



**Privacy Impact Assessment  
for**

**FAFSA On The Web**

Date

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Contact Point

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Federal Student Aid (FSA)

U.S. Department of Education

## **1. What information will be collected for the system?**

### **A. Student (and spouse, if applicable) personal information:**

Personal information is used to identify you (the student) in our system and to determine if you meet the eligibility requirements for Federal student aid. Personal information includes but is not limited to: first name; last name; middle initial; address; Social Security number (SSN); date of birth; telephone number; driver's license number and state of issuance; e-mail address; citizenship status; marital status (married, separated, divorced or widowed); month and year you were married; separated, divorced or widowed; state of legal residence; date you became a legal resident; whether you are male or female; if you are male have you registered with Selective Service; whether you will have a high school diploma or its equivalent before you start college; whether you will have your first bachelor's degree before July 1 of the current year; and whether you have ever been convicted of possessing or selling illegal drugs while receiving Federal student aid.

### **B. Dependency status questions:**

Dependency status questions on the FAFSA determine whether your parents' income and asset information needs to be included on the application. For the 2008-09 academic year, these questions ask about: your age—will you be 24 years old or older by December 31<sup>st</sup> of the award year? Your education level—will you be working on a master's or doctorate program? Your marital status—are you married? Children—do you have children who receive more than half of their support from you? Dependents—do you have dependents (other than your children or spouse) who live with you and who will receive more than half of their support from you, for the period of July 1 through June 30 of the financial aid award year? Your dependency status—are both of your parents deceased, or are you (or were you until age 18) a ward/dependent of the court? Your military active duty status—are you currently serving on active duty in the U.S. Armed Forces for purposes other than training? Your veteran status—are you a veteran?

If you answer "Yes" to any of the above questions, you are considered "independent" for Federal student aid purposes and parental information is not required on the FAFSA. Answering "No" to all of the questions requires you to provide your parents' information. If you have questions about your dependency status, contact the Financial Aid Administrator at your school.

### **C. Student's income, tax credit and asset information:**

The student income and asset information collected on the FAFSA includes but is not limited to: income tax return information, Adjusted Gross Income (AGI), income tax paid, number of exemptions, income earned from working (wages, salaries, tips, etc.), and untaxed income (such as payments to tax deferred pension and savings plans, child support, etc.). Assets include but are not limited to: cash, savings and checking accounts, investments, and the net value (market value less the debt) of businesses and/or investment farms.

A formula has been established by law, which calculates an amount that can be reasonably expected for you and your family to contribute toward your annual educational expenses. The result of the calculation is known as the Expected Family Contribution or EFC. The EFC is used in the determination of your eligibility for Federal financial assistance, and may be used in the determination of your State, and institutional financial assistance.

**D. Dependent applicant's parental information:**

If all your answers to the dependency status questions (above) are "No," parental income and asset information is required in the EFC calculation. Other parental information requested on the form, includes, but is not limited to: the highest level of schooling completed, marital status, marital status date (month and year), SSN(s), last name(s) and first initial(s), date(s) of birth, e-mail address, number in household supported by the parent(s), state of legal residence, date that parent(s) became legal residents, tax return information, untaxed income information, tax credit information and asset net worth information.

**E. School information:**

FAFSA on the Web allows you to enter up to 10 Federal school codes for postsecondary institutions that you are interested in attending. We will send your FAFSA data and processed results to each of the schools that you enter. Information is also requested about your plans once you are enrolled in college. This information is used by your schools to create a personalized financial aid package that reflects your preferences. For the 2008-09 academic year, information includes but is not limited to: the type of degree or certificate you will be working toward and your grade level at the beginning of the academic year, whether you would like to be awarded student loans or work study, your enrollment status and your housing plans at each institution.

**F. Signature and certification:**

You are required to sign your FAFSA on the Web application. If you are a dependent student, your parent must also sign the application. You and your parent may request a Personal Identification Number (PIN) through a link in the FAFSA on the Web application. The PIN will serve as your electronic signature. By electronically signing with your PIN, you are certifying that the information provided on FAFSA on the Web is true and accurate under penalty of fine or imprisonment. The PIN may also be used to access other secure ED Web sites and to electronically sign other required ED forms. To protect your identity, you must never share your PIN with anyone.

