

LaRS Security Overview



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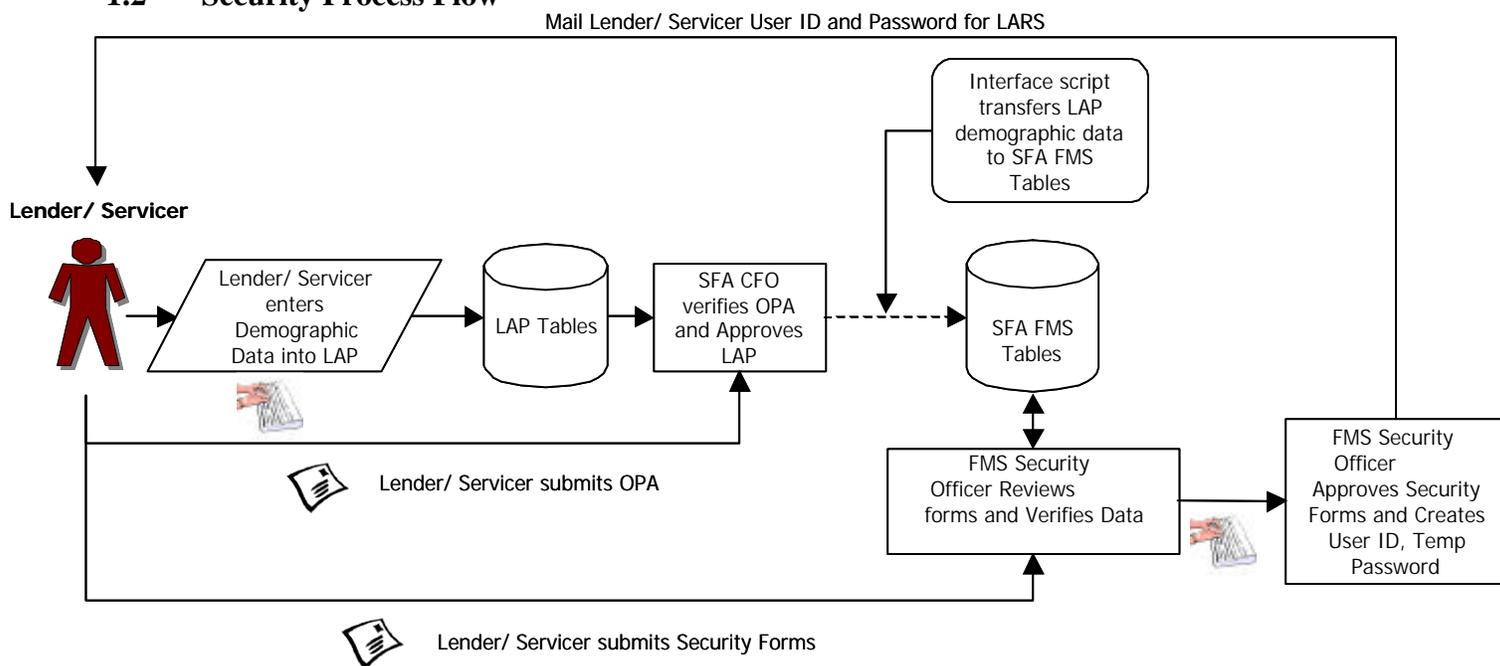
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1.0 Overview

1.1 Introduction

This document will identify and describe the different items that are involved in authorizing organizations and users to access the LaRS application.

1.2 Security Process Flow



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2.0 Organization Participation Agreement (OPA)

2.1 Description

The Organization Participation Agreement is a legally binding document between the Lender organization and the Department of Education, a Lender's Trust entity and the Department of Education, and between the Servicer organization and the Department of Education. The purpose of the OPA is to eliminate the need for an 'authorizing official' at the Lender or Servicer organization to separately mail a signed document each quarter when the organization electronically submits the Lender Reporting Form (LaRS) (formerly the hardcopy ED Form 799). The OPA is expected to be valid for a period of two years.

The signed OPA must be on file at SFA prior to SFA accepting an electronic Lender Reporting Form (LaRS) from the organization. The signed OPA does not need to be completed and received by SFA prior to a representative of the organization completing the Lender Application Process (LAP). In order to access LAP screens, the representative completing the LAP process will need to know the name of the 'authorizing official' that will be signing the OPA.

All existing Lenders and Servicers and any new Lenders and Servicers who would like to participate in the FFEL program need to complete an OPA.

In the event that a Lender or Servicer prefers to complete the paper-based version of the LaRS form, an OPA is not required since the OPA relates to electronic submission. Instead, an 'authorizing official' of the Lender organization will be required to sign each quarterly LaRS form prior to mailing the form. This process is similar to the process for the existing hardcopy ED Form 799.

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3.0 Lender Application Process (LAP)

3.1 Description

The Lender Application Process is used in two scenarios:

1. Initial review and update of existing Lender and Servicer information
2. Initial capture of information for Lenders and Servicers requesting to participate in the FFEL program.

