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FEDERAL STUDENT AID

**Privacy Impact Assessment  
for the**

***FACS Collection Platform***

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Contact Point

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## **1. What information will be collected for the system?**

- Information of individual users collected
- Full Name
- Address
- SSN
- Phone
- Employment Information
- Borrower Information to include: disbursement amount, principal balance, interest accrual, loan status, repayment plan, repayment amount, credit and skiptrace info, history of contacts with borrower by PCA, letter history

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

This information is collected to complete business related to the collection of outstanding student loans as outlined in our contract with the Department of Education.

## **3. How will FSA use this information?**

We will use this information to attempt to contact borrowers with outstanding student loans, and provide them with the options available to resolve their debt.

## **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:

- National Credit Bureaus
- National Letter Vendors
- National Location Information "Skip Tracing" Vendors
- National Bankruptcy Notification Vendors
- National Death Verification Companies
- National Payment Processing Companies (ie. Speedpay)
- Subcontractors



**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 West Asset Management 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 West Asset Management 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 West Asset Management 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. West Asset Management Inc. company privacy policy also restricts the sharing of information.

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

West Asset Management develops, disseminates, and periodically reviews/updates formal, documented policies related to information security. These policies address the following information security related areas:

- access control
- awareness and training
- audit and accountability
- certification, accreditation, and security assessments
- configuration management
- contingency planning
- identification and authentication
- incident response
- maintenance
- media protection
- physical and environmental protection
- planning
- personnel security
- risk assessment



- systems and services acquisition
- system and communications protection
- system and information integrity.

Some specific security controls in place include:

- Operating systems and infrastructure devices are hardened
- Intrusion Detection Systems are deployed at the Intranet and Internet edges and are actively monitored by the Network Operation Center (NOC)
- Vulnerability scans are conducted periodically to ensure supporting systems and all applications are at the highest state of security and are patched accordingly.
- 3-tier system architecture
- Data is segregated preventing the co-mingling of customer data
- Encryption is implemented as required
- Strict background checks and drug screening
- On site security guards, video surveillance and security card access for all employees, all visitors are signed in and accompanied while in West facilities

**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. West Asset Management 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).