Do Not Pay

Initial Questions Document Guide

December 2023

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Overview

In order to request access to the Do Not Pay Portal (DNP) for matching activities, the agency is required to complete the Initial Questions document. This document contains a record of the data sources and functionalities the agency is requesting access to for the purposes of preventing and detecting improper payments. The agency will also be required to provide explanations for why these requested data sources would strengthen their payment eligibility processes.

The Agency Lead/Agency Specialist prepares the Initial Questions document in the Salesforce DNP Community. The user will log in to the DNP Community using the Common Approach to Identity Assurance (CAIA) to authenticate their identity. A user can log in via a Personal Identity Verification (PIV) card, a Common Access Card (CAC), a LincPass card, or by using a Credential Service Provider (CSP), ID.me.

# Enter the Community Emails

The agency user will receive two emails.

1. The first email will come from CAIA Admin. This email is to notify the user that they have been provisioned access to the DNP Community.
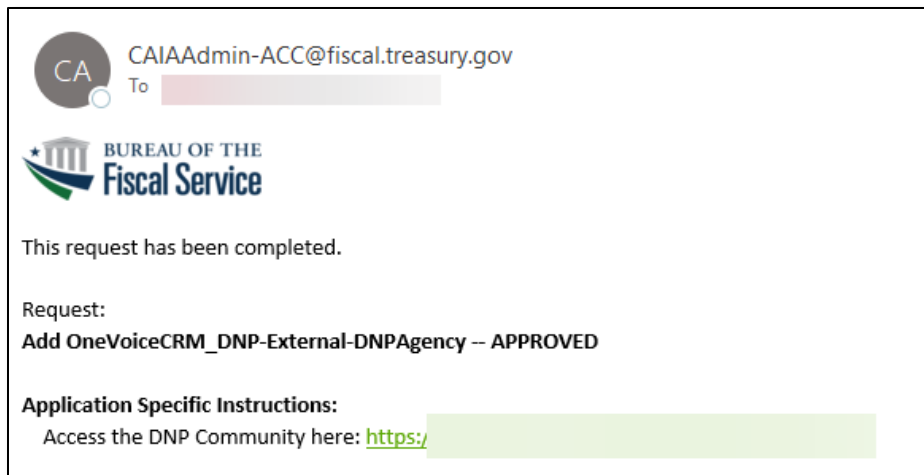
IMPORTANT NOTE: The link on the CAIA Admin email will redirect you to the DNP Community homepage (https://fiscalservice.force.com/dnp/).

DNP **recommends** waiting for the DNP email (that will come subsequent to this one) to use the link which will take you to your specific Initial Questions document.

2. The second email will come from Do Not Pay. This email gives the user more information about the DNP program, a link to access their Initial Questions document, and information on how to log in.

   a. Click the link on the email to sign in.
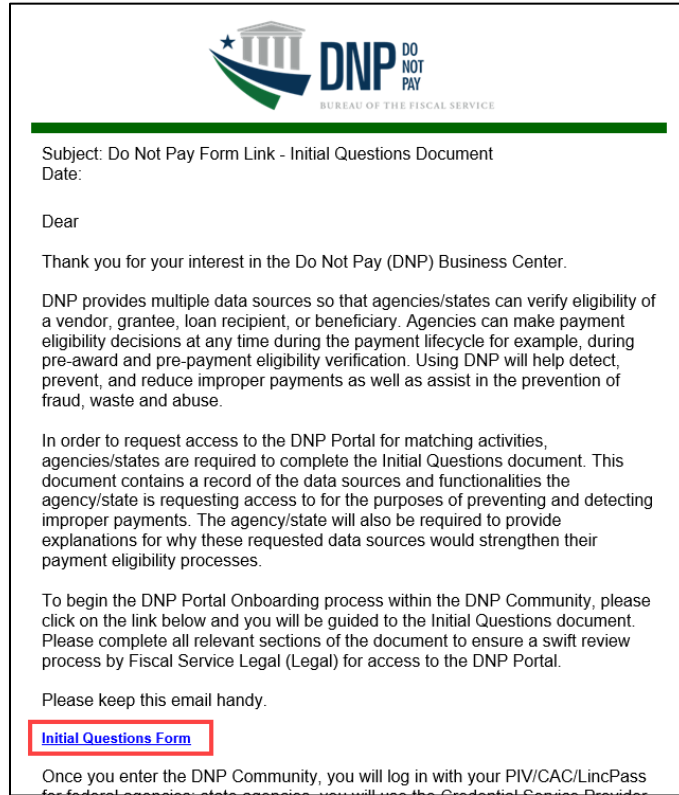

How to Log in to the DNP Community

3. After clicking the link in the DNP email, a user will be redirected to this login screen.

   a. If a user has access to a PIV, CAC, or LincPass card, they will select the **PIV/CAC button**.

