RENEWAL OF THE COMPUTER MATCHING AGREEMENT BETWEEN THE U.S. DEPARTMENT OF EDUCATION AND THE U.S. DEPARTMENT OF VETERANS AFFAIRS

Under the applicable provisions of the Privacy Act of 1974, as amended by the Computer Matching and Privacy Protection Act of 1988, Public Law No. 100-503 (5 U.S.C. § 552a), a computer matching agreement (CMA) shall remain in effect for such period, not to exceed 18 months, as the Data Integrity Board (DIB) of each party to the CMA determines, is appropriate. See 5 U.S.C. § 552a(o)(2)(C). Within 3 months prior to the expiration of such CMA, the DIB of each party to the CMA may renew the CMA for a current, ongoing matching program for a single period not to exceed 12 additional months if:

- 1. Such program will be conducted without any change, and
- 2. Each party to the CMA certifies to the DIB, in writing, that the program has been conducted in compliance with the CMA.

The following match meets the conditions for renewal upon the signatures of the officials authorized in the "Agency Certification" and "Data Integrity Board Approval" sections below:

I. TITLE OF MATCH:

Computer Matching Agreement between the U.S. Department of Education (ED) and the U.S. Department of Veterans Affairs (VA)

II. PARTIES TO THE MATCH:

Recipient Agency: U.S. Department of Education

Source Agency: U.S. Department of Veterans Affairs

III. PURPOSE OF THE AGREEMENT:

The purpose of this matching program is to allow ED to receive information from VA to assist the Secretary of Education (Secretary) in the Secretary's obligation to verify the status of applicants for financial assistance under Title IV of the Higher Education Act of 1965, as amended, who claim to be veterans.

IV. ORIGINAL EFFECTIVE AND EXPIRATION DATES OF THE MATCH:

Original Effective Date: December 27, 2023

Original Expiration Date: June 26, 2025

V. <u>RENEWAL AND NEW EXPIRATION DATES</u>:

Renewal Date: June 27, 2025 Expiration Date: June 26, 2026

VI. CHANGES:

By this renewal, VA and ED make the following non-substantive changes in the CMA:

- 1. In the first paragraph of Section II, "PURPOSE AND AUTHORITY":
 - a. In the first sentence, deleting "expected family contribution' (EFC), or";
 - b. Deleting and replacing the third sentence with the following: "The data collected from the FAFSA is maintained and processed in ED's FAFSA Processing System (FPS)";
 - c. Deleting and replacing "an EFC and an SAI are indices that reflect" with "an SAI is the index that reflects"; and
 - d. Deleting and replacing "an EFC and SAI are the amount" with "an SAI is the amount."
- 2. In Section IV, "RECORDS DESCRIPTION":
 - a. Deleting and replacing the language in paragraph (A)(1) with the following:
 - "Aid Awareness and Application Processing' (18-11-21), last published in full in the *Federal Register* on November 7, 2024 (89 FR 88240) and available at https://www.federalregister.gov/documents/2024/11/07/2024-25897/privacy-act-of-1974-system-of-records;"
 - b. Deleting in paragraph (B)(1) "(processed by ED's CPS through award year AY 2023-24 and processed by ED's FPS for AY 2024-25 and beyond)."
 - c. Deleting and replacing the language in paragraph (B)(3) with the following:
 - "ED will disclose data from records in the CPS and FPS, which are covered by the system of records notice entitled 'Aid Awareness and Application Processing' (18-11-21), which was most recently published in the *Federal Register* on June 15, 2023 (88 FR 39233)" with "ED will disclose data from records in the FPS, which is covered by the systems of records notice entitled "Aid Awareness and Application Processing" (18-11-21), last published in full in the *Federal Register* on November 7, 2024 (89 FR 88240)"

- 3. In Section VI, "VERIFICATION AND OPPORTUNITY TO CONTEST PROCEDURES":
 - a. In the first paragraph, deleting and replacing "(Student Aid Report (SAR) (FAFSA Submission Summary (FSS) beginning in Award Year 2024-25))" with "(FAFSA Submission Summary (FSS))"; and
 - b. In the second and third paragraphs, deleting and replacing all references to "SAR/FSS" with "FSS."
- 4. In Section VIII, "SECURITY AND PRIVACY SAFEGUARDS":
 - a. Deleting and replacing the second sentence in the first paragraph with the following: "ED's FPS and COD systems, and the VA 'Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records VA' (58VA21/22/28) system have a current Authorization to Operate (ATO) in accordance with FISMA";
 - b. Deleting and replacing the fourth bullet in the second paragraph with the following: "VA and ED systems reside within a Trusted Internet Connection, per OMB M-19-26"; and
 - c. In paragraph A, "Incident Reporting":
 - i. Deleting and replacing the second sentence in the first paragraph with the following: "ED will report to its Office of the Chief Information Officer (OCIO) in compliance with the instructions, standards, and procedures set forth in ED's Departmental Directive ACSD-OCIO-004 on Cybersecurity Policy"; and
 - ii. Deleting and replacing the bullet in the subparagraph titled "ED/FSA" with the following: "EDSOC, (202) 245-6550; edsoc@ed.gov. VA will subsequently notify the FPS Information System Security Officer (ISSO) and then the FPS System Owner's Primary Representative, using their contact information, which is listed in Section XIV of this CMA, as amended by this Renewal."
- 5. In the first sentence of the second paragraph of Section X, "RECORDS USE, DUPLICATION AND REDISCLOSURE RESTRICTIONS", deleting and replacing "CPS and FPS, which are covered by" with "FPS, which is covered by."
- 6. In Section XIV, "PERSONS TO CONTACT", "ED Contacts":
 - a. Deleting this contact:

