 percent, or a valid disability determination from the Department of Defense or is registered in the Beneficiary Identification and Records Locator Subsystem maintained by Department of

Veterans Affairs' Veterans Benefits Administration as a service-disabled veteran. Reservists or members of the National Guard disabled from a disease or injury incurred or aggravated in line of duty or while in training status also qualify.

VA maintains a list of veterans and service-disabled veterans and will provide SBA with this data. To accomplish this, VA and SBA will participate in a Computer Matching program to match data in order to identify what veterans are qualifying veterans and to verify eligibility for SBA's certification program.

B. Legal Authority

This Agreement is executed in compliance with the Privacy Act and other statutes discussed in this Agreement, their implementing regulations, and related notices and guidance.

1. Section 862 of the National Defense Authorization Act for Fiscal Year 2021, Public Law 116-283, 134 Stat. 3388 (January 1, 2021) (NDAA 2021), amended 38 U.S.C § 8127 and transferred the responsibility for certification of VOSB and SDVOSB for VA procurements to SBA as of January 1, 2023 (Transfer Date). NDAA 2021 also amended Section 36 of the Small Business Act to create a certification requirement for SDVOSBs seeking sole source and set-aside contracts across the Federal Government.
2. Pursuant to section 862(b) of the NDAA 2021, VA shall verify an individual's status as a veteran or a service-disabled veteran and establish a system to permit SBA to access, but not alter, the verification of such status.
3. Pursuant to section 862(d) of the NDAA 2021, upon request by SBA, federal agencies shall provide data that SBA determines to be necessary to carry out the certification of a small business concern owned and controlled by veterans or service-disabled under sections 36 and 36A of the Small Business Act.

III. JUSTIFICATION AND EXPECTED RESULTS

A. Justification

To obtain certification, VOSB and SDVOSB must be owned and controlled by one or more qualifying veterans. However, SBA does not determine an individual's eligibility as a veteran or service-disabled veteran, nor does SBA maintain a list of qualifying veterans or have access to VA's records.

To obtain this information without a computer match, SBA must either request the information directly from the applicant or request the applicant's data from VA. A request for information directly from the applicant would result in a less efficient and more timely process as well as an additional burden on the applicant. A manual request to VA would also not be an efficient process.

Under the scenario where SBA requests information from VA manually, an SBA employee would contact VA to obtain the information by either phone or email; upon

receipt of the request by VA, an employee would search VA information records for the applicant and then transmit this information by phone or email to SBA; an SBA employee would then enter the information into the applicant's record. Alternatively, SBA could require the applicant to upload documentation to Veteran Certification Management System (VCMS) as proof of status as a qualifying veteran; SBA would review for eligibility and evaluate the authenticity of the documentation by either a manual check or confirmation with VA; and then enter the information into the applicant's record. Either manual process would cause significant delays in processing of applications, increase the probability of human error in the process, and increase costs to both agencies due to the use of employees.

The matching Agreement may also reduce instances of fraud or misrepresentation by applicants as to veteran status. While the risk of fraud is low, there is a possibility that an applicant may misrepresent their status as a qualifying veteran in documentation submitted to SBA. With the matching Agreement, SBA will obtain this information directly from VA, the agency that verifies qualifying veteran status and maintains a list of eligible qualifying veterans, thereby ensuring that applicant's status is accurate.

To accomplish this task in an efficient and timely manner, VA and SBA will participate in a Computer Matching program to match data in order to identify what veterans are qualifying veterans and to verify eligibility for SBA's certification program. VA's Veterans Benefits Administration maintains a list of veterans and service-disabled veterans and will disclose this data to SBA.

B. Expected Results

The matching program will ensure that applicants to SBA's Veteran Small Business Certification Program have a small business that is owned and controlled by one or more qualifying veterans. VA will disclose data about veteran status, SBA will verify the status of applicants but will not alter the data. The matching program will allow SBA to instantaneously verify the status of an applicant.

This Agreement will help SBA quickly and efficiently identify qualifying veterans that have submitted applications to SBA for certification. Without the use of this computer match, SBA staff would be required to manually request this data from VA staff to verify qualifying veteran status, or in the alternative, request this information from the applicant. Given the extent of firms that may apply for certification, this manual request process would be require significant federal employee time and resources from both agencies to verify status. The matching program between SBA and VA will decrease the time required by SBA to process applications saving the federal government between \$128,412 and \$481,802, depending on which method SBA chose to manually verify qualifying veterans.

