

Federal Communications Commission **2021 Matching Activities Review and Report**

Pursuant to section 14 of the Office of Management and Budget (OMB) Circular No. A-108, “Federal Agency Responsibilities for Review, Reporting, and Publication under the Privacy Act,” the Federal Communications Commission (FCC or Commission) submits this report on the computer matching programs in which it participated during 2021.

I. Data Integrity Board Members

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III. Matching Programs

The Computer Matching and Privacy Protection Act of 1988 (Pub. L. 100-503) requires the Data Integrity Board (DIB) of each Federal agency to review its matching activities on a yearly basis. 5 U.S.C. § 552a(u)(3)(D). The DIB took action in 2021 to enter into 26 new or reestablished, and 9 renewals of, computer matching agreements (CMAs) in which the FCC acted as the “recipient agency,” as that term is defined in 5 U.S.C. § 552a(a)(9). At the close of 2021, the FCC was engaged in a total of 45 matching programs. These activities are discussed below.

¹ Francisco Salguero, formerly Chief Information Officer, left the agency at the end of October 2021.

² Thomas Green, formerly Chief Human Capital Officer, left the agency at the end of December 2021.

³ Margaret Drake, formerly SAOP, left the agency in November 2021. Linda L. Oliver was Acting SAOP from November 2021 until April 26, 2022.

Background on FCC Matching Programs

The FCC's Lifeline program provides support for discounted broadband and voice services to low-income consumers. Consumers qualify for Lifeline through proof of income or participation in a qualifying federal benefit program, such as Medicaid, the Supplemental Nutritional Assistance Program (SNAP), Federal Public Housing Assistance, or Veterans and Survivors Pension Benefit.

In a Report and Order adopted on March 31, 2016, the Commission ordered the Universal Service Administrative Company (USAC) to create a National Lifeline Eligibility Verifier (National Verifier) that would match data about Lifeline program applicants and subscribers with other data sources to verify their eligibility. *Lifeline and Link Up Reform and Modernization Order et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962 (2016).

In the Consolidated Appropriations Act, 2021, Congress created the Emergency Broadband Benefit Program (EBBP), and directed use of the National Verifier to determine eligibility based on various criteria, including the qualifications for Lifeline (Medicaid, SNAP, etc.).⁴ EBBP provided \$3.2 billion in total, allocated as monthly consumer discounts, for broadband service and one-time provider reimbursement for a connected device (laptop, desktop computer, or tablet). In the Infrastructure Investment and Jobs Act, Congress modified and extended EBBP, provided an additional \$14.2 billion, and renamed it the Affordable Connectivity Program.⁵

New or Reestablished CMAs

In 2021, the FCC's Data Integrity Board (DIB) reviewed and approved 26 new or reestablished CMAs for matching programs in which the FCC and USAC compared Lifeline and EBBP applicant and subscriber lists against lists of persons enrolled in qualifying programs, as follows:

1. On January 21, 2021, the DIB conducted a virtual meeting to consider reestablishment of CMAs between the FCC and four non-Federal agencies:
 - Missouri Department of Social Services (SNAP and Medicaid)
 - North Carolina Department of Health and Human Services (SNAP)
 - Pennsylvania Department of Human Services (SNAP and Medicaid)
 - Tennessee Department of Human Services (SNAP)

At the meeting, the DIB approved these agreements, which permit matching to verify Lifeline eligibility by establishing that applicants or subscribers are enrolled in SNAP and/or Medicaid. *See* 86 Fed. Reg. 13372 (March 8, 2021). In its review of these agreements, the DIB determined that the benefits of the matching activity were greater than the costs. The

⁴ Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, 134 Stat. 1182, 2129-36 (2020) (codified, as amended, at 47 U.S.C. § 1752).

⁵ Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, 135 Stat. 429, 1238-44 (2021) (codified at 47 U.S.C. §§ 1751-52).