"Business/Agreement Issues

Gerard Duffey Management and Program Analyst U.S. Department of Education Federal Student Aid Student Experience and Aid Delivery 100 Penn Square East Philadelphia, PA 19107 Telephone: (215) 656-3249

Email: Gerard.Duffey@ed.gov"

and replacing it with the following contact:

"Agreement Issues

Dennis Kramer II
Director, Data Policy and Evaluation
U.S. Department of Education
Federal Student Aid
Policy Implementation Division
400 Maryland Ave. SW
Washington, DC 20024
Telephone: 202-676-7918

Email: Dennis.Kramer@ed.gov"; and

b. Deleting these contacts:

"Security and Privacy Issues

Nina Colon Information System Security Officer (ISSO) Central Processing System (CPS) U.S. Department of Education Federal Student Aid Business Operations, Security Division 830 First Street, NE UCP-52C4 Washington, DC 20202-5454

Telephone: (202) 377-3736 Email: Nina.Colon@ed.gov

Michele Hawkins

Information System Security Officer (ISSO)

FAFSA Processing System (FPS)

U.S. Department of Education

Enterprise Technology Directorate

Information System Security Division, contractor

830 First Street, NE

Washington, DC 20202-5454 Telephone: (240) 462-9365

Email: Michele.Hawkins@ed.gov

Folajimi Ayodele

System Owner's Primary Representative

Central Processing System (CPS)

U.S. Department of Education

Federal Student Aid

Program Technical & Business Support Group (PTBSG)/ Partner Production Division

830 First Street, NE

UCP-43G3

Washington, DC 20202-5454

Telephone: (202) 320-2605

Email: Folajimi.Ayodele@ed.gov"

and replacing them with the following contact:

"Security and Privacy Issues

Jordan Hughes

Information System Security Officer (ISSO)

FAFSA Processing System

U.S. Department of Education

Chief Technology Office

Information System Security Division, contractor

Telephone: (813) 380-4621

Email: Jordan.Hughes@ed.gov."

7. In Section XIV, "PERSONS TO CONTACT", "VA Contacts":

a. Deleting this contact:

"Business/Agreement Issues

Allison Conn

Program Analyst

Compensation Service

Department of Veterans Affairs

Veterans Benefits Administration

Interagency Data Sharing & Military Operations (212C)

810 Vermont Ave, NW

Washington, DC 20420

Email: Allison.Conn@va.gov"

and replacing it with the following contact:

"Business/Agreement Issues

Delonda Garmon
Program Analyst
Department of Veterans Affairs
Veterans Benefits Administration Compensation Service
810 Vermont Ave, NW
Washington, DC 20420
Telephone: (202) 848-5940

Email: Delonda.Garmon@va.gov."

8. Deleting and replacing the language on the last page under "Attachment 2" with the following: "Aid Awareness and Application Processing" (18-11-21), last published in full in the *Federal Register* on November 7, 2024 (89 FR 88240) and available at https://www.federalregister.gov/documents/2024/11/07/2024-25897/privacy-act-of-1974-system-of-records."

VII. <u>AUTHORIZED SIGNATURES</u>:

The U.S. Department of Veterans Affairs:

Source Agency Certification

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

As the authorized representative of the source agency named above, I certify that: (1) the subject matching program has been conducted in compliance with the existing CMA between the parties; and (2) the subject matching program will continue without any changes for an additional 12 months, subject to the approval of the respective Data Integrity Boards of the parties.

NINA TANN Date: 2025.04.08 14:51:13 -04'00'		
Nina Tann	Date	
Executive Director		
Compensation Service		
Veterans Benefits Administration		
U.S. Department of Veterans Affairs		
KEVIN FRIEL Digitally signed by KEVIN FRIEL Date: 2025.04.24 14:12:55		
Kevin Friel	Date	
Executive Director		
Pension and Fiduciary Service		
Veterans Benefits Administration		
U.S. Department of Veterans Affairs		

Data Integrity Board Approval

Having jurisdiction and oversight over the VA's participation in this matching program, upon consideration of the foregoing certifications of the agencies named herein that: (1) the subject matching program has been conducted in compliance with the existing CMA between the parties, and (2) the subject matching program will continue without change for an additional 12 months, the DIB for the VA hereby approves this renewal.

MERISSA LARSON Date: 2025.06.25 12:08:28 -04'00'	
Merissa Larson	Date
Chair, Data Integrity Board	
U.S. Department of Veterans Affairs	

The U.S. Department of Education

Recipient Agency Certification

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

As the authorized representative of the recipient agency named above, I certify that: (1) the subject matching program has been conducted in compliance with the existing CMA between the parties; and (2) the subject matching program will continue without any changes for an additional 12 months, subject to the approval of the respective DIB of the parties.

JAMES BERGERON	Digitally signed by JAMES BERGERON Date: 2025.06.06 19:04:27 -04'00'	
James Bergeron	1	Date
Delegated the a	authority to perform the functions and dut	ties of the Chief Operating Officer
Federal Student	t Aid	1 0
U.S. Departmer	nt of Education	

Data Integrity Board Approval

Having jurisdiction and oversight over the ED's participation in this matching program, upon consideration of the foregoing certifications of the agencies named herein that: (1) the subject matching program has been conducted in compliance with the existing CMA between the parties, and (2) the subject matching program will continue without change for an additional 12 months, the DIB for the ED hereby approves this renewal.

FRANK MILLER Digitally signed by FRANK MILLER Date: 2025.06.09 10:53:40 -04'00'		
Frank E. Miller, Jr.	Date	
Senior Agency Official for Privacy		
Chair, Data Integrity Board		
U.S. Department of Education		

Attachments: Computer Matching Agreement