Privacy Impact Assessment

for

U.S. Department of Education Contract

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Contacts

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1. What information will be collected for the system?

Information required by Windham Professionals, Inc. (Windham) to perform the necessary actions required to contact individuals with defaulted student loans will be obtained from the U.S. Department of Education to include but not limited to:

- Borrower's Name
- Social Security Number
- Date of Birth
- Last known Address
- Telephone Numbers
- Student Loan Financial Information

In addition to the information provided by the U.S. Department of Education, Windham obtains additional borrower information from credit bureaus and skip tracing vendors in an effort to locate and contact the borrower.

2. Why is this information being collected?

This information is being collected in an effort to locate, contact and recover defaulted student loans issued by the U.S. Department of Education as described within the contract and Statement of Work.

3. How will Windham use this information?

Windham utilizes information obtained from the U.S. Department of Education, credit bureaus and skip tracing vendors in an effort to locate and contact borrowers to recover outstanding debt. At no time will this information be utilized for any other activity, client or contract.

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

No. Windham does not share this information with any other agency or entity.

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 Windham Professionals 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 Windham Professionals 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 Windham Professionals 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. Windham Professionals Inc. company privacy policy also restricts the sharing of information.

6. How will this information be secured?

All data maintained by Windham will be protected utilizing industry best practices required based on a security categorization of moderate. Windham is currently evaluating our security controls in place to identify gaps utilizing NIST 800-53 controls for moderate categorization to further enhance data protection within our infrastructure. Windham currently uses the following software/hardware to secure all systems and data:

Firewalls:

Cisco ASA5510's to secure business internet access points.

Cisco ASA/PIX to build secure DMZ on appropriate internal networks.

Intrusion Detection:

We are reviewing IDS solutions for deployment prior to the placement of U.S. Department of Education data.

Encryption:

Encryption standards: PGP, Winzip (256-bit), IPSEC-VPN, https-SSL (128-bit).

Anti-Virus:

Symantec Anti-Virus is maintained and updated on all servers and workstations.

Anti –Spyware/Malware:

Symantec AntiVirus.

Remote Access Controls:

Inbound remote access to services is limited to a small group of members. All inbound access is managed by Cisco ASA5510 firewall at the Salem home office, authenticated by firewall and Windows domain accounts.

Outbound access to internet targets is managed by Cisco ASA5510 firewall, Microsoft ISA Server, Websense Surf Control, and Centos/Squid cache server.

Inbound email is filtered for spam/content at Postini.com before arrival at the Exchange server in the home office.

User access to data:

Access to all system folders is secured by Microsoft Server 2003 user/group rights. Standard authentication requirements to include unique user ID and password are required for all users accessing the system. Specific details on access control will be fully documented in the System Security Plan and conform to industry best practices as defined by NIST.

Access to data in the *e*Collections application is secured by user/group rights within the SQL DB. Standard authentication requirements to include unique user ID and password are required for all users accessing the system. Specific details on access control will be fully documented in the System Security Plan and conform to industry best practices as defined by NIST.

System/Application Security Controls:

The *e*Collections system will be deployed on a secure DMZ at the home office. All network access will be secured and logged by Cisco ASA/PIX firewalls.

The *e*Collections SQL-DB server creates a DB based log of all activity.

The *e*Collections front end applications servers log all activity to a daily local log file.

System configuration:

All systems and network hardware are backed up daily. Server logs are maintained, showing each systems configuration and logged activity.

Monitoring events:

IP Monitor and Cacti are used to monitor all critical system activity at the home and remote offices. Additional monitoring will be developed upon completion of deployment of the selected IDS solution.

Alert process:

Email, desktop and pager alerts are sent to the IT Systems Administration group when any process or system goes to alarm mode. IT System Administration group will then Investigate the alert and take all actions necessary to include escalation to management based on the criticality on the event.

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. Windham Professionals 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).