



Appendix C: Questionnaires

The focus of Task Orders 123.1.26 and 123.1.27 was the documentation of Business Objectives and High-Level Requirements. Current state system information was gathered as an initial task to facilitate the creation of those objectives and requirements. The following appendices document the information-gathering meetings held with Core Team members and system owners:

Appendix	System(s)	FSA Participant(s)	Interview Date
C.1	CPS	Angeline Iwanicki	05/13/03
C.2	Participation Management SAIG	Gregory James, Paul Steinhauer	05/14/03
C.3	COD	Tony Milidantri, Ted Taverner/Renee Wade	05/15/03 05/20/03
C.4	FAA On-line	Nina Colon	05/15/03
C.5	Eapp PEPS	Jay Long, Chris Hill, Patricia Patterson	05/19/03
C.6	eCB	Rich Bennett, Tammy Connelly	05/20/03
C.7	DLSS	Randy Bowman, Allen Prodgers	05/20/03
C.8	DLDM	Randy Bowman, Allen Prodgers	05/20/03
C.9	eZAudit	Randy Wolff, Matt Portolese	05/21/03
C.10	CMDM	Andy Cho	05/21/03
C.11	NSLDS	Pam Eliadis, Andrea Wise	05/21/03
C.12	FMS - Core App FMS - LaRS FMS - LAP FMS - GAFR	Stephen Mallack, Pamela Jefferson, Matt Fontana, Angela Baker, Frank Ramos	05/22/03
C.13	FPDM	Nettie Harding	05/22/03
C.14	Schools Portal	Colleen Kennedy	05/28/03
C.15	IFAP	Colleen Kennedy	05/28/03
C.16	Collections (DMCS)	Gregory Plenty, Courtland Smith, Steve Martus	05/29/03
C.17	Consolidation (DLCS)	Denise Leifeste, Bill Burns, David Yang	05/30/03
C.18	FMS - LEAP/SLEAP	Greg Gerrans	06/06/03



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Appendix - C.1: CPS

Business Processes Impacted	System Enrollment for Trading Partners
Channels Impacted:	CPS is Student Channel System; Schools, Financial Partners
System Name/Acronym:	Central Processing System/CPS
Point of Contact:	Angeline Iwanicki
Department/ Phone Number:	202-377-3237
Date:	5-13-2003
Objective:	This document serves as a questionnaire for system owners to provide information regarding Trading Partner Enrollment and Access and Management methods employed by their system. Questions are aimed at soliciting information that will assist in identifying and documenting Enrollment and Access Management Business Objectives and High-Level Requirements.

User Questions:

1. **What types of users/trading partners need access to your system?**

Internal FSA Users/Contractors Customer Service Post-Secondary Institutions
 3rd-party servicers (not direct - via FAA access) Students (direct access?) GA's
 PCA's State Agencies Federal Agencies Other (please specify) - Lenders & Servicers

2. **From the trading partner identified, who is eligible to gain access and what is there business function? (Roles/Positions - CFO, president, FAA, etc.)**

Internal FSA Users:

- 1) Enrollment Methods - 3 methods - SAIG Online Web site, Paper based, or via Core/COTR FSA process. Most internal users gain access through FSA Employee (Nancy), the Core/COTR for CPS.
- 2) Business Functions: Need access to investigate issues for students, schools - try to figure out what's happenings - E.g. a student might have a low EFC or missing records, etc.
- 3) Types of Access:
 - a. Direct CICS (Pearson system) access and view only access to FAFSA/student input data with ability to update phone log. Data from FAFSA cannot be manually changed.
 - b. MIS CPS (management info system) - TSO option - reporting. Budget, OPE, contractors and other internal users utilize.

CSRs:

- 1) Enrollment Methods: Need additional info.
- 2) Business Functions: Work with students/schools - DRN (Data Release Number) - on corrections. Two current cycles 02-03, app deadline 6/30,



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corrections til ~9/15; 03-04 – started in January 2003.

- 3) Types of Access:
 - a. FSA I/PIC – customer inquiry screens –including information such as EFC, data match, schools-transaction based, who enters data.

Students:

- 1) Not direct access. Will follow up with Nina re: Student Access and PIN Site/FAA On-line

Post-Secondary Institutions:

- 1) Enrollment Methods: SAIG On-line/ Paper. FAA Access On-line – FAAs – Need a PIN from PIN Site. DPA – must approve persons for mailbox and PIN Site – if the person is applying for PIN, does have to match SSN, if DPA approves.
- 2) Business Functions: Mailbox – to send student records to systems via SAIG.
- 3) Types of Access: Not direct access. Only FAA Online.

3rd Party:

- 1) Same as Post-Secondary Institution Access

Guaranty Agencies:

- 1) Not sure about if they are currently on-line? In future - later this year - ISIR Data mart will give access.

State Agencies:

- 1) Not direct access.

Federal Agencies:

- 1) Not direct access – files.

3. **Is there any limit on the number of users from a single trading partner?**

Don't think so – not 100% sure.

4. **How are these users/trading partners informed of services (CAMs, PICs)?**

CPS is an existing system – few users are currently being added.

For new users:

- 1) Internal/Other – Nancy to Pearson rep. – for TSO or CICS access
- 2) Schools – Case Management – As a part of the enrollment process, as soon as a school signs up for eligibility, the schools are referred to sign up to CPS.

5. **Does your system utilize a shared registration process? (Is your registration shared/linked with another application?)**

Yes, SAIG process.

6. **Does the registration process differ based on user access requirements?**

No – does not appear to do so.

7A. **What individual user data is collected? Does the data obtained differ by job position or business function? (e.g. is more data required for certain users?)**

Schools – User data is the same as SAIG data. Federal school code is the CPS unique data needed.

7B. **Where is this data stored? How is this data used? Are records of user data sent to FSA or the Department of Education?**

SAIG reporting – who monitors who signs up?



Trading Partner Registration Process Description:

8. What steps does a trading partner need to follow to register for access? Are there automated processes? manual processes? Is it a paper based or web based?

SAIG Online Process:

1. Go to <https://www.fsawebenroll.ed.gov/PMEnroll/index.htm>
2. Enroll On-Line -
 - Enrolled Organizations need their current TG Number
 - Post-secondary institutions need their OPE-ID, FISAP serial number, Pell Grant Program numbers, and/or Direct Loan Program numbers.
 - Guaranty agencies need their guaranty agency (GA) code assigned by ED.
 - Lenders will need their lender ID number assigned by ED
 - All individuals completing this form will need the name, address, Social Security Number (SSN), date of birth, and mother's maiden name.
3. Submit Signature Page - Signed Hard Copy sent to Pearson via mail. The information will not be processed until the signed form is received.
4. Pearson stamps application.
5. Pearson scans application/signature page. This info is stored for 5 years.
6. TG Number and customer number sent to User. (Potentially PIN site instructions sent.)

SAIG Paper Based:

Same process as On-line only with physical mail.

Direct Method :

Internal Users only – CPS sign up through Core/COTR.

9. **Is there any current documentation on this process?**
Refer to CSR volumes describing access provided by Angie.
10. **What length of time is required to complete the registration process?**
Varies - Time to mail documents, a nightly file is sent to SAIG.
11. **How did this process develop? (E.g. who designed this process?, was there a risk assessment performed?, who approved the process?, etc.)**
Previous system process - from Title IV Wan application processing mailbox system. Not aware of risk assessment.

Approval Process Description:

12. **Who from the trading partner must approve access? (Positions – CFO, president, etc.)**
Schools – SAIG DPA (Data Point Administrator) approves access for school users. For SAIG forms, School President and DPA have to sign.
- 13A. **To whom are the forms submitted?**
PM system (Pearson)
- 13B. **Who from the FSA system must approve access?**
Schools Info – Pearson sends an email/ calls FSA office (Bev. – Pearson) notifying FSA that the school needs an E-Code.



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PEPS file dictates access. Currently, FSA personnel manually match school with PEPS weekly report. In Jan. this process will be automatically sent to CPS to provide eligibility - the daily PEPS file will have E-code for matching. Not too many schools sign up in a given week ~ 5 a week.

FSA/Beverly sends approval to Pearson via email.

Users not approved by FSA are not added.

This file will also handle de-activation. Sometime access is only needed for a six week period of time. They would like to automate this 6 week access.

- 13C. **What validations/verifications of user provided information take place? (Individual user or school.) Does this process require a wet signature? Is e-Authentication utilized to verify a user's identity?**

Signed paper copy.

14. **Are there any other people involved in the process (system SSOs, business owners, etc.)?**

N/A

15. **How is notification of enrollment success/failure sent to the applicant?**

No notification for each user.

Customer Service responds to issues. Case management could also be working with school.

Once a year a report is sent out with all eligible schools listed. Also a copy is posted on FSA download. This was used for schools to review.

Admin Functions:

16. **Confirm User ID/Password requirements? (pre-populated)**

Internal Users:

Username - 7 alphanumeric characters (e.g. pel0000)

Password - Boundaries TBD - example was 7 alphanumeric characters -

Password valid for 30 days...renewal countdown after 23 days.

Pearson/Contractor Username - fed0000

- 17A. **How does the user obtain their User ID and password credentials? Web? Manual (mail/fax)? Email?**

Nancy (FSA) notifies via email/telephone - gives username, "pelled" is default password. User changes password on first log in.

- 17B. **Are there any procedures to obtain forgotten User ID or passwords?**

Call helpdesk @CPS/WAN tech support.

- 17C. **Does the credential notification process differ by permission level (e.g. is the notification process more stringent for Admin level permissions?)**

No.

- 18A. **What access controls and rules are available for system? What access controls and rules are utilized for system? (I.e. is the system configured to use all the access controls available?)**

Internal - Nancy decides...new person responsibilities, etc.

School - DPA determines who has access

- 18B. **How are Access rules currently administered? (e.g. Are the access rules modeled to protect certain data or role based for a given business process?)**



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There currently 3 plus levels of access:

Inquiry Access – review student

Variable Access - Not everyone has access to TSO, MIS, Federal school code file

Admin Access – e.g. Nancy - Core/ contracting officer representative COTR

19. **Are permission levels configurable by role?**

No – seem to be independent and on a case-by-case basis. Seems to be user based not role based.

20A. **Who sets up the user on the system? (e.g. Ops group, FSA employee, contractor, etc.)**

Pearson Contractor – Bill Shulte.

20B. **How are users set-up on the system? Does the system administrator utilize a tool or directory service to manage this access? (e.g. window based menu, etc.)**

21A. **What is the process utilized to terminate a user's access ?**

Email is sent to Pearson Contractor (Bill Shulte) to terminate.

21B. **What is the process utilized to terminate a group of user's access (e.g. a school is no longer eligible to participate.)**

If a school isn't eligible – manual process via the weekly report tells ineligible, 5 branch campuses – SAIG would revoke the mailbox.

Participation management gets file from CPS regarding eligible users.

21C. **What is the process utilized to modify user access or group access (when a user changes roles, departments, organizations, etc.)?**

Changes are through internal process (FSA (Nancy) to Pearson (Bev))

22. **Are any reports currently generated to summarize who has access to the system?**

Reports are generated– Nancy knows report name. Spreadsheet has id and access information.

23A. **When and how often is system access reviewed?**

Nancy reviews access periodically.

23B. **Are inactive accounts periodically disabled?**

Don't think there is a limit – not 100% sure.

24A. **Is the history of access activity retained for future use? If so, how long is the access history maintained?**

No history on current report.

24B. **Is the history of access privileges (different levels of access) retained for future use? If so, how long is the access history maintained?**

No.

Conclusion:

25. **Do any trading partners have issues gaining access to your system?**

26. **Are there any improvements for a future access management process that you would like to see incorporated?**

Additional Comments



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Only occasional new sign-ups...Most frequent request - Access to MIS reports...

DPA - could sign up more than one school...Internal users use CITRIX as for access.



Appendix - C.2: Participation Management / SAIG

Business Processes Impacted System Enrollment for Trading Partners

Channels Impacted: Schools Channel

System Name/Acronym: Participation Management (PM)

Point of Contact: Gregory James

Department / Phone Number: 202-377-3386

Date: 5-27-2003

Objective: This document serves as a questionnaire for system owners to provide information regarding Trading Partner Enrollment and Access and Management methods employed by their system. Questions are aimed at soliciting information that will assist in identifying and documenting Enrollment and Access Management Business Objectives and High-Level Requirements.

User Questions:

1. **What types of users/trading partners need access to your system?**

Internal FSA Users / App Systems Customer Service Post-Secondary Institutions

3rd-party Servicers Students GA's PCA's

State Agencies Federal Agencies Other (please specify)

All non-students can get a mailbox.

2. **From the trading partner identified, who is eligible to gain access and what is there business function? (Roles/Positions - CFO, president, FAA, etc.)**

Internal FSA Users / Contractors:

1) Website - The mailbox owner/super user enrolled - CPS for example.

Customer Service:

1) CPS/WAN Customer service not FSA customer service

Post-Secondary Institutions:

1) Via PM Website.

Guaranty Agencies:

1)

Lenders & Servicers:

1)

2)

Other



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Don't require signature - COTR.

3. **Is there any limit on the number of users from a single trading partner?**
In general a single TG number is granted per service with the exception of NSLDS on-line where they can be unlimited. DPAs manage individual user's access to the TG number.
For data exchange (not access), a school can only specify one mailbox to receive data (CPS data, NSLDS data, etc.)
4. **How are these users/trading partners informed of services (CAMs, etc.)?**
PEPS/CMO - Participant Management - goes to FSA workshops, CPS encourage people to sign up to send ISIRs electronically. Basic education process on how schools get eligible. CPS has been providing guidance that schools have to go to participation management to get ISIR data. Tried to get case manager to provide education to the schools on this process.
5. **Does your system utilize a shared registration process? (Is your registration shared/linked with another application?)**
All under PM - SAIG mailbox and TD Comm. Mgr. are given at the same time. SAIG, CPS, NSLDS Batch/On-line/eCDR, FISAP, LaRS, etc.
6. **Does the registration process differ based on user access requirements?**
No Foreign schools - req. to get foreign schools signed up. US citizen working in office could have signed up. SSN is required. No NSLDS online access for foreign. DPA user agreement - FAA On-line access given by DPA
FAA Access is used to give other people access to the system.
NSLDS requires mothers maiden name so sign up for PM requires this. The PM signup is a rollup of requirements of each of the subsystems. This gets review every year and this year they tried to remove maiden name requirement.
- 7A. **Does the data obtained differ by job position or business function? (e.g. is more data required for certain users?)**
- 7B. **Where is this data stored? How is this data used? Are records of user data sent to FSA or the Department of Education?**
Participation Management System - FTP to SAIG, use mailboxing system for the rest of the files....message class - special message class for each customized to each user, NSLDS mother's maiden name utilizes...
Modify the paper form and then
OMB clearance.
Stays on Part

Trading Partner Registration Process Description:

8. **What steps does a trading partner need to follow to register for access? Are there automated processes? manual processes? Is it a paper based or web based?**
Online Process:
FFEL, Campus Based, OPEID (8 digit code), Pell Id, DL Code Gcode
PEPS crosswalk - contains all information



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NSLDS sends
CPS sends Federal School File goes to PM system
Cross Walk Direct Load from PEPS??

