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**Privacy Impact Assessment  
for the**

***Collectcorp Corp***

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- 1. What information will be collected for the system? Address, Credit bureau, with borrower contact – financial information, documented skip-tracing efforts, employers, and public records**
- 2. Why is this information being collected? In an effort to contact borrowers and resolve debt**
- 3. How will FSA use this information? To update their system with the most current information possible**
- 4. Will this information be shared with any other agency or entity? If so, with which agency or agencies/entities? Certified entities only.**  
**Lexis Nexis, Central Research, High Cotton, TALX**
- 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. All information obtained is updated to FSA daily, weekly, and monthly as required. No other entity can use the information for any other purpose than to update Collectcorp with most current information.**

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



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

**Information received, stored and transmitted will follow Collectcorps encryption and data at rest policy. This policy details that confidential information will be encrypted with at least 128bit encryption while at rest or in transit.**

**All users follow a vigorous screening process through HR and are granted a unique user ID only on a need to know basis. Also employees sign a confidentiality agreement with Collectcorp and ED as well as security training that enforces the need to keep information secure. User will only have access to one account at any time and not have the facility to capture this information and remove it from the premises.**

**Physically the information is stored in a secure computer room only available by strictly controlling who physically has access to this information. Biometrics ensures 2-factor access to the physical server while review of daily security logs allows for anomalies to be escalated to the incident reporting team.**

**Logically the data is stored in a separate database from all other client information preventing any user from having access to more than ED. System logs are reviewed daily, which include antivirus, lockout, access and unauthorized access, which are escalated to the incident management team.**

**Development of any process goes through change control processes, which review and accept the changes to this system. Security officer, system admin and Ed management are on this team.**

**Collectcorp has an Information Security Policy that details all the requirements to keep information safe. All employees read and understand this policy**

## **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. Collectcorp 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).