



**Privacy Impact Assessment for the
National Student Loan Data System (NSLDS)**

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Contact Point

System Owner: Victoria Bateman
Author: Pamela Eliadis (System Security Officer)

Federal Student Aid
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1. What information will be collected for the system?

Information of individual users collected

Student/borrower Full Name

SSN (required)

Information on borrowers' loans such as; loan amounts, educational status, disbursements, balances, loan status, collections, claims, deferments, refunds and cancellations.

Enrollment information including; school(s) attended, anticipated completion date, enrollment status and effective dates

Student demographic information such as; course of study, dependency, citizenship, gender, data on family income, expected family contribution, and address

Federal Pell Grant amounts and dates; and

Federal Pell Grant, Federal Supplemental Educational Opportunity Grant, and Federal Perkins Loan Program overpayments.

2. Why is this information being collected?

- 1) To provide pre-screening and post-screening for Title IV aid eligibility;
- 2) To provide default rate calculations for educational institutions, guaranty agencies, and lenders;
- 3) To report changes in student/ borrower enrollment status via a Student Status Confirmation Report (SSCR) or other means;
- 4) To prepare electronic financial aid history information;
- 5) To assist guaranty agencies, educational institutions, financial institutions and servicers collect loans;
- 6) To provide audit and program review planning;
- 7) To support research studies and policy development;
- 8) To conduct budget analysis and development;
- 9) To track loan transfers from one entity to another;
- 10) To assess Title IV Program administration of guaranty agencies, educational institutions, financial institutions and servicers;
- 11) To track loan borrowers and overpayment debtors;
- 12) To provide information that supports Credit Reform Act of 1992 requirements;
- 13) To provide information to track refunds/cancellations; and
- 14) To assist in the collection of debts owed to the Department under Title IV of the Higher Education Act, as amended.

3. How will FSA use this information?

- 1) To verify the identity of the applicant involved, the accuracy of the record, or to assist with the determination of program eligibility and benefits, the Department may disclose records to the applicant, guaranty agencies, educational institutions, financial institutions and servicers, and to Federal and State agencies;



- 2) To provide default rate calculations, the Department may disclose records to agencies, educational institutions, financial institutions and servicers, and to State agencies;
- 3) To provide a standardized method for educational institutions to efficiently submit student enrollment status information, the Department may disclose records to guaranty agencies, educational institutions, financial institutions and servicers;
- 4) To provide financial aid history information, the Department may disclose records to educational institutions and servicers;
- 5) To assist loan holders in the collection of loans and to support pre-claims/supplemental pre-claims assistance, the Department may disclose records to guaranty agencies, educational institutions, financial institutions and servicers, and to Federal, State or Local agencies;
- 6) To support auditors and program reviewers in planning and carrying out their assessments of Title IV Program compliance, the Department may disclose records to guaranty agencies, educational institutions, financial institutions and servicers, and to Federal, State and Local agencies;
- 7) To support researchers and policy analysts, the Department may disclose records to guaranty agencies, educational institutions, financial institutions and servicers, and to Federal, State and Local agencies; using safeguards to ensure compliance with the Privacy Act, disclosures may also be made to other researchers and policy analysts not associated with guaranty agencies, educational institutions, financial institutions or servicers;
- 8) To support budget analysts in the development of budget needs and forecasts, the Department may disclose records to Federal and State agencies;
- 9) To assist in locating holders of loan(s), the Department may disclose records to students/borrowers, guaranty agencies, educational institutions, financial institutions and servicers, and to Federal, State or Local agencies;
- 10) To assist analysts in assessing Title IV Program administration of guaranty agencies, educational institutions, financial institutions and servicers, the Department may disclose records to Federal and State agencies;
- 11) To assist loan holders in locating borrowers and overpayment holders in locating debtors, the Department may disclose records to guaranty agencies, educational institutions, financial institutions and servicers, and to Federal agencies;
- 12) To assist with meeting Credit Reform Act of 1992 requirements, the Department may disclose records to Federal agencies;



- 13) To assist program administrators with tracking refunds and cancellations, the Department may disclose records to guaranty agencies, educational institutions, financial institutions and servicers, and to Federal and State agencies;
- 14) To enforce the terms of a loan, assist in the collection of a loan and assist in the collection of an aid overpayment, the Department may disclose records to guaranty agencies, educational institutions, financial institutions and servicers, and to Federal, State, or Local agencies.

