

CHAPTER 4. ESTABLISHING AND MANAGING PRIVACY ACT SYSTEMS OF RECORDS

4-1 Introduction. This chapter sets forth procedures for establishing and managing systems of records under the Privacy Act. The Privacy Act of 1974 requires agencies to publish in the Federal Register a "notice of the existence and character of the system of records" subject to the Act. Existing notices of systems of records are published biennially in the Federal Register. The Office of the Federal Register compiles and publishes a complete listing of all agencies systems of records in the Register's annual compilation of system notices. A copy of the Department's most recent compilation of systems of records is included in Appendix I. An updated version is provided to appropriate staff immediately after the biennial publication in the Federal Register.

The Privacy Act also requires agencies to send reports to the Congress and the Office of Management and Budget (OMB) on the agency's intention to establish any new system of records and under certain circumstances, the agency's intention to alter an existing system of records. More detailed information describing situations when a report and notice is required is provided in paragraph 4-3 of this handbook. Also, included is guidance on the report and notice content, format, and distribution.

4-2 Responsibilities of the System Manager. The Privacy Act requires that a System Manager be designated for each system of records. More detailed duties are contained in Appendix E. This individual is responsible for:

- A. Using the System Development Methodology (SDM) as a reference in the planning, preparation, execution, and administration of HUD's various system development activities and business areas. A copy of the document is available from the Office of Information Policies and Systems (IPS), Systems Engineering Group (SEG), Development Technology Division (DTD), Mainframe Technology Branch.
- B. Establishing the policies, practices, and procedures governing the operation, maintenance, and release of records in the system, including appropriate physical, administrative, and

4-1

10/95

1325.01 REV-1

technical safeguards to prevent unauthorized disclosure of information from the system.

- C. Establishing procedures and guidelines to ensure that information and data in the system are accurate and necessary; to ensure that an accounting of disclosure is maintained or can be constructed; and to ensure that the routine uses of the system are compatible with the purposes for which the information was collected.
- D. Establishing procedures for access, correction, or amendment

of records that conform to the requirements of this chapter and HUD regulations governing the Privacy Act.

- E. Ensuring that systems of records notices are kept current and accurate with particular emphasis ensuring that routine use statements are correct and accurate.
- F. Preparing drafts of new or altered system reports and related documents and ensuring that systems of records are not operated without first preparing the draft notices and reports and coordinating with the Privacy Act Officer for guidance prior to finalizing the documents.
- G. Reviewing routine use statements every 3 years to ensure that the disclosures of records under each routine use are still compatible with the purpose for the system of records.
- H. Conducting risk assessments of new or altered systems of records to ensure that appropriate administrative, technical, and physical safeguards are established to protect records in the system from unauthorized disclosure or invasion of privacy.

4-3 Situations Requiring a Report and Federal Register Notice.

- A. **New and Altered System of Records Report.** The Privacy Act requires agencies to publish notices in the Federal Register describing new or altered systems of records, and to submit reports to OMB, and to the Chair of the Committee on Government Operations of the House of Representatives, and the Chair of the Committee on Governmental Affairs of the Senate. See Exhibits 4-1 and 4-2 for examples of a new and an altered System of Records Notice. A notice is also required when an agency conducts a new or altered computer matching program.

10/95

4-2

1325.01 REV-1

More specific details relating to this requirement is provided under 5-4. The Privacy Act Officer will work with the system managers to prepare the reports. The reports must be transmitted at least 40 days prior to the operation of the new system of records or the date on which the alteration to an existing system takes place. A new system is one for which no public notice is currently published in the Federal Register. Examples of changes constituting an altered system of records follow:

1. A significant increase in the number of individuals about whom records are maintained. For example, a decision to expand a system that originally covered only residents of public housing in major cities to cover such residents nationwide would require a report. Increases attributable to normal growth should not be reported.
2. A change that expands the types of categories of information maintained. For example, a file covering

single family mortgagors that has been expanded to include multifamily mortgagors would require a report.

3. A change that alters the purpose for which the information is used.
 4. A change to equipment configuration (either hardware or software) that creates substantially greater access to the records in the system. For example, locating interactive terminals at field offices for accessing a system formerly accessible only at Headquarters would require a report.
- B. Minor changes to systems of records need not be reported. For example, a change in the designation of the system manager due to a reorganization would not require a report, so long as an individual's ability to gain access to his or her records is not affected. Other examples include changing applicable safeguards as a result of a risk analysis or deleting a routine use when there is no longer a need for the disclosure.
- C. Exemption Rule. The content of some systems of records may be exempted from the requirement that individuals be permitted access to records through an informal rulemaking process. This process requires publication of a proposed rule, a final

4-3

10/95

1325.01 REV-1

rule, and the adoption of the final rule. Agencies may not withhold records under an exemption until these requirements have been met.

4-4 Contents of the New or Altered System Report. The report for a new or altered system has three elements: a transmittal letter, a narrative statement, and supporting documentation that includes a copy of the proposed Federal Register Notice. There is no prescribed format for either the letter or the narrative statement. The notice must appear in the format prescribed by the Office of the Federal Register's Document Drafting Handbook. Specific requirements relating to the content of the notice are described below. The System Manager will prepare a draft of the system notice and forward it to the Privacy Act Officer to finalize. The Privacy Act Officer will prepare the remaining documentation.

