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**Privacy Impact Assessment
for the**

***ICR Debt Collection System
(IDCS)***

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Contact Point

System Owner: Juan G. Bernardo

Author: Juan G. Bernardo



1. What information will be collected for the system?

The following information will be gathered for the sole purpose of collecting on an account:

Information of individual users collected

Full Name

Address

SSN

Date of Birth

Phone

Email

Employment Information

School Information

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

2. Why is this information being collected?

The information being collected is for the sole purpose of collecting on a borrower's student loan account. The ICR Debt Collection System (IDCS) is the main operations platform for collections. It provides for the storage, retrieval, and editing of debtor information. Payments on defaulted loans are processed through the National Payment Center (NPC) as a part of this system.

Outgoing correspondence will be handled by CompuMail. A separate PO Box will be provided for Dept of Education student's correspondence.

Administrative Wage Garnishment may also be pursued as a part of the collection process.

3. How will FSA use this information?

IDCS provides a vehicle for the storage, retrieval, and editing of debtor information and uses this information to collect on defaulted accounts. Information may be collected as part of the processing, collection, and disposition of the account. This information is available for access through B-Frame to ED approved collection staff.



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 for the sole purpose of collecting on the account:

- Lexis Nexis
- Compumail
- LiveVox
- Talx
- BFrame Data Systems
- National Credit Bureaus
- CBC/Innovis
- Interactive Data
- Fletch Data
- Central Research

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



6. How will the information be secured?

Immediate Credit Recovery Inc. 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 controls.

No confidential information will be stored on user systems. All confidential information stored separately from the main operations platform will be stored on an independent server in personal folders with strict access controls to secure the information.

Data will be stored on servers in a highly secure data center that includes 24/7 monitoring utilizing cameras, security personnel and video recording. Access to this requires a finger print scan, badge scan and eye retina scan to gain access. Servers are stored in a locked server rack on the server floor.

The system platform will be secured by highly secured network devices that include firewalls, managed switches and a stand alone server. All data and backups will be encrypted. Only approved users will have access to physical servers, and all connections to remote sites will be secured using a site-to-site VPN.

Information masking will be used for system users to secure confidential data when applicable.

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. Immediate Credit Recovery Inc. 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).