



Privacy Impact Assessment

For
Integrated Student Experience (ISE)

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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.

Integrated Student Experience (ISE) – StudentAid.gov is a web application designed to be Federal Student Aid's (FSA) main interface with the public. ISE serves as a centralized information repository for federal student aid, consolidating content from four decommissioned FSA sites (Ombudsman.gov, College.gov, FederalStudentAid.ed.gov and StudentAid.ed.gov.) ISE provides students, parents and borrowers with information related to financial aid, repaying student loans, applying for federal aid and navigating through the college decision-making process.

In addition to providing the public with information pertaining to federal student aid, ISE collects and transmits information for the FSA ombudsman via the FSA ombudsman web form. ISE also synchronizes with FSA's social media pages and display various social media posts and other data via RSS feeds. The ISE/National Student Loan Data System (NSLDS) interface is being added for the May 2014 release. This will allow federal aid recipients to view their loan and grant information by logging in to StudentAid.gov. In additional phases, ISE will incorporate transactional functionality including integrations with FAFSA.gov and other ED domains requiring user login and authentication. For future phases of ISE, separate privacy impact assessments will be created.

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?

20 U.S.C 1018(f) (1998)

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?

ISE's ombudsman web form collects and transmits the following information from users in regards to claims: Social Security number (SSN), email address, phone number, mailing address, and financial information pertaining to the individual's student loans. The source of the information is current student loan holders. The information collected through FSA's Ombudsman portal is collected via a web form accessed through ISE.

The ISE/NSLDS interface allows users to access their federal student loan information through the StudentAid.gov website. The user logs in using their SSN, DOB, first 2 letters of their last name, and PIN. However, the ISE/NSLDS interface is not a "login" in the traditional sense; it is actually a one-time data request to a web service provided by NSLDS. A "login" is an exchange of information that allows a user access to an application for a period of time. The ISE/NSLDS interface does not allow the user prolonged access to the application or allow the user to make repeated data calls. There is no session information created on the ISE or NSLDS application servers and there is no persistence granted for



repeated calls. The ISE/NSLDS interface is instead a one-time request from a user's browser, and the receipt of data with any future requests needing to be validated individually.

Once the data has been delivered to the user's web browser, it is stored in the browser's memory cache. This data is never delivered to the ISE servers and no copy of it resides on the ISE servers. The ISE web pages are built to include no PII data, and the PII data displayed is dynamically done so by the browser accessing the data in its memory. This memory is wiped out when one of the following activities happens: 1) the user closes the browser window, 2) the user closes the browser tab, 3) the user has had no activity in that tab for 15 minutes, or 4) the user hits a "logout" button that flushes memory.

In the case of the ISE/NSLDS data request, the request itself is logged by the NSLDS team stating that a request had been made and processed. Specifics of this can be received from the NSLDS team.

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 aforementioned information is collected via the ombudsman form and/or the NSLDS interface as a means to authenticate an individual in FSA's system, and tie an ombudsman claim or the student's loan or grant information to that student's existing student data.

The privacy risks associated with collecting individuals' SSNs include unauthorized disclosure of sensitive information, which could result in identity theft. Other risks include hacking attempts that could compromise the integrity or availability of the data.

These risks are mitigated through multiple layers of security, including the following: intrusion detection systems at the network and application layers; firewalls; physical security; encryption; identification and authentication mechanisms; training and awareness; configuration management; regular security assessments; and updating of security mechanisms and procedures in response to evolving threats. Additionally, ISE operates in accordance with the management, operational, and technical controls required by the Federal Information Security Management Act of 2002.

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.

SSNs will be collected by ISE in order to authenticate ombudsman claims with existing student loan data and for logging into the NSLDS interface. The use of the ombudsman web form is optional; users have the option to contact the ombudsman via the contact number provided on the 'contact the ombudsman' page. For the ISE/NSLDS interface, users have the option to access their loan information directly through the NSLDS website or by contacting the Federal Student Aid Information Center.

