



Privacy Impact Assessment (PIA)
for the
Enterprise Data Warehouse and Analytics (EDWA)
3/30/17

Contact Point

Homayoon Khalili/Security Architect
202-617-0948

System Owner

Mike Fillinich/Director

Author

Homayoon Khalili/Security Architect

Office of Federal Student Aid

Reviewing Official

Kathleen Styles
Chief Privacy Officer
U.S. Department of Education

Please submit completed Privacy Impact Assessments to the Privacy Safeguards Division at privacysafeguards@ed.gov.

*Please complete this **Privacy Impact Assessment (PIA)** on how information in identifiable form is collected, stored, protected, shared, and managed electronically by your system. You may wish to consult with your ISSO in completing this document. If a question does not apply to your system please answer with N/A.*

Introduction

- 1.1. Describe the system including the system name, system acronym, and a brief description of the major functions.

The Enterprise Data Warehouse and Analytics (EDWA) system is a system within the Office for Federal Student Aid (FSA) under the Department of Education. EDWA is a data warehouse with data from multiple and distinct data sources. It is a centralized location for cross-lifecycle data, with access through a comprehensive analytics toolset that provides quick and accurate access to inform internal and external data requests. This warehouse is a foundation that can be aligned with organizational objectives and business needs to enhance analytics and data request response capabilities.

- 1.2. Describe the purpose for which the personally identifiable information (PII)¹ is collected, used, maintained, or shared.

EDWA provides timely, accurate, consistent, and repeatable data for improved analytics, insights, and reporting to FSA. Maintaining a data warehouse also reduces burdens on FSA's production systems whose primary purposes are not data analysis but rather the delivery of aid to college students. Furthermore, the production systems do not have the business intelligence and statistical front end needed by statisticians and analysts to perform their work. EDWA thus enables FSA to maintain the types of data sets and data tools essential for effective analysis. It also significantly enhances FSA's ability to make information available to the public and to respond to research requests. EDWA consolidates information from several source systems:

- COD-Sourced
- Central Processing System (CPS)
- Common Origination and Disbursement (COD) System

¹ The term "personally identifiable information" refers to information which can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc. alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc.

<https://www.whitehouse.gov/sites/default/files/omb/memoranda/fy2007/m07-16.pdf>

- Postsecondary Education Participants System (PEPS)
- Guaranty agencies
- Federal loan servicers (and specialty vendors such as DMCS and TPD)
- Perkins Loan schools
- National Student Loan Data System (NSLDS), particularly enrollment data and historical loan data
- Other Sources

1.3. Is this a new system, or one that is currently in operation?

This system is currently in operation.

1.4. Is this PIA new, or is it updating a previous version? If this is an update, please include the publication date of the original.

This is a new PIA for the EDWA system. The PIAs for the EDWA source systems listed in Section 1.2 can be found at <http://www2.ed.gov/notices/pia/index.html#FSA>

1.5. Is the system operated by the agency or by a contractor?

This system is operated by a contractor.

2. Legal Authorities and Other Requirements

If you are unsure of your legal authority, please contact your program attorney.

2.1. What specific legal authorities and/or agreements permit and regulate the collection and use of data by the system?

The Higher Education Act of 1965 (Public Law 89–329), as amended, sections 428, 484, and 485B; 31 U.S.C. 7701; and Executive Order 9397 (November 22, 1943), as amended by Executive Order 13478 (November 18, 2008).

SORN

2.2. Is the information in this system retrieved by name or personal identifier? If so this system will need to be covered by a Privacy Act System of Records Notice(s)

(SORN(s))²? If no, explain why not. If yes, provide the SORN name and number, or indicate that a SORN is in progress.

EDWA operates within the Common Origination and Disbursement (COD) System, 75 FR 186, 59242-46. The SORN number is 18-11-02, dated Sept 27, 2010.

Records Management

If you do not know your records schedule, please consult with your records liaison or RMHelp@ed.gov.

- 2.3. Does a records retention schedule, approved by National Archives and Records Administration (NARA), exist for the records contained in this system? If yes, please provide the NARA schedule number.

EDWA, currently a subsystem of COD, has a records retention and disposition schedule approved by the National Archives and Records Administration. The records schedule number is N1-441-09-23.