   b. If a user does not have access to a PIV, CAC, or LincPass card, they will select the **ID.me button**.
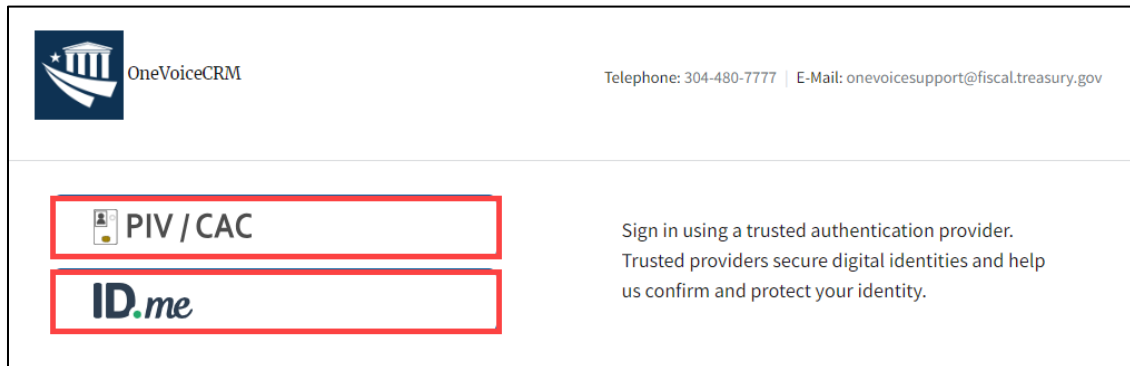
4. If a user logs in using the **PIV/CAC button**, they will have to select their certificate and enter their pin.
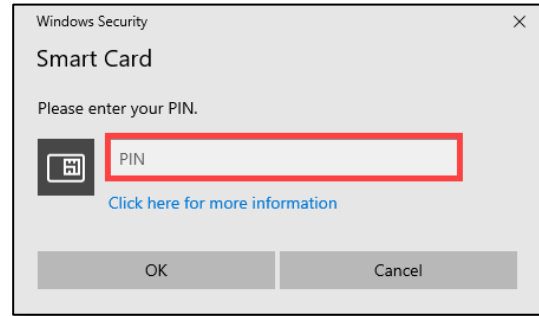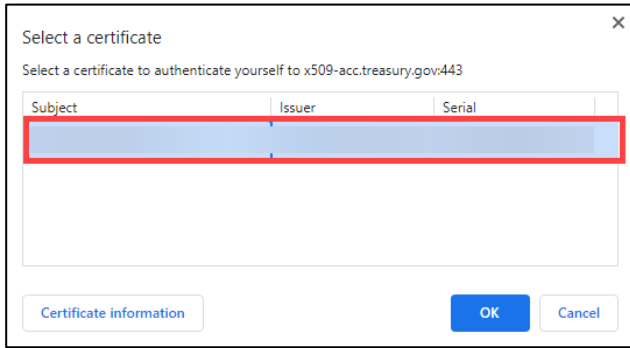
5. If a user selects the **ID.me button**, they will be redirected to the ID.me login page.
   a. A user can use an existing ID.me account or create one.
   b. The email address used to create the account <u>must</u> be an official work email address.
   c. If a user is using an existing ID.me account, their official work email address must be selected as the *primary* email address in the account.
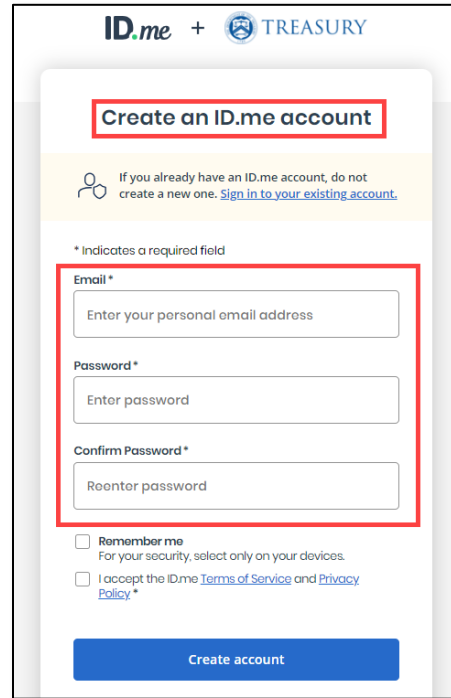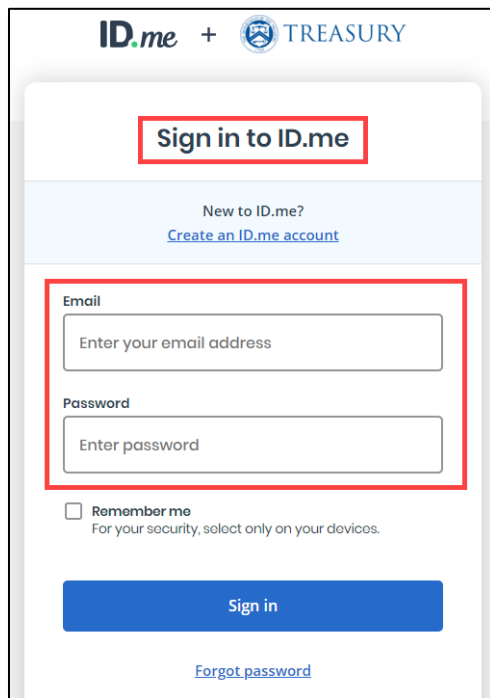
6. After successfully logging in using the link in the DNP email, the user will see the first page of the Initial Questions document.

