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**Privacy Impact Assessment
for the**

The CBE Group, Inc. Collection System (CCS)

February 20, 2009

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1. What information will be collected for the system?

- Information provided to The CBE Group, Inc. (CBE) by the Department of Education (ED) in its original placement files and any subsequent update files.
- The CCS system contains records on borrowers who have received loans under the William D. Ford Direct Loan (Direct Loan) Program and the Federal Family Education Loan (FFEL) Program.
- The CCS system contains records regarding: (1) Student/borrower identifier information including Social Security number and name; (2) loan information (e.g., last date of attendance, date entered repayment, default date) for each student/borrower loan
- Data purchased by CBE from approved third parties
- Data developed by CBE through searches of publicly available data sources
- Data provided to CBE by the borrower or a third party in the course of collection activities

2. Why is this information being collected?

- This information is being collected to facilitate the resolution of defaulted student loans placed with CBE by ED

3. How will FSA use this information?

- CBE will use this information to locate and contact borrowers to facilitate the resolution of defaulted student loans. Contacts will be made through written correspondence and telephone calls.

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

- CBE and our Teaming Partner, Value Recovery Holdings, LLC. will not share this information with any agency other than ED except as required by ED.

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 CCS system is a government authorized database system with access limited to authorized users only. A warning banner reminds visitors of the consequences of unauthorized attempts to access the system:



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WARNING, this system may contain Government information, which is restricted to authorized users ONLY. Unauthorized access, use, misuse, or modification of this computer system or of the data contained herein or in transit to/from this system constitutes a violation of Title 18, United States Code, Section 1030, and may subject the individual to Criminal and Civil penalties pursuant to Title 26, United States Code, Sections 7213(a), 7213A (the Taxpayer Browsing Protection Act), and 7431., This system and equipment are subject to monitoring to ensure proper performance of applicable security features or procedures. Such monitoring may result in the acquisition, recording and analysis of all data being communicated, transmitted, processed or stored in this system by a user. If monitoring reveals possible evidence of criminal activity, such evidence may be provided to Law Enforcement Personnel., ANYONE USING THIS SYSTEM EXPRESSLY CONSENTS TO SUCH MONITORING.

Before being granted access to the system, authorized users must acknowledge and agree to comply with *CCS System Acceptable Use Policy (AUP)* Among other things, the AUP informs the users that the information contained in the CCS system is protected by the Privacy Act of 1974, as amended; and stipulates that protecting this information, once it is entrusted to the CCS user, becomes his or her responsibility. The AUP outlines good security practices expected of each authorized user, and specifically require all CCS users to acknowledge the following criminal penalties imposed by the Privacy Act:

Any person who knowingly and willfully requests or obtains any record concerning an individual from an agency under false pretenses shall be guilty of a misdemeanor and may be fined not more than \$5,000. (5 U.S.C.552a(i)(3)).

Additionally, the Acceptable Use Policy requires CBE employees and contractors authorized to access the CCS system to acknowledge the following criminal penalties imposed by the Privacy Act:

Any officer or employee of an agency, who by virtue of his employment or official position, has possession of, or access to, agency records which contain individually identifiable information the disclosure of which is prohibited by this section or by policy or regulations established thereunder, and who knowing that disclosure of the specific material is so prohibited, willfully discloses the material in any manner to any person or agency not entitled to



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receive it, shall be guilty of a misdemeanor and fined not more than \$5,000. (5 U.S.C 552a(i)(1)).

The authority to use this type of information to collect on defaulted student loans is governed by Federal statute. The Fair Debt Collection Practices Act requires agencies when communicating with debtors to notify them that any information they provide can be and will be used to collect a debt.

The CBE Group, 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 CBE Group Inc. receives 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 CBE Group, 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. CBE Group, Inc. company privacy policy also restricts the sharing of information.



6. How will the information be secured?

- CBE's systems, at a minimum, employ the security controls from the moderate baseline of security controls as defined in NIST SP 800-53 Revision 2 "Recommended Security Controls for Federal Information Systems".
- All physical access to the CBE's site, and the sites of the CBE's contractors where this system of records is maintained, are secured by controls as defined in NIST SP 800-53 Revision 2.
- The computer system employed by CBE offers a high degree of resistance to tampering and circumvention. Records are stored in a database on the CBE's secure servers, and via other controlled electronic media. Access to records is limited to authorized personnel only. Authorized personnel retrieve records by borrower Social Security number or name
- Individuals must review, and agree to follow the *CCS System Acceptable Use Policy*. These outline good security practices and stipulate consequences of a failure to comply. All users of this system of records are given a unique user identification. The CBE's Federal Student Aid Information Security Privacy Policy requires and the system enforces a complex password policy. In addition, users are required to change their password at least every 60 days in accordance with the CBE's information technology standards.

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. CBE Group 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).