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If you have questions:

Elena Epps

(202) 512-3421

or

Lisa Hardman

(202) 512-3442

or email them:

FSA_Survey@gao.gov

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Management of Federal Student Aid Records

US Government Accountability Office

This questionnaire collects information on the management and use of student aid records by post-secondary institutions who partner with the U.S. Department of Education’s Office of Federal Student Aid. It asks about the following at your institution:

1. Identify the types of information being collected and used as part of the federal student aid process, and what, if any, agreements exist to share the information collected.
2. Assess the recordkeeping policies and processes used to manage, store, and protect federal student aid information, including for records retention and disposition.
3. Determine what automated systems are being used to manage federal student aid program records and how those systems were acquired, and assess any plans that exist to modify or replace the systems.

Please answer this questionnaire specifically for: *(Your school name will appear here)*

You may save and exit the questionnaire at any time. When you return to the survey website and log in, you will be returned to the place in the questionnaire where you exited.

Terminology

Records retention – the length of time each document or record will be retained as an active record.

Disposition – involves transferring records of permanent, historical value for archiving (preservation) and destroying all other records that are no longer needed for organization operations.

Automated systems – any computer hardware, software, database, or any combination of these, configured to accomplish specific information handling operations, such as communication, computation, dissemination, processing, and storage of information.

Student Aid Information

1. Does your school collect and use the types of information identified below as part of the federal student aid process?

	Yes	No
a. Personally identifiable information (e.g., date of birth, Social Security number, student ID numbers, or citizenship)	<input type="checkbox"/>	<input type="checkbox"/>
b. Financial information (e.g., tax information, adjusted gross income)	<input type="checkbox"/>	<input type="checkbox"/>
c. School-related information (e.g., degree, certificate, grade level, credit/clock hours)	<input type="checkbox"/>	<input type="checkbox"/>
d. Employment information of parent and/or student (e.g., employer or e-mail address)	<input type="checkbox"/>	<input type="checkbox"/>
e. Other	<input type="checkbox"/> (DISPLAY D1)	<input type="checkbox"/>

(Red markings indicate conditional questions triggered by previous corresponding answers)

(D1)

IF OTHER: Explain in the box below.

2. How does your school use the information identified in question 1?

	Yes	No
a. Support the disbursement of federal financial aid (e.g., loans, grants, federal work study)	<input type="checkbox"/>	<input type="checkbox"/>
b. School-based disbursement (e.g., scholarship programs)	<input type="checkbox"/>	<input type="checkbox"/>
c. Other (e.g., outside scholarships/fellowships)	<input type="checkbox"/> (DISPLAY D2)	<input type="checkbox"/>

(D2)

IF OTHER: Explain in the box below.

3. Does your school have agreements in place with each of the following entities to share any or all of the information listed?

Entity	Personally identifiable information	Financial information	School-related information	Other information (explain below)
a. Banks				

	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
b. Private collection agencies	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
c. Loan servicers	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
d. Guaranty agencies	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
e. Contractors	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
f. Other entity (explain below)	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

IF OTHER ENTITY OR OTHER INFORMATION SHARED: Explain those answers in the box below.



Recordkeeping

4. Does your school have **policies** for managing (including accessing, using, and protecting) federal student aid information?

- ☐ Yes
- ☐ No (DISPLAY D4)
- ☐ Don't know

(D4)

IF NO: How does your school ensure effective management of federal student aid information?

5. Does your school have **documented processes** for managing (including accessing, using, and protecting) federal student aid information? (Processes may be included in your school's policies on managing federal student aid information.)

- ☐ Yes
- ☐ No (DISPLAY D5)
- ☐ Don't know

(D5)

IF NO: Please describe the processes used by your school to manage federal student aid information.

6. Does your school store **paper-based** federal student aid information?

- ☐ Yes (continue with next question)
- ☐ No (Click here to skip to Question 8)

7. Does your school store **paper-based** federal student aid information in the following ways?

	Yes	No
a. School-owned records storage facility	<input type="checkbox"/>	<input type="checkbox"/>
b. Contractor-owned records storage facility	<input type="checkbox"/>	<input type="checkbox"/>
c. Locked office on campus	<input type="checkbox"/>	<input type="checkbox"/>
d. Locked storage room on campus	<input type="checkbox"/>	<input type="checkbox"/>
e. Locked filing cabinets on/off campus	<input type="checkbox"/>	<input type="checkbox"/>
f. Fireproof cabinets	<input type="checkbox"/>	<input type="checkbox"/>
g. Other	<input type="checkbox"/> (DISPLAY D7)	<input type="checkbox"/>

(D7)

IF OTHER: Explain in the box below.

8. Does your school store **electronic** federal student aid information?

- ☐ Yes *(continue with next question)*
- ☐ No *(Click here to skip to Question 10)*

9. Does your school store **electronic** federal student aid information in the following ways?

	Yes	No
a. Data server on school-owned network	<input type="checkbox"/>	<input type="checkbox"/>
b. Data server on contractor-owned network	<input type="checkbox"/>	<input type="checkbox"/>
c. Other	<input type="checkbox"/> <i>(DISPLAY D9)</i>	<input type="checkbox"/>

(D9)

IF OTHER: Explain in the box below.