Mailbox still exists

1. Go to <https://www.fsawebenroll.ed.gov/PMEnroll/index.htm>
2. Enroll On-Line -
 - Enrolled Organizations need their current TG Number
 - Post-secondary institutions need their OPE-ID, FISAP serial number, Pell Grant Program numbers, and/or Direct Loan Program numbers.
 - Guaranty agencies need their guaranty agency (GA) code assigned by ED.
 - Lenders will need their lender ID number assigned by ED
 - All individuals completing this form will need the name, address, Social Security Number (SSN), date of birth, and mother's maiden name.
3. Submit Signature Page - Signed Hard Copy sent to NCS via mail. The information will not be processed until the signed form is received.
4. Pearson stamps application.
 5. Pearson scans application/signature page. This info is stored for 5 years. Matches on Conf. Number.
 6. PM FTP file to SAIG, assigns TG number on PM (incremented), FTPs on a file to SAIG.
 7. Those trading partners receive PM file from PM. Send 12 participant files. 4 participant files received. CPS sends file
 8. Schools know what to sign up for...services training, conferences – eCDR
 9. Communicated
6. TG Number and customer number sent to User. (Potentially PIN site instructions sent.)

Manual Process:

Also, there is a paper based process like the one for On-line.

Direct Process?

Are there additional methods for SAIG/PM? A direct method?

9. **Is there any current documentation on this process?**
System Documentation....
10. **What length of time is required to complete the registration process?**
Modify services – overnight file sent out...
24 hours plus mail time. 48 hours
FAA Access is real time – identification PIN Site to / authentication w/ PM system. Right now one at a time, in future could be a string of numbers...

Why is this fed school code in active?

CPS sends feed to PM to tell reactivated? Sent nightly...



11. How did this process develop? (E.g. who designed this process?, was there a risk assessment performed?, who approved the process?, etc.)

PM System – GES network - TIV WAN Pearson; 2.5 years ago program paper process on the Web...

Taking the functionality to the web – skip logic, 1 service 10 clicks to be done

Iterative process year by year...

80% electronic / 20% paper – password for this? CPS Customer Service password...

Forms 2000 (wants data on mailboxing system)

If you want to use mailboxing system, get them to utilize enrollment process.

Most freq. At roll over, some systems pay to have it over

LaRS – implementation of software – processing of documents...

Approval Process Description:

12. Who from trading must approve access? (Positions – CFO, president, etc.)

PEPS has to sign up beforehand...

Pres, cfo, chancellor – can create designee – designee can sign up from then on

13A. To whom are the forms submitted?

PM

13B. Who from the FSA system must approve access?

FSA Endorsed the process, not repeated...

13C. What validations/verifications of user provided information take place? (Individual user or school.) Does this process require a wet signature? Is e-Authentication utilized to verify a user's identity?

Signed paper copy.

PEPS / Participant

User info not verified...

14. Are there any other people involved in the process (system SSOs, business owners, etc.)?

15. How is notification of enrollment success/failure sent to the applicant?

Gets all the process,

Send back the paper letter –

Electronic notification next year –

Errors? - web has fewer errors, for paper based - calls the schools...system.



Admin Functions:

16. **Confirm User ID/Password requirements? (pre-populated)**
Can give userid and password for Save process on the web...

Saves on hold process.

Username: 7 characters for TG Number. Up to 34 characters?
Password: 7-8 characters, currently 120 day lifetime, in June will be 90 days; Case sensitive, no spaces; at least 3 different characters
- 17A. **How does the user obtain their User ID and password credentials? Web? Manual (mail/fax)? Email?**
- 17B. **Are there any procedures to obtain forgotten User ID or passwords?**
- 17C. **Does the credential notification process differ by permission level (e.g. is the notification process more stringent for Admin level permissions?)**

School users should change mailbox passwords via ED Connect because it will update TD community manager but changes to TD community manager will not update ED Connect mailbox password.
- 18A. **What access controls and rules are available for system? What access controls and rules are utilized for system? (I.e. is the system configured to use all the access controls available?)**
- 18B. **How are Access rules currently administered? (e.g. Are the access rules modeled to protect certain data or role based for a given business process?)**
19. **Are permission levels configurable by role?**
- 20A. **Who sets up the user on the system? (e.g. Ops group, FSA employee, contractor, etc.)**

SAIG:
For TG Numbers, PM sends to SAIG.
On-line accounts are created by SAIG system admin.
- 20B. **How are users set-up on the system? Does the system administrator utilize a tool or directory service to manage this access? (e.g. window based menu, etc.)**

Automated user revocation?
Schools can send



- 21A. **What is the process utilized to terminate a user's access ?**
- e.g. DPA goes away – secure info – must fax a letter on university letterhead to say that they left –
- access is needed but user info is not known...
- 21B. **What is the process utilized to terminate a group of user's access (e.g. a school is no longer eligible to participate.)**
- User calls or goes on-line to request deactivation.
- 21C. **What is the process utilized to modify user access or group access (when a user changes roles, departments, organizations, etc.)?**
22. **Are any reports currently generated to summarize who has access to the system?**
- 32000 reports, 6K have ISIR, store and forward info –
- 23A. **When and how often is system access reviewed?**
- DPA review....
- 23B. **Are inactive accounts periodically disabled?**
- Inactive accounts –
90% never use mailbox – just for use on NSDLS on-line. Cannot use mailbox activity to deem.
Can send primary DPA
Users notify if they want to disable, other system sec. has
- 180 days SAIG...
- 24A. **Is the history of access activity retained for future use? If so, how long is the access history maintained?**
- Current State...
- 24B. **Is the history of access privileges (different levels of access) retained for future use? If so, how long is the access history maintained?**

Conclusion:

25. **Do any trading partners have issues gaining access to your system?**
- Schools - CPS Tech support – survey page will be added....
- Systems - NSLDS, CPS,



Number of different Ids,

26. **Are there any improvements for a future access management process that you would like to see incorporated?**

Additional Comments

Some foreign schools are signed up because someone within the school has a social security number. There is work in developing a pseudo-SSN to set up other schools.

Rights driven not title driven. DPA would specify access.

Role - Website is based on entity you specify. Contractor vs. GAs, Others

PMs - DPA, NSLDS Online - must have TG Number..., Report to SAIG with the mailbox

Schools have more than one TG number

Just because a school is eligible, the school has to tell who to receive data

Linked to user

Central place to org.

DPA would specify Read/write access

Don't keep track of who made the change, but at destination point

Who is the current DPA...



Appendix - C.3: COD

Business Processes Impacted: System Enrollment for Trading Partners
Channels Impacted: Schools Channel
System Name/Acronym: Common Origination and Disbursement / COD
Point of Contact: Renee Wade
Department / Phone Number: 202-377-3133
Date: 5-21-2003
Objective: This document serves as a questionnaire for system owners to provide information regarding Trading Partner Enrollment and Access and Management methods employed by their system. Questions are aimed at soliciting information that will assist in identifying and documenting Enrollment and Access Management Business Objectives and High-Level Requirements.

User Questions:

1. **What types of users/trading partners need access to your system?**
[X] Internal FSA Users / App Systems [X] Customer Service COD/LO System [X] Post-Secondary Institutions [X] 3rd-party Servicers [] Students [] GA's [] PCA's
[] State Agencies [] Federal Agencies [] Other (please specify)
2. **From the trading partner identified, who is eligible to gain access and what is there business function? (Roles/Positions - CFO, president, FAA, etc.)**
Internal FSA Users:
 - 1) SSO Process
 - 2) Can only view, cannot update information.External users have website-only access to COD
Customer Service:
 - 1) Complete Access form for Customer Service.Post-Secondary Institutions/3rd party servicers:
 - 1) Web-site access is not mandatory - schools could interact through TG Number.
 - 2) Schools need to also set up mailbox through PM.
 - 3) School letter head used to set up Administrators. As a guideline, up to 2 admins. Customer Service sets up the admins, delegated admins set up users at the school. Access UserId and Password...
3. **Is there any limit on the number of users from a single trading partner?**
No limit.
4. **How are these users/trading partners informed of services (CAMs, etc.)?**



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- Software Conferences, FSA conferences, notify for voluntary web access.
5. **Does your system utilize a shared registration process? (Is your registration shared/linked with another application?)**
Starting in Sept., COD will also have access to DLSS website with the same Userid and password.
6. **Does the registration process differ based on user access requirements?**
Schools and 3rd party have 5 levels of access:
1. School Admin.
 2. View and update: via admin on website.
 3. View: via admin on website.
 4. Credit Checks: via admin on website.
 5. 5th access?
- 7A. **Does the data obtained differ by job position or business function? (e.g. is more data required for certain users?)**
Admin gathers same type of information.
Relates to functions of the system – not roles. Schools separated out the functions.
COD and Pell permissions are tied together.
- 7B. **Where is this data stored? How is this data used? Are records of user data sent to FSA or the Department of Education?**
Oracle database at TSYS.

Trading Partner Registration Process Description:

8. **What steps does a trading partner need to follow to register for access? Are there automated processes? manual processes? Is it a paper based or web based?**

Please Note: Schools have to be eligible in PEPS before allowed in COD.

NEW Schools: All schools that intend to transmit records to COD as Full Participants in 2003-2004 are required to register as a Full Participant with the COD School Relations Center prior to transmitting its 2003-2004 records. If the school submits 2003-2004 records in XML Common Record format and COD is unaware that the school is a Full Participant, those records will reject.

All EDEXpress Users must register as Full Participants prior to using EDEXpress to transmit 2003-2004 records to COD. If the school submits 2003-2004 records using EDEXpress software and COD is unaware that the school is an EDEXpress user, those records will reject.

EXISTING Schools that now wish to be full must send a signed letter on school letterhead to the COD School Relations Center. COD uses the information in the request letter to set processing flags and options for Full Participants to ensure the records are processed correctly.

Schools may complete the registration process by contacting the COD School Relations Center at the following phone numbers or email address:

- 1-800-474-7268 for Pell Grant assistance
- 1-800-848-0978 for Direct Loan assistance
- CODSupport@acs-inc.com

Any questions should be directed to the COD School Relations Center.

Schools using the 2003-2004 EDEXpress v9.1 software Pell Grant or Direct Loan



modules will automatically be COD Full Participants in 2003-2004 because EDEExpress is converting to the XML format. EDEExpress schools must still submit the Full Participant Request letter to the School Relations Center to ensure their records are processed correctly in COD.

9. **Is there any current documentation on this process?**
IFAP - COD Technical Reference Guide, Web site.
10. **What length of time is required to complete the registration process?**
Fax in letterhead, and wet signature follow up. 2-3 days.
11. **How did this process develop? (E.g. who designed this process?, was there a risk assessment performed?, who approved the process?, etc.)**
Based on Loan Origination side. Schools requested delegated admin capabilities. FSA Security channels sign off.

Approval Process Description:

12. **Who from trading must approve access? (Positions - CFO, president, etc.)**
President, FAA listed in IFAP announcement.
- 13A. **To whom are the forms submitted?**
COD School Relations Center. ACS Niagara Falls. Customer Service grants rights based on letter.
- 13B. **Who from the FSA system must approve access?**
Internally- COD SSO.
Externally - COD School Relations Center.
- 13C. **What validations/verifications of user provided information take place? (Individual user or school.) Does this process require a wet signature? Is e-Authentication utilized to verify a user's identity?**
Internal/External - Wet signature hard copy.
14. **Are there any other people involved in the process (system SSOs, business owners, etc.)?**
No.
15. **How is notification of enrollment success/failure sent to the applicant?**
One email goes out with user id and another email with password.
When admin signs up same example.

Admin Functions:

16. **Confirm User ID/Password requirements? (pre-populated)**
Username: Auto generated - 8 characters min/max. Syntax - First letter of FN + First five letters of LN + Last two digits.
Password: 8 characters min/max, 60 day lifetime. Syntax - 6 alpha characters and 2 numeric characters.
Will change to Department of Education Password standards soon.
- 17A. **How does the user obtain their User ID and password credentials? Web? Manual (mail/fax)? Email?**
Via email. User creates initial password. User sent message and forced to change



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- password.
- 17B. **Are there any procedures to obtain forgotten User ID or passwords?**
School Relations Center - might change to web questions.
- 17C. **Does the credential notification process differ by permission level (e.g. is the notification process more stringent for Admin level permissions?)**

No.
- 18A. **What access controls and rules are available for system? What access controls and rules are utilized for system? (I.e. is the system configured to use all the access controls available?)**

Data Entry field for name. Third party servicers can give "their" schools access to their system. Table in the background lets them see only their schools.
- 18B. **How are Access rules currently administered? (e.g. Are the access rules modeled to protect certain data or role based for a given business process?)**

Function.
19. **Are permission levels configurable by role?**

No.
- 20A. **Who sets up the user on the system? (e.g. Ops group, FSA employee, contractor, etc.)**

Once user id is created by delegated Admin, no one from COD has to physically set up.
- 20B. **How are users set-up on the system? Does the system administrator utilize a tool or directory service to manage this access? (e.g. window based menu, etc.)**

Automated. Custom code for COD.
- 21A. **What is the process utilized to terminate a user's access ?**

If not eligible - they have access to the system but cannot do anything. It will appear they can but will not allow them to submit data. PEPS file updates schools nightly and users are linked to the school. This must be the way it operates but the school could have been eligible at another point and could still be processing old records from another year but not currently eligible. That's why access to COD cannot be strictly denied.

Manual process by System Administrator (global) or School Administrator (restricted to school). For Oct. release, will automatically deny access, if not accessed within 3 months.
- 21B. **What is the process utilized to terminate a group of user's access (e.g. a school is no longer eligible to participate.)**



Group managed with PEPS file. See question 21A.

- 21C. **What is the process utilized to modify user access or group access (when a user changes roles, departments, organizations, etc.)?**

Delegated Admin.

22. **Are any reports currently generated to summarize who has access to the system?**

No.

- 23A. **When and how often is system access reviewed?**

No.

- 23B. **Are inactive accounts periodically disabled?**

No. - planned for Oct. release. See question 21A.

- 24A. **Is the history of access activity retained for future use? If so, how long is the access history maintained?**

Activity history, last update by date/user/Original/new value.

- 24B. **Is the history of access privileges (different levels of access) retained for future use? If so, how long is the access history maintained?**

Last 3 passwords stored, capture but not viewable....

Conclusion:

25. **Do any trading partners have issues gaining access to your system?**

No, issues reported.

26. **Are there any improvements for a future access management process that you would like to see incorporated?**

- Increased reports generation and facilitating the termination of access for groups of users.

- Simplified registration process for those with limited access.

- Turnover rate within the financial aid departments in schools is high - need to be able to give access efficiently.

- School admin should be able to sign up access to all systems.

Additional Comments

N/A



Appendix - C.4: FAA On-line

Business Processes Impacted	System Enrollment for Trading Partners
Channels Impacted:	Students Channel
System Name/Acronym:	FAA On-line
Point of Contact:	Nina Colon
Department / Phone Number:	202-377-3384
Date:	5-15-2003
Objective:	This document serves as a questionnaire for system owners to provide information regarding Trading Partner Enrollment and Access and Management methods employed by their system. Questions are aimed at soliciting information that will assist in identifying and documenting Enrollment and Access Management Business Objectives and High-Level Requirements.

User Questions:

- 1. What types of users/trading partners need access to your system?**
[X] Internal FSA Users / App Systems/ Ed Super Users [X] Customer Service [X] Post-Secondary Institutions [X] 3rd-party Servicers (designated by school) [] Students (direct?) [] GA's [] PCA's [] State Agencies [] Federal Agencies [] Other (please specify)
- 2. From the trading partner identified, who is eligible to gain access and what is there business function? (Roles/Positions - CFO, president, FAA, etc.)**
Post-Secondary Institutions:
 - Business Functions - Student fills out FAFSA. Schools goes to FAA-Access to:
 - View students' SAR data
 - Check the status of batches
 - Request the signature hold file and set the frequency of receipt
 - Enter a FAFSA or Renewal FAFSA
 - Correct a processed FAFSA
 - Continue working on a saved FAFSAFAAs - DPA signs up. DPA has read/write access. DPA decides access on individual basis. Read / Write.