- 2.4. Is the PII contained in this system disposed of appropriately, and in accordance with the timelines in the records disposition schedule?
Yes

3. Characterization and Use of Information

Collection

- 3.1. List the specific personal information data elements (e.g. name, email, address, phone number, date of birth, Social Security Number, etc) that the system collects, uses, disseminates, or maintains.

The EDWA system receives and stores personally identifiable information (PII), such as names, Social Security numbers, addresses, dates of birth, places of birth, telephone numbers, income levels, etc.

- 3.2. Does the system collect only the minimum amount required to achieve the purpose stated in Question 1.2.
Yes

² A System of Records Notice (SORN) is a formal notice to the public that identifies the purpose for which PII is collected, from whom and what type of PII is collected, how the PII is shared externally (routine uses), and how to access and correct any PII maintained by ED. <https://connected.ed.gov/om/Documents/SORN-Process.pdf>

- 3.3. What are the sources of information collected (e.g., individual, school, another agency, commercial sources, etc.), how is the information collected from stated sources (paper form, webpage, database, etc.), and how is this information validated or confirmed?³

EDWA does not collect the data from the public but rather receives it from other FSA systems. EDWA collects this information electronically using the source systems described above in section 1.2. The PII is provided by the student applicants, guaranty agencies, federal vendors, and the schools participating in the Title IV Higher Education Student Financial Aid Programs to enable the administration of the Federal Title IV grants and loans by the Department. The Title IV loans and grants are used by eligible students to attend those schools. Source systems such as CPS have mechanisms, such as matches with other federal agencies, to confirm and validate PII. The FAFSA form contains input validation mechanisms, such as ensuring that the SSN matches the 'xxx-xx-xxxx' numeric format. In addition, the SSN and other identifiers obtained via FAFSA are validated against SSA records.

Use

- 3.4. Describe how and why the system uses the information to achieve the purpose stated in Question 1.2 above.

EDWA provides a single-source repository of financial and loan information for students and institutions. It reduces burdens on FSA's production systems whose primary purposes are not data analysis but rather the delivery of aid to college students. EDWA enables FSA to maintain the types of data sets and data tools essential for an effective data office. FSA can use EDWA to perform analysis needed to provide information requested by the executive and legislative branches of the US government to assist them with student aid policymaking.

The information obtained from the EDWA source systems (see §1.1) is consolidated and available to FSA to conduct analysis in various areas such as:

- Student Aid Data, including information on income-driven repayment plans, the Federal student loan portfolio, aid eligibility and applications, default, and forgiveness
- School Data, including information on school eligibility and participation as well as school compliance

Social Security Numbers

³ Examples include form filling, account verification, etc.

It is the Department's policy that, in order to collect Social Security Numbers, the System Owner must state the collection is: 1) authorized by the law, 2) necessary for an agency purpose, and 3) there is no reasonable alternative.

- 3.5. Does the system collect Social Security Numbers? If so, explain the purpose of its collection, type of use, and any disclosures. *Please note if the system collects SSN, the PIA will require a signature by the Assistant Secretary or equivalent.*

Yes

- 3.6. Specify any alternatives considered in the collection of SSN and why the alternatives were not selected.

EDWA uses the SSN because it is used as a unique identifier in EDWA's source systems. EDWA needs it to join/link data across the various components of the federal student aid lifecycle. However, during 2017, EDWA is implementing tokenization, which provides an additional layer of security by masking the SSN with a random nine-character sequence.

The SSN is the unique identifier for Title IV student financial assistance programs and its use is required by program participants and their trading partners to satisfy borrower identification, borrower eligibility, loan servicing, and loan status reporting requirements under law and regulations. Trading partners include the Department of Education, Internal Revenue Service, Selective Service System, institutions of higher education, national credit bureaus, lenders, and servicers.

Regulations governing the Federal student financial aid programs require schools to collect and confirm the SSN of student borrowers and grantees prior to disbursement of funds. When the U.S. Department of Education asks individuals to supply information related to the Title IV student financial assistance programs, the trading partner or system manager provides the individual with a written "Privacy Act statement" which can be retained by the individual. FSA has considered alternatives to the collection of a Social Security Number (SSN). However, because SSN is a unique identifier for Title IV programs, its collection and use is required to verify the identity of the FSA customer, access the FSA customers' information in other FSA applications, such as PAS, CPS, and NSLDS, and assist FSA customers with their questions on a wide range of topics throughout the entire financial aid process. The SSN is also a unique identifier for tax returns which are required to determine financial eligibility for student loans and grants

4. Notice

- 4.1. How does the system provide individuals notice about the collection of PII prior to the collection of information (i.e. written Privacy Act notice, link to a privacy policy, etc.)? If notice is not provided, explain why not.