Signing the application electronically with your PIN also certifies that you will not violate the regulations governing Federal Student Aid. Your signature confirms that you understand and agree that: 1. You will use Federal and/or State student financial aid only to pay the cost of attending an institution of higher education; 2. You are either not in default on a Federal student loan or have made satisfactory arrangements to repay it. 3. You do not owe money back on a Federal student grant or have made satisfactory arrangements to repay it; 4. You will notify your school if you default on a Federal student loan. 5. You will not receive a Federal Pell Grant from more than one school for the same period of time.

There is a separate Privacy Statement for the PIN Web site. It can be found by selecting the Privacy Act link on that Web site.

**G. Non-Personal information we record (use of cookies)**

No cookies or other tracking technology are used on the Web site. Cookies are small programs placed on the user's computer that track the user's whereabouts. If you do nothing during your visit but browse through the Web site, read pages, or download information, our Web site's operating system will automatically record some general information about your visit.

During your visit, our Web operating system will record:

- The Internet domain for your Internet service, such as “xcompany.com” or “xcompany.net” if you use a private Internet access account, or “yourschool.edu” if you connect from a college or university domain.
- The type of browser (such as “Internet Explorer version x” or “Firefoxversion x”) that you are using.
- The type of operating system that you use (such as Macintosh, Unix, or Windows).
- The date and time you visited our site, and the Web pages you visit on our site.
- The address of the previous Web site you were visiting, if you linked to us from another Web site.

If the Financial Aid Administrator at your school creates or modifies your record, your record will contain personal Financial Aid Administrator information that is entered when your Financial Aid Administrator accesses the Web site. The privacy information of the Financial Aid Administrator will not be viewable by you.

#### **H. Information from e-mail you send to us**

E-mail is not a secure method of communicating personal information. Do not send us personally identifying information in your email. If you decide to send us an electronic mail message that includes information you send to Customer Service regarding a problem, the message may contain your return e-mail address. If you include personally identifying information in your e-mail because you want us to address issues specific to your situation, the information will not be used, but will be destroyed.

Also, information that you e-mail to our customer service Web site is not secure against interception. Do not send us personally identifying information in your email. If your communication is sensitive, or includes personal information such as data from your tax return or student loan account, mail it by postal mail to:

Federal Student Aid Information Center, P.O. Box 84, Washington, D.C. 20044

#### **I. Links to Other Sites**

Our policy discloses the privacy practices for FAFSA on the Web. The Department is not responsible for information you provide when you link to any non-Department of Education Web sites.

### **2. Why is this information being collected?**

Application information submitted on FAFSA on the Web is collected from you, as the student, your parents, and financial aid administrators to determine your EFC (used to establish your eligibility for Federal, State, and institutional student aid), to identify the schools to which your processed record is to be sent; and to collect your certification that the information is correct and that you agree to comply with Federal regulations. See #1 above to identify the specific data elements used for each purpose.

### **3. How will FSA use this information?**

Information in this system will be used by Federal Student Aid to create a unique record, determine your dependency status, calculate your EFC, identify the schools to which the processed record is to be sent, and to collect your certification that the information is

correct and that you agree to comply with Federal regulations. See #1 above to identify the specific data elements used for each purpose.