Internal FSA:
 - Complete Super UserCustomer Service:
 - Screen Access / Read



Read Only can only look through student

3. **Is there any limit on the number of users from a single trading partner?**
DPA can decide.
4. **How are these users/trading partners informed of services (CAMs, etc.)?**
Sent out letter / posted to IFAP. Sent to DPAs and gave instructions. Conferences...
NEW School - DPA signs up - they are sent welcome package, PIN mailer, process to use
Starting 2004 schools can only use FAA Access.
5. **Does your system utilize a shared registration process? (Is your registration shared/linked with another application?)**
PM just like FAAs. Students utilize the FAFSA web. FAA looks the same as FAFSA but with added features for FAAs to utilize...
6. **Does the registration process differ based on user access requirements?**
DPA - PM.
User registers from the DPA.
- 7A. **Does the data obtained differ by job position or business function? (e.g. is more data required for certain users?)**
Depends on the DPA.
- 7B. **Where is this data stored? How is this data used? Are records of user data sent to FSA or the Department of Education?**
PM - sends nightly feed to PIN Site.
FAA Access hits PIN DB.

Trading Partner Registration Process Description:

8. **What steps does a trading partner need to follow to register for access? Are there automated processes? manual processes? Is it a paper based or web based?**
SAIG.
9. **Is there any current documentation on this process?**
N/A
10. **What length of time is required to complete the registration process?**
PM.
11. **How did this process develop? (E.g. who designed this process?, was there a risk assessment performed?, who approved the process?, etc.)**
What can we do to make easier for financial aid admin? Wanted to put on Web....
First yr. - used same code FAA side...based on FAA feedback. Jean Saunders approved the process. Due to high profile risk assessment Andy Boots with Security on risk assessment.

Approval Process Description:

12. **Who from trading must approve access? (Positions - CFO, president, etc.)**
PM
- 13A. **To whom are the forms submitted?**
PM



13B. Who from the FSA system must approve access?

External Users -
PM - DPAs

Internal FSA - Jean approves who can
Ida Mondragon - Mainframe DPA - 4 or 5 have access as Super Users.

13C. What validations/verifications of user provided information take place? (Individual user or school.) Does this process require a wet signature? Is e-Authentication utilized to verify a user's identity?

Wet Signature is required for DPAs.
Not required for PIN Site

14. Are there any other people involved in the process (system SSOs, business owners, etc.)?

N/A

15. How is notification of enrollment success/failure sent to the applicant?

DPA would know. User would have notification. Variable text mailer - you've been reistered for FAA Online.

Admin Functions:

16. Confirm User ID/Password requirements? (pre-populated)

FAAs -
First give TG number
Authentication Page: Complete SSN + First 2 Letters of Last Name + DOB + PIN

Application save login - If FAA chooses to do a FAFSA for the student, these user names apply to saving application:

Username: SSN, DOB, F2 letters of last name

User specifies password: User can save application for up to 45 days. Temporary DB on web server FAFSA on the web on temp database...

Password: 4-6 characters min/max, unlimited lifetime. All numeric.

Working on Foreign School access.

17A. How does the user obtain their User ID and password credentials? Web? Manual (mail/fax)? Email?

FAAs: if email address - with secure link with access to pick up PIN. Name DOB SSN. They can see the PIN once.

Otherwise PIN mailer mail via USPS to recipient - initial password can be changed but is not forced to change.

PIN can be changed -

A function on PIN System - can either ask for new PIN or you can change your PIN to something you can remember. They disable PIN.

PINs are repeated because only 4 digit number

17B. Are there any procedures to obtain forgotten User ID or passwords?



- 17C. **Does the credential notification process differ by permission level (e.g. is the notification process more stringent for Admin level permissions?)**

Same. Internal System.

- 18A. **What access controls and rules are available for system? What access controls and rules are utilized for system? (I.e. is the system configured to use all the access controls available?)**

N/A

- 18B. **How are Access rules currently administered? (e.g. Are the access rules modeled to protect certain data or role based for a given business process?)**

Admin

Super Users

DPAs

Everyone Else (up to DPA discretion), students working for work study programs...

19. **Are permission levels configurable by role?**

No.

- 20A. **Who sets up the user on the system? (e.g. Ops group, FSA employee, contractor, etc.)**

- 20B. **How are users set-up on the system? Does the system administrator utilize a tool or directory service to manage this access? (e.g. window based menu, etc.)**

Automated process based on PIN Site, sends message to cps to send pin mailer. CPS has the resp. to print mailers and interacts with FAA online.

- 21A. **What is the process utilized to terminate a user's access ?**

PM - DPA sends

- 21B. **What is the process utilized to terminate a group of user's access (e.g. a school is no longer eligible to participate.)**

School DPA is responsible to notify. PM is notified...

If school is not eligible, PM would need to notify...

Who changes the access - System Admin



- 21C. **What is the process utilized to modify user access or group access (when a user changes roles, departments, organizations, etc.)?**
DPA would change through PM.
22. **Are any reports currently generated to summarize who has access to the system?**
No reports
- 23A. **When and how often is system access reviewed?**
No Audit system within the PIN...
26 million PINs issued
PIN Reengineering Analysis – enterprise wide PIN
STAN PIN Side... CIO and Nina.

Nina
- 23B. **Are inactive accounts periodically disabled?**
NO, PIN is active until. Users disable
- 24A. **Is the history of access activity retained for future use? If so, how long is the access history maintained?**
Not on PIN side.
- 24B. **Is the history of access privileges (different levels of access) retained for future use? If so, how long is the access history maintained?**
No password history.

Conclusion:

25. **Do any trading partners have issues gaining access to your system?**
N/A
26. **Are there any improvements for a future access management process that you would like to see incorporated?**

Some people internal want access to FAA Access but are not granted....

Nightly feed – ftp'd API application interface....

No use of mailboxes...

Additional Comments



Appendix - C.5: eApp / PEPS

Business Processes Impacted System Enrollment for Trading Partners

Channels Impacted: Schools Channel

System Name/Acronym: eApp / PEPS

Point of Contact: Jay Long, Chris Hill, Patricia Patterson

Department / Phone Number: 202-377-4246

Date: 5-19-2003

Objective: This document serves as a questionnaire for system owners to provide information regarding Trading Partner Enrollment and Access and Management methods employed by their system. Questions are aimed at soliciting information that will assist in identifying and documenting Enrollment and Access Management Business Objectives and High-Level Requirements.

User Questions:

1. **What types of users/trading partners need access to your system?**
 Internal FSA Users / App Systems Customer Service Post-Secondary Institutions
 3rd-party Servicers Students (direct?) GA's PCA's
 State Agencies (what do they need?) Federal Agencies Other (please specify)
2. **From the trading partner identified, who is eligible to gain access and what is there business function? (Roles/Positions - CFO, president, FAA, etc.)**
 - 1) Internal FSA Users:
 - a) Employees have access to PEPS -
 - b) Case Management access to Eapp. Approved for eapp.
 - c) IG office.
 - 2) Post-Secondary Institutions:
 - a) School faxes in request to Case Management. CM checks to see if school already has an OPEID. CM contacts school to ask questions about accreditation? System OPEID and TIN data migrates to PEPS application. App filled out. Put in reviewer area of peps. Established OPEID and TIN as user id and password for eapp. E-app is a holding area outside of PEPS. Oracle replication sent data nightly. Analysts review and trace down data migrates. Reviewer area in off-shot of peps (working progress) - PPA prog. Part. Agreement.
 - b) Foreign schools don't have TIN. Foreign schools use eAPP. Mail code used for foreign schools. All schools eapp.
 - c) COD, CPS, NSLDS, eCB, ezAudit, FMS - create/ start up new schools, losses, additions, prog ids, name changes, institution, demographics,



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creditors. NSLDS sends PEPS info.

3) 3rd Party Servicers:

- a) COD, CPS, NSLDS, eCB, ezAudit, FMS – create/ start up new schools, losses, additions, prog ids, name changes, institution, demographics, creditors. NSLDS sends PEPS info. have access only if school gives access. 3rd party logs on as a school.

GA's:

- 1) PEPS access only. No e-app access for GAs.
2) CITRIX – state licensing agencies, GAO, look at question #8.

3. **Is there any limit on the number of users from a single trading partner?**

PEPS: No limit of users.

Eapp: Multiple users – Financial Aid director completes but form was designed to share across users.

4. **How are these users/trading partners informed of services (CAMs, etc.)?**

PEPS: Internal Office user fills out one page app. Non-Ed user – from sec. forms.

Eapp: Case Management team helps schools in process.

5. **Does your system utilize a shared registration process? (Is your registration shared/linked with another application?)**

Info only goes to PEPS.

6. **Does the registration process differ based on user access requirements?**

PEPS:

How many levels of access exist? More than 5 types of users: E.g. view only, view and update, super user, admin (multiple users). Users also change with each release...

ECM? Tools to update access with CIO. System Admin/ monthly release.

Sometimes define a new role...

Can create a new level.

7A. **Does the data obtained differ by job position or business function? (e.g. is more data required for certain users?)**

PEPS specific by person.

7B. **Where is this data stored? How is this data used? Are records of user data sent to FSA or the Department of Education?**

PEPS – Nina – if outside of FSA – Sec. Admin from the office that this employee is from.

If outside of Ed, Nina has to send documentation up to VDC. CITRIX Send through email. Maintains.

Trading Partner Registration Process Description:

8. **What steps does a trading partner need to follow to register for access? Are there automated processes? manual processes? Is it a paper based or web based?**

eApp (web based):

Go to site <http://eligcert.ed.gov/>

You must have an 8-digit OPE ID assigned by the Department of Education (ED) to use as your "User name" preceded by "ED" (example ED09999900).

Password is the schools' 9 digit TIN (Taxpayer Identification Number)



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Questions go to Case Management.

App changes based on choices. App would print out for PEPS. After they've obtained OPEID will pre-populate the questions for school.

App (paper based):

School are not allowed to fill out paper app. Only one school has not completed - one exception. A school in France was manually approved and then entered in PEPS directly (production).

PEPS:

1. Go to <http://www.ed.gov/offices/OSFAP/PEPS/aboutpeps.html>
- 2A. U.S. Department of Education employees must complete the Education Employee Security Document.
- 2B. Guarantors, State Licensing, Accrediting Agency or State Department of Education employees must complete the Security Document.
3. User faxes the completed security form to: Nita Washington; 202-275-4518 (FAX); nita.washington@ed.gov. Please e-mail Nita Washington, the PEPS Security Officer, prior to sending a fax request. She will reply to your e-mail to confirm receipt of the fax.
4. Please allow a minimal three-week processing period for processing. The PEPS Security Officer e-mails the PEPS User ID to the address provided on the Security Document and request that users call 202-377-4316 to obtain their PEPS Password.
5. Remote PEPS database users from guaranty, state licensing and accrediting agencies may connect to the PEPS database via the Internet using a web-enabled Citrix Metaframe Solution package. Users whose personal computers utilize Windows 95 or Windows 98 will also need to purchase a client access license (CAL).
9. **Is there any current documentation on this process?**
PEPS: Website...GAs 36 GAs checking...some servicers try to sign up.
10. **What length of time is required to complete the registration process?**
Look on web page - 3 weeks....
eApp -
A day for OPEID - replicates data.
Re-certification would take 120 days for review process but backlog prevents, FIFO schedule; Initial school - schools.
11. **How did this process develop? (E.g. who designed this process?, was there a risk assessment performed?, who approved the process?, etc.)**
CIO Channel - Bob Ingwalson.
Eapp: Designed as a way to automate paper format.

Approval Process Description:

12. **Who from trading must approve access? (Positions - CFO, president, etc.)**

PEPS:



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- Sec. Admin from office.
GAs – aren't checked. Email address. Can tell who is sending... SSN with NSLDS.
Primary POC of GAs?
Eapps:
- 13A. **To whom are the forms submitted?**
PEPS: Nina.
E-app: Hard copy of certain pages. Section M.
E-app: CM reviewers. Co-team leader/ review will approve or disapprove the action.
- 13B. **Who from the FSA system must approve access?**
PEPS: Nina.
E-app: PPA. Data will update...
- 13C. **What validations/verifications of user provided information take place? (Individual user or school.) Does this process require a wet signature? Is e-Authentication utilized to verify a user's identity?**
E-App: Wet signature page required.
14. **Are there any other people involved in the process (system SSOs, business owners, etc.)?**
PEPS: None
E-app: None
15. **How is notification of enrollment success/failure sent to the applicant?**
PEPS:
E-app: Letter or email. Print out copies of PPA mail in.

Admin Functions:

16. **Confirm User ID/Password requirements? (pre-populated)**
Username: 4-8 characters. Syntax: 2 Letter Office Code (e.g., EN, EI, OC) + First letter of FN + LN.
Password: 8-14 characters. Expiration? 90 days. Letter and numbers.
SSO checks the SSN with NSLDS to check to see if in default status.
- 17A. **How does the user obtain their User ID and password credentials? Web? Manual (mail/fax)? Email?**
PEPS:
User sent Password by email; asked to change but is required to change.
Automatically expires...
Nina also sends CITRIX for new users.
Send email to Jay Long.
- 17B. **Are there any procedures to obtain forgotten User ID or passwords?**
PEPS: – call Nina, Sam Dejong, Randy – pull security forms and recheck.
CITRIX – call pell helpdesk. Craig Gates CSC... CITRIX log in.
If TIN is forgotten – PPA – FSA will mail or fax copy.
- 17C. **Does the credential notification process differ by permission level (e.g. is the notification process more stringent for Admin level permissions?)**



Same for all.

- 18A. **What access controls and rules are available for system? What access controls and rules are utilized for system? (I.e. is the system configured to use all the access controls available?)**

PEPS: Manual process - e-app users are, co-team leader has to explain to Pattie on how to use (training). Update info - regular user leaves - Nina gets a listing.

- 18B. **How are Access rules currently administered? (e.g. Are the access rules modeled to protect certain data or role based for a given business process?)**

N/A

19. **Are permission levels configurable by role?**

N/A

- 20A. **Who sets up the user on the system? (e.g. Ops group, FSA employee, contractor, etc.)**

N/A

- 20B. **How are users set-up on the system? Does the system administrator utilize a tool or directory service to manage this access? (e.g. window based menu, etc.)**

Manual by administrator.

- 21A. **What is the process utilized to terminate a user's access?**

PEPS: Ed employees: Nina shuts off access. HR process.

GAs: periodically send emails to GAs. When emails reject. Call the GAs. Is this person still there? Try to contact.

Eapp: Title IV - if lost, can apply again...

- 21B. **What is the process utilized to terminate a group of user's access (e.g. a school is no longer eligible to participate.)**

GAs region code - each GA, AA, ST/SL, CS has a third, state associated...

- 21C. **What is the process utilized to modify user access or group access (when a user changes roles, departments, organizations, etc.)?**

Manual.

22. **Are any reports currently generated to summarize who has access to the system?**

Ad hoc.

- 23A. **When and how often is system access reviewed?**



PEPS: Manual review. PEPS changed password. Last year expiring password...

23B. **Are inactive accounts periodically disabled?**

PEPS: Manual review.

24A. **Is the history of access activity retained for future use? If so, how long is the access history maintained?**

Not sure. Capability, Sam (Samuel) Dejong would know.

24B. **Is the history of access privileges (different levels of access) retained for future use? If so, how long is the access history maintained?**

PEPS: Not a frequent activity.

Conclusion:

25. **Do any trading partners have issues gaining access to your system?**

26. **Are there any improvements for a future access management process that you would like to see incorporated?**

Schools Portal – SSO – which school was signing on?

User can log on – 3rd party servicer signing on – how do we know which school?

