



## **Privacy Impact Assessment for the Common Origination and Disbursement (COD)**

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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?**

Information of individual users collected

Full Name

Address

SSN

Date of Birth

Place of Birth

Phone Number

Disbursement Dollar Amounts

**2. Why is this information being collected?**

- (1) The student applicants and the schools participating in the Title IV Higher Education Student Financial Aid Programs provide the information. The Department utilizes the information to enable the administration of the Federal Title IV grants and loans. Students eligible to attend those schools use the Title IV loans and grants.

**3. How will FSA use this information?**

FSA/COD uses this student-level detail to book loans, account for awarded grants and to enable the Department to reconcile school cash drawdowns from the Treasury to individual student disbursements and ensure the respective schools receive the appropriate amount of dollars during the respective time periods.

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

Not routinely (This information can be made available for a civil or criminal law enforcement activity that is authorized by law, upon a written request by the agency).

**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.**

Extensive Privacy Act notices are posted at the web site of the Free Application for Federal Student Aid (<http://www.fafsa.ed.gov>). The basis for the data sent to COD by colleges is the FAFSA, which is filled out by student applicants first. The FAFSA is an OMB approved data collection instrument (OMB #1845-0001).

**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.

At the system level the following controls are employed;

- All information is protected by a PIN or password and is monitored by automated and manual controls.
- COD is developed and maintained under a contract with Accenture, and is housed within a secure facility run under a subcontract with TSYS Inc., one of the largest credit card processors in the world.
- Interfacing ED systems are operated for the most part within FSA's Virtual Data Center (VDC), located in Meriden, CT, which provides the respective security controls. The COD data is encrypted as it moves between COD system interfaces.
- System administrators outside of the VDC provide comparable security controls to protect the system and the information contained therein.

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

A system of records notification has been submitted to update the previous system of record notification for the Direct Loan Origination System.

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

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