



## **Privacy Impact Assessment for the Direct Loan Servicing System (DLSS)**

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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

Phone

Email

Employment 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?

- (1) The Direct Loan Servicing System (DLSS), operational since 1994, is at the center of all Direct Loan Program (DLP) functions. This information is collected to complete official Government business related to the administration of the Direct Loan Program.

## 3. How will FSA use this information?

The Direct Loan Servicing System (DLSS) interacts with both participating institutions and other ED Systems, and serves as a filter for data exchanges between Schools and ED. The Utica Processing Center and its partner site in Bakersfield, California provide loan processing, customer service and loan collection support, while ED has primary responsibility for the implementation, operation and oversight of the DLP.

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

Yes. This information will be shared with the following agencies and/or companies:

- Bank of America
- Electronic Debit Account (EDA) – Treasury
- Loan Origination (EDS)
- Loan Consolidation (EDS)
- Schools
- Fulfillment (ABR Inc.)
- Internal Revenue Service
  - Internal FSA Interfaces
    - Common Origination and Disbursement (COD)
    - National Student Loan Database (NSLDS)
    - Financial Management Systems (FMS)
    - Student Aid Gateway (SAIG)
    - Grants Administration and Payment System (GAPS)
    - Postsecondary Education Participation System (PEPS)



**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.**

The Privacy Act Notice below was updated for the Common Services for Borrowers (CSB) Contract. The following link is representative of the Privacy Act Notice:

<https://www.dlssonline.com/borrower/PrivacyPolicy.do>

**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.

The application IDs are reviewed by the SSO quarterly. The SSO provides a list of current users to business POCs and requests them to verify who has left the project or no longer needs access to the application. The SSO will remove access as appropriate.

Account management includes the identification of account types (i.e., individual, group, and system), establishment of conditions for group membership, and assignment of associated authorizations. The organization identifies authorized users of the information system and specifies access rights/privileges. The organization grants access to the information system based on: (i) a valid need-to-know that is determined by assigned official duties and satisfying all personnel security criteria; and (ii) intended system usage. The organization requires proper identification for requests to establish information system accounts and approves all such requests. The organization specifically authorizes and monitors the use of guest/anonymous accounts and removes, disables, or otherwise secures unnecessary accounts. The organization ensures that account managers are notified when information system users are terminated or transferred and associated accounts are removed, disabled, or otherwise secured. Account managers are also notified when users' information system usage or need-to-know changes.

The information is secured following the guidance of OMB Circular A-130, "Management of Federal Information Resources," Appendix III, "Security of Federal Automated Information Resources," and Public Law 100-235, "Computer Security Act of 1987." In addition, CSB is currently re-writing the System Security Plan (SSP) that details the security requirements and describes the security controls that are in place to meet those requirements. A certification and accreditation process in accordance with the National Institute of Standards & Technology (NIST) "Guide for the Security Certification and Accreditation of Federal Information Systems" will validate our security controls.



**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. DLCS 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).

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

<https://dlenote.ed.gov/empn/index.jsp>

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

<https://www.dlssonline.com/borrower/BorrowerWelcomePage.jsp>

<http://schools.dlssonline.com>

<https://cod.ed.gov/cod/LoginPage?Partner=DLSS>