**4. Will this information be shared with any other agency or entity? If so, with which agency or agencies/entities?**

Yes. ED may disclose information in this system, without the consent of the individual, in accordance with the provisions of the Privacy Act. This includes disclosures under the routine uses listed in the Privacy Act System of Records notice if the disclosure is compatible with the purposes for which the record was collected. Specific routine use disclosures include the following:

- To the postsecondary institution that the applicant designates on the application
- To state agencies having agreements with the Secretary for the purposes of coordinating student aid
- To parent(s) of a dependent applicant or an applicant's spouse
- For Freedom of Information Act (FOIA) Advice Disclosure, to the Department of Justice and the Office of Management and Budget
- For Contract Disclosure
- For Litigation and Alternative Dispute Resolution Disclosures
- For Research Disclosure
- For Congressional Member Disclosure
- For Disclosure for Use By Other Law Enforcement Agencies
- For Enforcement Disclosure
- For Employment, Benefit, and Contracting Disclosure for decisions by the department and for decisions by other public agencies and professional organizations
- For Employee Grievance, Complaint or Conduct Disclosure
- For Labor Organization Disclosure
- For Disclosure to OMB for Federal Credit Reform Act Support
- For Disclosures to third parties through legally authorized computer matching programs
- For Disclosure to DOJ
- For Disclosure to Consumer Reporting Agencies
- For Disclosure to third parties in the course of responding to breach of data

These disclosures may be made on a case-by-case basis. Where a computer matching agreement has been authorized, ED, consistent with the requirements of the Privacy Act, may disclose personally identifying information to another agency designated in the computer matching agreement.

Records will only be disclosed in accordance with the provisions of the Privacy Act. Any contractor responsible for the operations of this Web site is held to the privacy and security requirements of the Department of Education in the handling of information collected through the Web site.

A link to the Privacy Act Statement is provided on the home page of the Web site.

**5. Describe the notice or opportunities for consent that would be or are provided to individuals about what information is collected and how that information is shared with other organizations.**

As a government agency Web site accessed by students, parents and financial aid administrators, the Privacy Policy (above) is appropriately posted for all Web site users.

This is a general policy, which applies to the handling of any information collected at the site. The policy highlights the voluntary nature of information collected, and explains which data elements are necessary in order to fully consider an application. Users are notified that providing the information constitutes consent to all of its uses, and they are given no option affirmatively to consent to certain limited uses. In addition, the policy notifies customers about the automatic recording and potential uses of any non-personal information about a visit (i.e., site management data).

A Privacy Act Statement is incorporated into the FAFSA on the Web Privacy Policy articulating the specific authority for collecting personal information that will be maintained and retrieved by name or identifier from a Privacy Act system of records, the mandatory or voluntary nature of the information collected and the uses of the information. A link to the Privacy Act Statement is provided on the FAFSA on the Web page.

**6. How will the information be secured?**

The Office of Management and Budget (OMB) requires the completion of a system security plan in Circular A-130, "Management of Federal Information Resources," Appendix III, "Security of Federal Automated Information Resources," and Public Law (P.L.) 100-235, "Computer Security Act of 1987." The Web site's System Security Plan and Configuration Management Plan demonstrating its compliance with the Information Technology requirements mandated by Federal law and policy are included in ED's Central Processing System (CPS) security plan. The security plan contains details regarding the Risk Assessment conducted for the Web site, as well as the security controls (hardware/ software/ facilities/ personnel) in place to mitigate any identified risks to the information collected on the Web site. Management, operational, and technical security controls are in place for the Web site, encompassing personnel, physical environment access, contingency plans, disaster recovery, and identification and authentication procedures. The Web site is currently in the operations/maintenance phase of the life cycle. As such, the following functions are being performed: security operations and administration, operational assurance, audits and monitoring. There is a System Security Officer (SSO) for the Web site.

**7. Is a system of records being created or updated with the collection of this information?**

Yes, a system of records has been created for this collection of information. Users are provided notice of rights under the Privacy Act via links to the agency Privacy Act regulations (5 C.F.R. Part 5b.) and to the Privacy Act system of records notice for the Website. The original notice entitled, "Federal Student Aid Application File (18-11-01)" was published in the Federal Register on June 4, 1999 (64 FR 30159). This notice was subsequently amended on: December 27, 1999 (64 FR 72407), March 2, 2000 (65 FR 11294), and April 11, 2001(66 FR 18758).

**8. List the web addresses (known or planned) that will have a Privacy Policy.**

<http://fafsa.ed.gov>.