Privacy Impact Assessment
for the eCampus-Based System (e/CB)

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1. System Information. **Describe the system** - include system name, system acronym, and a description of the system, to include scope, purpose and major functions.

The eCampus-Based System (eCB) is an online system that allows users to access the Fiscal Operations Report and Application to Participate (FISAP), a combination application and reporting document for postsecondary institutions participating in selected federal financial aid programs. eCB allows participating schools and other authorized users to access, complete, and submit the FISAP online at http://www.cbfisap.ed.gov.

The FISAP is used for the three ED "campus-based programs": Federal Perkins Loan, Federal Supplemental Educational Opportunity Grant (FSEOG), and Federal Work-Study (FWS). The eCB Web site allows users to access and input FISAP information as well as run and view reports. The Department uses the information in the Application to Participate and in the Fiscal Operations Report to determine the amount of funds schools receive for each campus-based program.

ED's Default Reduction Assistance Program (DRAP) and Teacher Cancellation Low Income (TCLI) Directory are also part of the eCB system. Schools can use DRAP on the Web to enter names and addresses of defaulted Federal Perkins Loan borrowers. ED will generate and mail letters to these borrowers, urging them to repay their defaulted loans. Through eCB, schools can track invalid addresses and deleted borrowers more easily to ensure defaulted borrower files are current. States can access the TCLI on the Web at www.tcli.ed.gov. States can update contact information as well as update information in the Designated Low-Income Schools for Teacher Cancellation Benefits directory regarding schools that qualify as serving students from low-income families.

2. **Legal Authority.** **Cite the legal authority to collect and use this data.** What specific legal authorities, arrangements, and/or agreements regulate the collection of information?

Sections 401, 451 and 461 of the Higher Education Act (HEA) (20 U.S.C. 1070a, 1087a, and 1087aa) and Executive Order 9397 as amended by Executive Order 13478.

3. **Characterization of the Information**. **What elements of PII are collected and maintained by the system (e.g., name, social security number, date of birth, address, phone number)?** What are the sources of information (e.g., student, teacher, employee, university)? How is the information collected (website, paper form, on-line form)? Is the information used to link or cross-reference multiple databases?

The elements of PII collected include:

Name (first and last), Address, Phone, Email and financial information (as it pertains to the e/CB programs) from the schools that participate in the e/CB programs.

The information is collected through the e/CB website.

4. **Why is the information collected?** **How is this information necessary to the mission of the program, or contributes to a necessary agency activity**. Given the amount and any type of data collected, discuss the privacy risks (internally and/or externally) identified and how they were mitigated.

The information is necessary to the mission of the Agency in order to comply with the HEA policies, regulations and statues.

The privacy risks identified include the loss of data, stolen data, identity theft and misuse of data. These risks have been mitigated through access authentication and security and intrusion detection software. All security vulnerabilities are identified, tracked, and mitigated through the Operational Vulnerability Management System (OVMS).

5. **Social Security Numbers - If an SSN is collected and used, describe the purpose of the collection, the type of use, and any disclosures.** Also specify any alternatives that you considered, and why the alternative was not selected.

No Social Security Numbers (SSN) are collected.

6. **Uses of the Information**. **What is the intended use of the information?** How will the information be used? Describe all internal and/or external uses of the information. What types of methods are used to analyze the data? If the system uses commercial information, publicly available information, or information from other Federal agency databases, explain how it is used.

Contact information for schools will be stored in e/CB and used primarily as a point of contact to notify schools of actions taken specify to them and make inquiries regarding the e/CB program. Contact information for State Agencies will be posted with the Teacher Cancellation Low Income (TCLI) Directory and will be available to the public for information on schools that qualify as low income. Financial information will be used to calculate the amount of funding to be made available for the schools participating in the e/CB programs and to account for the funding levels awarded in previous years.

7. **Internal Sharing and Disclosure**. **With which internal ED organizations will the information be shared?** What information is shared? For what purpose is the information shared?

This information is not shared with other internal divisions within DoED.

8. **External Sharing and Disclosure**. **With what external entity will the information be shared (e.g., another agency for a specified programmatic purpose)?** What information is shared? For what purpose is the information shared? How is the information shared outside of the Department? Is the sharing pursuant to a Computer Matching Agreement (CMA), Memorandum of Understanding or other type of approved sharing agreement wit another agency?

This information is not shared with external entities.

9. **Notice**. **Is notice provided to the individual prior to collection of their information (e.g., a posted Privacy Notice)?** What opportunities do individuals have to decline to provide information (where providing the information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent?

https://www2.ed.gov/notices/pia/index.html

10. Web Addresses. List the web addresses (known or planned that have privacy notice).

www.cbfisap.ed.gov
www.tcli.ed.gov
www.cbfisap.ed.gov/CBSWeb/App.admin/adminWelcome.jsp

11. **Security.** **What administrative, technical, and physical security safeguards are in place to protect the PII?** Examples include: monitoring, auditing, authentication, firewalls, etc. Has a C&A been completed? Is the system compliant with any federal security requirements?

The security safeguards in place include:

Audit trails
Authentication Control
Signed Rules of Behavior
Password Controls
Access Privileges
OMB Clearances
Security Awareness Training
Vulnerability Scanning
Change Management Process
Separation of duties
Continuous Monitoring
Annual Auditing
System Firewalls
Intrusion Detection Software
Session Controls
Encryption

The e/CB System last Security Authorization (SA) was granted on XXXX, 2008 and is compliant with all Federal Security requirements (OMB Circular A130, NIST 800-53 and FISMA).

11. **Privacy Act System of Records.** **Is a system of records being created or altered under the Privacy Act, 5 U.S.C. 552a?** Is this a Department-wide or Federal Government-wide SORN? If a SORN already exists, what is the SORN Number?

A system of record notice is not needed because the information collected from e/CB is not retrieve by any personal identifiers. Therefore, a system of record as defined by the Privacy Act is not being created and the reporting requirements of OMB Circular A-130 do not apply.

12. **Records Retention and Disposition.** **Is there a records retention and disposition schedule approved by the National Archives and Records Administration (NARA) for the records created by the system development lifecycle AND for the data collected?** If yes – provide records schedule number:

Destroy/delete 15 years after final repayment or audit of student financial obligation, or after student record information is transferred to alternate recordkeeping system (i.e., loan servicing system), whichever is sooner.