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**Privacy Impact Assessment  
for the**

***Progressive Financial Services, Inc. Collection System***

Date

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Contact Point

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## **1. What information will be collected for the system?**

Progressive collects the following information from the Department of Education: (1) Full Name, (2) Address, (3) Social Security Number (SSN), (3) Phone Number, (4) E-Mail Address, (5) Employment Information and (6) Borrower Information. Borrower Information includes 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?**

All information received from the Department is used for the sole purpose of contacting the consumer and collecting owed funds on behalf of the Department of Education. Progressive will utilize the information to (1) Make contact with the debtor, (2) Collect outstanding debt, and (3) Qualify debtor for rehabilitation or resolution.

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

FSA uses this information to update their records with current consumer information, payment history and updated loan encumbrances.

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

Yes.

Skip tracing is performed by the following vendors:

eBureau  
First Data  
LexisNexis  
CBC  
The Work Number  
TransUnion  
Experian  
Accurint

Letters are produced by the following vendor(s):

Letter Logic



**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.**

There is a Privacy Policy in place at the PFS website. It can be viewed at, <http://www.progressivefinancial.com/Privacy/privacy.htm>

All letters sent to debtors utilize scripted text reviewed and approved by an ACA MAP Attorney for state and federal compliance. The letters are also approved by ED. The text cannot be changed by the collector.

All automated attendants use default verbiage approved by in house Counsel and Executive Management.

The Progressive Financial Services, 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 Progressive Financial Services, 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 Progressive Financial Services, 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. Progressive Financial Services, Inc. company privacy policy also restricts the sharing of information.

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

Progressive Financial Services, 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 access controls.



PFS identifies authorized users of the information system and specifies access rights/privileges. PFS 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. PFS requires proper identification for requests to establish information system accounts and approves all such requests. PFS specifically authorizes and monitors the use of guest/anonymous accounts and removes, disables, or otherwise secures unnecessary accounts. PFS 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.

In addition to the controls outlined above, PFS undergoes an independent Security Authorization process every three years utilizing the requirements set forth by the National Institute of Standards and Technology (NIST) Federal Information Processing Standards (FIPS) and the 800 series of Special Publications.

**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. Progressive Financial Services, 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).