Additional Comments

Access:

PEPS

Schools E-app

Review E-app (internal work looking at eapp)

PEPS access necessary for review area.

Bruce Questions:

Section H:

Page 26 – fill out sections, send files, won't give any funds without PEPS info.

Brad Question:

Users – table driven

Access can be changed for user

Default.

Only Sherry can generate an audit number.

GUI interface. Functions.

25 users -

John Question: What are business processes for State Agencies?



Appendix - C.6: eCB

Business Processes Impacted System Enrollment for Trading Partners
Channels Impacted:
System Name/Acronym: eCB
Point of Contact: Richard Bennett - Rich.Bennett@ed.gov
Tammy Connelly - Tammy.Connelly@ed.gov
Department / Phone Number: 202-377-3177
Date: 5-20-2003
Objective: This document serves as a questionnaire for system owners to provide information regarding Trading Partner Enrollment and Access and Management methods employed by their system. Questions are aimed at soliciting information that will assist in identifying and documenting Enrollment and Access Management Business Objectives and High-Level Requirements.

User Questions:

1. **What types of users/trading partners need access to your system?**
[X] Internal FSA Users / App Systems/ Contractor [X] Customer Service - eCB Call Center

[X] Post-Secondary Institutions [X] 3rd-party Servicers [] Students (direct?) [] GA's [] PCA's
[] State Agencies [] Federal Agencies [X] Other (please specify) ED (OPE & Budget accessing system)
2. **From the trading partner identified, who is eligible to gain access and what is there business function? (Roles/Positions - CFO, president, FAA, etc.)**
Internal FSA Users:
- User signs up for PIN via PIN Site. SSO/DPA sets up users for access via SAIG Enrollment Form. Finally, system SSO enters module access via Admin Security web page for FISAP levels of access.
Customer Service:
- eCB Call Center - internal process
Post-Secondary Institutions:
- Delegated administration to TG number DPA. DPA grants access given (Read/Write/Submit). Users must complete PIN information.
3. **Is there any limit on the number of users from a single trading partner?**
No limit.
4. **How are these users/trading partners informed of services (CAMs, etc.)?**
Users are informed from PEPS/CMO cert eligibility group, the Federal Register



- mandates, or personal communications to the schools.
5. **Does your system utilize a shared registration process? (Is your registration shared/linked with another application?)**
PM System – DPA process.
 6. **Does the registration process differ based on user access requirements?**
No – same access. As long as they are eligible for Title IV, can have access to eCB. eCB doesn't check the PPA.
 - 7A. **Does the data obtained differ by job position or business function? (e.g. is more data required for certain users?)**
Some users are at different risk levels. For example, a Read Only role requires a 1C versus an System Admin would need a 5C.
 - 7B. **Where is this data stored? How is this data used? Are records of user data sent to FSA or the Department of Education?**
No privacy act data transported. Stored at PM or PIN Site.

Trading Partner Registration Process Description:

8. **What steps does a trading partner need to follow to register for access? Are there automated processes? manual processes? Is it a paper based or web based?**
Exttternal - Schools:
PM handles everything. DPA sets up users via PM. PIN for authentication. TG Id rights to check. Log in screen PIN Site (verify), input TG number (via PM - TG Number, enrolled for FISAP services) – send real time interface to SAIG to determine access rights to what schools and years (Read/ Write/ Submit access). From SAIG come first name, last name, dob, user rights for schools

Internal - FSA:
User log into system with PIN and TG number (created prod. TG number for internal users). Set up under 2 TG Ids (1 – just a view of school side look (pres./ testing); 1 - admin side).
9. **Is there any current documentation on this process?**
Printed info from Rich and Tammy: EAC SAIG Sec. Overview, eCampus Based System User Access Req. Info, Admin Sec. View, List of eCB Roles.
10. **What length of time is required to complete the registration process?**
Schools – Immediate via website.
Admin – Immediate via Tammy
11. **How did this process develop? (E.g. who designed this process?, was there a risk assessment performed?, who approved the process?, etc.)**
Mod partner/ Accenture as a part of eCB project.

Approval Process Description:

12. **Who from trading must approve access? (Positions – CFO, president, etc.)**
DPA.
- 13A. **To whom are the forms submitted?**
PM.
- 13B. **Who from the FSA system must approve access?**



N/A - checks SAIG file.

- 13C. **What validations/verifications of user provided information take place? (Individual user or school.) Does this process require a wet signature? Is e-Authentication utilized to verify a user's identity?**

PM signature page is an original wet signature.

New schools get serial number when submitting FISAP (under dummy serial number). Suspense file is sent to PM from eCB to narrow down serial number. New schools cannot fill in serial number. On FISAP, new school must input all information. Existing schools can be pre-populated based on serial number after the updated serial number is sent to PM.

14. **Are there any other people involved in the process (system SSOs, business owners, etc.)?**

No, just the DPAs and SSOs.

15. **How is notification of enrollment success/failure sent to the applicant?**

PM notifies via PM process (will follow up with PM).

Admin Functions:

16. **Confirm User ID/Password requirements? (pre-populated)**

N/a - no unique eCB User Id or Password.

- 17A. **How does the user obtain their User ID and password credentials? Web? Manual (mail/fax)? Email?**

N/a - no unique eCB User Id or Password.

- 17B. **Are there any procedures to obtain forgotten User ID or passwords?**

N/a - no unique eCB User Id or Password.

- 17C. **Does the credential notification process differ by permission level (e.g. is the notification process more stringent for Admin level permissions?)**

N/a - no unique eCB User Id or Password.

- 18A. **What access controls and rules are available for system? What access controls and rules are utilized for system? (I.e. is the system configured to use all the access controls available?)**

Submit/Write/Read access created via web based screen. Could theoretically use SQL plus to update table.

- 18B. **How are Access rules currently administered? (e.g. Are the access rules modeled to protect certain data or role based for a given business process?)**

Roles have access to certain modules. For example the CB Operations - Accounting Group have access to all modules except Admin Security.

19. **Are permission levels configurable by role?**

DPA specifies the following roles:

- Submit - All functions.



- Write - Edit only.
- Read - View only.

20A. **Who sets up the user on the system? (e.g. Ops group, FSA employee, contractor, etc.)**

Internally: - web screen (delete userid), and go into SAIG website to delete.
School: DPA can add, change, view, or delete FAA users. DPA would need to update the info via the custom web based interface. The information must exactly match data entered in FSA PIN Site. DPA selects schools by checking appropriate boxes. DPA also selects FISAP access rights (submit, read, write)

20B. **How are users set-up on the system? Does the system administrator utilize a tool or directory service to manage this access? (e.g. window based menu, etc.)**

See Question 20A.

21A. **What is the process utilized to terminate a user's access ?**

See Question 20A.

21B. **What is the process utilized to terminate a group of user's access (e.g. a school is no longer eligible to participate.)**

PM individual applications need to notify of termination. PM needs to notify eCB of any schools that need to be terminated.

21C. **What is the process utilized to modify user access or group access (when a user changes roles, departments, organizations, etc.)?**

School: DPA can change FAA User Access Rights. See Question 20A.

22. **Are any reports currently generated to summarize who has access to the system?**

Ad hoc reports can create a list view of users.

23A. **When and how often is system access reviewed?**

SSO checks info.

23B. **Are inactive accounts periodically disabled?**

Not an automated process - manual.

24A. **Is the history of access activity retained for future use? If so, how long is the access history maintained?**

Changing of data is logged with firstnamelastnamemonthday.

24B. **Is the history of access privileges (different levels of access) retained for future use? If so, how long is the access history maintained?**

No history on permission levels.

Conclusion:



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25. **Do any trading partners have issues gaining access to your system?**

Some trading partners don't want to give Privacy Act Data (SSN or maiden name).

eCB Log in totally Dependent on PIN Site being up and SAIG/TG number being up. (test ones go down which could hamper testing).

26. **Are there any improvements for a future access management process that you would like to see incorporated?**

Simplification of user ids. Have about 20 user ids or password. PEPS, GAPS, FMSS, Oracle Financial analyzer, CPSS (accounting), NSLDS, LAN.

Additional Comments

N/A



Appendix - C.7 DLSS / C.8 - DLDM

Business Processes Impacted	System Enrollment for Trading Partners
Channels Impacted:	Students
System Name/Acronym:	Servicing Systems - DLSS/ DLDM (Non-Student)
Point of Contact:	Randy Bowman, Allen Prodgers,
Department / Phone Number:	R. Bowman - 202-377-3262 A. Prodgers - 202-377-3276
Date:	5-20-2003
Objective:	This document serves as a questionnaire for system owners to provide information regarding Trading Partner Enrollment and Access and Management methods employed by their system. Questions are aimed at soliciting information that will assist in identifying and documenting Enrollment and Access Management Business Objectives and High-Level Requirements.

User Questions:

- What types of users/trading partners need access to your system?**
 Internal FSA Users / App Systems Customer Service Post-Secondary Institutions 3rd-party Servicers Students (direct?) GA's PCA's State Agencies Federal Agencies Other (please specify) Lenders
- From the trading partner identified, who is eligible to gain access and what is there business function? (Roles/Positions - CFO, president, FAA, etc.)**
DLSS:
Servicing System:
 - Only direct access for FSA employees or FSA contractors
 - Federal Agency IRS - access DLSS remotely - income contingent repayment form - sign on the system - do updates, have to approve the form... 6 ppl.
 - Customer Service Utica - DLSS people in Utica and Bakersfield have access.
 - Separate accounting contract - ACS - DL Servicing System. Refunds - acting on behalf of CFO.Web:
 - Web looks into Servicing system - Post Sec. School - same as access COD log in go to EDS LO/sign up website - need to COD. Represent a school for LO/COD.
 - Separate dept. Users - can do different things on the system...
 - Students use the PIN to access the website.
- Is there any limit on the number of users from a single trading partner?**
No limit.
- How are these users/trading partners informed of services (CAMs, etc.)?**



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5. Does your system utilize a shared registration process? (Is your registration shared/linked with another application?)
6. Does the registration process differ based on user access requirements?
- 7A. Does the data obtained differ by job position or business function? (e.g. is more data required for certain users?)
- 7B. Where is this data stored? How is this data used? Are records of user data sent to FSA or the Department of Education?

Trading Partner Registration Process Description:

8. What steps does a trading partner need to follow to register for access? Are there automated processes? manual processes? Is it a paper based or web based?
9. Is there any current documentation on this process?
Call DLSS FSA team...
10. What length of time is required to complete the registration process?
11. How did this process develop? (E.g. who designed this process?, was there a risk assessment performed?, who approved the process?, etc.)

Approval Process Description:

12. Who from trading must approve access? (Positions - CFO, president, etc.)
- 13A. To whom are the forms submitted?
- 13B. Who from the FSA system must approve access?
- 13C. What validations/verifications of user provided information take place? (Individual user or school.) Does this process require a wet signature? Is e-Authentication utilized to verify a user's identity?
14. Are there any other people involved in the process (system SSOs, business owners, etc.)?
15. How is notification of enrollment success/failure sent to the applicant?

Admin Functions:

16. Confirm User ID/Password requirements? (pre-populated)



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- EDNET log in
Extra no log in until DLSS -
DLSS - internal userid is 2 numeric characters, password - 6? - have to change every 30 days, when you change your password - any of your last 12 passwords cannot, is invalid is already been used...
Unknown connectin prob. - let you into the system first screen but cannot go forward,
School - comes to web site -
LO links back to
COD can access via DLSS already authenticated...
Transitioning CSRs to FE Siebel Access? Timeframe - since last june - majority on Siebel...only inbound call service reps transitioning to Siebel. 550 on inbound of 1100 total CSRs.
- 17A. **How does the user obtain their User ID and password credentials? Web? Manual (mail/fax)? Email?**
- 17B. **Are there any procedures to obtain forgotten User ID or passwords?**
- 17C. **Does the credential notification process differ by permission level (e.g. is the notification process more stringent for Admin level permissions?)**
- 18A. **What access controls and rules are available for system? What access controls and rules are utilized for system? (I.e. is the system configured to use all the access controls available?)**
- 18B. **How are Access rules currently administered? (e.g. Are the access rules modeled to protect certain data or role based for a given business process?)**
19. **Are permission levels configurable by role?**
- 20A. **Who sets up the user on the system? (e.g. Ops group, FSA employee, contractor, etc.)**
- 20B. **How are users set-up on the system? Does the system administrator utilize a tool or directory service to manage this access? (e.g. window based menu, etc.)**
- 21A. **What is the process utilized to terminate a user's access ?**



- 21B. **What is the process utilized to terminate a group of user's access (e.g. a school is no longer eligible to participate.)**
- 21C. **What is the process utilized to modify user access or group access (when a user changes roles, departments, organizations, etc.)?**
22. **Are any reports currently generated to summarize who has access to the system?**
- 23A. **When and how often is system access reviewed?**
- 23B. **Are inactive accounts periodically disabled?**
- 24A. **Is the history of access activity retained for future use? If so, how long is the access history maintained?**
- 24B. **Is the history of access privileges (different levels of access) retained for future use? If so, how long is the access history maintained?**

Conclusion:

25. **Do any trading partners have issues gaining access to your system?**
26. **Are there any improvements for a future access management process that you would like to see incorporated?**

Additional Comments

CSB in the future...wouldn't diff. Dlcs dlss. Talk to someone from collections.



Appendix - C.9 ezAudit

Business Processes Impacted System Enrollment for Trading Partners
Channels Impacted:
System Name/Acronym: EZ Audit
Point of Contact: Randy Wolff, Matt Portolese
Department / Phone Number: 202-377-3151
Date: 5-21-2003
Objective: This document serves as a questionnaire for system owners to provide information regarding Trading Partner Enrollment and Access and Management methods employed by their system. Questions are aimed at soliciting information that will assist in identifying and documenting Enrollment and Access Management Business Objectives and High-Level Requirements.

User Questions:

1. **What types of users/trading partners need access to your system?**
 Internal FSA Users / App Systems Customer Service Post-Secondary Institutions
 3rd-party Servicers Students (direct?) GA's PCA's
 State Agencies Federal Agencies Other (please specify)
2. **From the trading partner identified, who is eligible to gain access and what is there business function? (Roles/Positions - CFO, president, FAA, etc.)**
Internal FSA Users:
1) Case Management team member. They work financial statements and audits that schools submit.
Post-Secondary Institutions:
1) Schools submit financial statements and audits via the web interface and view the status and historical submissions.
3. **Is there any limit on the number of users from a single trading partner?**
No, but there can only be 2 admins per institution. This is procedurally enforced, not systematically. Delegated admin at schools, can add users for their own institutions, can assign different roles.
4. **How are these users/trading partners informed of services (CAMs, etc.)?**
External: IFAP and federal notices.
Internal: Local and CMO team communications.
5. **Does your system utilize a shared registration process? (Is your registration shared/linked with another application?)**
Not linked with any other app. Would have access to all other systems by this point since access to this system is required to submit annual audit. Since schools dictate



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- when their audit/end date is, their submissions are on school cycle.
6. **Does the registration process differ based on user access requirements?**
Yes – FSA and Institution administrators (delegated admin) follow the same process. Admin must have letter signed by Pres. of University or Institution and wet signature.
Data entry user accounts follow delegated admin procedures. Admins keep user statements and wet signature for local users. This info is not submitted to FSA but schools are requested to keep their own records for data entry user accounts.
- 7A. **Does the data obtained differ by job position or business function? (e.g. is more data required for certain users?)**
Yes – Admin requires more info – see question #6.
- 7B. **Where is this data stored? How is this data used? Are records of user data sent to FSA or the Department of Education?**
User information / applications are submitted in via a paper application and maintained by FSA. Ti Baker updates local tables with the user information.