7. If a user logs in using the CAIA email and is directed to the DNP Community homepage, they will see the screen down below.
   a. Select the available form to complete the Initial Questions Document.
   b. The user can only complete forms that have a status of **Application Sent** or **Draft.**

Initial Questions

The user may notice that some of the questions have a red bar at the beginning of the question. The **RED** bar indicates a **required field**. They will not be able to **Submit** the application to DNP if these required fields are not answered. They can save the form to complete later using the **Save as Draft** button. **Save as Draft** changes the form **Status** from **Application Sent** to **Draft**.

*Note: DNP can assist the user in the completion of the form only when the form is in **Application Sent** and **Draft** status.*

Step 1 of 3

Initial Questions - Step 1 of 3

In preparation for onboarding your agency for access to the web-based Do Not Pay (DNP) Portal, responses to the following questions are requested of you to answer during the initial onboarding conversation with your DNP Agency Specialists in order to determine your agency's eligibility. Please come prepared with answers during the initial discussion. Additional questions and information may be required. DNP services and DNP data sources are available to customers only for the limited purposes of making decisions regarding federal payments in order to identify, prevent or recover improper payments. Required fields are denoted by a RED bar or question specific instructions.

Agency Profile:

Agency Name: _____   **Program Name:** _____

Primary Contact: **Secondary Contact**
Name: _____   Name: _____
Title: _____   Title: _____
Phone Number: _____   Phone Number: _____
Email Address: _____   Email Address: _____

Legal Contact: **Technical Contact:**
Name: _____   Name: _____
Title: _____   Title: _____
Phone Number: _____   Phone Number: _____
Email Address: _____   Email Address: _____

1. What types of payments are made under this program? <u>Select at least 1 type of payment</u> and provide an explanation if the "Other" payment type is selected.

Benefits ☐   Contracts/Vendors ☐   Grants ☐

Loans ☐   Other ☐

If "Other", explain: _____

2. Which of the following is the appropriate classification for your agency?   [--None-- ▼]

3. Do you generate payments on behalf of your agency?   [--None-- ▼]
   a. Are your payments disbursed by the Department of the Treasury?   Click here if Yes: ☐

   b. If yes, provide a brief description.   [_____]

   c. If no, indicate the shared service provider that generates payments on your agency's behalf.   [_____]

4. Are you an Office of the Inspector General?   [--None-- ▼]

   a. If yes, do you plan to use DNP to conduct audits?   [--None-- ▼]

5. Under what legal authority are payments for this program issued?   [_____]

6. What program(s) are included in the file or online searches that you intend to perform?

[text box]

7. Is the information in your file covered by a System of Records Notice (SORN)? (Please check with your Privacy or Legal Office.)

--None-- ⌄

   a. If yes, please provide the System of Records Notice (SORN) information (name and Federal Register publication number) and a copy of the SORN.

[text box]

   b. For the SORN identified in 7a, please identify the Routine Use that authorizes the disclosure of your files to Treasury to identify, prevent, or recover improper payments.

[text box]

8. Does your agency have any restrictions on the re-disclosure of data that you send to the DNP Portal?

--None-- ⌄

   a. Statutory

[text box]

   b. Regulatory

[text box]

   c. License

[text box]

9. What is the approximate volume of your payments that will be processed through DNP?

[text box]

10. Do your employee(s) have access to Personal Identity Verification (PIV) card readers or active Universal Serial Bus (USB) ports on their computer?

--None-- ⌄

Save as Draft | Next Step >> | Submit

Use of Do Not Pay

1. What verifications will you complete from the returned match results?

```
[                                                                    ]
```

2. At what point in the payment process do you need verification?

Pre-Award☐   Pre-Payment☐   Post-Payment☐

3. Which data sources and services are you interested in? (see Appendix A for descriptions and other data source info) and for which service? Select at least 1 data source. If you select any Restricted data sources below, you must answer the corresponding data source questions on the next page, Step 3 of 3.

