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**Privacy Impact Assessment
For**

***Delta Management Associates, Inc.
Debt Collection System***

Date

3/09/09

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Manager



US Department of Education

Privacy Impact Assessment Delta Management Associates, Inc.

1. What information will be collected for the system? Borrower information collected may include: name, maiden or aliases used, address, previous address, SSN, DOB, phone numbers, email, employment information, related demographic data.

Default loan information collected may include: account number, disbursement amount, principal balance, interest accrual, interest rate, loan status, repayment plan, repayment amount, forbearance status, deferment status, separation date, grace period and delinquency, references, correspondence, credit bureaus, as well as additional information from DMCS system regarding loan.

System user information will also be collected.

2. Why is this information being collected? This information is being collected in order to perform debt collection services for the Department of Education (ED) and provide updates to ED's Debt Management and Collection System (DMCS).

3. How will FSA use this information? The Information will be used to collect defaulted accounts and to update debtor information on ED's DMCS.

4. Will this information be shared with any other agency or entity? If so, with which agency or agencies/entities? Yes. This information will be shared with the following entities:

- ED
- National Credit Bureaus
- The Field Companies, Inc.(letter service)
- Lexis-Nexis, (skip-tracing service)
- United States Postal Service
- Online Information Systems (credit bureau access)
- DAKCS
- Other Skip Tracing Vendors



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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. All borrowers receive a written notice stating our privacy policy can be viewed online or by writing us.

In addition to our current privacy policy listed on our web site, we will have a banner in place on our collection system and web site as follows:

DISCLOSURE STATEMENT: "The user understands that Delta Management Associates, Inc, 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 Delta Management Associates, 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 Delta Management Associates, 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 Delta Management Associates, 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. Delta Management Associates, Inc. company privacy policy also restricts the sharing of information.

6. How will the information be secured?

Physical Security:

- Security Cameras
- Fire Suppression hardwired to fire department
- Live Intrusion Alarm Monitoring
- Key Coded Doors
- Additional secured doors to data/management areas
- Clean Desk Policy is strictly enforced
- Cell/Mobile device free office (only company issued allowed)
- Server access is not granted through mobile devices.
- All workstation (non-management) USB/CD drivers are disabled.
- All workstations are password protected

Collection System Security

The system is encrypted using Blowfish encryption algorithms. Our system is also protected by a firewall that uses proxy technology which inspects all seven layers of data communication to instantly block offending data from each layer for far greater protection than Packet Filter Inspection.

All security features are centrally managed with real-time monitoring, logging, and reporting.

Collection System Security

Delta has a Site Security Certificate from Security Metrics. Security Metrics Perimeter Check automatically finds security weaknesses on our server. Perimeter Check provides third-party proof that our server is secure.



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Access to the information on our collection system is further restricted through user account controls. All vendors, including Experian, DAKCS, The Field Companies, Inc., Online Information Systems and Lexis-Nexis security policies, contracts, technical controls, and physical controls are reviewed annually to ensure the data is protected.

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. Delta Management Associates 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).