IV. RECORDS DESCRIPTION

As required by the Privacy Act's subsection 552a(o)(1)(C), the following is a description of the records that will be matched:

A. Systems of Records and Estimated Number of Records Involved

VA will disclose records from the following system of records:

- “Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records – VA (58 VA 21/22/28)” last amended at 86 FR 61858 (November 8, 2021). Routine Use No. 46 is the applicable routine use that gives VA Privacy Act disclosure authority for this Agreement.
- “Veterans Affairs Profile – VA, (192VA30),” established at 87 FR 36207 (June 15, 2022). Routine Use No. 11 is the applicable routine use that gives Privacy Act disclosure authority for this Agreement.
- “Veterans Affairs/Department of Defense Identity Repository (VADIR) – VA (138VA005Q),” last amended at 74 FR 142 (July 27, 2009), is in the process of being republished. The amended SORN includes Routine Use No. 13. Once published, this Routine Use will be the applicable routine use that gives VA Privacy Act disclosure authority for this Agreement. This Routine Use reads as follows- 13. Federal Agencies, for Computer Matches: VA may disclose information from this system to other Federal agencies in accordance with a computer matching program to determine or verify eligibility of veterans receiving VA benefits or medical care under Title 38.

SBA will match the disclosed VA records with records from its Government Contracting and Business Development System SBA 30 system of records, as provided by 86 FR 19078, to verify qualifying veteran status for inclusion in SBA’s Veterans Small Business Certification Program.

Records Estimate

SBA and VA intend to match records on applicants to the SBA’s Veteran Small Business Certification Program. The estimated number of records SBA and VA will match is dependent on the number of applications for certification received by SBA. SBA estimates that as many as 21,468 self-certified SDVOSBs may apply for certification in the first year of the program. Applicants will typically have between one to two owners whose qualifying veteran status will need to be verified.

B. Description of the Match

There is one type of match process that SBA may use during three types of certification actions: initial application, program examination, and recertification. Each use by SBA is essentially the same, SBA will verify a veteran’s eligibility

whether at application, during program participation, or at recertification prior to the firm's eligibility period of three years has expired.

1. VA/SBA – SBA automated verification of qualifying veterans at initial application, program examination, and recertification:
 - a. SBA is the recipient (i.e., matching) agency. During the application, program examination, and recertification processes, an applicant will first register with SBA's OAuth IDP Provider (CLS). This provider allows the SBA to first enforce registration and identification rules before allowing the Veteran to begin the VA Veteran's status validation process.
 - b. Following registration with SBA's system, the platform will leverage VA's Verification Application Programming Interface (API) (v2) which will allow the real-time validation of the qualifying veteran status.
 - c. SBA will leverage these APIs to request and match veteran status, disability rating, and service history of an applicant or participant. SBA will then confirm or deny eligibility based on this data.

C. Projected Starting and Completion Dates

This Agreement will take effect forty (40) days from the date copies of this signed Agreement are sent to both Houses of Congress and OMB, or thirty (30) days from the date the Computer Matching Notice is published in the Federal Register for public comment, at which time comments will be addressed. Additionally, depending on whether comments are received, this Agreement could yield a contrary determination (Commencement Date). SBA is the agency that will:

1. Transmit this Agreement to Congress;
2. Notify OMB;
3. Publish the Computer Matching Notice in the Federal Register; and
4. Address public comments that may result from publication in the Federal Register.

Matches under this program will be conducted for every Veteran Small Business Certification Program application, program examination, or recertification. The aforementioned matching processes shall commence on January 1, 2023 following the transfer of certification from VA to SBA in accordance with NDAA 2021 and shall continue until the application is denied certification at application or a participant fails to recertify its eligibility after a three-year period.

V. NOTICE PROCEDURES

The Privacy Act's subsection 552a(o)(1)(D) requires CMAs to specify procedures for notifying applicants/recipients at the time of registration and other periodic notice, as directed by the Data Integrity Board of such agency (subject to guidance provided by the Director of OMB).

VA and the SBA agree to notify all individuals initially, at the time they apply for benefits, that the information they provide on the benefit applications is subject to use in computer matching programs with other agencies. SBA will provide the notice by including appropriate language printed on their application forms (or on separate handouts, when necessary). SBA will provide subsequent periodic notices to their respective recipients, by notifying each recipient, at the time of redetermination of eligibility, of the match between VA and the SBA. VA sends all beneficiaries a notice, as part of an annual beneficiary notice, indicating that the information they provided is subject to verification by computer matching.