Data Sources

DEATH

	Online	Batch	ConMon	Single Query API	Multiple Query API
American InfoSource (AIS) Obituary (AIS-OBIT)	☐	☐	☐	☐	☐
American InfoSource (AIS) Probate(AIS-PROB)	☐	☐	☐	☐	☐
NAPHSIS Electronic Verification of Vital Events Fact of Death (EVVE FOD)	☐	☐	☐	☐	☐
Death Master File-Full (DMF-Full)	☐	☐	☐	☐	☐
Department of Defense (DOD)	☐	☐	☐	☐	☐
Department of State (DOS)	☐	☐	☐	☐	☐

DEBARMENT

PUBLIC	Online	Batch	ConMon	Single Query API	Multiple Query API
Automatic Revocation of Exemption List (ARL)	☐	☐	☐	☐	☐
Publication 78 (PUB78)	☐	☐	☐	☐	☐
Form 990-N (e-Postcard) (990-N)	☐	☐	☐	☐	☐
List of Excluded Individuals/Entities (LEIE-PUB)	☐	☐	☐	☐	☐
Office of Foreign Assets Control (OFAC)	☐	☐	☐	☐	☐
System for Award Management (SAM) Exclusion Records (SAM-EXCL-PUB)	☐	☐	☐	☐	☐

RESTRICTED	Online	Batch	ConMon	Single Query API	Multiple Query API
LEIE (LEIE-RES)	☐	☐	☐	☐	☐
SAM Entity Registration Records (SAMENT)	☐	☐	☐	☐	☐
SAM Exclusion Records (SAM-EXCL-RES)	☐	☐	☐	☐	☐

DEBT

RESTRICTED	Online	Batch	ConMon	Single Query API	Multiple Query API
*Credit Alert System (CAIVRS)	☐	☐	☐	☐	☐
Treasury Offset Program (TOP) Debt Check (DBCK)	☐	☐	☐	☐	☐

*Batch Matching (Batch) Continuous Monitoring (ConMon)

*Currently CAIVRS includes: The Department of Agriculture (USDA) Rural Development (RD) and Farm Service Agency (FSA), The Department of Housing and Urban Development (HUD), The Department of Justice (DoJ), The Department of Veterans Affairs (VA), and The Small Business Administration (SBA) data.

*Single Query API call contains the search criteria of one entity to be matched against your agency's approved data source(s). The DNP response will include data source match result(s) for that single entity.

*Multiple Query API call contains the search criteria of up to 100 entities to be matched against your agency's approved data source(s). The DNP response will include data source match result(s) for the searched entities.

Portal Users

1. How many users do you expect to use the DNP Portal?

[   ]

2. Of the Portal users, please indicate the following:

a. Are all users United States citizens?

[--None-- ˅]

b. Will the DNP Portal be accessed by users on United States soil only?

[--None-- ˅]

c. Are the user(s) federal employees, contractors or a mix of both?

[--None--   ˅]

d. Are background investigations conducted on agency's contractors?

[--None-- ˅]

e. Please advise the anticipated frequency of use by all users.

[   ]

f. Number of users that you estimate will be using the DNP Portal at the same time?

[   ]

[Save as Draft] [<< Previous Step] [Next Step >>] [Submit]

Credit Alert System (CAIVRS) - Restricted

If requesting access to CAIVRS-Restricted data, will your agency use the data for one of the following purposes? Please select "Yes" or "No".

a. To transmit data to U.S. Department of the Treasury to affect issuance of loan funds to borrowers.   `--None-- ▾`

b. To transmit data to other federal agencies to conduct computer matching programs to locate delinquent Small Business Administration (SBA) borrowers who are receiving federal salaries or benefit payments and programs to identify delinquent SBA borrowers receiving federal salaries or benefit payments. Disclosure will be made if the records indicate the loan is in default, at least 30 days past due or to update a previous disclosure.   `--None-- ▾`

c. Disclosure to other federal agencies to assist such agencies in preventing and detecting possible fraud, waste, overpayment, or abuse by individuals in their operations and programs as well as identifying areas where legislative and regulatory amendments directed toward preventing overpayments. These records may also be disclosed as part of an ongoing computer-matching program to accomplish this purpose.   `--None-- ▾`

d. For the purpose of identifying, preventing, or recouping improper payments to an applicant for, or recipient of, federal funds, including funds disbursed by a state in a state-administered, federally-funded program, information from this system may be disclosed to (a) a federal or state agency, its employees, agents (including contractors of its agents) or contractors; or (b) a fiscal or financial agent designated by the Bureau of the Fiscal Service or other Department of the Treasury bureau or office, including employees, agents or contractors of such agent; or (c) a contractor of the Bureau of the Fiscal Service.   `--None-- ▾`

