



## **Privacy Impact Assessment for the Common Services for Borrowers (CSB)**

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Contact Point

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

Common Services for Borrowers (CSB) is a consolidated system that supports Loan Consolidation (LC), Debt Management (DMCS), Direct Loan Servicing System (DLSS) and Conditional Disability Discharge Tracking System (CDDTS). These four legacy systems will eventually be discontinued and will be replaced by a single CSB solution that will incorporate and enhance the functionality of the existing systems.

### Information of individual users collected

Full Name

Address

SSN

Phone

Email

Employment Information

Financial Information

Medical Information

Bank Account Numbers

Related Demographic Data

Borrower Information to include; disbursement amount, principal balance, interest accrual, loan status, repayment plan, repayment amount, forbearance status, deferment status, separation date, grace period and delinquency

## 2. Why is this information being collected?

- (1) This information is collected to complete official Government business related to the administration of the CSB Program.

## 3. How will FSA use this information?

- (1) The CSB System supports a Program Office (PO) that assists borrowers with loan consolidation and disburses funds related to loan consolidation. It also has functionality wherein loan holders can verify, update data, and certify loans they hold before its consolidation. The CSB System database assists in the tracking of information pertinent to the borrower as well as information on the consolidation of loans.
- (2) Also, this information can be used to collect monies from a defaulted student loan, and to tracking borrowers that apply for Full and Permanent Disability.

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

Yes. This information will be shared with the following agencies and/or companies:

- Private Collection Agencies (PCAs)
- Guaranty Agencies (GA)
- National Credit Bureaus



- Department of Justice (DOJ)
- Internal Revenue Service (IRS)
- United States Treasury
- United States Department of Health and Human Services (HHS/NDNH)
- Education Credit Management Center (ECMC)
- Sallie Mae
- Schools
- Lenders
- United States Postal Service (USPS)
- Internal FSA Interfaces
  - Common Origination and Disbursement (COD)
  - National Student Loan Database (NSLDS)
  - Financial Management Systems (FMS)
  - Loan Consolidation (LC)
  - Grants Administration and Payment System (GAPS)
  - Postsecondary Education Participation System (PEPS)

**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.**

(1) There are Privacy Act Notices on the CSB System and its legacy sites for both internal and external users, including public users. The following link is representative of the Privacy Act Notice:

[https://dlswsprd.dlsonline.com/csbweb\\_borrower/privacyPolicy.do?FROM\\_DLSS=true](https://dlswsprd.dlsonline.com/csbweb_borrower/privacyPolicy.do?FROM_DLSS=true)

(2) In addition, there is a Privacy Act Notice on the FFEL Mainframe and other CSB components.

**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.

The application IDs are reviewed by the SSO quarterly. The SSO provides a list of current users to business POCs and requests them to verify who has left the project or no longer needs access to the application. The SSO will remove access as appropriate.

Account management includes the identification of account types (i.e., individual, group, and system), establishment of conditions for group membership, and assignment of associated authorizations. The organization identifies authorized users of the information system and specifies access rights/privileges. The organization grants access to the information system based on: (i) a valid need-to-know that is determined by assigned official duties and



satisfying all personnel security criteria; and (ii) intended system usage. The organization requires proper identification for requests to establish information system accounts and approves all such requests. The organization specifically authorizes and monitors the use of guest/anonymous accounts and removes, disables, or otherwise secures unnecessary accounts. The organization ensures that account managers are notified when information system users are terminated or transferred and associated accounts are removed, disabled, or otherwise secured. Account managers are also notified when users' information system usage or need-to-know changes.

The information is secured following the guidance of OMB Circular A-130, "Management of Federal Information Resources," Appendix III, "Security of Federal Automated Information Resources," and Public Law 100-235, "Computer Security Act of 1987." In addition, CSB is currently re-writing the System Security Plan (SSP) that details the security requirements and describes the security controls that are in place to meet those requirements. A certification and accreditation process in accordance with the National Institute of Standards & Technology (NIST) "Guide for the Security Certification and Accreditation of Federal Information Systems" will validate our security controls.

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

A "System of Records" was created for the Common Services for Borrowers (CSB) Contract.

The "System of Records" was published in the Federal Register (Volume 71, Number 14/Monday, January 23, 2006/Notices).

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

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

<https://dlenote.ed.gov/empn/index.jsp>

<http://www.dlservicer.ed.gov>

<https://www.dlssonline.com/borrower/BorrowerWelcomePage.jsp>

<http://schools.dlssonline.com>

<https://cod.ed.gov/cod/LoginPage?Partner=DLSS>