A complete user guide for the LAP application will be available upon completion of the LAP application testing.

3.2 Existing Lenders and Servicers

With the implementation of a new application system, the desire is to make sure that information contained within the new system is accurate. To this end, all existing active Lenders and Servicers are required to access the LAP screens to verify and update their demographic information.

To assist with this process, some information from the existing FFEL system was used to initially populate the LAP application. Other information from the FFEL system that was identified as 'questionable' in its reliability was not used.

In order to access the LAP application, the representative of the Lender or Servicer organization will need to enter the Lender ID (LID) or the Servicer ID. The representative will also need to type the name of the 'authorizing official' that signed (or will sign) the OPA (see section 2.0 Organization Participation Agreement).

Once in the LAP application, the type of information requested for Lenders by the LAP application is:

1. Lending User name, mailing address and email
2. Lending Institution name, mailing address and email
3. Associated Guaranty Agencies
4. Associated Servicers
5. Additional LIDs

The type of information requested for Servicers by the LAP application is:

1. Servicer name, mailing address and email
2. Associated Lenders (display only to be used by Servicers to verify that lenders have submitted data)

Sensitive information such as bank account information will not be displayed within the LAP application. Bank account information can only be verified within the LaRS application on the Profile page. Changes to bank account information will be done through the FMS Help Desk.

Approximately two weeks prior to deploying the LaRS application, verified information within the LAP application will be copied into the LaRS application. Prior to copying this demographic information from the LAP application to the LaRS application, SFA personnel will review the LAP information and make sure that the information was entered by an appropriate representative of the organization (by

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knowing who signed the OPA) and comparing it with the signed OPA that is on file. Verification of the LAP information and copying into the LaRS application must occur prior to SFA accepting an electronic Lender Reporting Form (LaRS).

3.3 New Lenders and Servicers

Lenders and Servicers who do not currently participate in the FFEL program can request to participate in the FFEL program by accessing the LAP application.

A representative from the Lender or Servicer organization will be required to enter all information contained in the LAP application.

New Lenders and Servicers and those existing lenders who are requesting an additional LID will access the LAP application by selecting the new user option. Once selected, the representative will need to select the type of agency he is representing (ie. Lender or Servicer). Once the agency type has been selected, the representative will be required to complete the appropriate form.

Once in the LAP application, the type of information requested for new Lenders by the LAP application is:

1. Lending User name, mailing address and email
2. Lending Institution name, mailing address and email
3. Associated Guaranty Agencies
4. Associated Servicers
5. Additional LIDs

The type of information requested for new Servicers by the LAP application is:

1. Servicer name, mailing address and email
2. Associated Lenders (display only to be used to by Servicers to verify that lenders have submitted data)

Sensitive information such as bank account information will not be displayed within the LAP application. Once the Lender or Servicer organization is accepted into the FFEL program, a representative from the organization will be able to contact the SFA helpdesk to have sensitive information updated on their records.

Prior to creating a LID for the Lender or a Servicer ID for the Servicer, SFA personnel will review the LAP information and make sure the information was entered by an appropriate representative of the organization (by knowing who signed the OPA) and comparing it with the signed OPA. Once LAP data is verified by SFA, a LID or Servicer ID will be issued to the Lender or Servicer.

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4.0 Lender Reporting System (LaRS) Security Forms

4.1 Description

The Lender Reporting System (LaRS) Security Forms are to identify individual representatives from the Lender and Servicer organizations who need access to the LaRS application. Each representative who needs access to LaRS is required to complete, sign, and mail the security form to SFA. The LaRS security supported by the FMS Security Officer will review the information contained on the form and will authorize access as appropriate. Once access is authorized, a notice will be mailed to the requesting representative identifying the User ID and password.

Once finalized, the LaRS security form may be obtained by accessing a designated website and downloading a copy of the form and the instructions.

4.2 Levels of Authority

Several levels of authority will exist within the LaRS application.

Levels of authority for representatives of a Lender are:

1. View Data – allows the user to view information related to their organization
2. Maintain Data – allows the user to create and maintain information related to their organization
3. Submit Data – allows the user to create, maintain, and submit information related to their organization

Levels of authority for representatives of a Servicer are:

1. View Data – allows the user to view information related to their organization and to view information (LaRS forms) for Lenders submitted by this Servicer
2. Maintain Data – allows the user to create and maintain information related to their organization and to create and maintain information (LaRS forms) for Lenders supported by this Servicer
3. Submit Data – allows the user to create, maintain, and submit information related to their organization and to create, maintain, and submit information (LaRS forms) for Lenders supported by this Servicer

4.3 Lender and Servicer Responsibilities

It is the responsibility of the Lender and Servicer organizations to maintain appropriate control over the information that they access in the LaRS application. Individual general users are responsible for practicing effective password management. Users are responsible for maintaining the secrecy of their User IDs as well as their passwords. Authorized users will be held responsible for all data transmitted to SFA under their User ID. The Lenders and Servicers shall be responsible for providing internal controls, inclusive of but not limited to, separation of duties and compliance with applicable third party audit provisions.