

# Archived Information



## **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 e/Campus-Based System (e/CB) is an online system that allows users to access the Fiscal Operations Report and Applications to Participate (FISAP), a combination application and reporting document for postsecondary institutions participating in selected Federal financial programs. e/CB allows participating schools and other authorized user to access, complete, and submits 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 e/CB Web site allows users to access and input FISAP information as well as run and view reports. The Department uses the information in the FISAP 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 e/CB 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 e/CB, schools can track invalid addresses and deleted borrowers more easily to ensure defaulted borrowers files are current. States can access the TCLI on the web at [www.tcli.ed.gov](http://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, 1087aa) and Executive Order 9397 as amended by Executive Order 13478.

3. **Characterization of the Information. What elements of personally identifiable information (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

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 and it’s not maintained with the e/CB system.

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 statutes. 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 Number (SSN). 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. If system collects SSN, the PIA will require a signature by the Assistant Secretary or designee. If no SSN is collected, no signature is required.

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? Explain how the information is used, if the system uses commercial information, publicly available information, or information from other Federal agency databases.

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 to the 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?

The information is not shared with other internal divisions within FSA.

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 with 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://www.ed.gov/notices/pia/index/html>

10. **Web Addresses. List the web addresses (known or planned) that have a Privacy Notice.**

[www.cbfisap.ed.gov](http://www.cbfisap.ed.gov)



[www.tcli.ed.gov](http://www.tcli.ed.gov)

[www.cbfsap.ed.gov/CBSWeb/App.admin/adminWelcome.jsp](http://www.cbfsap.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 Controls  
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 is currently under Ongoing Security Authorization (OAS) program and last Security Authorization was granted on 7/30/2015 and is compliant with all Federal Security requirements (OMB Circular A130, NIST 800-53 and FISIM).

12. **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 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 requirement of OMB Circular A130 do not apply.

13. **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 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.