FCC records matched in these agreements are part of the FCC/WCB-1, Lifeline Program, system of records. *See* 82 Fed. Reg. 38686 (Aug. 15, 2017).⁶

2. On February 22, 2021, the DIB conducted a virtual meeting to consider the establishment of a CMA between the FCC and one non-Federal agency:

- Pennsylvania Department of Human Services (SNAP and Medicaid)

At this meeting, the DIB approved this agreement, which permits matching to verify EBBP eligibility by establishing that applicants or subscribers are enrolled in SNAP and Medicaid. *See* 86 Fed. Reg. 12445 (March 3, 2021). In its review of this agreement, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in this agreement are part of the FCC/WCB-3 Emergency Broadband Benefit Program system of records. *See* 86 Fed. Reg. 11523 (Feb. 25, 2021).⁷

3. On March 2, 2021, the DIB conducted a virtual meeting to consider the modification of a CMA between the FCC and one Federal agency:

- Centers for Medicare and Medicaid Services (Medicaid)

At this meeting, the DIB approved this modification, which permits matching to verify Lifeline and EBBP eligibility by establishing that applicants or subscribers are enrolled in the Medicaid program. *See* 86 Fed. Reg. 14426 (March 16, 2021). In its review of this agreement, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in this agreement are part of the FCC/WCB-1, Lifeline Program system of records, and the FCC/WCB-3 Emergency Broadband Benefit Program system of records. *See* 86 Fed. Reg. 11526 (Feb. 25, 2021) and 86 Fed. Reg. 11523 (Feb. 25, 2021).

4. On March 4, 2021, the DIB conducted a virtual meeting to consider the establishment of a CMA between the FCC and one non-Federal agency:

- Indiana Family and Social Services Administration, Division of Family Resources (SNAP and Medicaid)

At this meeting, the DIB approved the agreement, which permits matching to verify Lifeline and EBBP eligibility by establishing that applicants or subscribers are enrolled in SNAP and Medicaid. *See* 86 Fed. Reg. 14430 (March 16, 2021). In its review of this agreement, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in this agreement are part of the FCC/WCB-1, Lifeline Program system of records, and the FCC/WCB-3 Emergency Broadband Benefit Program system of records. *See* 86 Fed. Reg. 11526 (Feb. 25, 2021) and 86 Fed. Reg. 11523 (Feb. 25, 2021).

⁶ In 2021, the FCC updated this System of Record Notice (SORN). The new citation is 86 Fed. Reg. 11526 (Feb. 25, 2021).

⁷ In 2021, the FCC updated this SORN. The new citation is 86 Fed. Reg. 71494 (Dec. 16, 2021).

5. On March 16, 2021, the DIB conducted a virtual meeting to consider the establishment of a CMA between the FCC and one non-Federal agency:
 - Wisconsin Department of Health Services and Wisconsin Department of Revenue (SNAP and Medicaid)

At this meeting, the DIB approved the agreement, which permits matching to verify EBBP eligibility by establishing that applicants or subscribers are enrolled in SNAP and/or Medicaid. *See* 86 Fed. Reg. 17391 (April 2, 2021). In its review of this agreement, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in these agreements are part of the FCC/WCB-3, Emergency Broadband Benefit Program, system of records. *See* 86 Fed. Reg. 11523 (Feb. 25, 2021).

6. On March 18, 2021, the DIB conducted a virtual meeting to consider the establishment of a CMA between the FCC and one non-Federal agency:
 - Utah Department of Workforce Services (SNAP and Medicaid)

At this meeting, the DIB approved the agreement, which permits matching to verify EBBP eligibility by establishing that applicants or subscribers are enrolled in SNAP and/or Medicaid. *See* 86 FR 16597 (March 30, 2021). In its review of this agreement, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in this agreement are part of the FCC/WCB-3, Emergency Broadband Benefit Program system of records. *See* 86 Fed. Reg. 11523 (Feb. 25, 2021).

