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**Privacy Impact Assessment
for
Collecto, Inc., d/b/a CCA
US Department of Education Contract**

**Ontario Systems, Inc. – FACS
(Flexible Automated Collection System)
(PCA-CCA-FACS)**

**Date: March 20, 2009
Updated: June 30, 2009**

Contact Point:

**System Owner:
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**System Security Manager:
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VP of Information Services and Technology
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1. Information collected for the system include:

- a. Minimally all data provided by the Financial Student Aid Program System as described by the U.S. Department of Education, Office of Federal Student Aid Program Document # **D-CAR-001-E**.

Inclusive of:

- i. Account Records
 - ii. CoMaker Records
 - iii. Debt Records
 - iv. Payment Records
 - v. Reference Records
- b. Place of employment information to include such information as:
- i. Name of employer
 - ii. Address of employer
 - iii. Phone number of employer
 - iv. Length of service for employee
 - v. Title of employee
- c. Bankruptcy information to include such information as:
- i. Chapter information
 - ii. File date
 - iii. Disposition
 - iv. Status
 - v. Legal/Attorney demographics
 - vi. Trustee demographics
 - vii. Court demographics
- d. Deceased information to include such information as:
- i. Deceased demographics
 - ii. Date of death
 - iii. Death Certificate requested date
 - iv. Death Certificate requested location
- e. Incarceration information to include such information as:
- i. Alias
 - ii. Inmate demographics
 - iii. Conviction information
 - iv. Admission date
 - v. Location



- vi. Offense
 - vii. Parole information
 - viii. Sentence information
 - ix. Release information
- f. Credit Bureau information
- g. Miscellaneous Information – Triggers and skip tracing include such information as:
- i. Demographic changes
 - ii. Credit changes and or applications

2. Purpose of information being collected:

To enable the effective location, recovery and/or administrative resolution of defaulted student loans on behalf of and under contract with the U.S. Department of Education, Office of Federal Student Aid.

3. How will FSA use this information?

To enable the effective location, recovery and/or administrative resolution of defaulted student loans.

4. Will information be shared with any other agency or entity?

Agencies Yes, the U.S. Department of Education, Office of Federal Student Aid.
Entities Yes, information collected may be used as seed data for the sole purpose of identifying additional information available through contracted vendor services (entities).

If so, with which entities?

CCA partners with a number of third party information service providers. The following is an inclusive list of all providers utilized as part of the U.S. Department of Education contract:

- a. Experian
- b. LexisNexis
- c. Accurint/LexisNexis
- d. TALX – (The Work Number)
- e. Central Research



- f. HOV Services* formally known as Lason Systems, Inc.
(*Letter vendor)

5. Describe the notice or opportunity's 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 PCA-CCA-FACS receives information from the Department of Education, Federal Student Aid Debt Management and Collection System (DMCS). As DCMS is the parent system from where PCA-CCA-FACS receives 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 PCA-CCA-FACS 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. CCA company privacy policy also restricts the sharing of information.

6. How will the information be secured?

The information collected and maintained on the behalf of the U.S. Department of Education, Office of Federal Student Aid is secured using the requirements established by the Federal Information Security Management Act of 2002 (FISMA) and in accordance with NIST Special Publication (SP) 800-53, Recommended Security Controls for Federal Information Systems, Revision 2, and NIST SP 800-53A. A System Security Plan (SSP) using guidance in NIST SP 800-18 Revision 1, Guide for Developing Security Plans for Federal Information Systems, to document the security posture and describe each of the security controls required as established in NIST SP 800-53 and 800-53A.

The U.S. Department of Education, Office of Federal Student Aid has implemented a certification and accreditation process in accordance with "NIST SP 800-37, Guide for the Security Certification and Accreditation of Federal Information Systems."

CCA conforms to the ISO 27001/27002 guidelines with regard to information security. In addition, CCA has put in place the systems, software, services, and appropriate policies and procedures to facilitate ISO, PCI, FISMA, and SAS



compliance.

With regard to the data described in this assessment, CCA currently utilizes strong segmentation policies for network, database, and user access to ensure a secure environment. Physical security, complete with badge access and 24 by 7 video recording, ensures that secure areas are accessible to only those authorized. Automated logging within the network and systems ensures that unauthorized access to systems and network equipment can be determined immediately. Automated monitoring and notification ensures that responsible parties are notified immediately when there are problems.

An N+1 infrastructure ensures that there is little to no down time for mission critical applications in the event of an equipment failure. Dual backup power supplies are used to ensure clean shutdown of mission critical systems in the event of a power failure.

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. Ontario Systems, Inc., FACS 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).