Trading Partner Registration Process Description:

8. **What steps does a trading partner need to follow to register for access? Are there automated processes? manual processes? Is it a paper based or web based?**
External (institutions): It's a paper based, manual process for Institution administrators. They download the application from IFAP and send the completed app to FSA EzAudit Mailbox. Ti Baker, the Operation Manager for ezAudit or another team member manually enters the user data.
Internal: E.g. Case Management Team has to be trained on the system before they are granted access. Once this training is complete, they utilize previous security forms and often no additional paperwork is required. Issue username and password.
9. **Is there any current documentation on this process?**
Document on IFAP explains registration process.
10. **What length of time is required to complete the registration process?**
4-5 days...less than 1 hour to fill out the form plus 2-3 days in transit, and then a day or two for FSA to process the request.
11. **How did this process develop? (E.g. who designed this process?, was there a risk assessment performed?, who approved the process?, etc.)**
This process was modeled after COD and was reviewed by FSA CIO prior to going live. There was a risk assessment performed for ezAudit that included registration. Registration was not considered an unmitigated risk.

Approval Process Description:

12. **Who from trading must approve access? (Positions – CFO, president, etc.)**
President and FAA have to sign form for Admin. Admin maintains delegated information.
- 13A. **To whom are the forms submitted?**
ezAudit operations (Ti Baker)
- 13B. **Who from the FSA system must approve access?**



- Ti Baker / SSO (Barbara Johnson is the SSO delegated to Ti)
- 13C. **What validations/verifications of user provided information take place? (Individual user or school.) Does this process require a wet signature? Is e-Authentication utilized to verify a user's identity?**
- Admin process does require a wet signature. Delegated Admins must have approval forms for their users.
14. **Are there any other people involved in the process (system SSOs, business owners, etc.)?**
- Ti Baker, Barbara Johnson, Elizabeth Hosier (SSO backup).
15. **How is notification of enrollment success/failure sent to the applicant?**
- Notified via email. One email with username and one email with password.

Admin Functions:

16. **Confirm User ID/Password requirements? (pre-populated)**
- Username: First letter of the first name plus first five letters of the last name plus a two digit number. The number starts at 01.
- Passwords: The passwords are 8-15 chars and must contain 3 of the four types of characters (i.e. cap letter, lower case, number, and special char). Access locked after password is incorrectly input 3 times.
- 17A. **How does the user obtain their User ID and password credentials? Web? Manual (mail/fax)? Email?**
- IDs and passwords are e-mailed to the user in separate e-mails. Must change the password on the first log in.
- 17B. **Are there any procedures to obtain forgotten User ID or passwords?**
- All users call the ezAudit help desk to get their password reset.
- 17C. **Does the credential notification process differ by permission level (e.g. is the notification process more stringent for Admin level permissions?)**
- No.
- 18A. **What access controls and rules are available for system? What access controls and rules are utilized for system? (I.e. is the system configured to use all the access controls available?)**
- The system has a set of user roles that can be assigned and combined.
- Matt P. is sending more information on this.
- 18B. **How are Access rules currently administered? (e.g. Are the access rules modeled to protect certain data or role based for a given business process?)**
- 11 default roles.
- Institution User/Ed User can fulfill several roles that limit access to certain screens.



19. **Are permission levels configurable by role?**
Yes.
- 20A. **Who sets up the user on the system? (e.g. Ops group, FSA employee, contractor, etc.)**
FSA employees for FSA users and School Admins. School Admins can set-up their own users.
Delegated Admin sets up users through the web – custom.
Ti Baker (Ops) utilized the same interface via web.
- 20B. **How are users set-up on the system? Does the system administrator utilize a tool or directory service to manage this access? (e.g. window based menu, etc.)**
Done through the web app.
- 21A. **What is the process utilized to terminate a user’s access ?**
School Admin or Ti terminates via the web...
- 21B. **What is the process utilized to terminate a group of user’s access (e.g. a school is no longer eligible to participate.)**
Notifications via formal information. Eligibility info as tracked by PEPS school file is used to verify. Users are independently deleted.
- 21C. **What is the process utilized to modify user access or group access (when a user changes roles, departments, organizations, etc.)?**
Web.
22. **Are any reports currently generated to summarize who has access to the system?**
No user reports are utilized.
- 23A. **When and how often is system access reviewed?**
Not reviewed.
- 23B. **Are inactive accounts periodically disabled?**
365 days of inactivity (1 year)...
If more than 1 year passes, the user has to call back because the password expires. They can get access to help via helpdesk/hotline for ezAudit, ezAudit email box.
- 24A. **Is the history of access activity retained for future use? If so, how long is the access history maintained?**
User and time access information is maintained in the audit logs and maintained indefinitely.
- 24B. **Is the history of access privileges (different levels of access) retained for future use? If so, how long is the access history maintained?**
Track that update was made (user/time stamp) but not capture exact information.



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Conclusion:

25. **Do any trading partners have issues gaining access to your system?**

New password is auto generated and contains symbols, numbers - sometimes the new user doesn't get the password exactly right (odd characters). Should cut and paste into email. That is the most frequent issue.

26. **Are there any improvements for a future access management process that you would like to see incorporated?**

The idea of making it easier for the school to sign up. Should be able to sign up once or one place for all systems.

Additional Comments

N/A



Appendix - C.10: CMDM

Business Processes Impacted	System Enrollment for Trading Partners
Channels Impacted:	
System Name/Acronym:	CMDM
Point of Contact:	Andy Cho
Department / Phone Number:	202-377-3493
Date:	5-20-2003
Objective:	This document serves as a questionnaire for system owners to provide information regarding Trading Partner Enrollment and Access and Management methods employed by their system. Questions are aimed at soliciting information that will assist in identifying and documenting Enrollment and Access Management Business Objectives and High-Level Requirements.

Meeting Summary

Held a brief meeting to review the Credit Management Data Mart system. CMDM was created to continue the required reporting functions after FARS retirement. CMDM receives information from the DLSS system regarding Direct Loans.

CMDM was meant to provide CFO and Student Credit Management with a tool to report on DLSS detail financial transaction.

CMDM has Web Users (60), Extended Web Users (10), and Power Users (8). The Web users have view only access to reports. The Power Users are limited to FSA internal users.



Appendix - C.11 NSLDS

Business Processes Impacted System Enrollment for Trading Partners
Channels Impacted:
System Name/Acronym: NSLDS (non-student)
Point of Contact: Pam Eliadis - Pam.Eliadis@ed.gov
Andrea Wise - Aowise@raytheon.com
Department / Phone Number: P. Eliadas - 202-377-3554
Date: 5-21-2003
Objective: This document serves as a questionnaire for system owners to provide information regarding Trading Partner Enrollment and Access and Management methods employed by their system. Questions are aimed at soliciting information that will assist in identifying and documenting Enrollment and Access Management Business Objectives and High-Level Requirements.

User Questions:

1. **What types of users/trading partners need access to your system?**
[X] Internal FSA Users / App Systems/Contractor [X] Customer Service
[X] Post-Secondary Institutions [X] 3rd-party Servicers [] Students (direct?) [X] GA's [] PCA's [X] State Agencies (state higher education) [] Federal Agencies
[X] Other (please specify) Lenders
2. **From the trading partner identified, who is eligible to gain access and what is there business function? (Roles/Positions - CFO, president, FAA, etc.)**
Internal FSA Users / App Systems/Contractors:
Internal users submit a paper form to Barbara Cobbs (ext. 377-3550). FSA applicants are checked for defaulted loans and follows usual system signs off, CIO security office. ED Employee has completed their background information and fingerprint form. VDC (Meridan) assign user Ids. Password is mailed to new users. The User Id obtained if for both the Web and NSLDS mainframe (only internal users have access to the mainframe).
Post-Secondary Institutions:
External trading partner sign up. Sign up via PM website. Batch form questions #10-12 relate to NSLDS. 3rd party servicers must have schools complete form/sign up.
3. **Is there any limit on the number of users from a single trading partner?**
Batch users - 1 DPA user per TG Number.
Number of online accounts is unlimited.
4. **How are these users/trading partners informed of services (CAMs, etc.)?**



Internal – VDC

External – PM sends file to NSLDS Customer Service Center (Greenville, SC). Check for defaulted loans. Yes or No sent to VDC.

5. **Does your system utilize a shared registration process? (Is your registration shared/linked with another application?)**

Participation Management process.

6. **Does the registration process differ based on user access requirements?**

Internal Users:

RACF group reflect the mainframe security package. Raytheon will change function groups. The director of NSLDS has to sign off on group changes. Every function is in a different group. There are at least 20 groups including an EDUSER group. Individual possesses access to certain groups. A user is either a part of that group or not. Individual access cannot be changed except by group.

External Users:

School users can see only their school. EDUSER can see data pertaining to all schools. Other schools/users cannot see that school's data. GA's have update ability to their own data.

- 7A. **Does the data obtained differ by job position or business function? (e.g. is more data required for certain users?)**

Yes – PM requires additional data for DPA including privacy act data.

- 7B. **Where is this data stored? How is this data used? Are records of user data sent to FSA or the Department of Education?**

NSLDS sends PEPS school file to PM. Every time something changes in enrollment PM sends to NSLDS.

Trading Partner Registration Process Description:

8. **What steps does a trading partner need to follow to register for access? Are there automated processes? manual processes? Is it a paper based or web based?**

SAIG Online Process:

1. Go to <https://www.fsawebenroll.ed.gov/PMEnroll/index.htm>

2. Enroll On-Line -

-Enrolled Organizations need their current TG Number

-Post-secondary institutions need their OPE-ID, FISAP serial number, Pell Grant Program numbers, and/or Direct Loan Program numbers.

-Guaranty agencies need their guaranty agency (GA) code assigned by ED.

-Lenders will need their lender ID number assigned by ED

-All individuals completing this form will need the name, address, Social Security Number (SSN), date of birth, and mother's maiden name.

3. Submit Signature Page - Signed Hard Copy sent to Pearson via mail. The information will not be processed until the signed form is received.

4. Pearson stamps application.

5. Pearson scans application/signature page. This info is stored for 5 years.

6. TG Number and customer number sent to User. (Potentially PIN site instructions sent.)



SAIG Paper Based:

Same process as On-line only with physical mail.

Exception - Direct Method:

Just Batch - Work around for Perkins loan – they would not follow PM process. 80 schools. Raytheon handles these on a case-by-case basis.

NSLDS completed a reconciliation with PM because NSDLS started before PM began.

9. **Is there any current documentation on this process?**
Web site PM documentation.
10. **What length of time is required to complete the registration process?**
PM process.
11. **How did this process develop? (E.g. who designed this process?, was there a risk assessment performed?, who approved the process?, etc.)**
This process evolved over time. Previously, school users registered through TIV WAN. SAIG/PM replaced and provided on-line type access. Never thought of a way to send files. Went through SAIG enrollment form.

Approval Process Description:

12. **Who from trading must approve access? (Positions – CFO, president, etc.)**
PM process.
- 13A. **To whom are the forms submitted?**
PM process.
- 13B. **Who from the FSA system must approve access?**
Just verify the school completed PM. Greenville completes additional checks on defaulted loans.
- 13C. **What validations/verifications of user provided information take place? (Individual user or school.) Does this process require a wet signature? Is e-Authentication utilized to verify a user's identity?**
External users: PM process – wet signature for DPAs. Delegated admin for other users.
14. **Are there any other people involved in the process (system SSOs, business owners, etc.)?**
Sandra Fowler is the Admin. Barbara Cobbs handles internal forms.
15. **How is notification of enrollment success/failure sent to the applicant?**
External users: PM process.
Internal users: Letter from VDC.

Admin Functions:

16. **Confirm User ID/Password requirements? (pre-populated)**
User Id: 1- 256 characters? SC (school) LS (lender), ED (ed employee), SC + random characters and numbers – NSLDS system generated.
Password: 19 character max. Valid for 120 days. Some functions (admin, GA update, and lenders etc.) require 30 day resets due to their high level of access.



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- Password is system generated and users must change during the first log in.
1 user id per person.
- 17A. **How does the user obtain their User ID and password credentials? Web? Manual (mail/fax)? Email?**
Letter sent from VDC for internal users. Internal users follow PM process.
- 17B. 1.1.1.1 Are there any procedures to obtain forgotten User ID or passwords?
Internal and External calls Customer Service with user Id and privacy act info.
Reset password has to be change upon log in.
- 17C. **Does the credential notification process differ by permission level (e.g. is the notification process more stringent for Admin level permissions?)**
No.
- 18A. **What access controls and rules are available for system? What access controls and rules are utilized for system? (I.e. is the system configured to use all the access controls available?)**
Users are made a part of groups with RACF. See question #6.
- 18B. **How are Access rules currently administered? (e.g. Are the access rules modeled to protect certain data or role based for a given business process?)**
See question #6.
19. **Are permission levels configurable by role?**
See question #6.
- 20A. **Who sets up the user on the system? (e.g. Ops group, FSA employee, contractor, etc.)**
VDC Staff completes set up.
- 20B. **How are users set-up on the system? Does the system administrator utilize a tool or directory service to manage this access? (e.g. window based menu, etc.)**
Not sure - need to talk with VDC.
- 21A. **What is the process utilized to terminate a user's access ?**
Internal: Barbara Cobbs.

External - Unless NSLDS is notified by PM, the user id stays on NSLDS system. At one point, a proposal regarding sweeping user ids was discussed but that is not currently being done.

PM/SAIG in the past charged users for signing up. A new employee at an institution would hand off old ID because of then the cost associated with creating a new Id.

How do they turn off PM file is what determines users... even if NSLDS deleted access, PM would update it as new.
- 21B. **What is the process utilized to terminate a group of user's access (e.g. a school is no longer eligible to participate.)**



Even if school is now ineligible, they can gain access because they may need to reference information from when there were eligible. If a school closes, PM turns off.

- 21C. **What is the process utilized to modify user access or group access (when a user changes roles, departments, organizations, etc.)?**
PM - have to go back through on-line form.
22. **Are any reports currently generated to summarize who has access to the system?**
Web - Audit report to see what pages are hit on web, what user ids, what they are doing, how they are searching - userid and date updates on system. This information is used to research possible data mining activities etc. Any follow-up is done through Financial Partners.
- 23A. **When and how often is system access reviewed?**
On ad hoc basis - if some users are hitting systems - NSLDS contacts Financial Partners to talk to Lenders...oversight for users that are abusing systems.
- 23B. **Are inactive accounts periodically disabled?**
No, not currently.
- 24A. **Is the history of access activity retained for future use? If so, how long is the access history maintained?**
History maintained - see question #22.
- 24B. **Is the history of access privileges (different levels of access) retained for future use? If so, how long is the access history maintained?**
Not sure...might be through PM? Will follow up with PM.

Conclusion:

25. **Do any trading partners have issues gaining access to your system?**

Perkins users documented in Question #8.

COA - Closures - PEPS file that does a change of affiliation. NSLDS sends file to PM/SAIG. If the change of affiliation is incorrect/misinterpreted deletions, they wouldn't be able to sign up via PM. They would stop them from signing up on NSLDS and other systems (because they send the file to PM).

School cannot come into system without being eligible. But if lose eligibility don't take away access.

26. **Are there any improvements for a future access management process that you would like to see incorporated?**

PM - currently updates don't require signature file. NSLDS changes/updates via PM should include signature page. Would like to review/purge inactive User Ids.

