



**Financial Asset Management Systems**  
*Gold Standard Recovery Solutions*

**Privacy Impact Assessment  
for the  
BFrame Collection System (PCA-BCS)**

**Providing Private Collection Agency Services on behalf of the:**

**US Department of Education  
Federal Student Aid**



**START HERE  
GO FURTHER**

---

**FEDERAL STUDENT AID**

Date: March 13, 2009  
Updated: June 30, 2009

**Contact Point**

System Owner: Jerry Hogan, President and CEO, FAMS

Information Owner: Dwight Vigna, US Department of Education, Federal Student Aid

Author: FAMS Security Review Board

Page C-2

***CONFIDENTIAL and PROPRIETARY information***

*This document contains company confidential and proprietary security information. No part of this documentation may be released or distributed in any form without the prior written permission from the FAMS PCA-BCS System Owner, 1967 Lakeside Pkwy, Suite 400, Tucker, GA 30084*

**FOR OFFICIAL USE ONLY**

This document contains Department of Education Sensitive Material and is exempted from release under the Freedom of Information Act by Exemption b(2). Staff reviewing this document must hold a minimum of Public Trust Level 5c clearance.



**Financial Asset Management Systems**  
*Gold Standard Recovery Solutions*



US Department of Education

Privacy Impact Assessment  
Financial Asset Management Systems, Inc.  
BFrame Collection System (PCA-BCS)

March 13, 2009 / Updated June 30, 2009

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

The following borrower information may be collected:

- ❖ Full Name
- ❖ Address
- ❖ Social Security Number
- ❖ Phone Number
- ❖ Employment Information
- ❖ Email Address
- ❖ Additional Information Obtained From Skip Tracing Efforts  
(i.e. bankruptcy, death, additional addresses, additional phone numbers, etc.)
- ❖ Disbursement Amount
- ❖ Principal Balance
- ❖ Interest Accrual
- ❖ Loan Status
- ❖ Repayment Plan
- ❖ Repayment Amount
- ❖ Forbearance Status
- ❖ Deferment Status
- ❖ Separation Date
- ❖ Grace Period
- ❖ Delinquency

## 2. Why is this information being collected?

This information is being collected by Financial Asset Management Systems, Inc. (FAMS), a Private Collection Agency (PCA) contractor, on behalf of the US Department of Education, Federal Student Aid to support collection and administrative resolution activities on debts resulting from non-payment of student loans made under the Federal Family Education Loan (FFEL) Program: Stafford Loans (formerly the Guaranteed Student Loan Program and including Federally Insured Student Loans), Supplemental Loans for Students, PLUS Loans (formerly Parental Loans for Undergraduate Students), and Consolidation Loans; the William D. Ford Federal Direct Student Loan (Direct Loan) Program (formerly known as the Federal Direct Student Loan Program): Federal Direct Stafford/Ford Loan Program, Federal Direct

***CONFIDENTIAL and PROPRIETARY information***

*This document contains company confidential and proprietary security information. No part of this documentation may be released or distributed in any form without the prior written permission from the FAMS PCA-BCS System Owner, 1967 Lakeside Pkwy, Suite 400, Tucker, GA 30084*

**FOR OFFICIAL USE ONLY**

This document contains Department of Education Sensitive Material and is exempted from release under the Freedom of Information Act by Exemption b(2). Staff reviewing this document must hold a minimum of Public Trust Level 5c clearance.



**Financial Asset Management Systems**  
*Gold Standard Recovery Solutions*



US Department of Education

Privacy Impact Assessment  
Financial Asset Management Systems, Inc.  
BFrame Collection System (PCA-BCS)

March 13, 2009 / Updated June 30, 2009

Unsubsidized Stafford/Ford Loan Program, Federal Direct Consolidation Loan, and Federal Direct Plus Loans; and Federal Perkins Loans (formerly National Direct/Defense Student Loans).

The PCA-BCS provides the mechanism to store, retrieve, and maintain borrower information on defaulted student loans to support the location of the borrower and arrange for the collection or administrative resolution of the defaulted loan portfolios assigned to FAMS by Federal Student Aid.

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

The information collected, stored, and updated by FAMS on behalf of Federal Student Aid will be used in carrying out collection and administrative resolution activities on defaulted student loans guaranteed by the U.S. Department of Education. The information is used only to support the collection or administrative resolution of the debts associated with a borrower's defaulted student loan(s).