4. Will this information be shared with any other agency? If so, with which agency or agencies?

The Department of Education may disclose information contained in a record in an individual's account under the routine uses listed in the Privacy Act System of Records notice without the consent of the individual if the disclosure is compatible with the purposes for which the record was collected. Specific disclosures include the following:

- Freedom of Information Act (FOIA) Advice Disclosure
- Disclosure to the Department of Justice
- Contract Disclosure
- Litigation and Alternative Dispute Resolution (ADR) Disclosure
- Parties, counsels, representatives and witnesses
- Administrative Disclosures
- Federal and State agencies
- Enforcement Disclosure
- Employee Grievance, Complaint or Conduct Disclosure
- Labor Organization Disclosure
- Congressional Member Disclosure
- Consumer reporting agency

These disclosures may be made on a case-by-case basis. If the Department has complied with the computer matching requirements of the Privacy Act, disclosure also may be made to another agency under a computer matching agreement.

There will be no sharing of information for purposes outside of the above disclosure requirements or for anything other than the primary purpose(s) of collecting the information. Any contractor responsible for the operations of the National Student Loan Data System (NSLDS) is held to the privacy and security requirements of the Department of Education in the handling of information collected through NSLDS.

5. Describe the notice or opportunities for consent that will be/or are provided to individuals about what information is collected and how that information is shared with others organizations.



NSLDS is a government agency database system that the public accesses, the Privacy Policy is appropriately posted for the NSLDS users. This is a general policy, which applies to the handling of any information collected on the database.

A Privacy Act Statement Requirement is incorporated into the NSLDS log on 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. Before an individual can log to the NSLDS system they must read the Privacy Act Requirement statement and agree before the system will allow them access.

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

The Department of Education develops, disseminates, and periodically reviews/updates: (i) a formal, documented, access control policy that addresses purpose, scope, roles, responsibilities, and compliance; and (ii) formal, documented procedures to facilitate the implementation of the access control policy and associated access controls.

All policy and procedures may be found on ED's internal website at: <http://connectED>.

Federal Student Aid provides comments on departmental policy and procedures through the department's Administrative Communications System (ACS) process.

NSLDS reviews: account management processes, account establishment, activation, modification, disabling, and removal. NSLDS also reviews periodically for account reviews and disablement.

The application IDs are reviewed by the SSO quarterly. The SSO provides a list of current users to business POCs and requests them to verify who has left the project or no longer needs access to the application. The SSO will remove access as appropriate.

Account management includes the identification of account types (i.e., individual, group, and system), establishment of conditions for group membership, and assignment of associated authorizations. The organization identifies authorized users of the information system and specifies access rights/privileges. The organization grants access to the information system based on: (i) a valid need-to-know that is determined by assigned official duties and satisfying all personnel security criteria; and (ii) intended system usage. The organization requires proper identification for requests to establish information system accounts and approves all such requests. The organization specifically authorizes and monitors the use of guest/anonymous accounts and removes, disables, or otherwise secures unnecessary accounts. The organization ensures that account managers are notified when information system users are terminated or transferred and associated accounts are removed, disabled, or otherwise secured. Account managers are also notified when users' information system usage or need-to-know changes.



All physical access to the sites of the contractor 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 employed by the Department offers a high degree of resistance to tampering and circumvention by use of software that requires user access to be defined to specific online functions. This security system limits data access to users on a "need to know" basis and controls individual users' ability to access and alter records within the system. All users of this system are given a unique user ID with a personal identifier. Most data is loaded into NSLDS via a batch process. The security utilized ensures that only data from authorized data providers can add or update records in NSLDS.

In addition to controlling access at the information system level, access enforcement mechanisms are employed at the application level, when necessary, to provide increased information security for the organization.

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

Yes, a system of records has been created with this collection of information. Users are provided notice of rights under the Privacy Act via links to the agency Privacy Act regulations (34 C.R.F. Part 5b.5) and to the Privacy Act system of records notice for the National Student Loan Data System. (64 Fed. Reg. 72395 (December 27, 1999)).

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

<http://www.nslsfaf.ed.gov> (Financial Aid Professional)
<http://www.nsls.ed.gov/> (Students)