



**Privacy Impact Assessment
for the**

**Account Control Technology Loan Data System
(ACTLDS)**

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1. What information will be collected for the system?

Information of individual users collected:

1. Full Name
2. Social Security Number
3. Address
4. Phone
5. Employment Information
6. School borrower attended
7. Checking account information
8. Credit Card Information
9. Banking information
10. Collected correspondence
11. 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
12. Borrower Reference information (Parent's name, address, phone)

2. Why is this information being collected?

1. To aid in the collection efforts and resolving defaulted Federal Student Aid accounts.
2. Account Control Technology Loan Data System (ACTLDS) provides a vehicle for the storage, retrieval, and editing of borrower information.
3. Correspondence to the borrowers from ACT is provided by this system and on behalf of ED.

3. How will this information be used?

ACTLDS provides a vehicle for the storage, retrieval, and editing of debtor information and uses the information to collect defaulted accounts. Information may be collected as part of the processing, collection, and disposition and resolution of the account. Information on Federal Student Aid borrowers is not used for any other purpose other than collection efforts for defaulted Federal Student Aid accounts.

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



Yes. FSA information will be shared with the following agencies and or companies in efforts to aid the collection of debt. Information is encrypted and only approved transfer methodologies can be used. For example, Secure FTP, Secure Web Portal, or SSH.

- Coast Professional (PCA - Mentoring)
- National Credit Bureaus
- LexisNexis (skip tracing)
 - Dolan (skip tracing)
 - Banko (bankruptcy notification)
 - Courtlink (court documentation)
 - Accurint Data Services (skip tracing)
- The Work Number (skip tracing)
- Fletch Data Services (skip tracing)
- Accurate Computer Technology (letter correspondence)
- Quikpik (programming support)
- Pragmatic Solutions (custom programming)
- Ecliptics (d3/pick programming)
- SoundBite (auto dialer)
- American Business Bank (banking/ach/wire)
- Authorize.net (banking/credit card processing)

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.

The ACTLDS receives information from the Department of Education, Federal Student Aid Debt Management and Collection System (DMCS). As DCMS is the parent system from where ACTLDS receive privacy information, the DCMS warning and privacy disclosure statement below is used:

DISCLOSURE STATEMENT: "The user understands that the Department of Education, its agents and sub-contractors have signed up to meet the requirements of the "PRIVACY ACT of 1974" (as amended). As such, by entering this system, the user hereby verifies that he/she has read the "PRIVACY ACT of 1974" (as amended), that the user understands the requirements of the act, and that the user has no remaining unanswered questions."

The ACTLDS will not further disclose the information except as defined by the System of Records Notice in the interest of the U.S. Government and the Department of Education. ACTLDS company privacy policy also restricts the sharing of information.

6. How will the information be secured?



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ACTLDS has been secured at the physical security, operating system, database, and network infrastructure levels. The network complies with the security controls and procedures described in the Federal Information Security Management Act (FISMA), National Institute of Standards and Technology (NIST) Special Publications, and Federal Information Processing Standards (FIPS). Please refer to the ACTLDS System Security Plan for the specific Management, Operational, and Technical security controls deployed on the system. The System Security Plan details how the following security control families are implemented on the system:

- Risk assessment
- Planning
- System and services acquisition
- Certification, accreditation, and security assessments
- Personnel security
- Physical and environmental security
- Contingency planning
- Configuration management
- Maintenance
- System and information integrity
- Media protection
- Incident response
- Awareness and training
- Identification and authentication
- Access control
- Audit and accountability
- System and communications protection.

Some specific security controls in place include:

- Operating systems and infrastructure devices are hardened in accordance with NIST moderate confidentiality controls.
- Vulnerability scans are conducted periodically to ensure supporting systems and all applications are at the highest state of security and are patched accordingly.
- Redundant firewalls are placed at entry points to the network with hardened access control lists
- Intrusion detection systems are in place to spot any malicious activity
- Least privilege policy is practiced throughout the organization.

In addition, ACT identifies authorized users of the information system and specifies access rights/privileges. ACT 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. ACT 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. ACT ensures that account managers are notified when information system users are terminated or transferred and associated accounts are removed, disabled, or otherwise secured.



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Account managers are also notified when users' information system usage or need to-know changes.

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. ACTLDS is working under this "System of Records."

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