VI. VERIFICATION PROCEDURE AND OPPORTUNITY TO CONTEST

A. General

The Privacy Act subsection 552a(o)(1)(E) requires that each CMA outline procedures for verifying information produced in the matching program, as required by 5 U.S.C. § 552a(p). This subsection requires agencies to independently verify the information produced by a matching program and to provide the individual an opportunity to contest the agency's findings, before an adverse action is taken against the individual, as a result of the match. Subsequent amendments and regulations allow for an agency to authorize a waiver of independent verification procedures when it finds a high degree of confidence in the accuracy of the data. (See OMB "Final Guidance Interpreting the Provisions of P.L.100-503, the Computer Matching and Privacy Protection Act", Sec. 6.g. Providing Due Process to Matching Subjects, 54 Fed. Reg. 25,818 (June 19, 1989).

VA will be responsible for ensuring that VA data is current and accurate at the time it is provided to SBA. SBA will be responsible for ensuring that SBA data is solely used for eligibility review and that the data received from VA is not altered.

B. VA-SBA Automated Import Process for Eligibility Review

The matching program will be accomplished by leveraging APIs to request and match veteran status, disability rating, and service history of an applicant or program participant. SBA personnel will review the returned data and then confirm or deny eligibility based on this data. SBA will not alter this data.

C. VA/SBA Notice and Opportunity to Contest

As required by the Privacy Act's subsection 552a(p), SBA will not terminate, suspend, reduce, deny, or take other adverse action against an applicant for or participant in the

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Veterans Small Business Certification Program based on data disclosed from VA records until the individual is notified in writing of the potential adverse action, and provided an opportunity to contest the planned action. That opportunity to contest will in no case be shorter than 30 days. Notice will be provided in English and Spanish and include a tagline in the major languages of the limited English population, indicating how information is available in other languages. For additional information on language services, please see Section X.

"Adverse action" means any action resulting in a termination, suspension, reduction, or final denial of eligibility, payment, or benefit. The applicant will follow the current SBA process for response as detailed in the written notice or letter.

To enable rapid response and resolution, VA and SBA telephone numbers will be provided to call in the event of a dispute. VA and/or SBA will respond to these calls as soon as reasonably possible, and when requested, in writing.

VII. DISPOSITION AND RECORDS RETENTION OF MATCHED ITEMS

As required by the Privacy Act's subsection 552a(o)(1)(F):

- A. SBA will retain data it receives from VA under this Agreement only for the processing times required for the applicable federally funded benefit programs to verify data, and will then destroy all such data.
- B. An exception applies if the information is required for evidentiary reasons, in which case, the information will be destroyed upon completion of the criminal, civil, or administrative actions and cases.
- C. Any paper-based documentation used to determine whether a record was matched in the other agency's system and any documentation that was prepared for, provided to, or used to determine final benefit status will be destroyed by shredding, burning, or electronic erasure of the subject information according to the proper records retention schedules. Other identifiable records that may be created by each agency during the course of the investigation will be destroyed as soon as they have served the matching program's purpose pursuant to records retention requirements established in conjunction with the National Archives and Records Administration (NARA). For electronic matches, electronic records will be housed in VA System, and SBA's VCMS database, retained with and according to the appropriate records retention policy.
- D. Pursuant to SBA document retention policy, SBA retains applicant records in VCMS applicant files, including records for matched items.

VIII. SECURITY PROCEDURES

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As required by the Privacy Act's subsection 552a(o)(1)(G), SBA and VA agree to the following information security procedures:

A. Administrative

VA and SBA will comply with the existing and future requirements set forth by the Privacy Act, 44 U.S.C. §§ 3541-3549, related OMB circulars and memoranda such as Circular A-130, Managing Information as a Strategic Resource (July 28, 2016); NIST directives; and the Federal Acquisition Regulations (FAR), 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 used in federal agency business processes, as well as related reporting requirements. Specifically, the Federal Information System Modernization Act of 2014 (FISMA), (44 U.S.C. §§3501 - 3558) 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 VA and SBA will ensure that their authorized users will receive training to ensure proper information security and privacy protections are adhered to in a manner consistent with this Agreement. Accordingly, VA and SBA will restrict access to the data matched and to any data created by the match to only those users authorized under this Agreement.

B. Technical

VA will disclose data from the systems of records listed in Section IV. A. via VA's secure Lighthouse API. The results of the query are returned to VCMS in real-time and populated in VCMS so that delegated SBA staff can match data and use it in the determination of program eligibility.

C. Physical

SBA and VA agree to maintain all automated matching records in a secured computer environment that includes the use of authorized access codes (passwords and/or PIV) to restrict access. Those records will be maintained under conditions that restrict access to persons who need them in connection with their official duties related to the matching process. It is the responsibility of the user's supervisor to ensure that VA or SBA, as applicable, are notified when a user has departed or duties have changed such that the user no longer needs access to the system, to ensure timely deletion of the user's account and password.