7. On March 23, 2021, the DIB conducted a virtual meeting to consider the establishment of a CMA between the FCC and one non-Federal agency:
 - Iowa Department of Human Services (SNAP)

At this meeting, the DIB approved the agreement, which permits matching to verify EBBP eligibility by establishing that applicants or subscribers are enrolled in SNAP. *See* 86 Fed. Reg. 17835 (April 6, 2021). In its review of the agreement, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in this agreement are part of the FCC/WCB-3, Emergency Broadband Benefit Program system of records. *See* 86 Fed. Reg. 11523 (Feb. 25, 2021).

8. On March 25, 2021, the DIB conducted a virtual meeting to consider the establishment of CMAs between the FCC and two non-Federal agencies:
 - Florida Department of Children and Families, Office of Economic Self-Sufficiency (SNAP and Medicaid) (EBBP)
 - Puerto Rico Department of the Family (Nutrition Assistance Program) (Lifeline and EBBP)

At this meeting, the DIB approved these agreements, which permit matching to verify Lifeline and/or EBBP eligibility by establishing that applicants or subscribers are enrolled in SNAP and Medicaid or the Nutrition Assistance Program. *See* 86 Fed. Reg. 17838 (Apr. 6, 2021) and 86 Fed. Reg. 17837 (Apr. 6, 2021). In its review of these agreements, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in these agreements are part of the FCC/WCB-1, Lifeline Program system of records, and the FCC/WCB-3, Emergency Broadband Benefit Program system of records. *See* 86 Fed. Reg. 11526 (Feb. 25, 2021) and 86 Fed. Reg. 11523 (Feb. 25, 2021).

9. On March 26, 2021, the DIB conducted a virtual meeting to consider the establishment of CMAs between the FCC and two non- Federal agencies:

- Colorado Governor's Office of Information Technology (SNAP and Medicaid) (EBBP)
- Michigan Department of Health and Human Services (SNAP, Supplemental Security Income (SSI), and Medicaid) (Lifeline and EBBP)

At this meeting, the DIB approved these agreements, which permit matching to verify Lifeline and/or EBBP eligibility by establishing that applicants or subscribers are enrolled in SNAP, Medicaid and/or SSI. *See* 86 Fed. Reg. 17836 (Apr. 6, 2021) and 86 Fed. Reg. 17841 (Apr. 6, 2021). In its review of these agreements, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in these agreements are part of the FCC/WCB-1, Lifeline Program system of records, and the FCC/WCB-3, Emergency Broadband Benefit Program system of records. *See* 86 Fed. Reg. 11526 (Feb. 25, 2021) and 86 Fed. Reg. 11523 (Feb. 25, 2021).

10. On May 19, 2021, the DIB conducted a virtual meeting to consider the establishment of a CMA between the FCC and one non- Federal agency:

- Tennessee Department of Human Services (SNAP)

At this meeting, the DIB approved this agreement, which permits matching to verify EBBP eligibility by establishing that applicants or subscribers are enrolled in SNAP. *See* 86 Fed. Reg. 32037 (June 16, 2021). In its review of this agreement, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in this agreement are part of the FCC/WCB-3, Emergency Broadband Benefit Program system of records. *See* 86 Fed. Reg. 11523 (Feb. 25, 2021).

11. On June 2, 2021, the DIB conducted a virtual meeting to consider the establishment of a CMA between the FCC and one non- Federal agency:

- Minnesota Department of Human Services, Business Solutions Office (SNAP and Medicaid)

At this meeting, the DIB approved this agreement, which permits matching to verify EBBP eligibility by establishing that applicants or subscribers are enrolled in SNAP and/or Medicaid. *See* 86 Fed. Reg. 32036 (June 16, 2021). In its review of this agreement, the DIB

determined that the benefits of the matching activity were greater than the costs. The FCC records matched in this agreement are part of the FCC/WCB-3, Emergency Broadband Benefit Program system of records. *See* 86 Fed. Reg. 11523 (Feb. 25, 2021).

