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**Privacy Impact Assessment
for the**

ConServe Collection Management System (CCMS)

Date

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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?

ConServe collects the following information from the Department of Education, borrowers, responsible parties, and skip trace vendors:

1. Full Name
2. Address
3. Social Security Number
4. Phone Numbers
5. Place of Employment
6. Loan Information – balances, interest accrued, loan status, repayment plan, repayment amount, repayment history

2. Why is this information being collected?

All information received from the Department of Education is used for the sole purpose of contacting the borrower or responsible party and collecting owed funds on behalf of the Department of Education. ConServe will utilize the information to (1) facilitate the repayment of the loan, (2) identify the current status of the borrower, and (3) qualify the borrower for rehabilitation or resolution.

3. How will FSA use this information?

The Department of Education uses this information to update their records with current consumer information, payment history, and updated loan encumbrances. ConServe will use this and all other information obtained to support the collection of defaulted student loans for the Department of Education. Information is used for skip-tracing, location, collections, repayment and rehabilitation monitoring, and reporting results to the Department of Education.

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

Yes, this information will be shared with the following agencies and/or companies:

- Federal Student Aid (FSA)
- United States Department of the Treasury
- National Credit Bureaus
- CompuMail



- Western Union
- Skip Trace Vendors

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 ConServe receives information from the Department of Education, Federal Student Aid Debt Management and Collection System (DMCS). As DCMS is the parent system from where ConServe 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 ConServe 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. ConServe company privacy policy also restricts the sharing of information.

6. How will the information be secured?

1. ConServe employs multiple layers of security controls to protect the information residing in CCMS. These controls include access control, security awareness and training, physical and environmental protection, risk assessment, personnel security, system and communications protection, and contingency planning.
2. These controls include formal, documented policies and procedures that ConServe develops, disseminates, and periodically reviews and updates. The security controls are developed with guidance from OMB Circular A-130, "Management of Federal Information Resources", Appendix III, "Security of Federal Automated Information Resources."
3. ConServe's access control policy and procedures ensure that each CCMS user is uniquely identified and authenticated to the system.



User access to CCMS is only granted after the user has completed system and security training. User access rights are assigned based on the user's business role and their business need-to-know. ConServe's access control procedures include documented processes to handle terminating user accounts, as well as a periodic verification of active users and CCMS access rights.

4. ConServe's security controls also include controls that provide encryption of CCMS information during storage and transmission. The encryption of CCMS information is implemented using industry encryption standards to ensure the safety of CCMS and the information contained within. Additionally, ConServe ensures that any Personally Identifiable Information (PII) that is collected and stored within CCMS is properly disposed of within specific retention times that are defined by contractual and/or regulatory requirements.
5. ConServe is currently writing the System Security Plan (SSP) for CCMS with guidance from the National Institute of Standards and Technology (NIST) Special Publication 800-18, Rev.1, "Guide for Developing Security Plans for Federal Information Systems." The SSP controls for CCMS will meet the applicable baseline for Moderate Impact systems as defined by NIST Special Publication 800-53, Rev. 2, "Recommended Security Controls for Federal Information Systems." Additionally, the SSP controls for CCMS will undergo a certification and accreditation process in accordance with NIST Special Publication 800-53A, "Guide for Assessing the Security Controls in Federal Information Systems" to validate the security controls in-place to protect the system.

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. ConServe 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).