Additional Comments



Appendix – C.12 Financial Partners

Business Processes Impacted	System Enrollment for Trading Partners
Area Impacted:	Financial Partners
System Name/Acronym:	FMS – LAP / LARS / GAFR
Point of Contact:	
Department / Phone Number:	P. Jefferson - 202-377-3457 F. Ramos - 202-377-3330
Date:	5-20-2003
Objective:	This document serves as a questionnaire for system owners to provide information regarding Trading Partner Enrollment and Access and Management methods employed by their system. Questions are aimed at soliciting information that will assist in identifying and documenting Enrollment and Access Management Business Objectives and High-Level Requirements.

User Questions:

- What types of users/trading partners need access to your system?**
 Internal FSA Users / App Systems Customer Service Post-Secondary Institutions
 3rd-party Servicers Students (direct?) GA's PCA's
 State Agencies Federal Agencies Other (please specify) Lenders
- From the trading partner identified, who is eligible to gain access and what is there business function? (Roles/Positions – CFO, president, FAA, etc.)**

Internal FSA Users.

LAP – Lenders who are associated with a given Servicer/Servicers

If a lender is established, Automatically sends alert from FMS.

Links to box on LAP. Need Lender ID & TIN log into. Complete.

Submits LAP. LAP is approved by FP Staff. Is reviewed. Alert back to them – yes or no about enrolled – lender doesn't qualify or fields not current.

OPA is used for electronically. Financial partners staff would review the information.

LARS – LAPS/paper OPAs process.

FMS Security form – have to eligible lender. Submit paper version web signature.

FMS Operations staff. FMS SSO reviews and approves. Send response name password email. Manual email. Submit shared secret. User is this. First time has to be reset the first time.



Data Strategy Enterprise-Wide Enrollment and Access Management Business Objectives and High-Level Requirements

GAs – same type of userid but different for GAFR, LARS.

GAs and Lenders are only external.

Users - Via PM **2 GAs use VPN account. File transfers

Request goes to FMS helpdesk. Request user add. System Admin – add user GUI
oracle form manual – responsibility –

Maintain.

Submit.

View Only.

Forms to responsibility. A GA first gets an example. GAs are limited to their own data. Servicers can see all lenders they are associated with.

Listing of access –

When the lender completes LAP, they have to put info on servicers...

Now a users. Template that they send to LARS.

FMS helpdesk.

Financial Partners (Lenders, GAs, Servicing Agencies)

1)

2)

3. **Is there any limit on the number of users from a single trading partner?**
FMS – No limit – procedural limit.
4. **How are these users/trading partners informed of services (CAMs, etc.)?**
5. **Does your system utilize a shared registration process? (Is your registration shared/linked with another application?)**
6. **Does the registration process differ based on user access requirements?**
- 7A. **Does the data obtained differ by job position or business function? (e.g. is more data required for certain users?)**
- 7B. **Where is this data stored? How is this data used? Are records of user data sent to FSA or the Department of Education?**
Oracle Table.

Trading Partner Registration Process Description:

8. **What steps does a trading partner need to follow to register for access? Are there automated processes? manual processes? Is it a paper based or web based?**
9. **Is there any current documentation on this process?**
Super Users
View only
AP – Manager



Payables

10. **What length of time is required to complete the registration process?**
Complete app - Shirley;
11. **How did this process develop? (E.g. who designed this process?, was there a risk assessment performed?, who approved the process?, etc.)**
FMS with OGC - Shirley Pratt SSO

Approval Process Description:

12. **Who from trading must approve access? (Positions - CFO, president, etc.)**
User and immediate supervisor...
School or bank
- 13A. **To whom are the forms submitted?**
- 13B. **Who from the FSA system must approve access?**
- 13C. **What validations/verifications of user provided information take place? (Individual user or school.) Does this process require a wet signature? Is e-Authentication utilized to verify a user's identity?**
Wet Signature
14. **Are there any other people involved in the process (system SSOs, business owners, etc.)?**
No.
15. **How is notification of enrollment success/failure sent to the applicant?**
Email.

Admin Functions:

16. **Confirm User ID/Password requirements? (pre-populated)**
First initial + last names - Truncated - 7 spaces; 7-15 usernames. Not case sensitive.
Password: determined by user, temp password - 6 - ?
more complicated, case - sensitive
- 17A. **How does the user obtain their User ID and password credentials? Web? Manual (mail/fax)? Email?**
- 17B. **Are there any procedures to obtain forgotten User ID or passwords?**
- 17C. **Does the credential notification process differ by permission level (e.g. is the notification process more stringent for Admin level permissions?)**
Internal.
- 18A. **What access controls and rules are available for system? What access controls and rules are utilized for system? (I.e. is the system configured to use all the access controls available?)**



- 18B. **How are Access rules currently administered? (e.g. Are the access rules modeled to protect certain data or role based for a given business process?)**
19. **Are permission levels configurable by role?**
- 20A. **Who sets up the user on the system? (e.g. Ops group, FSA employee, contractor, etc.)**
- 20B. **How are users set-up on the system? Does the system administrator utilize a tool or directory service to manage this access? (e.g. window based menu, etc.)**
- 21A. **What is the process utilized to terminate a user's access ?**
Communicated by daily
Withdraw the program...
Lenders - internally - notify the FMS helpdesk...
GAs - supposed to use form to delete...
- 21B. **What is the process utilized to terminate a group of user's access (e.g. a school is no longer eligible to participate.)**
Independent users...
- 21C. **What is the process utilized to modify user access or group access (when a user changes roles, departments, organizations, etc.)?**
Modifications through the helpdesk...
22. **Are any reports currently generated to summarize who has access to the system?**
User audit reports. SSO primarily reviews. Users and resp. date and
- 23A. **When and how often is system access reviewed?**
Upon Shirley request...
- 23B. **Are inactive accounts periodically disabled?**
6 months the password. Account is disabled...



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24A. **Is the history of access activity retained for future use? If so, how long is the access history maintained?**

What has been updated. Indefinite.

24B. **Is the history of access privileges (different levels of access) retained for future use? If so, how long is the access history maintained?**

People changing access – tracked the system.

Lender – Bank, credit union, school <100l, insurance company, servicer (has ID structure),
GA – has access to lender data

Conclusion:

25. **Do any trading partners have issues gaining access to your system?**

Firewall issues & port issues with banks, etc. for security. Cannot gain access.

- Alerts won't be accepted.

26. **Are there any improvements for a future access management process that you would like to see incorporated?**

User Id, PIN Site, Sec. Under review, #22 – 24A – view to view internal super user in a month

reports to view the lender status changes, delta changes from month to month, etc.

Request to change 36 GAs – a change in the user profile... Helpdesk isn't as familiar with the specifics fo the lender/servicer relationships. PPI that leave GA, etc.

Additional Comments

N/A



Appendix - C.13 FPDM

Business Processes Impacted System Enrollment for Trading Partners

Area Impacted: Financial Partners

System Name/Acronym: Financial Partners Data Mart / FPDM

Point of Contact: Nettie Harding

Department / Phone Number: 202-377-3307

Date: 5-20-2003

Objective: This document serves as a questionnaire for system owners to provide information regarding Trading Partner Enrollment and Access and Management methods employed by their system. Questions are aimed at soliciting information that will assist in identifying and documenting Enrollment and Access Management Business Objectives and High-Level Requirements.

User Questions:

1. **What types of users/trading partners need access to your system?**
 Internal FSA Users / App Systems Customer Service Post-Secondary Institutions
 3rd-party Servicers Students (direct?) GA's PCA's
 State Agencies Federal Agencies Other (please specify) Lenders
2. **From the trading partner identified, who is eligible to gain access and what is there business function? (Roles/Positions - CFO, president, FAA, etc.)**
Types of Users:
Everyone has view only access.
Power users have reports
Admin person

GA or GA Servicer:
Can only see their own info - restricted info
Each individual user has 2 Ids -
 - Each user has restricted ID for their own information
 - Public ID - can see all data on everyone
 - If they go into reports as their own user will only pull back their own info.
Lender Access may be added for the future.
3. **Is there any limit on the number of users from a single trading partner?**
Only 6 users per GA. 12 Ids (2 per).
4. **How are these users/trading partners informed of services (CAMs, etc.)?**
Emails to exec directors, training, etc.
5. **Does your system utilize a shared registration process? (Is your registration**



shared/linked with another application?)

No, registration just for FPDM.

6. **Does the registration process differ based on user access requirements?**
No.
- 7A. **Does the data obtained differ by job position or business function? (e.g. is more data required for certain users?)**
No.
- 7B. **Where is this data stored? How is this data used? Are records of user data sent to FSA or the Department of Education?**
FPDM only – information is not shared.

Trading Partner Registration Process Description:

8. **What steps does a trading partner need to follow to register for access? Are there automated processes? manual processes? Is it a paper based or web based?**
E.g. GA Access:
1. Users sign up for Data Marts by completing the DM Access Form and submitting to FPDM SSO (Willie Sutton).
2. Datamart SSO forwards to Ops Team to add or modify user access.
3. Ops Team notifies requester of access change.
9. **Is there any current documentation on this process?**
EDNet Site? Sent out flyers internally.
10. **What length of time is required to complete the registration process?**
11. **How did this process develop? (E.g. who designed this process?, was there a risk assessment performed?, who approved the process?, etc.)**
This process is very similar to other processes, including the processes for DataMarts.

Approval Process Description:

12. **Who from trading must approve access? (Positions - CFO, president, etc.)**
Financial people, Forms 2000 – want access to Datamart.
Immediate supervisor needs to approve access. Would be looking into trends
- 13A. **To whom are the forms submitted?**
SSO.
- 13B. **Who from the FSA system must approve access?**
SSO.
- 13C. **What validations/verifications of user provided information take place? (Individual user or school.) Does this process require a wet signature? Is e-Authentication utilized to verify a user's identity?**
Hard copy.
14. **Are there any other people involved in the process (system SSOs, business owners, etc.)?**
Willie reviews – will talk to Nettie or Anna.
15. **How is notification of enrollment success/failure sent to the applicant?**
Willie sends physical letter.



Admin Functions:

16. **Confirm User ID/Password requirements? (pre-populated)**
- 17A. **How does the user obtain their User ID and password credentials? Web? Manual (mail/fax)? Email?**
- 17B. **Are there any procedures to obtain forgotten User ID or passwords?**
Helpdesk - FPDM email and number.
- 17C. **Does the credential notification process differ by permission level (e.g. is the notification process more stringent for Admin level permissions?)**
- 18A. **What access controls and rules are available for system? What access controls and rules are utilized for system? (I.e. is the system configured to use all the access controls available?)**
- 18B. **How are Access rules currently administered? (e.g. Are the access rules modeled to protect certain data or role based for a given business process?)**
19. **Are permission levels configurable by role?**
- 20A. **Who sets up the user on the system? (e.g. Ops group, FSA employee, contractor, etc.)**
- 20B. **How are users set-up on the system? Does the system administrator utilize a tool or directory service to manage this access? (e.g. window based menu, etc.)**
- 21A. **What is the process utilized to terminate a user's access ?**
No one ever terminated. Willie.
- 21B. **What is the process utilized to terminate a group of user's access (e.g. a school is no longer eligible to participate.)**
- 21C. **What is the process utilized to modify user access or group access (when a user changes roles, departments, organizations, etc.)?**



View access.

22. **Are any reports currently generated to summarize who has access to the system?**

23A. **When and how often is system access reviewed?**

23B. **Are inactive accounts periodically disabled?**

Yes, every 90 days. Microstrategy wouldn't allow to update. DM just started in Sept.

24A. **Is the history of access activity retained for future use? If so, how long is the access history maintained?**

By request has access list. Contractor provides Anna who has report of what reports people have accessed. Post on shared drive. All FP can review.

24B. **Is the history of access privileges (different levels of access) retained for future use? If so, how long is the access history maintained?**

Conclusion:

25. **Do any trading partners have issues gaining access to your system?**

Ask Willie about this...

26. **Are there any improvements for a future access management process that you would like to see incorporated?**

Get everyone on same direction - if one internal user has. Back up system when the primary person address. Passwords be reset within a 1/2 hour. Send Willie personal email will get email but might not be here. Make everyone to send to helpdesk. One central location...

Additional Comments

N/A



Appendix – C.14 Schools Portal

Business Processes Impacted	System Enrollment for Trading Partners
Channels Impacted:	Schools Channel
System Name/Acronym:	Schools Portal
Point of Contact:	Colleen Kennedy
Department / Phone Number:	202-377-4119
Date:	5-16-2003
Objective:	This document serves as a questionnaire for system owners to provide information regarding Trading Partner Enrollment and Access and Management methods employed by their system. Questions are aimed at soliciting information that will assist in identifying and documenting Enrollment and Access Management Business Objectives and High-Level Requirements.

User Questions:

- 1. What types of users/trading partners need access to your system?**
 Internal FSA Users / App Systems Customer Service Post-Secondary Institutions
 3rd-party Servicers Students (direct?) GA's PCA's
 State Agencies Federal Agencies Other (please specify)
- 2. From the trading partner identified, who is eligible to gain access and what is there business function? (Roles/Positions - CFO, president, FAA, etc.)**
Internal FSA Users:
1) All eligible. Access simply supports customization/personalization of page. All headline, calendar and link information provided by the page is open access.
2)
Post-Secondary Institutions:
1) All eligible. Access simply supports customization/personalization of page. All headline, calendar and link information provided by the page is open access.
2)
3rd Party Servicers:
1) All eligible. Access simply supports customization/personalization of page. All headline, calendar and link information provided by the page is open access.
- 3. Is there any limit on the number of users from a single trading partner?**
No - users independently register via web site.
- 4. How are these users/trading partners informed of services (CAMs, etc.)?**
FSA internal and external communications, FAA training performed by FSA U, CAMS, etc; FSA conference presentations and/or display booths; electronic



- announcements posted to IFAP and/or IFAP subscription service.
5. **Does your system utilize a shared registration process? (Is your registration shared/linked with another application?)**
No, unfortunately. It is not.
6. **Does the registration process differ based on user access requirements?**
No. There is only one level of access.
- 7A. **Does the data obtained differ by job position or business function? (e.g. is more data required for certain users?)**
No personal data obtained beyond name, email address.
- 7B. **Where is this data stored? How is this data used? Are records of user data sent to FSA or the Department of Education?**
In an Oracle table, resident in the Schools Portal files operating at the VDC. The data is not used at all. Collection of the email address was intended to facilitate "pushing" information to customers, but no such functionality currently exists. No records of user data are sent anywhere.

Trading Partner Registration Process Description:

8. **What steps does a trading partner need to follow to register for access? Are there automated processes? manual processes? Is it a paper based or web based?**
Go to <http://fsa4schools.ed.gov/SCHOOLSWebApp/index.jsp>
Provide First Name, Last Name, Email address
Specify and confirm a password.
Customize Site, Portal Links, etc.
Automated, dynamic process, via the web site.
9. **Is there any current documentation on this process?**
There are on-line help pages for the registration process. The Schools Portal utilizes the ITA developed "portlet" for registration. System documentation of the portlet does exist.
10. **What length of time is required to complete the registration process?**
Two minutes, or less.
11. **How did this process develop? (E.g. who designed this process?, was there a risk assessment performed?, who approved the process?, etc.)**
Approach enhanced from that used on the IFAP web site (<http://ifap.ed.gov>), and used specifically to allow personalization/customization of the portal, without the use of cookies.

Approval Process Description:

12. **Who from trading must approve access? (Positions - CFO, president, etc.)**
N/A
- 13A. **To whom are the forms submitted?**
N/A
- 13B. **Who from the FSA system must approve access?**
N/A
- 13C. **What validations/verifications of user provided information take place?**



(Individual user or school.) Does this process require a wet signature? Is e-Authentication utilized to verify a user's identity?

None, currently. No wet signature required. No.

14. **Are there any other people involved in the process (system SSOs, business owners, etc.)?**

No.

15. **How is notification of enrollment success/failure sent to the applicant?**

Via Web, dynamically, upon completion of the registration process.

