



**Privacy Impact Assessment for the
Conditional Disability Discharge Tracking System (CDDTS)**

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?

Information of individual users collected

Full Name

Address

SSN (required)

Financial Information

Date of birth (DOB)

2. Why is this information being collected?

- (1) This information is collected to complete official Government business related to the administration of the Disability Discharge Program.

3. How will FSA use this information?

The Conditional Disability Discharge Tracking System (CDDTS) allows the U.S. Department of Education (ED) to record and track borrowers who have requested that their loans be discharged due to total and permanent disabilities. Regulations require that all such loans be recorded and tracked for a period of three (3) years from the date of disability, as certified by a physician, before being discharged.

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:

- Credit Bureaus
- Loan Servicers
- Schools
- Other FSA Interfaces
 - Direct Loan Servicing System (DLSS)
 - Collections (DMCS)
 - Financial Management System (FMS)
 - National Student Loan Database (NSLDS)

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.

There is no Privacy Notice on CDDTS; however, all contractor and subcontractor personnel are required to sign non-disclosure agreements at the time of hire. The non-disclosure agreements include provisions for safeguarding client information. In addition to the existing non-disclosure agreements, contract personnel are required to sign "Privacy Act Statements". A sample of the Privacy Act Statement is attached to this Assessment.



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.

CDDTS reviews: account management processes, account establishment, activation, modification, disabling, and removal. CDDTS also reviews periodically for account reviews and disablement.

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. CDDTS is working under this "System of Records." The "System of Records Notice" was published in the Federal Register (Volume 71, Number 14/Monday, January 23, 2006/Notices).



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

N/A



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Attachment
Privacy Act Statement



I _____, an Affiliated Computer Systems ("ACS") employee assigned to work on ACS' contract with the Department of Education, do hereby acknowledge my responsibilities for safeguarding Department of Education information covered by the Privacy Act of 1974, as amended. Privacy Act information includes but is not limited to unique identifiers associated with an individual, such as a name, social security number, and financial information.

I accept the responsibilities associated with the handling and protecting of Privacy Act information entrusted to me. Such responsibilities include securing such Department of Education information in locking containers (desks or filing cabinets) when the information is not being processed, and following the procedures for turning in sensitive waste material to the on-site security representative for proper disposal.

I agree not to divulge, to unauthorized individuals, Privacy Act information, which I may acquire while working for ACS on the Department of Education contract. Upon termination of my work under ACS' Department of Education Contract, I further agree not to disclose Privacy Act information to unauthorized individuals.

I understand that disclosing information protected by the Privacy Act to an unauthorized person or agency is a violation of the Act punishable by a fine not to exceed \$5,000.

I certify that I have read the attachment entitled "The Privacy Act of 1974 (As Amended)", that I understand the requirements of the Act, and that I have no remaining unanswered questions.

Signature

Date

Name of Employee (Print/Type)

(____)

Telephone Number

NOTE: Complete this statement and return it to your ACS Project Manager.