e. To federal agencies, non-federal entities, their employees, and agents (including contractors, their agents or employees; employees or contractors of the agents or designated agents); or contractors, their employees or agents with whom Housing and Urban Development (HUD) has a contract, service agreement, grant, cooperative agreement, or computer matching agreement for the purpose of: (1) Detection, prevention and recovery of improper payments; (2) detection and prevention of fraud, waste, and abuse in major federal programs administered by a federal agency or non-federal entity; (3) detection of fraud, waste, and abuse by individuals in their operations and programs, but only to the extent that the information shared is necessary and relevant to verify pre-award and prepayment requirements prior to the release of federal funds, prevent and recover improper payments for services rendered under programs of HUD or of those federal agencies and non-federal entities to which HUD provides information under this routine use.   `--None-- ▾`

f. For the purpose of identifying, preventing, or recouping improper payments to an applicant for, or recipient of, federal funds, including funds disbursed by a State in a State administered, federally funded program, information that will allow for pre-payment eligibility review of a loan applicant through the Do Not Pay computer matching program. Authorized employees of, and approved private lenders acting on behalf of, the federal agencies participating in the Do Not Pay computer matching program will be able to search the Do Not Pay database. The disclosure may include applicant's name, home address, Social Security Number, income/financial data, date of birth, personal telephone number, and personal email address.   `--None-- ▾`

List of Excluded Individuals and Entities (LEIE) - Restricted

If requesting access to LEIE-Restricted data source, does your agency meet the following criteria? Please select "Yes" or "No".

a. An agency or organization which reimburses or regulates individuals or entities with respect to the furnishing of health-related services or items. `--None-- v`

b. An agency or organization which licenses, certifies, or otherwise regulates the health-related activities of individuals and entities which provide health care services or items, to alert them to possibly disqualifying actions, practices or conditions. `--None-- v`

SAM-Restricted

If requesting access to SAM Entity Registration Records-Restricted data source or SAM Exclusion Records-Restricted data source, please select "Yes" or "No".

a. Use by contracting officers and other federal employees involved in procuring goods and services with federal funds to determine a party's eligibility status to participate in federal procurement and non-procurement programs. `--None-- v`

b. Use by contracting officers and other federal employees involved in administering federal financial assistance programs or benefits to determine a party's eligibility status to participate in federal procurement and non-procurement programs. `--None-- v`

c. Use by a federal agency in connection with letting a contract, or issuing a license, grant, or other benefit by the requesting agency where the information is needed to decide on a federal financial or non-financial assistance program or benefit. `--None-- v`

TOP Debt Check-Restricted

If requesting access to TOP Debt Check-Restricted data source, answer the following questions in detail (refer to Appendix B for DNP Guide to Access TOP Debt Check Data Source):

a. Will you be barring the debtor/payee from receiving any federal benefit, privilege or license or take other adverse action? Please explain the adverse action which will be taken. (Note the action must be required by program rules or regulations, not discretionary.)

--None-- ⌄

Explain if "Yes".

b. Will you take any action to assist in the collection of the debt? For example, will you inform each debtor of the existence of the debt and encourage the debtor to contact and pay the agency they owe?

--None-- ⌄

c. Will you use the information to audit a program where paying a delinquent debtor was prohibited, in order to determine if your agency or the entity you are auditing made improper payments?

--None-- ⌄

d. Do you have another proposed use of the TOP Debt Check-Restricted data source, which will further debt collection or the prevention, identification, or recoupment of improper payments? If so, please explain, in detail, how your use will result in the debt being collected or in the prevention, identification, or recoupment of improper payments. Treasury will contact you with follow-up questions for agency personnel familiar with the programs standard operating procedures and privacy policies in order to determine if DNP will grant access to the TOP Debt Check-Restricted data source.

--None-- ⌄

Explain if "Yes".

[For Batch Matching and/or Continuous Monitoring requests only]

1. If requesting access to SAM Entity Registration Records-Restricted, SAM Exclusion Records-Restricted, or TOP Debt Check-Restricted data sources, please select "Yes" or "No" .