Admin Functions:

16. **Confirm User ID/Password requirements? (pre-populated)**

Username: 8 characters. Syntax: First letter of first name + (up to) six letters of last name + number (assigned incrementally for matching strings)

Password: User selected, 8-16 characters. Never expires.

17A. **How does the user obtain their User ID and password credentials? Web? Manual (mail/fax)? Email?**

Web.

17B. **Are there any procedures to obtain forgotten User ID or passwords?**

Customers are advised to call the Customer Support Call Center (CSCC).

However, no password reset Admin capability exists. It is under development.

17C. **Does the credential notification process differ by permission level (e.g. is the notification process more stringent for Admin level permissions?)**

Only one permission level.

18A. **What access controls and rules are available for system? What access controls and rules are utilized for system? (I.e. is the system configured to use all the access controls available?)**

User ID and password to access application.

18B. **How are Access rules currently administered? (e.g. Are the access rules modeled to protect certain data or role based for a given business process?)**

N/A

19. **Are permission levels configurable by role?**

N/A

20A. **Who sets up the user on the system? (e.g. Ops group, FSA employee, contractor, etc.)**

System administration via "registration" portlet.

20B. **How are users set-up on the system? Does the system administrator utilize a tool or directory service to manage this access? (e.g. window based menu, etc.)**

Successful completion of registration writes a records to the Oracle database. No



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tool currently available, but in development.

21A. **What is the process utilized to terminate a user's access?**

There is currently no process for termination. This is considered a public site.

21B. **What is the process utilized to terminate a group of user's access (e.g. a school is no longer eligible to participate.)**

None. This is considered a public site.

21C. **What is the process utilized to modify user access or group access (when a user changes roles, departments, organizations, etc.)?**

None. User is, however, able to update his/her email address.

22. **Are any reports currently generated to summarize who has access to the system?**

No.

23A. **When and how often is system access reviewed?**

None.

23B. **Are inactive accounts periodically disabled?**

Not currently.

24A. **Is the history of access activity retained for future use? If so, how long is the access history maintained?**

Minimal history is captured. None has been "archived" or deleted.

24B. **Is the history of access privileges (different levels of access) retained for future use? If so, how long is the access history maintained?**

N/A

Conclusion:

25. **Do any trading partners have issues gaining access to your system?**

Customers have indicated that they would rather we use cookies to identify them, so that they wouldn't have to re-log on at every visit.

26. **Are there any improvements for a future access management process that you would like to see incorporated?**

Single sign on. One ID/password for access to all FSA systems to which a single user can/should have access.

Additional Comments

A significant amount of investigative work has already been done by Accenture, under previous FSA task orders. Neil Sattler, FSA CIO, was the project manager and should have a wealth of information about the various FSA systems and their access



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procedures, controls, etc.



Appendix - C.15 IFAP

Business Processes Impacted: System Enrollment for Trading Partners

Channels Impacted: Schools Channel

System Name/Acronym: Information for Financial Aid Professionals (IFAP)

Point of Contact: Colleen Kennedy

Department / Phone Number: 202-377-4119

Date: 5-30-2003

Objective: This document serves as a questionnaire for system owners to provide information regarding Trading Partner Enrollment and Access and Management methods employed by their system. Questions are aimed at soliciting information that will assist in identifying and documenting Enrollment and Access Management Business Objectives and High-Level Requirements.

User Questions:

1. **What types of users/trading partners need access to your system?**
[X] Internal FSA Users / App Systems [X] Customer Service [X] Post-Secondary Institutions

[X] 3rd-party Servicers [] Students (direct?) [X] GA's [] PCA's
[X] State Agencies [X] Federal Agencies [] Other (please specify)
~2,000 registered users of ~10,000 FAAs.
2. **From the trading partner identified, who is eligible to gain access and what is there business function? (Roles/Positions - CFO, president, FAA, etc.)**
Internal FSA Users:
1) All eligible. Access supports customized search query development, and enrollment in email subscription service. All information provided by the site is open access.
2)
Post-Secondary Institutions:
1) All eligible. Access supports customized search query development, and enrollment in email subscription service. All information provided by the site is open access.
2) The query features were intended for an FAA to prepare a query and save it for future reference. The next time the FAA needed the same information, the FAA would launch the saved query and get updated results.
3rd Party Servicers:
1) All eligible. Access supports customized search query development, and enrollment in email subscription service. All information provided by the site is



open access.

2)

3. **Is there any limit on the number of users from a single trading partner?**
No – users independently register via web site.
4. **How are these users/trading partners informed of services (CAMs, etc.)?**
FSA internal and external communications, FAA training performed by FSA U, CAMS, etc; FSA conference presentations and/or display booths; cross posting of IFAP documents to the NASFAA (National Association of Student Financial Aid Administrators) website and newsletters.
5. **Does your system utilize a shared registration process? (Is your registration shared/linked with another application?)**
No, unfortunately. It is not.
6. **Does the registration process differ based on user access requirements?**
No. There is only one level of access.
- 7A. **Does the data obtained differ by job position or business function? (e.g. is more data required for certain users?)**
No personal data obtained beyond name, email address, School/organization name, city, state, “type” of professional.
- 7B. **Where is this data stored? How is this data used? Are records of user data sent to FSA or the Department of Education?**
In an Oracle table, resident in the IFAP files operating at the VDC. The data is used to facilitate “pushing” information to customers, the subscription feature. Records of cumulative numbers of “subscribers” are reported regularly by CSCC to Schools Channel management.

Trading Partner Registration Process Description:

8. **What steps does a trading partner need to follow to register for access? Are there automated processes? manual processes? Is it a paper based or web based?**
Go to <http://ifap.ed.gov/IFAPWebApp/newLogonMemberServicesPag.jsp>
Provide First Name, Last Name, Email address, School/organization name, city, state, “type” of professional.
Customer will receive an email within 48 hours of registering which provides them with the User ID and the default password. User prompted to change password at first attempt to log in with default.
9. **Is there any current documentation on this process?**
There are on-line help pages for the registration process. The IFAP website system documentation does exist.
10. **What length of time is required to complete the registration process?**
Two minutes, or less.
11. **How did this process develop? (E.g. who designed this process?, was there a risk assessment performed?, who approved the process?, etc.)**
Developed to enable participation in email subscription service, and support customized search query development.



Approval Process Description:

12. **Who from trading must approve access? (Positions - CFO, president, etc.)**
N/A
- 13A. **To whom are the forms submitted?**
N/A
- 13B. **Who from the FSA system must approve access?**
N/A
- 13C. **What validations/verifications of user provided information take place? (Individual user or school.) Does this process require a wet signature? Is e-Authentication utilized to verify a user's identity?**
None, currently. No wet signature required. No.
14. **Are there any other people involved in the process (system SSOs, business owners, etc.)?**
No.
15. **How is notification of enrollment success/failure sent to the applicant?**
Via email, to the address provided in the registration.

Admin Functions:

16. **Confirm User ID/Password requirements? (pre-populated)**
Username: 8 characters. Syntax: First letter of first name + (up to) six letters of last name + number (assigned incrementally for matching strings)
Password: User selected, 8-16 characters. Never expires.
- 17A. **How does the user obtain their User ID and password credentials? Web? Manual (mail/fax)? Email?**
Web registration, ID and password conveyed via email.
- 17B. **Are there any procedures to obtain forgotten User ID or passwords?**
Customers are advised to call the Customer Support Call Center (CSCC). A select number of the CSCC IFAP team have the access to reset a customer's password.
- 17C. **Does the credential notification process differ by permission level (e.g. is the notification process more stringent for Admin level permissions?)**
Only one permission level.
- 18A. **What access controls and rules are available for system? What access controls and rules are utilized for system? (I.e. is the system configured to use all the access controls available?)**
User ID and password to access application.
- 18B. **How are Access rules currently administered? (e.g. Are the access rules modeled to protect certain data or role based for a given business process?)**
N/A



19. **Are permission levels configurable by role?**
N/A
- 20A. **Who sets up the user on the system? (e.g. Ops group, FSA employee, contractor, etc.)**
System administration via registration process.
- 20B. **How are users set-up on the system? Does the system administrator utilize a tool or directory service to manage this access? (e.g. window based menu, etc.)**
Successful completion of registration writes a record to the Oracle database. System Admin has direct access. Select IFAP Team members have access to an "admin" web page.
- 21A. **What is the process utilized to terminate a user's access?**
CSCC sends a list of users with an undeliverable email address on file (based upon undeliverable mail records received in response to email subscriptions), to the support contractor who deletes these records from the database.
- 21B. **What is the process utilized to terminate a group of user's access (e.g. a school is no longer eligible to participate.)**
None. This is considered a public site.
- 21C. **What is the process utilized to modify user access or group access (when a user changes roles, departments, organizations, etc.)?**
None. User is, however, able to update his/her email address.
22. **Are any reports currently generated to summarize who has access to the system?**
The support contractor reports weekly on the number of email subscribers and the top subscription options selected.
- 23A. **When and how often is system access reviewed?**
None.
- 23B. **Are inactive accounts periodically disabled?**
Not currently.
- 24A. **Is the history of access activity retained for future use? If so, how long is the access history maintained?**
Minimal history is captured. None has been "archived" or deleted.
- 24B. **Is the history of access privileges (different levels of access) retained for future use? If so, how long is the access history maintained?**
N/A

Conclusion:



Data Strategy Enterprise-Wide Enrollment and Access Management Business Objectives and High-Level Requirements

25. **Do any trading partners have issues gaining access to your system?**

Customers have indicated that they would rather we use cookies to identify them, so that they wouldn't have to re-log on at every visit.

26. **Are there any improvements for a future access management process that you would like to see incorporated?**

Single sign on. One ID/password for access to all FSA systems to which a single user can/should have access.

Additional Comments

A significant amount of investigative work has already been done by Accenture under previous FSA task orders. Neil Sattler, FSA CIO, was the project manager and should have a wealth of information about the various FSA systems and their access procedures, controls, etc.

IFAP came into existence before the Schools Portal. FSA internet guidelines concerning icons, publishing, and printing were planned for a standard look and common feel. Mike High should have additional working documents.



Appendix - C.16 Collections

Business Processes Impacted: System Enrollment for Trading Partners

Channels Impacted: Students

System Name/Acronym: Debt Management Collections System / DMCS

Point of Contact: Gregory Plenty, Courtland Smith, Steve Martus

Department / Phone Number: G. Plenty - 202-377-3254

Date: 5-29-2003

Objective: This document serves as a questionnaire for system owners to provide information regarding Trading Partner Enrollment and Access and Management methods employed by their system. Questions are aimed at soliciting information that will assist in identifying and documenting Enrollment and Access Management Business Objectives and High-Level Requirements.

User Questions:

1. **What types of users/trading partners need access to your system?**
 Internal FSA Users / Regional Offices Customer Service/PICs Post-Secondary Institutions 3rd-party Servicers Students (direct?) GA's PCA's
 State Agencies Federal Agencies Other (please specify)
2. **From the trading partner identified, who is eligible to gain access and what is there business function? (Roles/Positions - CFO, president, FAA, etc.)**
Users:
Internal FSA Users / Contractors - 3 regional offices updating records including bankruptcy (SF) and Collection Agencies (ATL)
Customer Service/PICs
PCA's
Business Functions: Receiving assigned loans and grants, notification and reporting, collection, forced collection, refunds.
3. **Is there any limit on the number of users from a single trading partner?**
No limit. Approx. 300+ DMCS users; approx. 200 TSO users.
4. **How are these users/trading partners informed of services (CAMs, etc.)?**
Each regional office has a security process / SSO.
5. **Does your system utilize a shared registration process? (Is your registration shared/linked with another application?)**
No - just used for DMCS and TSO (Time Sharing Option) - same log in.
6. **Does the registration process differ based on user access requirements?**
One difference in the process relates to Security Clearance Levels required for certain forms of access.



- 7A. **Does the data obtained differ by job position or business function? (e.g. is more data required for certain users?)**
Reviewing Security Policy Document.
- 7B. **Where is this data stored? How is this data used? Are records of user data sent to FSA or the Department of Education?**
RACF as a part of local DMCS at VDC. Information is not sent elsewhere.

Trading Partner Registration Process Description:

8. **What steps does a trading partner need to follow to register for access? Are there automated processes? manual processes? Is it a paper based or web based?**
Process is the same for internal and external users except for a slight variation if the user works in a regional office.
Hard copy form is submitted to SSO (Gregory Plenty)
The form is submitted to HR/security access level and clearance required (1C - CSR, 5C/6C Dev.)
After user is approved, request is sent to VCD who assigns user ids based on location (see question #16).
A phone call is placed from the VDC to the user with a userid and temporary pass code. In some circumstances, the regional office SSO facilitates the user id process.
9. **Is there any current documentation on this process?**
Gregory Plenty sent DCS Security Policy. Access Management Team will review.
10. **What length of time is required to complete the registration process?**
90 days if HR security clearance is required (depending on level of clearance required). 3-5 days for processing if additional clearance process is not needed.
11. **How did this process develop? (E.g. who designed this process?, was there a risk assessment performed?, who approved the process?, etc.)**
CSC is responsible for this process. The security process has been in place for 15 years.

Approval Process Description:

12. **Who from trading must approve access? (Positions - CFO, president, etc.)**
External users/PCAs - local SSO / manager must approve. E.g. ATL regional office handles security for PCAs - sends information to FSA.
- 13A. **To whom are the forms submitted?**
System SSO.
- 13B. **Who from the FSA system must approve access?**
SSO signs if the HR clearance is sufficient.
RACF Security Manager at VDC (Jim Rutherford) approves and changes access.
- 13C. **What validations/verifications of user provided information take place? (Individual user or school.) Does this process require a wet signature? Is e-Authentication utilized to verify a user's identity?**
SSO / CM Manager at Raytheon verifies.
14. **Are there any other people involved in the process (system SSOs, business owners, etc.)?**



No.

15. **How is notification of enrollment success/failure sent to the applicant?**

User is notified via phone from the VDC or, in some cases, notified by regional office SSO if they are handling the process.

Admin Functions:

16. **Confirm User ID/Password requirements?**

Username: 3-7 characters; Raytheon/VDC users have initials as password; ED and PIC users have 7 characters including the location - e.g. AG23___; no special characters; previous passwords stored; once a username is used, will not be used again.

Password: 5-8 characters; Expires after 6 months of inactivity; 90 days.

17A. **How does the user obtain their User ID and password credentials? Web?**

Manual (mail/fax)? Email?

See question #8.

17B. **Are there any procedures to obtain forgotten User ID or passwords?**

User calls SSO - FSA user sets to a temporary password.

17C. **Does the credential notification process differ by permission level (e.g. is the notification process more stringent for Admin level permissions?)**

No, see question #8.

18A. **What access controls and rules are available for system? What access controls and rules are utilized for system? (I.e. is the system configured to use all the access controls available?)**

RACF controls access on a screen by screen basis.

18B. **How are Access rules currently administered? (e.g. Are the access rules modeled to protect certain data or role based for a given business process?)**

Access has shifted between role based and rules based. Current goal is role-based users with generic profile (class of screens).

19. **Are permission levels configurable by role?**

Generic profiles are created but actual access is on a user-by-user basis.

20A. **Who sets up the user on the system? (e.g. Ops group, FSA employee, contractor, etc.)**

RACF Security Manager at the VDC (currently Jim Ruthersford).

20B. **How are users set-up on the system? Does the system administrator utilize a tool or directory service to manage this access? (e.g. window based menu, etc.)**

Most likely command line...

21A. **What is the process utilized to terminate a user's access ?**



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PCA's and other external users would send forms to SSO to delete users.

SSO would be notified of internal users with HR emails.