10. Does your school use the following to protect federal student aid information (either **paper-based** or **electronic** records)?

	Yes	No
a. Onsite, locked room or drawer	<input type="checkbox"/>	<input type="checkbox"/>
b. Onsite, locked server room	<input type="checkbox"/>	<input type="checkbox"/>
c. Off-site, secured facility	<input type="checkbox"/>	<input type="checkbox"/>
d. Other	<input type="checkbox"/> <i>(DISPLAY D10)</i>	<input type="checkbox"/>

(D10)

IF OTHER: Explain in the box below.



Retention

11. Does your school have record retention **policies** that cover federal student aid information?

- ☐ Yes
- ☐ No (DISPLAY D11)
- ☐ Don't know

(D11)

IF NO: How does your school ensure effective retention of federal student aid information?

12. Does your school have **documented processes** for record retention that cover federal student aid information? (Processes may be included in your school's record retention policies.)

☐ Yes

☐ No (DISPLAY D12)

☐ Don't know

(D12)

IF NO: How does your school handle the retention of federal student aid information?

13. How long does your school retain **paper-based** federal student aid information? Select the one answer in each row that best describes the length of time for each type of information. (If your school does not retain paper-based information, skip this question.)

	Up to 5 years	6 to 10 years	11 to 15 years	16 to 25 years	26 to 50 years	Over 50 years but not permanently	Permanently
a. Personal information (e.g., date of birth, Social Security number, citizenship)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Financial information (e.g., tax information, adjusted gross income)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. School-related information (e.g., degree, grade level)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Employment information (parent/student)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Other	<input type="checkbox"/> (DISPLAY D13)	<input type="checkbox"/> (DISPLAY D13)	<input type="checkbox"/> (DISPLAY D13)	<input type="checkbox"/> (DISPLAY D13)	<input type="checkbox"/> (DISPLAY D13)	<input type="checkbox"/> (DISPLAY D13)	<input type="checkbox"/> (DISPLAY D13)

(D13)

IF OTHER: Explain in the box below.

14. How long does your school retain **electronic** federal student aid information? Select the one answer in each row that best describes the length of time for each type of information. **(If your school does not retain electronic information, skip this question.)**

	Up to 5 years	6 to 10 years	11 to 15 years	16 to 25 years	26 to 50 years	Over 50 years but not permanently	Permanently
a. Personal information (e.g., date of birth, Social Security number, citizenship)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Financial information (e.g, tax information, adjusted gross income)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. School-related information (e.g., degree, grade level)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Employment information (parent/student)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Other	<input type="checkbox"/> <i>(DISPLAY D14)</i>	<input type="checkbox"/> <i>(DISPLAY D14)</i>	<input type="checkbox"/> <i>(DISPLAY D14)</i>	<input type="checkbox"/> <i>(DISPLAY D14)</i>	<input type="checkbox"/> <i>(DISPLAY D14)</i>	<input type="checkbox"/> <i>(DISPLAY D14)</i>	<input type="checkbox"/> <i>(DISPLAY D14)</i>

(D14)

IF OTHER: Explain in the box below.



Disposition

15. Does your school have records disposal policies that cover federal student aid information?

- ☐ Yes
- ☐ No (DISPLAY D15)
- ☐ Don't know

(D15)

IF NO: How does your school ensure that federal student aid information is not destroyed prematurely or in error? (After answering, skip to question 17)

16. Has your school **implemented** the records disposal policies identified above in question 15?

- ☐ Yes (DISPLAY D16A)
- ☐ No (DISPLAY D16B)
- ☐ Don't know

(D16A)

Describe in the box below an example of how your school implemented its disposal policies related to federal student aid information.

(D16B)

Explain in the box below why your school has not implemented its records disposal policies.

17. Does your school perform the following control activities identified by the National Archives and Records Administration (for **both paper-based and electronic** records) to ensure that federal student aid information is not destroyed prematurely or in error?

	Yes	No	Don't know
a. Regular review of records inventories	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Approval process for disposal notices from off-site storage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require certificates of destruction	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Monitor shredding services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Obtain pre-authorization from records management program before records are destroyed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Perform ad hoc monitoring of trash and recycle bins	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Receive notifications from facilities staff when large trash bins or removal of boxes are requested	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Conduct annual records clean out activities that are sponsored and monitored by records management staff	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

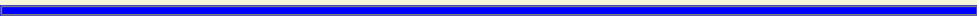
i. Other

☐ (DISPLAY
D17)

☐☐

(D17)

IF OTHER: Explain in the box below.



Automated Systems

18. Does your school use any of the following Department of Education automated systems to manage federal student aid information?