A "federal benefit program" means any program administered or funded by the federal government or by any agent on behalf of the federal government, providing cash or in-kind assistance in the form of payments, grants, loans, or loan guarantees to individuals.

a. The purpose of the match is to establish or verify the eligibility of an *applicant* for cash, in-kind assistance, or payments under a federal benefit program. `--None-- ⌄`

b. The purpose of the match is to establish or verify the eligibility of a *recipient or beneficiary* of cash, in-kind assistance, or payments under a federal benefit program. `--None-- ⌄`

c. The purpose of the match is to establish or verify continuing compliance by *applicants, recipients, or beneficiaries* with laws concerning cash, in-kind assistance, or payments under a federal benefit program. `--None-- ⌄`

d. The purpose of the match is to establish or verify eligibility of *service providers* with respect to cash, in-kind assistance, or payments under a federal benefit program. `--None-- ⌄`

e. The purpose of the match is to establish or verify continuing compliance of *service providers* with laws concerning cash, in-kind assistance, or payments under a federal benefit program. `--None-- ⌄`

f. The purpose of the match is to recoup payments or delinquent debts under a federal benefit program. `--None-- ⌄`

g. The match is between two or more automated federal personnel or payroll systems of records or a system of federal personnel or payroll records with non-federal records. `--None-- ⌄`

2. Are there other ways you would like to use SAM Entity Registration Records-Restricted, SAM Exclusion Records-Restricted, or TOP Debt Check-Restricted data sources? If yes, please explain. `--None-- ⌄`

Explain if "Yes".

Payment Automation Manager (PAM) Payment Integration

1. Are you sending your payment files through PAM? `--None-- ⌄`

2. Are the payments processed through a Shared Service Provider (SSP)? `--None-- ⌄`

3. If the point of contact for PAM issues is different than the primary contact provided on Step 1, please provide the following information:

PAM POC Name: PAM POC Phone: PAM POC Email:

Batch Matching (Batch) [Payment File] | Continuous Monitoring (ConMon) [Payee File]

How many files will be sent to DNP?

Click the "Add File Specification" button below to provide information for each file being sent to DNP.

[Add File Specification]

[Save as Draft] [<< Previous Step] [Submit]

Appendix A:

Portal Functionalities:

Online Search

Allows the agency to search by name or other uniquely identifiable information (e.g., Tax Identification Number) to match against approved data sources. The match results are immediately available in the Portal for review.

Batch Matching (Batch)

Batch Matching allows the agency to send a payment file to DNP to match against approved data sources. If the agency submits its file by 5:00 p.m. Central Time, match results are available in the Portal the next day.

Continuous Monitoring (ConMon)

ConMon allows a comparison of the agency payee file against approved data sources based on the specified frequency (e.g., bi-weekly, monthly, and yearly) of payee file submission by the agency. The DNP data sources are refreshed regularly and will continuously match the file to the data sources when there is an update to either the agency file or the data source. This eliminates the need to repeatedly submit a file to DNP and allows the agency to have the most up-to-date match results. If the agency submits its file by 5:00 p.m. Central Time, match results are available in the Portal the next business day.

Payments

Payments is provided to all agencies that use Treasury to disburse funds. Death data sources are offered as the default data sources to which all payments are matched.

Results from Payments are available after payment is issued and can be used for the purposes of payment recapture or identifying future improper payments. DNP does not stop payments that have been identified by the agency as improper.

Payments can be understood as matching payments against these data sources at the time of disbursement. Specifically, the agency begins Payment Integration by processing its payments through the Payment Automation Manager (PAM). Payment files are submitted by the agency in the PAM Standard Payment Request (SPR) format. The agency's PAM SPR file is transmitted to the Portal for matching against death data sources. Match results are available in the Portal the next business day for Adjudication.

Web Service/Application Program Interface (API)

A Web Service/Application Programming Interface (API) creates a connection with agency payment systems and the DNP Portal. This integrates the functionalities of the Portal within agency internal systems.

There are currently two query options for API:

- **Single Query API** call contains the search criteria of one entity to be matched against your agency's approved data source(s). The DNP response will include data source match result(s) for that single entity.
- **Multiple Query API** call contains the search criteria of up to 100 entities to be matched against your agency's approved data source(s). The DNP response will include data source match result(s) for the searched entities.

Data Source Descriptions:

Database	Owner	Description	Data Source Usage	Federal Agency Usage	State Agency Usage
DEATH		*Verify if a payee is deceased*			
American InfoSource (AIS) Obituary (AIS-OBIT) & Probate (AIS-PROB)- Commercial	AIS	Contains obituary and probate information on deceased individuals obtained from over 3,000 funeral homes, thousands of newspapers, and county-level probate records	Online Search, Batch Matching, Continuous Monitoring, Single Query API, Multiple Query API, Payments	☑	☑
Death Master File Full (DMF-Full)	SSA	Contains records of deaths reported to SSA. The deaths reported to SSA come from many sources, including family members, funeral homes, financial institutions, postal authorities, state information, and other federal agencies. *Does contain vital death records from states.*	Online Search, Batch Matching, Continuous Monitoring, Single Query API, Multiple Query API, Payments	☑	☑
Department of Defense Death Data (DOD) - Public	DOD	Contains information on active-duty U.S. military and Reserves regarding confirmed or presumed deaths	Online Search, Batch Matching, Continuous Monitoring, Single Query API, Multiple Query API, Payments	☑	☑
Department of State Death Data (DOS) - Public	DOS	Contains records of American Citizens who are deceased or presumed deceased while abroad, as reported by U.S. embassies or consulates upon its receipt of a foreign death certificate or finding of death by a local competent authority	Online Search, Batch Matching, Continuous Monitoring, Single Query API, Multiple Query API, Payments	☑	☑