IX. RECORDS USAGE, DUPLICATION AND REDISCLOSURE RESTRICTIONS

SBA and VA agree to the following restrictions on use, duplication, and disclosure of information furnished by the other agency:

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- A. Records obtained for this matching program or created by the match will not be disclosed outside the agency except as may be essential to conduct the matching program, or as may be required by law. Each agency will obtain the written permission of the other agency before making such disclosure.
- B. Records obtained for this matching program or created by the match will not be disseminated within the agency except on a need-to-know basis, nor will they be used for any purpose other than that expressly described in this Agreement.
- C. Data or information exchanged will not be duplicated unless essential to the conduct of the matching program. All stipulations in this Agreement will apply to any duplication.
- D. If required to disclose these records to a state or local agency or to a government contractor in order to accomplish the matching program's purpose, each agency will obtain the written agreement of that entity to abide by the terms of this Agreement.
- E. Each agency will keep an accounting of disclosures of an individual's record as required by the Privacy Act (5 U.S.C. § 552a(c)) and will make the accounting available upon request by the individual or other agency.

X. RECORDS ACCURACY ASSESSMENTS

VA and SBA attest that the quality of the specific records to be used in this matching program is assessed to be at least 99% accurate. The possibility of any erroneous match is extremely small.

In order to apply for the SBA Veteran Small Business Certification via SBA's platform, an applicant's name, address, and SSN are sent to SBA's fraud framework that orchestrates a series of commercial and internal identity and fraud verification steps. In the rare instances where the applicant's identity is not verified via this process, the applicants must proceed through an elevated screening process by contacting SBA's Customer Service Center to complete the registration.

XI. INCIDENT REPORTING AND NOTIFICATION RESPONSIBILITIES

- A. VA and SBA agree to report and track incidents in accordance with the most recent, final version of NIST Special Publication 800-61, Rev. 2.¹ Upon detection of an incident related to this interconnection, the agency experiencing the incident will promptly notify the other agency's System Security Contact(s) below:

¹ Cichonski, P., Millar, T., Grance, T., & Scarfone, K. (2012, August). Computer Security Incident Handling Guide (Unit, Department of Commerce, National Institute of Standards and Technology). Retrieved from <http://nvlpubs.nist.gov/nistp1bs/SpecialPublications/NIST.SP.800-61r2.pdf>.

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- VA will promptly notify the following contact at SBA: SBA Office of Chief Information Officer (OCIO) Chief Information Security Officer: 202-205-0101.
 - SBA will promptly notify api@va.gov, and the following contacts at VA simultaneously:
 - i. VA Privacy Officer, Rita Grewal: (202) 263-1646, rita.grewal@va.gov
 - ii. VA Chief Information Security Officer, Lynette Sherrill: (202) 270-1878, lynette.sherrill@va.gov
 - iii. Veterans Benefits Administration, Privacy Office: privacy.vbavaco@va.gov
- B.** If the federal agency experiencing the incident is unable to speak with the other federal agency's System Security Contacts within one (1) hour, or if contacting the System Security Contact is not practical (e.g., outside of normal business hours), then the following contact information shall be used:
- VA Chief Information Security Officer, Lynette Sherrill: (202) 270-1878
 - SBA Security Operations Center: (202) 205-0101 or SOC@sba.gov
- C.** If either VA and SBA experience an exposure of personally identifiable information (PII) provided under the terms of this Agreement, the federal agency that experienced the loss incident will also comply with the PII breach reporting and security requirements set forth by OMB M-17-12 "Preparing for and Responding to a Breach of Personally Identifiable Information" (January 3, 2017).
- D.** VA and SBA agree to notify all the Security Contact(s) named in this Agreement as soon as possible, but no later than one (1) hour, after the discovery of a breach (or suspected breach) involving PII. The agency that experienced the incident will also be responsible for following its internal established procedures, including:
- Notifying the proper organizations (e.g., United States Computer Emergency Readiness Team (US-CERT), the ISSOs, and other contacts listed in this document);
 - Conducting a breach and risk analysis, and making a determination of the need for notice and/or remediation to individuals affected by the loss;
 - Providing such notice and credit monitoring to the affected individuals at no cost to the other agency, if the analysis conducted by the agency having experienced the loss incident indicates that individual notice and credit monitoring are appropriate.

XII. COMPTROLLER GENERAL ACCESS

The parties authorize the Comptroller General of the United States, upon request, to have access to all SBA and VA records necessary to monitor or verify compliance with this matching Agreement, in accordance with 5 U.S.C. § 552a(o)(1)(K). This matching Agreement also authorizes the Comptroller General to inspect any records used in the matching process that are covered by this matching Agreement pursuant to 31 U.S.C. § 717 and 5 U.S.C. § 552a(b)(10).

