



**Privacy Impact Assessment  
for the**

**Office of the Student Loan Ombudsman Records System**

Date

September 28, 2007

Contact Point

System Owner: Ombudsman  
Office of Student Financial Assistance

U.S. Department of Education

**1. What information will be collected for the system (e.g., name, Social Security number, annual income, etc)?**

The Office of the Student Loan Ombudsman Records System contains records on individuals who are, were, or may be participants in any of the Title IV Student Financial Assistance Programs and who request assistance from the Ombudsman. The Federal Student Aid Ombudsman helps resolve disputes and solve other problems with federal student loans. Information is obtained from the individuals (e.g. borrowers) schools, lenders, and guaranty agencies. This system consists of a variety of records that identify the individuals' complaints, requests for assistance, or other inquiries. Records include, but are not limited to: written documentation of the individual's complaint; request for assistance or other inquiry; and information pertaining to the student's or parent's Title IV student financial assistance program account(s), such as the person's name, Social Security number, date of birth, address, email address, telephone number(s), personal identification number, type of loan. Additionally, records will include the name, address, and phone numbers of school(s), lender(s), secondary holder(s) or lender(s), guaranty agency(ies), and servicer(s). Records are indexed by Social Security number, name, date of birth and case tracking number.

**2. Why is this information being collected?**

The System information is collected in order to facilitate the resolving of issues on behalf of the entity or individual submitting the information relating to the Department of Education loan programs.

**3. How will the Department of Education use this information?**

The information contained in this system will be used for a number of purposes related to the duties and responsibilities of the SFA Ombudsman, including: verifying the identities of individuals; recording complaints and problems; tracking individual cases through final resolution; reporting complaint trends; analyzing the data to recommend improvements in student financial assistance programs; and assisting in the informal resolution of disputes.

**4. Will this information be shared with any other entity? If so, with whom?**

Information, such as addresses and telephone numbers, may be disclosed internally to Department of Education staff in order to address the complaint. The Department may disclose records to schools, lenders, guaranty agencies, and servicers when it is necessary to obtain further information about the complaint, request for assistance, or other inquiry before it can be resolved. However, it is not otherwise shared externally, except as required by law, or under the routine uses listed in the Privacy Act System of Records notice. These disclosures may be made on a case-by-case basis or, if the Department has

complied with the computer matching requirements of the Privacy Act, under a computer matching agreement. Such disclosures may include: for litigation purposes, to the Department of Justice for FOIA advice, to contractors conducting Department business, for law enforcement, to a member of Congress at the request of the data subject, or to a consumer reporting agency regarding a valid and overdue claim.

**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 others organizations. (e.g., posted Privacy Notice)**

When this information is collected from individuals, the following notice and Privacy policy is provided to users regarding what information is collected and how that information is shared. This notice is found at:  
<https://ombudsman.ed.gov/about/policies.html>.

**Privacy on the Ombudsman Website**

Thank you for visiting our Website. Our privacy policy is simple and straightforward:

1. We collect no personal information about you unless you choose to provide that information to us. We do not use "cookies" or other techniques for collecting personal information about you without your knowledge. We do, however, use temporary cookies to match you as you move from page to page with the set of memory variables created during your user session --this is referred to as "maintaining state" in the "stateless" environment of the Web.
2. In the normal course of events, we do not share your information with any outside organizations . We collect no information for commercial marketing purposes.

Our policy discloses the privacy practices for the Ombudsman Website. But our site contains links to other sites. An exit icon indicates links to other sites that will require you to leave our site. We make no promises about the privacy practices of other Websites. Once you link to another site, you are subject to the privacy and security policies of the new site.

We encourage you to read the privacy policies of any site you link to from ours, especially if you share any personal information. Be informed. You are the person best qualified to protect your own privacy.

If you want to know more about how we record nonpersonal information about your visit or how we use information that you submit voluntarily, read on.

Otherwise, enjoy your visit!

**Nonpersonal information we record**

If you do nothing during your visit but browse through the Ombudsman Website, read pages, or download information, our site's operating system will automatically record some general information about your visit.

During your visit, our Web operating system will record the following:

1. the Internet domain for your Internet service, such as "xcompany.com" or "xcompany.net" if you use a private Internet access account, or "yourschool.edu" if you connect from a college or university domain
2. the type of browser (such as "Netscape version X" or "Internet Explorer version X") you are using
3. the type of operating system you are using (such as Macintosh, UNIX, or Windows)

4. the date and time you visit our site, and the Web pages that you visit on our site
5. the address of the previous Website you were visiting, if you linked to us from another Website

We use this information for statistical analysis, to help us make our site more useful to visitors. This tracking system does not record information about individuals.

#### **Information from the Ombudsman Assistance Request Form**

If you decide to complete our Ombudsman Assistance Request Form, you may choose to include your e-mail address or telephone number so that we can contact you. If you include personally identifying information in the form because you want us to address issues specific to your situation, we may use that information in contacting other federal agencies. These federal agencies are governed by the Privacy Act, and will handle your private information in the way required by that act.

Also, you should understand that this form is not necessarily secure against interception. If your communication is very sensitive, or includes personal information such as data from your tax return or student loan account, you may prefer to send it by postal mail. To do this, use the following address:

U.S. Department of Education  
Office of the FSA Ombudsman  
830 First Street, SE  
Fourth Floor  
Washington, DC 20202

#### **6. How will the information be secured?**

The information is secured following the guidance of OMB Circular A-130, "Management of Federal Information Resources," Appendix III, "Security of Federal Automated Information Resources," NIST 800-53 "Recommended Security Controls for Federal Information Systems" and Public Law 100-235, "Computer Security Act of 1987." Additionally, the Department has a Handbook for Information Assurance Security Policy, which mandates many strong security controls. The security controls are validated by a certification and accreditation process in accordance with the National Institute of Standards & Technology "Guide for the Security Certification and Accreditation of Federal Information Systems."

A brief summary of the security controls in place is listed below:

- Access to and use of these records shall be limited to those persons whose official duties require access. This includes staff members of the Office of the Student Loan Ombudsman, other Department offices and agents of the Department.
- All physical access to the sites where this system of records is maintained, is controlled and monitored by security personnel who check each individual entering the building for his or her employee or visitor badge.
- The computer system offers a high degree of resistance to tampering and circumvention.

- This security system limits data access to staff on a "need to know" basis, and controls individual users' ability to access and alter records within the system.
- All users of this system of records are given unique user IDs with personal identifiers.
- All interactions by individual users with the system are recorded
- For site security purposes and to make sure this service remains available to all users, this government computer system employs software programs to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage.

**7. Is a system of records being created or updated with the collection of this information?**

The authority for the Department to maintain these records is an existing system of records entitled Office of the Student Loan Ombudsman Records System – 18-11-11.