12. On June 8, 2021, the DIB conducted a virtual meeting to consider the establishment of CMAs between the FCC and two non- Federal agencies:

- Nevada Department of Health and Human Services, Division of Welfare and Supportive Services (SNAP and Medicaid) (EBBP)
- New Mexico Human Services (SNAP and Medicaid) (Lifeline and EBBP)

At this meeting, the DIB approved these agreements, which permit matching to verify Lifeline and/or EBBP eligibility by establishing that applicants or subscribers are enrolled in SNAP and/or Medicaid. *See* 86 Fed. Reg. 32927 (June 23, 2021) and 86 Fed. Reg. 32929 (June 23, 2021). In its review of these agreements, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in these agreements are part of the FCC/WCB-1, Lifeline Program system of records, and the FCC/WCB-3, Emergency Broadband Benefit Program system of records. *See* 86 Fed. Reg. 11526 (Feb. 25, 2021) and 86 Fed. Reg. 11523 (Feb. 25, 2021).

13. On June 11, 2021, the DIB conducted a virtual meeting to consider the establishment of a CMA between the FCC and one non- Federal agency:

- Kentucky Cabinet for Health and Family Services, Division of Family Support (SNAP and Medicaid)

At this meeting, the DIB approved this agreement, which permits matching to verify Lifeline and EBBP eligibility by establishing that applicants or subscribers are enrolled in SNAP and/or Medicaid. *See* 86 Fed. Reg. 32928 (June 23, 2021). In its review of this agreement, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in this agreement are part of the FCC/WCB-1, Lifeline Program system of records, and the FCC/WCB-3, Emergency Broadband Benefit Program system of records. *See* 86 Fed. Reg. 11526 (Feb. 25, 2021) and 86 Fed. Reg. 11523 (Feb. 25, 2021).

14. On June 28, 2021, the DIB conducted a virtual meeting to consider the establishment of a CMA between the FCC and one non- Federal agency:

- Virginia Department of Social Services (SNAP and Medicaid)

At this meeting, the DIB approved this agreement, which permits matching to verify EBBP eligibility by establishing that applicants or subscribers are enrolled in SNAP and/or Medicaid. *See* 86 Fed. Reg. 36744 (July 13, 2021). In its review of this agreement, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in this agreement are part of the FCC/WCB-3, Emergency Broadband Benefit Program system of records. *See* 86 Fed. Reg. 11523 (Feb. 25, 2021).

15. On July 22, 2021, the DIB conducted a virtual meeting to consider the establishment of CMAs between the FCC and two non-Federal agencies:

- Iowa Department of Human Services (SNAP) (Lifeline and EBBP)
- Mississippi Department of Human Services (SNAP) (EBBP)

At this meeting, the DIB approved these agreements, which permit matching to verify Lifeline and/or EBBP eligibility by establishing that applicants or subscribers are enrolled in SNAP. *See* 86 Fed. Reg. 44363 (Aug. 12, 2021) and 86 Fed. Reg. 44020 (Aug. 11, 2021). In its review of these agreements, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in these agreements are part of the FCC/WCB-1, Lifeline Program system of records, and the FCC/WCB-3, Emergency Broadband Benefit Program system of records. *See* 86 Fed. Reg. 11526 (Feb. 25, 2021) and 86 Fed. Reg. 11523 (Feb. 25, 2021).

16. On August 2, 2021, the DIB conducted a virtual meeting to consider the reestablishment of a CMA between the FCC and one Federal agency:

- US Department of Housing and Urban Development (Federal Public Housing Assistance)

At this meeting, the DIB approved this agreement, which permits matching to verify Lifeline and EBBP eligibility by establishing that applicants or subscribers are enrolled in Federal Public Housing Assistance. *See* 86 Fed. Reg. 44021 (Aug. 11, 2021). In its review of this agreement, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in this agreement are part of the FCC/WCB-1, Lifeline Program system of records, and the FCC/WCB-3, Emergency Broadband Benefit Program system of records. *See* 86 Fed. Reg. 11526 (Feb. 25, 2021) and 86 Fed. Reg. 11523 (Feb. 25, 2021).