Extensive Privacy Act notices are posted on the FAFSA website (<https://fafsa.ed.gov>). The basis for the data sent to COD by colleges / universities is FAFSA, which is filled out by student applicants. FAFSA is an OMB-approved data collection instrument (OMB #1845-0001).

Privacy Act notices are posted within COD-sourced systems (<https://cod.ed.gov>). The individual COD-sourced systems include FAFSA (listed above), COD and PEPS.

- 4.2. Provide the text of the notice, or the link to the webpage where notice is posted.

<https://fafsa.ed.gov>

<https://cod.ed.gov>

- 4.3. What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?

The information within EDWA is collected from the source systems cited in Section 1.2 above. The student or borrower is provided notice and has the opportunity to decline to provide information to those systems. However, providing certain information is required in order to receive certain benefits or access their accounts on ED's systems.

5. Information Sharing

Internal

- 5.1. Will information be shared internally with other ED organizations, if so, which ones?

The FSA Enterprise Data Office shares information gleaned via EDWA-based reports and analysis with the business units within FSA.

These include:

- The Policy Liaison and Implementation Staff who use the data to assist in the development, implementation, and dissemination of Title IV student aid policy.
- The Strategic Planning and Reporting Staff who utilize the data to track program and organizational performance.
- The Communications and Outreach Staff who coordinate with any external agency requests for the EDWA data.

- The Office of Business Optimization who utilizes the data to lead activities to assess and improve the quality and efficiency and productivity of FSA management operations.
- The Business Operations office which provides services to aid recipients and schools, including notifying aid recipients of repayment options, controlling delinquent/defaulted accounts, recommending proactive strategies and consolidating aid recipient loans.
- The Customer Experience office which is responsible for identifying, measuring and reporting customer interaction and satisfaction with the federal financial aid services and products offered by Federal Student Aid.
- The Program Compliance Office which is responsible for providing integrated oversight of postsecondary schools and financial institutions that participate in the Title IV student financial assistance programs.

ED's Budget Service will use information from EDWA to assist in forecasts of loan program costs.

5.2. What information will be shared and with whom?

All of the information collected will be shared with the units listed above, for the approved agency purpose stated in 1.2 above.

5.3. What is the purpose for sharing the specified information with the specified internal organizations? Does this purpose align with the stated purpose in Question 1.2 above?

External

5.4. Will the information contained in the system be shared with external entities (e.g. another agency, school district, etc.)?

FSA may share aggregated analysis from EDWA with other executive and legislative branch agencies as needed but does not share identifiable, record-level data. Through its external data request process, FSA may also share aggregated analysis from EDWA with other external entities but, again, does not share identifiable, record-level data. In a limited number of cases, FSA may use memoranda of understanding (MOUs) to participate in data exchanges/matches of record-level data with other agencies, subject to restrictions contained in the Higher Education Act, Privacy Act, FERPA and routine uses of System of Record Notices, as well as ED/FSA disclosure review.

5.5. What information will be shared and with whom?

FSA may share aggregated analysis, as described in 5.4, of the types of data described in 1.2 and 3.4 but not identifiable, record-level data. FSA will determine the requester's needs prior to producing the analysis and conveying the results to the requester. These requesters include executive and legislative branches of the federal governance and other external entities. As noted in 5.4, FSA may also participate in external federal data matches and federal agency researcher projects. Prior to external sharing, FSA ensures that all PII is redacted, all assumptions pertaining to the data based on the need for the data are outlined, and a memorandum of understanding is in place, so there is no misinterpretation of the EDWA data. FSA may solicit, review and vet these research proposals on a case-by-case basis pursuant to documented controls and subject to restrictions contained in the Higher Education Act, Privacy Act, FERPA and routine uses of System of Record Notices, as well as ED/FSA disclosure review.

5.6. What is the purpose for sharing the specified information with the specified external entity? Does this purpose align with the stated purpose in Question 1.2 above?

