

3.9 Draft FSA Omnibus Privacy Act System of Records Notice/ Privacy Protections

Task Overview

The request to develop a new FSA Omnibus System of Records Notice came as a result of the need to consolidate some thirteen outstanding and draft system of records notices already issued by FSA. The existing structure of myriad system of records notice creates confusion for members of the public who are currently required to wade through technical descriptions of various systems to determine which particular system their request for notification, access or correction relates to. It also creates a burden on FSA whenever a change is made in its IT systems to update several systems of records that could be affected.

Task Details

The effort to combine the FSA System of Records notices has been short but productive. The policy effort began in February as a compilation of the non-boilerplate aspects of each of the existing and draft FSA system of records notices. It appeared that 10 of the current and draft notices pertain to student records and were consolidated into one system of record. A proposed Privacy Act system of records notice has been drafted and is currently being reviewed by the Department.

In addition to focusing on the System of Records issue, the team addresses additional facets of security and privacy policy matters. One issue that arose was in regards to the new requirements of Section 208 of the E-Government Act. This section focuses on information gathered from an agency's website and precautions that must be met for privacy.

Task Status

The FSA Security and Privacy Team researched the E-Government Act and the specific provisions regarding privacy protections and websites. The Team prepared a document explaining the highlights of the E-Government Act. The Team also created a privacy impact assessment to be used by the systems for the reporting requirements of the E-Government Act (i.e. to turn in to the CIO) and a guide for how systems can write privacy notices to be posted on their websites.