17. On September 15, 2021, the DIB conducted a virtual meeting to consider the establishment of a CMA between the FCC and one non-Federal agency:

- North Carolina Department of Health and Human Services (SNAP)

At this meeting, the DIB approved this agreement, which permits matching to verify EBBP eligibility by establishing that applicants or subscribers are enrolled in SNAP. *See* 86 Fed. Reg. 56267 (Oct. 8, 2021). In its review of this agreement, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in this agreement are part of the FCC/WCB-3, Emergency Broadband Benefit Program system of records. *See* 86 Fed. Reg. 11523 (Feb. 25, 2021).

18. On September 16, 2021, the DIB conducted a virtual meeting to consider the establishment of a CMA between the FCC and one non-Federal agency:

- Georgia Department of Human Services (SNAP)

At this meeting, the DIB approved this agreement, which permits matching to verify Lifeline and EBBP eligibility by establishing that applicants or subscribers are enrolled in SNAP. *See* 86 Fed. Reg. 57669 (Oct. 18, 2021). In its review of this agreement, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in this agreement are part of the FCC/WCB-1, Lifeline Program system of records, and the FCC/WCB-3, Emergency Broadband Benefit Program system of records. *See* 86 Fed. Reg. 11526 (Feb. 25, 2021) and 86 Fed. Reg. 11523 (Feb. 25, 2021).

19. On September 22, 2021, the DIB conducted a virtual meeting to consider the establishment of a CMA between the FCC and one non-Federal agency:

- Connecticut Department of Social Services (SNAP)

At this meeting, the DIB approved this agreement, which permits matching to verify Lifeline and EBBP eligibility by establishing that applicants or subscribers are enrolled in SNAP. *See* 86 Fed. Reg. 56266 (October 8, 2021). In its review of this agreement, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in this agreement are part of the FCC/WCB-1, Lifeline Program system of records, and the FCC/WCB-3, Emergency Broadband Benefit Program system of records. *See* 86 Fed. Reg. 11526 (Feb. 25, 2021) and 86 Fed. Reg. 11523 (Feb. 25, 2021).

Extensions of CMAs

In 2021, the FCC's Data Integrity Board (DIB) reviewed and approved 9 renewal CMAs in which the FCC and USAC compared Lifeline program subscriber lists against lists of persons enrolled in qualifying programs, as follows:

1. On February 28, 2021, the DIB conducted a virtual meeting to consider a 1-year renewal of a CMA between the FCC and one Federal agency:

- US Department of Health and Human Services (Medicaid)

At this meeting, the DIB approved this renewal, which permits matching to verify Lifeline eligibility by establishing that applicants or subscribers are enrolled in Medicaid. In its review of this agreement, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in this agreement are part of the FCC/WCB-1, Lifeline Program, system of records. *See* 86 Fed. Reg. 11526 (Feb. 25, 2021).

2. On April 20, 2021, the DIB conducted a virtual meeting to consider 1-year renewals of CMAs between the FCC and three non-Federal agencies:

- South Carolina Department of Social Services (SNAP)
- Virginia Department of Social Services (SNAP and Medicaid)
- Washington State Department of Social and Health Services, Economic Services Administration (SNAP and Medicaid)

At this meeting, the DIB approved these renewals, which permit matching to verify Lifeline eligibility by establishing that applicants or subscribers are enrolled in SNAP and/or Medicaid. In its review of these agreements, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in these agreements are part of the FCC/WCB-1, Lifeline Program, system of records. *See* 86 Fed. Reg. 11526 (Feb. 25, 2021).