The SSN is the unique identifier for Title IV programs and its use is required by program participants and their trading partners to satisfy borrower eligibility, loan servicing, and loan status reporting requirements



under law and regulations. Trading partners include the Department of Education, Internal Revenue Service, institutions of higher education, national credit bureaus, lenders, and servicers.

Borrowers (and endorsers, if applicable) are advised of the collection and use of the SSN in the promissory note materials of their Title IV program loans.

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.

The PII collected is used solely for authenticating users with existing student loan data. The information collected is not stored in the ISE application or its databases. Information from other FSA databases is used to authenticate ombudsman claim requests and associate said requests with existing loan data. In the case of the ISE/NSLDS data request, the request itself is logged by the NSLDS team stating that a request had been made and processed.

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 that is transmitted by the ombudsman web form is shared only with the FSA Ombudsman's office. There is no other internal sharing of information. The ISE/NSLDS data request is logged only by the NSLDS team.

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?

Information collected in ISE 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?

As the Web site is a government agency Web site that the public accesses, the Privacy Policy is appropriately posted for Web site users. This is a general policy, which applies to the handling of any information collected at the site. The policy highlights the voluntary nature of information collected, and explains which data elements are necessary for each level of functionality. Customers are notified that providing the information constitutes consent to all of its uses and they are given no option to



affirmatively consent to certain uses. In addition, the policy notifies customers about the automatic recording and potential uses of any non-personal information about a visit (i.e., site management data).

A Privacy Act Statement is incorporated into the Federal Student Aid web Privacy Policy articulating the specific authority for collecting personal Information that will be maintained and retrieved by name or identifier from a Privacy Act system of records, the mandatory or voluntary nature of the information collected and the uses of the information. A link to the Privacy Act Statement is provided on each page of the Web site.

Currently, no notice is provided to individuals prior to the collection of their information. Fields in the Ombudsman web form containing PII are required in order to submit the form. Individuals have the option to contact the Ombudsman via other channels, however. Users are provided with the option to contact the Ombudsman by phone or mail as an alternative to filling out the Ombudsman web form. For the ISE/NSLDS interface, users have the option to access their loan information directly through the NSLDS website or by contacting the Federal Student Aid Information Center.

10. Web Addresses.

List the web addresses (known or planned) that have a Privacy Notice.

<http://www.studentaid.ed.gov>

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 Department of Education develops, disseminates, and periodically reviews/updates: (i) a formal, documented, information security and privacy policy that addresses purpose, scope, roles, responsibilities, and compliance; and (ii) formal, documented procedures for implementing all required information security and privacy controls. ISE complies with all Education security requirements, as well as the security requirements of the Federal Information Security Management Act of 2002 (FISMA). ISE also complies with the following privacy-related laws and regulations: The Privacy Act of 1974, the E-Government Act of 2002, and various privacy memorandums issued by the Office of Management and Budget.

ISE received a FISMA-compliant Authorization to Operate in July 2012, and will employ continuous monitoring to ensure that the system is operating securely and is employing the appropriate administrative, technical, and physical security safeguards. Examples of controls include, but are not limited to: least privilege/separation of duties; configuration management; risk assessment; physical and environmental protection; identification and authentication; awareness and training; contingency planning/disaster recovery; audit log review; intrusion detection/prevention; firewalls; encryption; security planning; and vulnerability scanning.

ISE is housed in a secure data center that operates in accordance with the security safeguards listed in NIST Special Publication 800-53, Rev. 4, "Recommended Minimum Security Controls for Federal Information Systems."



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?

ISE operates under the following system of records notice: “Office of the Student Loan Ombudsman Records,” which was published in the Federal Register on December 27, 1999 (64 FR 72399).

ISE operates under the following system of records notice for the National Student Loan Data System. [64 Fed. Reg. 72395 (December 27, 1999)]

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:

ISE manages records in accordance with the following records schedule: “Ombudsman Case Files,” Schedule Locator 52. The NARA disposition authority is N1-441-09-21.