Database	Owner	Description	Data Source Usage	Federal Agency Usage	State Agency Usage
Electronic Verification of Vital Events - Fact of Death- (EVVE FOD) - Commercial	NAPHSIS	Contains information about death certificates contained within the vital records databases of participating states and jurisdictions	Online Search	☑	☑
DEBARMENT		*Verify whether an individual or entity is ineligible*			
Automatic Revocation of Exemption List (ARL) - Public	IRS	Contains entities that have their tax-exempt status automatically revoked under the law because they have not filed Form 990 series returns or notices annually for three consecutive years	Online Search, Batch Matching, Continuous Monitoring, Single Query API, Multiple Query API	☑	☑
Publication 78 (PUB 78) - Public	IRS	Contains lists of organizations that can receive tax-deductible contributions. • Users may rely on this list in determining deductibility of their contributions • If an organization uses a "doing business as" (DBA) name, that name will not be listed in the Pub 78 Data. Only the organization's official name submitted to the IRS is included in the data set • Some donees (i.e., churches, group ruling subordinates, and governmental units) eligible to receive tax-deductible charitable contributions may not be listed in Pub 78 Data. For more information see, Other Eligible Donees	Online Search, Batch Matching, Continuous Monitoring, Single Query API, Multiple Query API	☑	☑

Database	Owner	Description	Data Source Usage	Federal Agency Usage	State Agency Usage
Form 990-N (e-Postcard) (990-N) - Public	IRS	Form 990-N (e-Postcard) is an annual electronic notice most small tax-exempt organizations (annual gross receipts normally $50,000 or less) are eligible to file instead of Form 990 or Form 990-EZ	Online Search, Batch Matching, Continuous Monitoring, Single Query API, Multiple Query API	☑	☑
List of Excluded Individuals and Entities (LEIE) - Public & Restricted	HHS OIG	Contains information regarding individuals and entities currently excluded from participation in Medicare, Medicaid, and all other federal health care programs	Online Search, Batch Matching, Continuous Monitoring, Single Query API, Multiple Query API	☑	☑
Office of Foreign Assets Control (OFAC) - Public	Treasury	Contains a list of individuals and companies owned or controlled by, or acting for or on behalf of, targeted countries. It also lists individuals, groups, and entities, such as terrorists and narcotics traffickers designated under programs that are not country specific; collectively, such individuals and companies are called "Specially Designated Nationals" or "SDNs"; their assets are blocked, and U.S. persons are generally prohibited from doing business with them	Online Search, Batch Matching, Continuous Monitoring, Single Query API, Multiple Query API	☑	☑

Database	Owner	Description	Data Source Usage	Federal Agency Usage	State Agency Usage
DEBARMENT		*Verify whether an individual or entity is ineligible*			
System for Award Management (SAM) Entity Registration Records - Restricted	GSA	Contains entity registration data publicly available under the Freedom of Information Act for those entities registered in SAM to do business with the federal government in accordance with the Federal Acquisitions Regulation (FAR)	Online Search, Batch Matching, Continuous Monitoring, Single Query API, Multiple Query API	☑	☒ *Analytics only, receiving public fields and matching*
SAM Exclusion Records - Public & Restricted	GSA	Contains the data for all active exclusion records entered by the federal government identifying those parties excluded from receiving federal contracts, certain subcontracts, and federal financial and non-financial assistance and benefits	Online Search, Batch Matching, Continuous Monitoring, Single Query API, Multiple Query API	☑	☒ *Public only*
DEBT		*Verify if an individual or entity is delinquent, owes non-tax debt, or child support*			
Credit Alert System (CAIVRS) - Restricted	DOJ, HUD, SBA, USDA & VA	Contains information on loan applicants that have any federal debt that is currently in default or foreclosure or has had a claim paid by the reporting agency within the last three years *Although CAIVRS may not identify all federal "delinquent debt" or "prior losses," it is a valuable resource for "delinquent debt."*	Online Search, Batch Matching, Continuous Monitoring, Single Query API, Multiple Query API	☑	☒ *Analytics only, HUD, SBA, USDA feeds only*
Treasury Offset Program (TOP) Debt Check (DBCK) - Restricted	Treasury	Contains data on individuals who are delinquent on non-tax debts and child support obligations to the federal government (and participating states) if allowed by agency statute and regulations	Online Search, Batch Matching, Continuous Monitoring, Single Query API, Multiple Query API	☑	☒

