



## **Privacy Impact Assessment for the Financial Management System (FMS)**

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Contact Point

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Federal Student Aid  
U.S. Department of Education



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

Information of individual users collected

Full Name

SSN (required)

Address

Phone

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

(1) To allow payment processing on borrower refunds.

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

FMS collects this information to conform to the standard Department of Treasury check layout (SF 1166 format) requirements for refund payment processing. The Department of Treasury may also use this refund information in pursuing offsets against obligations owed the Federal Government.

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

This information is provided to the Department of Treasury on the SF1166 files prepared for payment on DLC, DLS, and CDDTS refunds.

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

Exempt: FMS is not a publicly accessible system and is accessible only by authorized internal users and external partners. As the system is not publicly accessible and does not collect any personally identifiable information directly from any public end user, FMS is exempt from placing a privacy notice on the website. In accordance with OMB Memo M-03-22, Attachment A, Section III (C), dated September 26, 2003, FMS is excluded as the guidance does not apply to “agency intranet websites that are accessible only by authorized government users (employees, contractors, consultants, fellows, grantees).”

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

The Department of Education develops, disseminates, and periodically reviews/updates: (i) a formal, documented, access control policy that addresses purpose, scope, roles, responsibilities, and compliance; and (ii) formal, documented procedures to facilitate the implementation of the access control policy and associated access controls.

All policy and procedures may be found on ED’s internal website at: <http://connectED>.



Federal Student Aid provides comments on departmental policy and procedures through the department's Administrative Communications System (ACS) process.

FMS reviews: account management processes, account establishment, activation, modification, disabling, and removal. FMS also reviews periodically for account reviews and disablement.

All individuals who apply for an FMS USERID must review and sign a Privacy Act Statement in order for a user account and USERID to be created. All users who access FMS receive the following Government System warning prompt that includes a Privacy Act Notice each time they enter FMS:

This is a Government system, to be used by authorized personnel only. If you use this computer system, you should understand that all activities may be monitored and recorded by automated processes and/or by Government personnel. Anyone using this system expressly consents to such monitoring. Warning: If such monitoring reveals possible evidence of criminal activity, monitoring records may be provided to law enforcement officials. This system contains personal information protected by the Privacy Act of 1974 (as amended). If you use this computer system, you are explicitly consenting to be bound by the Acts requirements and acknowledge the possible criminal and civil penalties for violation of the Act.

The general public is not allowed access to the FMS system. VDC, the General Service Support provider, offers some security features such as firewall and intrusion detection. The Oracle application provides FMS the ability to restrict access to the database and operating system. Public partners, i.e., guaranty agencies (GAs) and lenders, have inquiry-only access to information that is placed in a protected public network outside the internal network. FMS uses standard encryption algorithms for communications between the application and the Oracle Database.

Within the Oracle application, personal information, e.g., the borrower's name and social security number are embedded in tables that are only accessible through back-end or database administrator. Oracle enforces the control of least privilege on these tables. Access is restricted by FMS responsibility and Organization.

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

Yes. FMS is a System of Records. A System of Records Notice has been created; filing action is pending with the Department of Education's Office of General Counsel (OCG).

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

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US Department  
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