



US Department
of Education

Privacy Impact Assessment
Collection Technology, Inc.
CTi Collection System (PCA-CTi)



**Privacy Impact Assessment
For the
CTi Collection System (PCA-CTi)**

Providing Private Collection Agency Services on behalf of the:

**U.S. Department of Education
Federal Student Aid**



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Date

March 20, 2009

Updated

August 18, 2011

Contact Point

System Owner: Chris Van Dellen, President, Collection Technology, Inc (CTi)

System Security Manager: Scott Daniels, Vice President CTi

Information Owner: Dwight Vigna, U.S. Department of Education, Federal Student Aid

System Security Officer: Theon Dam, U.S. Department of Education, Federal Student Aid



1. What information will be collected for the system?

The CTi Collection System (PCA-CTi), which is owned and operated by Collection Technology, Inc. (CTi), provides the mechanism to store, retrieve, and maintain borrower information on defaulted student loans to support the search for each borrower and arrange for the collection or administrative resolution of the defaulted loan portfolios assigned to CTi by the U.S. Department of Education, Office of Federal Student Aid.

The following borrower information may be collected:

1. Demographic Information to include items such as:
 - Full Name
 - Address
 - Social Security Number
 - Phone Number
 - Email Address
 - Financial Information (i.e. credit card, banking, etc.)
2. Employment Information
3. Additional Information Obtained From Skip Tracing Efforts
(i.e. bankruptcy, death, additional addresses, additional phone numbers, etc.)
4. Borrower Information to include items such as:
 - Principal Balance
 - Interest Accrual
 - Loan Status
 - Repayment Plan
 - Repayment Amount
 - Forbearance Status
 - Deferment Status
 - Separation Date
 - Grace Period
 - Delinquency

2. Why is this information being collected?

This information is being collected by Collection Technology, Inc. (CTi), a Private Collection Agency (PCA) contractor, on behalf of the U.S. Department of Education, Office of Federal Student Aid, to support collection and administrative resolution activities on debts resulting from non-payment of student loans and related debts owed to the U.S. Department of Education.



3. How will FSA use this information?

The information collected, stored, and updated by CTi, on behalf of the U.S. Department of Education, Office of Federal Student Aid, is used to carry out collection and administrative resolution activities on defaulted student loans guaranteed by the U.S. Department of Education. The information is used only to support the collection or administrative resolution of the debts associated with a borrower's defaulted student loan(s) and to provide additional processing capacity and augment the U.S. Department of Education, Office of Federal Student Aid's Debt Management and Collections System (DMCS) Major Application.

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

Some or all of the information collected and maintained by CTi, on behalf of the U.S. Department of Education, Office of Federal Student Aid, may be shared with agencies and/or entities, such as:

Federal Agencies

- U.S. Department of Education, Office of Federal Student Aid

CTi Contractors and Vendors

- Fulfillment vendors
 - Universal Mail Delivery Service
 - Soundbite Communications
 - Immedia
- Skip Tracing vendors
 - LexisNexus
 - Accurint
 - CBC Innovis
 - Trans Union LLC
 - Experian
 - Equifax



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 PCA-CTi receives information from the Department of Education, Federal Student Aid Debt Management and Collection System (DMCS). As DCMS is the parent system from where PCA-CTi 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 PCA-CTi 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. CTi’s company privacy policy also restricts the sharing of information.

6. How will the information be secured?

The information collected and maintained by CTi, on the behalf of the U.S. Department of Education, Office of Federal Student Aid, is secured using the requirements established by the Federal Information Security Management Act of 2002 (FISMA) and in accordance with NIST Special Publication (SP) 800-53, *Recommended Security Controls for Federal Information Systems, Revision 3*, and NIST SP 800-53A, *Guide for Assessing the Security Controls in Federal Information Systems*.

Additionally, CTi has developed a FISMA compliant System Security Plan (SSP) using guidance in NIST SP 800-18 Revision 1, *Guide for Developing Security Plans for Federal Information Systems*, to document the security posture and describe each of the security controls as required by NIST SP 800-53 and 800-53A. This plan is reviewed and updated on an annual basis.

The U.S. Department of Education, Office of Federal Student Aid has implemented a certification and accreditation process in accordance with “NIST SP 800-37, *Guide for the Security Certification and Accreditation of Federal Information Systems*.” The CTi Collection System (PCA-CTi) will be certified and accredited with this process in order to validate the system’s 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. Ontario Systems, Inc., FACS 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).