Appendix B

Do Not Pay Guide to Accessing TOP Debt Check-Restricted

PURPOSE

This enclosure will help agencies determine if the law permits them to access the Department of the Treasury's Debt Check data source through Treasury's Do Not Pay Portal, and if yes, for what purposes they may use Debt Check information. The "Background" section explains why Debt Check is part of Do Not Pay and what data Debt Check contains. The "Restrictions on Disclosure and Use" explains the laws restricting the Do Not Pay Portal's ability to disclose information. The final section, "Accessing Debt Check," lays out the circumstances under which agencies may access Debt Check Data through Do Not Pay.

BACKGROUND

Why is Debt Check Part of Do Not Pay? Debt Check is one data source listed in the [Payment Integrity Information Act of 2019 (PIIA)](#), which directed agencies to review available databases with relevant information on eligibility before the release of any federal funds, "to the extent permitted by law." PIIA requires agencies to review data in Debt Check and other specific databases "where applicable and permitted by law." Based on the directive in PIIA, Treasury has included Debt Check in Do Not Pay and requires information from agencies to determine if the data is relevant to eligibility for the program seeking access and if such access is permitted by law.

What Data is in Debt Check? Debt Check is an extract, or subset, of data contained in the Treasury Offset Program (TOP) delinquent debtor database. TOP has data regarding delinquent federal and state debts for the purpose of offsetting and levying federal and state payments in accordance with several statutes and regulations. Some of the data in TOP is relevant for use with another debt collection tool referred to as "barring delinquent debtors." Barring delinquent debtors refers to the statutory bar on federal agencies providing loans, loan insurance and loan guarantees to applicants who owe federal nontax debts that are over 90 days delinquent, unless they pay or otherwise resolve their debts. In 1996, by Executive Order 13019 that bar was extended to delinquent child support obligations submitted to TOP for collection by administrative offset. Therefore, Treasury created Debt Check by extracting data regarding federal nontax debts and child support obligations that were 90 days past due.

RESTRICTIONS ON DISCLOSURE AND USE

What Restrictions Apply to the Disclosure and Use of Debt Check Data? In general, debts owed by individuals in the TOP database are subject to the Privacy Act of 1974, as amended (PA). Among other things, the PA prohibits disclosure of data about individuals in a "system of records", as the PA defines that term, unless the disclosure meets an exemption. All the data in TOP and other Treasury debt collection databases are contained in [Treasury/Fiscal Service* System of Records Notice (SORN) .012](#). The PA exemption most relevant to sharing Debt Check data is referred to as a "routine use." Agencies may disclose data pursuant to a routine use, so long as the use is consistent with the purpose for which the data was collected (as stated in the applicable SORN), and the routine use has been published in the Federal Register for notice and comment.

The data in [SORN .012](#) has been collected and maintained for the purpose of collecting delinquent debt and identifying, preventing and recouping improper payments. The routine uses Treasury has published are consistent with those purposes. This means that Treasury must determine if an agency's proposed use of Debt Check data is consistent with the stated purposes—collection of delinquent debt or prevention, identification or recoupment of improper payments. Once disclosed, recipients of that information may only use it in accordance with the purpose for which it was disclosed.

ACCESSING TOP DEBT CHECK

What Uses Has Treasury Already Identified as Permissible? Treasury has already determined that certain uses of Debt Check are clearly permissible under the SORN. Uses that are already approved include:

   a) barring delinquent debtors from receiving any federal benefit, privilege or license unless they resolve the debt or taking any other adverse action against a debtor unless they resolve the debt (e.g., negative scoring on a procurement until obtain proof that the debt is paid or otherwise resolved);
   b) taking an action to try to collect the debt (e.g., informing the debtor of the existence of the debt and encouraging them to contact and pay the agency they owe); and
   c) auditing programs where payments to debtors are prohibited in order to identify and/or recoup improper payments.

What Uses Has Treasury Determined Are Not Appropriate? While not prohibited by law, Treasury does not want or expect agencies to set up internal offset or recoupment plans for payments that TOP can offset. Such efforts would be duplicative and not cost beneficial.

Are There Other Permissible Uses? Treasury will consider any additional proposed uses of Debt Check data to determine if the use will assist debt collection or identify, prevent, or recoup improper payments. In order to make this determination, Treasury will ask the agency for information about the proposed uses to ensure that the Debt Check data is relevant, and the proposed use is consistent with the routine uses in our SORN.