N/A

5.7. How is the information accessed and used by the external entity?

Other agencies and external entities will not have access to EDWA to write reports and perform statistical analysis. The process is to submit a data request to FSA, and FSA will then perform analysis and produce report(s) after consulting with the requester to understand the requester's analytic needs. The final results will not include record-level data. In the long term it is possible that one or more additional executive branch agencies will receive access to executive-level dashboards. This will not include the ability to edit these dashboards or develop new reports. The dashboards will not contain record-level data. For the external federal agency matching and federal researcher approaches described in 5.4 and 5.5, information will be shared in a secure way and used only as stated in the MOU.

5.8. If the project is using the information for testing a system or for training/research purposes, what controls are in place to minimize the risk and protect the data?

N/A

5.9. Does the system use “live” PII for the development or testing of another system? If so, please explain.

N/A

5.10. Is the sharing pursuant to a Computer Matching Agreement (CMA), Memorandum of Understanding (MOU) or other type of approved sharing agreement with another agency?

N/A

5.11. Does the project place limitations on re-disclosure?

Yes, as stated in an MOU.

6. Redress⁴

6.1. What are the procedures that allow individuals to access their own information?

[Common Origination and Disbursement System](#)

[Federal Student Aid Application File](#)

[Common Services for Borrowers System](#)

[National Student Loan Data System](#)

6.2. What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

See 6.1 above.

6.3. How does the project notify individuals about the procedures for correcting their information?

See 6.1 above.

⁴ If the system has a System of Records Notice (SORN), please provide a link to the SORN in Question 6.1 and proceed onto Section 7. Safeguards.

7. Safeguards

If you are unsure which safeguards will apply, please consult with your [ISSO](#)

- 7.1. Does the principal office work with their CSO/ISSO to build privacy & security into the system and build privacy extensions to the extent feasible?

Yes. The POC's Information System Owner (ISO) works closely with the Office of the Chief Information Officer and the ISSO, to ensure that the required security controls are implemented both enterprise-wide and specific to this system.

- 7.2. What procedures are in place to determine which users may access the information and how does the project determine who has access?

Access to this system is restricted to users who have a need to know for an agency purpose. These users request access from the ISO or ISSO, and are only granted access after it is determined that they need access in order to perform valid work activity.

- 7.3. What administrative, technical, and physical safeguards are in place to protect the information?

EDWA complies with relevant security laws, OMB Directives, and NIST standards. Implemented controls comprise of a combination of management, operational, and technical controls, and include the following control families: access control, awareness and training, audit and accountability, security assessment and authorization, configuration management, contingency planning, identification and authentication, incident response, maintenance, media protection, physical and environmental protection, planning, personnel security, privacy, risk assessment, system and services acquisition, system and communications protection, system and information integrity, and program management.

- 7.4. Is an Authority to Operate (ATO) required? Has one been granted?

In accordance with the Federal Information Security Management Act of 2002 (FISMA) and the Federal Information Security Modernization Act of 2014, every FSA system must receive a signed Authority to Operate (ATO) from a designated FSA official. The ATO process includes a rigorous assessment of security controls, a plan of actions and milestones to remediate any identified deficiencies, and a continuous monitoring program. EDWA, currently a subsystem of COD, utilizes the COD ATO received on 08/20/2014.

7.5. Is the system able to provide an accounting of disclosures?

The system has audit and logging capabilities that would enable the ISO to provide an accounting of disclosures if requested under the Privacy Act.

8. Auditing and Accountability

8.1. How does the system owner ensure that the information is used in accordance with stated practices in this PIA?

The ISO and the ISSO operate the system proactively. They are required to review the system privacy and security controls on a yearly basis. They are made aware of any changes in collection or use of the information. LMM security and privacy rules apply to all relevant system changes, and the PIA and SORN are regularly reviewed. In addition, all data sharing is in accordance with signed interagency agreements which are reviewed on a regular basis.

8.2. What are the privacy risks associated with this system and how are those risks mitigated?

There are several privacy risks, both internally and externally, that have been identified and mitigated. Privacy risks include a breach of EDWA security safeguards implemented on the EDWA repository, which could compromise the confidentiality, integrity, and availability of information.

The information contained in this system is protected from unauthorized disclosure through the implementation of applicable Privacy controls as identified within NIST SP 800-53 Rev 4.