### **4. Will this information be shared with any other agency or entity? If so, with which agency or agencies/entities?**

Yes, some or all of this information may be shared with the following agencies and/or entities:

Federal Agencies

- ❖ US Department of Education, Federal Student Aid

FAMS Contractors and Vendors

- ❖ Collection subcontractors (currently Harvard Collection Services and Immediate Credit Recovery)
- ❖ Letter mailing vendors (currently Datamatx)
- ❖ Skip Tracing vendors (currently Lexis Nexis and Interactive Data)
- ❖ Automatic voice broadcast vendors (currently Livevox)

### **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.**

FAMS provides a "Mini-Miranda" notice to borrowers during written and verbal communications in accordance with requirements of the Fair Debt Collection Practices Act of

***CONFIDENTIAL and PROPRIETARY information***

*This document contains company confidential and proprietary security information. No part of this documentation may be released or distributed in any form without the prior written permission from the FAMS PCA-BCS System Owner, 1967 Lakeside Pkwy, Suite 400, Tucker, GA 30084*

**FOR OFFICIAL USE ONLY**

This document contains Department of Education Sensitive Material and is exempted from release under the Freedom of Information Act by Exemption b(2). Staff reviewing this document must hold a minimum of Public Trust Level 5c clearance.



**Financial Asset Management Systems**  
*Gold Standard Recovery Solutions*



US Department of Education

Privacy Impact Assessment  
Financial Asset Management Systems, Inc.  
BFrame Collection System (PCA-BCS)

March 13, 2009 / Updated June 30, 2009

1978 (FDCPA). The Mini-Miranda states “this is an attempt to collect a debt and any information obtained will be used for that purpose.”

The Financial Asset Management Systems, 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 Financial Asset Management Systems, Inc. receive 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 Financial Asset Management Systems, 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. Financial Asset Management Systems, Inc. company privacy policy also restricts the sharing of information.

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

The information collected and maintained on the behalf of the Department of Education by FAMS is segregated from non-Department of Education information and systems operated by FAMS through both physical and logical controls to prevent the use of this data for any other purpose than the collection or administrative resolution of the borrower’s defaulted student loan(s). Furthermore the information is secured using the requirements established by the Federal Information Security Management Act of 2002 (FISMA) and in accordance with NIST Special Publication (SP) 800-53, *Recommended Security Controls for Federal Information Systems, Revision 2*, and NIST SP 800-53A,

FAMS has a comprehensive combination of security policies and controls in place which protect FAMS’ physical assets and data processing resources. Compliance with FAMS’ security and disclosure policies is assessed during periodic information security audits as well as through periodic random inspections including network penetration tests. In addition, FAMS is currently re-writing its System Security Plan (SSP) that details security requirements and describes the security controls that are in place to meet those requirements.

Page C-3

### ***CONFIDENTIAL and PROPRIETARY information***

*This document contains company confidential and proprietary security information. No part of this documentation may be released or distributed in any form without the prior written permission from the FAMS PCA-BCS System Owner, 1967 Lakeside Pkwy, Suite 400, Tucker, GA 30084*

### **FOR OFFICIAL USE ONLY**

This document contains Department of Education Sensitive Material and is exempted from release under the Freedom of Information Act by Exemption b(2). Staff reviewing this document must hold a minimum of Public Trust Level 5c clearance.



**Financial Asset Management Systems**  
*Gold Standard Recovery Solutions*



US Department of Education

Privacy Impact Assessment  
Financial Asset Management Systems, Inc.  
BFrame Collection System (PCA-BCS)

March 13, 2009 / Updated June 30, 2009

The Department of Education, Federal Student Aid has implemented a certification and accreditation process in accordance with “NIST SP 800-37, Guide for the Security Certification and Accreditation of Federal Information Systems.” Certification and accreditation in accordance with this process is also being arranged in order to validate FAMS’ security controls.

**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. Financial Asset Management Systems, 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).

***CONFIDENTIAL and PROPRIETARY information***

*This document contains company confidential and proprietary security information. No part of this documentation may be released or distributed in any form without the prior written permission from the FAMS PCA-BCS System Owner, 1967 Lakeside Pkwy, Suite 400, Tucker, GA 30084*

**FOR OFFICIAL USE ONLY**

This document contains Department of Education Sensitive Material and is exempted from release under the Freedom of Information Act by Exemption b(2). Staff reviewing this document must hold a minimum of Public Trust Level 5c clearance.