	Yes	No
1. Common Origination and Disbursement	<input type="checkbox"/>	<input type="checkbox"/>
2. Central Processing System	<input type="checkbox"/>	<input type="checkbox"/>
3. Debt Management Collection System 2	<input type="checkbox"/>	<input type="checkbox"/>
4. Department of ED/Perkins	<input type="checkbox"/>	<input type="checkbox"/>
5. e-Campus Based	<input type="checkbox"/>	<input type="checkbox"/>
6. Financial Management System	<input type="checkbox"/>	<input type="checkbox"/>
7. Financial Partners Portal	<input type="checkbox"/>	<input type="checkbox"/>
8. FSA Counselor Toolkit	<input type="checkbox"/>	<input type="checkbox"/>

	Yes	No
9. Great Lakes Commercial System	<input type="checkbox"/>	<input type="checkbox"/>
10. HEAL Online Processing System	<input type="checkbox"/>	<input type="checkbox"/>
11. Integrated Partner Management	<input type="checkbox"/>	<input type="checkbox"/>
12. Integrated Student Experience	<input type="checkbox"/>	<input type="checkbox"/>
13. Integrated Technical Architecture	<input type="checkbox"/>	<input type="checkbox"/>
14. Lessons Learned Database	<input type="checkbox"/>	<input type="checkbox"/>
15. Missouri Higher Education Assistance Authority	<input type="checkbox"/>	<input type="checkbox"/>
16. Performance Award Tracking System	<input type="checkbox"/>	<input type="checkbox"/>

	Yes	No
17. Partners Enterprise Business Cooperation	<input type="checkbox"/>	<input type="checkbox"/>
18. Postsecondary Educational Participants System	<input type="checkbox"/>	<input type="checkbox"/>
19. Pennsylvania Higher Education Assistance Authority	<input type="checkbox"/>	<input type="checkbox"/>
20. Participation Management	<input type="checkbox"/>	<input type="checkbox"/>
21. Student Aid Internet Gateway	<input type="checkbox"/>	<input type="checkbox"/>
22. Sallie Mae Commercial System	<input type="checkbox"/>	<input type="checkbox"/>
23. Title IV Data Center	<input type="checkbox"/>	<input type="checkbox"/>
24. ED Financial	<input type="checkbox"/>	<input type="checkbox"/>
25. Iowa Student Loan Liquidity Corporation	<input type="checkbox"/>	<input type="checkbox"/>

	Yes	No
26. Granite State Management and Resources	<input type="checkbox"/>	<input type="checkbox"/>
27. Oklahoma Student Loan Authority	<input type="checkbox"/>	<input type="checkbox"/>
28. Utah Higher Education Assistance Authority	<input type="checkbox"/>	<input type="checkbox"/>
29. Vermont Student Assistance Corp	<input type="checkbox"/>	<input type="checkbox"/>

30. Nelnet Servicing	<input type="checkbox"/>	<input type="checkbox"/>
31. National Student Loan Database System	<input type="checkbox"/>	<input type="checkbox"/>
32. Ombudsman Case Tracking System	<input type="checkbox"/>	<input type="checkbox"/>
33. Operational Vulnerability Management Solution	<input type="checkbox"/>	<input type="checkbox"/>
34. Person Authentication Service	<input type="checkbox"/>	<input type="checkbox"/>

19. Does your school use its own (developed or acquired) automated system(s) in handling federal student aid data?

- ☐ Yes *(DISPLAY D19)*
- ☐ No
- ☐ Don't know

(D19)

IF YES: Please list the system(s) and describe each.

20. Did your school use either of the following funding mechanisms to develop or acquire the automated systems that you listed in question 19?

	Yes	No
a. Department of Education (Office of Federal Student Aid) funded	<input type="checkbox"/>	<input type="checkbox"/>
b. School funded (e.g., endowment, operations budget)	<input type="checkbox"/>	<input type="checkbox"/>
c. Other	<input type="checkbox"/> <i>(DISPLAY D20)</i>	<input type="checkbox"/>

(D20)

IF OTHER: Explain in the box below.



Information Security

21. Does your school have a documented information security program that includes policies and procedures to maintain reasonable and appropriate administrative, technical, and physical safeguards to ensure the integrity and confidentiality of federal student aid information, including the safeguards required by the Federal Trade Commission?
- ☐ Yes
- ☐ No (DISPLAY D21)

(D21)

IF NO: Please describe how your school ensures that the appropriate controls are in place to safeguard the federal student aid information it collects and uses.

Additional Comments

22. Do you have any additional explanations of your answers or comments on any of the issues in this questionnaire?
-

23. When you consider your answers to be final, and ready to be used in our analysis, click the box below. If you want a record of this questionnaire, click the "Print Your Answers" button below.
- ☐ **Answers are final**

Then click "Save & Exit" to save your questionnaire. Even after you indicate your "Answers are final", you can return to your questionnaire to change or provide additional answers at any time before we announce the closure of the survey.

We greatly appreciate your time and effort in our review for the Congress.

Print Your Answers

Save & Exit