XIII. DURATION OF AGREEMENT

A. Effective Date of the Agreement

This Agreement shall become effective, and matching may commence, under this Agreement on the later of the following dates:

- Thirty (30) days after notice of the matching program described in this CMA has been published in the Federal Register, or
- Forty (40) days after a report concerning this CMA is transmitted simultaneously to the Committee on Homeland Security and Governmental Affairs of the Senate, the Committee on Oversight and Government Reform of the U.S. House of Representatives according to 5 U.S.C. § 552a (o) (2) (A) (i), and to OMB, unless OMB waives 10 days of this 40-day period for compelling reasons, in which case 30 days after transmission of the report to OMB and Congress.

The Parties to this Agreement may assume OMB and Congressional concurrence if no comments are received within forty (40) days of the date of the transmittal letter of the Report of the Matching Program. The parties may assume public concurrence if no comment is received within thirty (30) days of the date of the publication of the Notice of Matching Program. This Agreement shall remain in effect for a period not to exceed eighteen (18) months.

B. Renewal of the Agreement

This Agreement may be extended for one twelve (12) month period upon mutual agreement by both Parties, if the renewal occurs within three (3) months of the expiration date of this Agreement. Renewals are subject to the requirements of the Privacy Act, including certification by the Parties to the responsible DIB (as described in Section XV of this Agreement) that:

- The matching program will be conducted without change, and
- The matching program has been conducted in compliance with the original Agreement pursuant to 5 U.S.C. § 552a(o)(2)(D).

C. Termination of the Agreement

This Agreement shall terminate when the purpose of the computer match has been accomplished, or after eighteen (18) months from the effective date of the Agreement without notice from either party (whichever comes first). This Agreement may also be terminated, nullified, or voided by either VA or SBA, if:

- Either Party violates the terms of this Agreement; or
- SBA or its authorized users misuse or improperly handle the data provided by VA; or
- VA or its authorized users misuse or improperly handle the data provided by SBA; or
- The Parties mutually agree to terminate this Agreement prior to its expiration after 18 months; or
- Either Party provides the other with 30 days written notice.

XIV. REIMBURSEMENT OF MATCHING COSTS

SBA and VA will bear their own costs for this program.

XV. DATA INTEGRITY BOARD REVIEW/APPROVAL

SBA and VA's Data Integrity Boards will review and approve this Agreement prior to the implementation of this matching program. Disapproval by either Data Integrity Board may be appealed in accordance with the provisions of the Computer Matching and Privacy Protection Act of 1988, as amended. Further, the Data Integrity Boards will perform an annual review of this matching program. SBA and VA agree to notify the Chairs of each Data Integrity Board of any changes to or termination of this Agreement.

This Agreement may be modified only by mutual consent of both Parties and approval of the respective DIBs. Any modifications must be in writing and satisfy the requirements of the Privacy Act and the requirements set forth in OMB Guidelines on the Conduct of Matching Programs, 54 Fed. Reg. 25818

XIV. POINTS OF CONTACTS AND APPROVALS

For general information, please contact:

- Jason Hoge, Acting Exec. Director, Product Engineering, Tel.: 612-725-4337 Email: jason.hoge@va.gov
- Steven W. Kucharski (202-205-7551), Acting Senior Agency Official for Privacy and Data Integrity Board Chair, U.S. Small Business Administration.

XVI. SIGNATURES

The authorizing officials whose signatures appear below have committed their respective agencies to the terms of this Agreement.

SMALL BUSINESS ADMINISTRATION

LARRY

STUBBLEFIELD

Digitally signed by LARRY
STUBBLEFIELD
Date: 2022.11.23 08:57:22 -0500

Larry Stubblefield

Associate Administrator for Office of Veterans Business Development

U.S. Small Business Administration

STEPHEN

KUCHARSKI

Digitally signed by
STEPHEN KUCHARSKI
Date: 2022.11.22
20:45:54 -0500

Steven W. Kucharski

Acting Senior Agency Official for Privacy

Data Integrity Board Chair

U.S. Small Business Administration

DEPARTMENT OF VETERANS AFFAIRS

RAYMOND TELLEZ

Digitally signed by RAYMOND
TELLEZ
Date: 2022.11.18 12:16:46 -0500

Raymond Tellez

Executive Director, Office of Business Integration

Department of Veterans Affairs



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John Oswalt

Chair Data Integrity Board

Department of Veterans Affairs