- 21B. **What is the process utilized to terminate a group of user's access (e.g. a school is no longer eligible to participate.)**

N/A - individual

- 21C. **What is the process utilized to modify user access or group access (when a user changes roles, departments, organizations, etc.)?**

User completes form to add additional access to existing account.

22. **Are any reports currently generated to summarize who has access to the system?**

Yes - see question 24A for the type of information captured.

- 23A. **When and how often is system access reviewed?**

On-demand / ad hoc reports - Brian Sullivan.

- 23B. **Are inactive accounts periodically disabled?**

Yes - after 6 months.

- 24A. **Is the history of access activity retained for future use? If so, how long is the access history maintained?**

Detailed history including activity on restricted screens, number of times a user tries to access a restricted screen. This data would be maintained with system back-ups so the history of system back-ups would dictate the amount of time this is saved.

- 24B. **Is the history of access privileges (different levels of access) retained for future use? If so, how long is the access history maintained?**

No history but changes would be reflected in the paper trail of requests.

Conclusion:

25. **Do any trading partners have issues gaining access to your system?**

Process has been refined over 15 years so there are currently no complaints.

26. **Are there any improvements for a future access management process that you would like to see incorporated?**

The mainframe environment of DMCS makes it difficult to change. The security process is manual and would also be difficult to change.

Additional Comments

Will follow up with CSB team regarding schedule and enrollment/access management impacts.



Appendix - C.17 Consolidation

Business Processes Impacted System Enrollment for Trading Partners
Channels Impacted:
System Name/Acronym: Direct Loan Consolidation System / DLCS
Point of Contact: Denise Leifeste, Bill Burns, David J. Yang
Department / Phone Number: D. Leifeste - 202-377-3293
D. Yang - 202.377.3256
Date: 5-30-2003
Objective: This document serves as a questionnaire for system owners to provide information regarding Trading Partner Enrollment and Access and Management methods employed by their system. Questions are aimed at soliciting information that will assist in identifying and documenting Enrollment and Access Management Business Objectives and High-Level Requirements.

User Questions:

1. **What types of users/trading partners need access to your system?**
 Internal FSA Users / App Systems EDS Staff Post-Secondary Institutions
 3rd-party Servicers Borrowers GA's PCA's
 State Agencies Federal Agencies Other (please specify) Lenders
Note: Internal FSA users do not have access directly to the HP system at the VDC. EDS Staff handles all administration and customer service responsibilities. GA's and lenders cannot log into the HP system but gain access to a web site to view extracts (rosters of their loans) from the DLCS system. PICs/Servicing cannot get access to the system. Borrowers do have access to the web site but this data gathering focuses on Trading Partners.
2. **From the trading partner identified, who is eligible to gain access and what is there business function? (Roles/Positions - CFO, president, FAA, etc.)**
EDS Staff - Administration, Operations, Customer Service.
GA's/Lenders - Web access for reviewing loan information. The lenders are reviewing information on their own loans so privacy is not a concern (they already have access). The borrower is requesting FSA to buy loans at a particular bank. Loan verification and payoff file is conducted when consolidating the loan. 82 of 7000 lenders receive payments but those 82 lenders are the largest and represent the largest % of loans.
3. **Is there any limit on the number of users from a single trading partner?**
2 individuals from authorized lenders - a primary and back-up to view payments on a daily basis, etc. Are notified via email that updates have occurred.
4. **How are these users/trading partners informed of services (CAMs, etc.)?**
Greg McCoy at EDS actively recruits lenders to participate in the electronic services.



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Greg has a working relationship with the lenders and communicates directly with them via telephone, etc.

5. **Does your system utilize a shared registration process? (Is your registration shared/linked with another application?)**
No.
6. **Does the registration process differ based on user access requirements?**
Trading partners only have one level of access. FSA personnel work through EDS for Operations and Admin work.
- 7A. **Does the data obtained differ by job position or business function? (e.g. is more data required for certain users?)**
- 7B. **Where is this data stored? How is this data used? Are records of user data sent to FSA or the Department of Education?**
HP EDS System at the VDC. Information is not shared with any other systems.

Trading Partner Registration Process Description:

8. **What steps does a trading partner need to follow to register for access? Are there automated processes? manual processes? Is it a paper based or web based?**
In most circumstances, there is a current lender who is beginning to follow the automated process so they have already been approved.
EDS Users:
Fingerprint form and approval clearance forwarded to FSA SSO (David/Bill). SSO checks for completeness and takes information to FSA HR. Monica Gales FSA processes the security information. Forms then go to SSO for EDS (Shawn Sustrish) who approves users and gives to Greg McCoy to add the user. Even though the system is housed at/was migrated to the VDC, EDS retains the admin privileges. VDC only maintains OS.
9. **Is there any current documentation on this process?**
Web site documentation. Also following up with Greg McCoy on additional documentation.
10. **What length of time is required to complete the registration process?**
Due to the nature of the system and users, registration process doesn't occur that often and given the low number, telephone calls, etc. facilitate the process.
11. **How did this process develop? (E.g. who designed this process?, was there a risk assessment performed?, who approved the process?, etc.)**
Enrollment process follows FSA needs. Shift to EFT (and therefore need to access DCLS) represents Treasury requirements.

Approval Process Description:

12. **Who from trading must approve access? (Positions - CFO, president, etc.)**
Delegated admin must approve. VP must approve principle person/back-up.
VP/bank is responsible for access.
Greg McCoy sends documents to FSA with signatures for record keeping.
- 13A. **To whom are the forms submitted?**
Greg McCoy.



- 13B. **Who from the FSA system must approve access?**
SSO/HR Sec. Packet for EDS. For Trading partners, they are viewing their own data so no additional approval is needed. VP signature means bank is responsible.
- 13C. **What validations/verifications of user provided information take place? (Individual user or school.) Does this process require a wet signature? Is e-Authentication utilized to verify a user's identity?**
Wet signature.
14. **Are there any other people involved in the process (system SSOs, business owners, etc.)?**
No additional people.
15. **How is notification of enrollment success/failure sent to the applicant?**
N/A

Admin Functions:

16. **Confirm User ID/Password requirements? (pre-populated)**
EDS User (Direct):

Lender (Website):

Borrower (Website):
Username: 5-8 characters; alphanumeric, first letter of first name, up to 5 letters of last name and 2 numeric characters;
Password: 5-8 characters; Password - Must not be blank, must be different than last 3 ones, must be kept for at least a day. SFA PIN used for Application Status Look-Up and e-signature of LC Promissory Notes on the LC Web Application; PIN does not expire., however, if you have requested a new PIN, only your new PIN can be used; 30 day lifetime.
- 17A. **How does the user obtain their User ID and password credentials? Web? Manual (mail/fax)? Email?**
Greg handles this process for lenders. EDS has a process to generate Ids / passwords through the system.
- 17B. **Are there any procedures to obtain forgotten User ID or passwords?**
Greg / EDS.
- 17C. **Does the credential notification process differ by permission level (e.g. is the notification process more stringent for Admin level permissions?)**

N/A
- 18A. **What access controls and rules are available for system? What access controls and rules are utilized for system? (I.e. is the system configured to use all the access controls available?)**

N/A



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- 18B. **How are Access rules currently administered? (e.g. Are the access rules modeled to protect certain data or role based for a given business process?)**
N/A
19. **Are permission levels configurable by role?**
N/A
- 20A. **Who sets up the user on the system? (e.g. Ops group, FSA employee, contractor, etc.)**
N/A
- 20B. **How are users set-up on the system? Does the system administrator utilize a tool or directory service to manage this access? (e.g. window based menu, etc.)**
N/A
- 21A. **What is the process utilized to terminate a user's access ?**

Lender must submit a new application specifying the primary and alternate. EDS notifies the EDS SSO who sends the information to the FSA SSO.
- 21B. **What is the process utilized to terminate a group of user's access (e.g. a school is no longer eligible to participate.)**

Not sure if users are linked to organization.
- 21C. **What is the process utilized to modify user access or group access (when a user changes roles, departments, organizations, etc.)?**
N/A - one level of trading partner access.
22. **Are any reports currently generated to summarize who has access to the system?**
Ad hoc reports - EDS is responsible for reviewing access. As resources change, they are constantly enabling and disabling accounts.
- 23A. **When and how often is system access reviewed?**
Ad hoc.
- 23B. **Are inactive accounts periodically disabled?**
Doesn't currently apply. About 1 year ago, all accounts inactive over 120 days were reviewed. John Harper (former EDS SSO) ran a report that was reviewed for inactivity. Not sure if accounts are now automatically deleted after 120 days.
- 24A. **Is the history of access activity retained for future use? If so, how long is the access history maintained?**
N/A
- 24B. **Is the history of access privileges (different levels of access) retained for future use? If so, how long is the access history maintained?**



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N/A

Conclusion:

25. **Do any trading partners have issues gaining access to your system?**

No.

26. **Are there any improvements for a future access management process that you would like to see incorporated?**

A goal is to get more users/lenders utilizing electronic methods.

Additional Comments

CSB effort will likely change the way DLCS and Servicing interact. Currently borrower issues have someone from Servicing and DCS communicating with each other. Eventually each group would likely have some level of access to historical data. CDTS – follow up with David Yang.



Appendix - C.18 FMS - LEAP/SLEAP

Business Processes Impacted	System Enrollment for Trading Partners
Area Impacted:	Financial Partners
System Name/Acronym:	FMS - LEAP/SLEAP
Point of Contact:	Greg Gerrans
Department / Phone Number:	202-377-3304
Date:	6-06-2003
Objective:	This document serves as a questionnaire for system owners to provide information regarding Trading Partner Enrollment and Access and Management methods employed by their system. Questions are aimed at soliciting information that will assist in identifying and documenting Enrollment and Access Management Business Objectives and High-Level Requirements.

User Questions:

- 1. What types of users/trading partners need access to your system?**
 Internal FSA Users / App Systems Customer Service Post-Secondary Institutions
 3rd-party Servicers Students (direct?) GA's PCA's
 State Agencies Federal Agencies Other (please specify) Lenders
- 2. From the trading partner identified, who is eligible to gain access and what is there business function? (Roles/Positions - CFO, president, FAA, etc.)**
Internal FSA Users:
 - 1) User updates information in FMS extension Oracle software for schools submitting excel based documentation. User would need to input information into GAPS for web based or excel based format.
State Agencies
 - 1) State Agencies Employees use the On-line form to secure LEAP/SLEAP funds. They are able to use an excel based format.
 - 2) Less than ½ of states utilize on-line forms.
 - 3) When the electronic/on-line forms for LEAP/SLEAP were created it was based on/developed as a part of the FMS platform. The states were supposed to be able to get their money via the electronic system however the connectivity from the extension tables to GAPS is not present. States therefore still do drawdowns via GAPS. In order for the data to get into GAPS for drawdowns, Greg must manually enter it for paper and electronic formats. Even if the state employee completes the form on-line, a wet signature is needed.
- 3. Is there any limit on the number of users from a single trading partner?**



- Max 3 users per agency.
4. **How are these users/trading partners informed of services (CAMs, etc.)?**
Federal Registry.
 5. **Does your system utilize a shared registration process? (Is your registration shared/linked with another application?)**
FMS process.
 6. **Does the registration process differ based on user access requirements?**
See FMS information.
 - 7A. **Does the data obtained differ by job position or business function? (e.g. is more data required for certain users?)**
See FMS information.
 - 7B. **Where is this data stored? How is this data used? Are records of user data sent to FSA or the Department of Education?**
See FMS information.

Trading Partner Registration Process Description:

8. **What steps does a trading partner need to follow to register for access? Are there automated processes? manual processes? Is it a paper based or web based?**
Notice in Federal Registry tells states to go to FMS website to apply for User Id. If they are not able to download form, they are provided a the file or paper version.
9. **Is there any current documentation on this process?**
Requesting Excel Form from Greg.
10. **What length of time is required to complete the registration process?**
See FMS information.
11. **How did this process develop? (E.g. who designed this process?, was there a risk assessment performed?, who approved the process?, etc.)**
When the electronic forms for LEAP/SLEAP were created it was based on/developed as a part of the FMS platform.

Approval Process Description:

12. **Who from trading must approve access? (Positions - CFO, president, etc.)**
Depends on particular state.
- 13A. **To whom are the forms submitted?**
States utilizing the electronic forms submit on line and mail paper based signature page. States utilizing the paper forms submit to Greg.
- 13B. **Who from the FSA system must approve access?**
See FMS information.
- 13C. **What validations/verifications of user provided information take place? (Individual user or school.) Does this process require a wet signature? Is e-Authentication utilized to verify a user's identity?**

Web signature required. States are certified users in that there are only 54 groups of users and they don't change.
14. **Are there any other people involved in the process (system SSOs, business**



owners, etc.)?

No.

15. **How is notification of enrollment success/failure sent to the applicant?**

See FMS information.

Admin Functions:

16. **Confirm User ID/Password requirements? (pre-populated)**

See FMS information.

- 17A. **How does the user obtain their User ID and password credentials? Web? Manual (mail/fax)? Email?**

See FMS information.

- 17B. **Are there any procedures to obtain forgotten User ID or passwords?**

FMS Helpdesk.

- 17C. **Does the credential notification process differ by permission level (e.g. is the notification process more stringent for Admin level permissions?)**

2 levels of access: Read/Write, Submit.

- 18A. **What access controls and rules are available for system? What access controls and rules are utilized for system? (I.e. is the system configured to use all the access controls available?)**

See FMS information.

- 18B. **How are Access rules currently administered? (e.g. Are the access rules modeled to protect certain data or role based for a given business process?)**

See FMS information.

19. **Are permission levels configurable by role?**

See FMS information.

- 20A. **Who sets up the user on the system? (e.g. Ops group, FSA employee, contractor, etc.)**

See FMS information.

- 20B. **How are users set-up on the system? Does the system administrator utilize a tool or directory service to manage this access? (e.g. window based menu, etc.)**

See FMS information.

- 21A. **What is the process utilized to terminate a user's access ?**

See FMS information.

- 21B. **What is the process utilized to terminate a group of user's access (e.g. a school is no longer eligible to participate.)**



Group access is not usually terminated since the max 54 groups of users are in close contact.

- 21C. **What is the process utilized to modify user access or group access (when a user changes roles, departments, organizations, etc.)?**

See FMS information.

22. **Are any reports currently generated to summarize who has access to the system?**

No.

- 23A. **When and how often is system access reviewed?**

No.

- 23B. **Are inactive accounts periodically disabled?**

See FMS information.

- 24A. **Is the history of access activity retained for future use? If so, how long is the access history maintained?**

No.

- 24B. **Is the history of access privileges (different levels of access) retained for future use? If so, how long is the access history maintained?**

No.

Conclusion:

25. **Do any trading partners have issues gaining access to your system?**

Some trading partners are reluctant to submit SSN and believe it should not be necessary.

Levels of access should consider the position of the person made responsible for certain actions. E.g., if the CFO or other user is the only one that can submit forms, the security requirements need to be balanced with their availability and the ability of their staff to get that user to actually submit the records.

Since this process only occurs twice a year, the user's passwords expire each time they are to use the system. Due to difficulties in using the FMS tables, LEAP/SLEAP participants reverted to the Excel based format. Therefore, FSA users reverted back to an Access DB based on the excel copies to track the LEAP/SLEAP program. If a feeder for GAPS was available from FMS, it would make sense to enter data into FMS. Currently, even if the data is entered into FMS, it still must be manually entered into GAPS creating a duplication of efforts.

26. **Are there any improvements for a future access management process that you would like to see incorporated?**



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A generic PIN for the agency to utilize rather than an individual. It would be the agency's responsibility to safe guard that information.

Additional Comments