3. On July 27, 2021, the DIB conducted a virtual meeting to consider a 1-year renewal of a CMA between the FCC and one non-Federal agency:

- Utah Department of Workforce Services (SNAP and Medicaid)

At this meeting, the DIB approved this renewal, which permits matching to verify Lifeline eligibility by establishing that applicants or subscribers are enrolled in SNAP and/or Medicaid. In its review of this agreement, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in this agreement are part of the FCC/WCB-1, Lifeline Program, system of records. *See* 86 Fed. Reg. 11526 (Feb. 25, 2021).

4. On October 19, 2021, the DIB conducted a virtual meeting to consider 1-year renewals of CMAs between the FCC and two non-Federal Agencies:

- Colorado Governor's Office of Information Technology (SNAP and Medicaid)
- Mississippi Department of Human Services (SNAP)

At this meeting, the DIB approved these renewals, which permit matching to verify Lifeline eligibility by establishing that applicants or subscribers are enrolled in SNAP and/or Medicaid. In its review of these agreements, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in these agreements are part of the FCC/WCB-1, Lifeline Program, system of records. *See* 86 Fed. Reg. 11526 (Feb. 25, 2021).

5. On December 13, 2021, the DIB conducted a virtual meeting to consider a 1-year renewal of a CMA between the FCC and one non-Federal agency:

- Nevada Department of Health and Human Services, Division of Welfare and Supportive Services (SNAP and Medicaid)

At this meeting, the DIB approved the renewal, which permits matching to verify Lifeline eligibility by establishing that applicants or subscribers are enrolled in SNAP and Medicaid. In its review of this agreement, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in this agreement are part of the FCC/WCB-1, Lifeline Program, system of records. *See* 86 Fed. Reg. 11526 (Feb. 25, 2021).

6. On December 21, 2021, the DIB conducted a virtual meeting to consider a 1-year renewal of a CMA between the FCC and one non-Federal agency:

- Wisconsin Department of Health Services, Wisconsin Department of Revenue (SNAP, SSI, Medicaid, or household income at or below 135% of the Federal Poverty Guidelines)

At this meeting, the DIB approved the renewal, which permits matching to verify Lifeline eligibility by establishing that applicants or subscribers are enrolled in SNAP, SSI, or Medicaid and/or have household income at or below 135% of the Federal Poverty Guidelines. In its review of this agreement, the DIB determined that the benefits of the matching activity were greater than the costs. The FCC records matched in this agreement are part of the FCC/WCB-1, Lifeline Program, system of records. *See* 86 Fed. Reg. 11526 (Feb. 25, 2021).

Copies of the FCC's matching notices that are currently in effect, and the relevant matching notices, can be found at: <https://www.fcc.gov/managing-director/privacy-transparency/privacy-act-information#matching>

Additional Information

On October 18, 2021, USAC discovered its system had, since September 28, 2021, improperly utilized authorized data connections for the Lifeline program with five state agencies (Georgia, Missouri, North Carolina, South Carolina, Washington) to verify eligibility for certain applicants to the EBBP (in addition to verifying eligibility for Lifeline, as authorized). At that time, USAC did not yet have an effective matching agreement with the five state agencies for the EBBP. For two states—Georgia and North Carolina—USAC had executed matching agreements for the EBBP, but the agreements had not yet become effective.

A system fix was instituted on October 19, 2021. The five state agencies were also notified, and corrective action has been taken to ensure that this type of incident does not occur in the future.

Other than the incident described above, the FCC DIB has no reason to believe that the FCC and its components have not fully adhered to the terms of the matching agreements during this reporting period.

The FCC DIB affirms that all disclosures of agency records for use in the matching programs continue to be justified.

The FCC DIB required a favorable cost-benefit ratio for all approved matches. Each matching agreement that the FCC participated in during 2021 had a favorable cost-benefit ratio.

IV. Cost-Benefit Waivers

The FCC DIB did not waive the requirement of a cost-benefit analysis for any matching agreement in which it participated during 2021.

V. Disapproval

The FCC DIB did not disapprove any matching agreements in 2021.