- A. Transmittal Letters. The transmittal letter will be signed by the Assistant Secretary for Administration. It should contain the name and telephone number of the individual who can best answer questions about the system of records.
- B. Narrative Statement. The narrative statement should be brief. It should make reference, as appropriate, to information in the supporting documentation rather than restating such information. The statement should:
 1. Describe the purpose for which the agency is establishing the system of records.

2. Identify the authority under which the system of records is maintained. The underlying programmatic authority for collecting, maintaining, and using the information should be cited. When the system is being operated to support an agency housekeeping program, e.g., a carpool locator, cite a general housekeeping statute that authorizes the department to keep such records as necessary.
3. Provide the probable or potential effect of the proposal on the privacy of individuals.
4. Provide a brief description of the steps taken to minimize the risk of unauthorized access to the system of records. A more detailed assessment of the risks and specific administrative, technical, procedural, and physical

10/95

4-4

1325.01 REV-1

safeguards established should be available to OMB upon request.

5. Explain how each proposed routine use satisfies the compatibility requirement of subsection (a) (7) of the Act. For altered systems, this requirement pertains only to any newly proposed routine use.
 6. Provide OMB Control Numbers, expiration dates, and titles of any OMB approved information collection request (e.g., forms, surveys, etc.) contained in the system of records. If the request for OMB clearance of an information collection is pending, state the title of the collection and the date it was submitted to OMB for clearance.
- C. Supporting Documentation. Attach the following to all new or altered system of records reports:
1. A copy of the new or altered system of records notice in Federal Register format. For proposed altered systems a copy of the original system of records notice should be included to ensure that reviewers can understand the changes proposed.
 2. A copy of any new exemption rules or changes to published rules that are proposed to issue for the new or altered system.

4-5 Timing, OMB Concurrence, and Publication of the Federal Register Notice.

- A. Timing. The Act requires agencies to publish notices in the Federal Register describing new or altered reports 40 days prior to the establishment of a new system of records or prior to the implementation of the amendment to the system of records. Another 40 days should be added to this timeframe to accommodate the time required to prepare the report and obtain appropriate concurrences. All new and altered notices must be

routed through the Office of General Counsel, the initiating Office, and the Privacy Act Officer for approval.

- B. OMB Concurrence. Approval is assumed, if OMB has not commented within 40 days from the date the transmittal letter was signed. System of records and routine use notices can be published in the Federal Register at the same time that the new or altered system report is sent to OMB and Congress.

4-5

10/95

1325.01 REV-1

The period for OMB and congressional review and the notice and comment period for routine uses and exemptions will then run concurrently. Note that exemptions must be published as final rules before they are effective.

- C. Notice of Records. The Office of the Federal Register prescribes the format that must be followed for Notices published in the Federal Register. (See the Federal Register Document Drafting Handbook). The Privacy Act requires the publication of specific information concerning systems of records described below:
1. System Name: This is, the name assigned to the system by the Office responsible for the system of records. It should reflect a general description of the contents of the system of records.
 2. System location: The address of each location where the system or a portion thereof is maintained is listed here. If the records are maintained in numerous locations, an address directory may be appended to the system or placed at the end of the system notice.
 3. Categories of individuals covered by the system: This lists the categories of individuals about whom records are maintained in the system; e.g., "All persons applying for HUD insured mortgages." By reading this heading, an individual should be able to determine if information about him is contained in the system.
 4. Categories of Records in the System: This describes the types of records maintained in the system; "individual pay records, individual leave records...." This, too, should help an individual determine if records about him are maintained in the system.
 5. Authority for maintenance of the system: This identifies the Federal statute or Presidential Executive Order that authorizes the agency to maintain the system of records. For example, if you are collecting or retrieving information by an individual's social security number (SSN), you must cite the regulation which permits this collection.

10/95

4-6

6. Routine uses of records maintained in the system, including categories of users and the purposes of such uses: This section must include all the routine uses established for the system. Remember, a routine use is a disclosure outside the agency i.e., HUD maintaining the record for a purpose which is compatible with the purpose for which it was collected. List the entities external to HUD having a need to know the information, e.g., the Internal Revenue Service (IRS), Office of Personnel Management (OPM), the General Accounting Office (GAO), Office of Management and Budget (OMB), etc. Generally, failure to include a particular routine use could prohibit a record from being disclosed without the individual's prior written consent. However, nonconsensual disclosure can be made if some other exception in subsection (b) of the Privacy Act applies.

7. Policies and practices for storing, retrieving, accessing, retaining, and disposing of records in the system: Under this section the following subsections must be listed:

Storage: This describes the methods used to store the records; e.g.,; ...on paper in file folders, on computer tapes..."

Retrievability: This describes what personal identifiers are used to index and retrieve records in the system; e.g., "Records are retrieved by individuals' names and SSN."

Safeguards: Here the measures used to protect the records from unauthorized access or disclosure are listed; e.g. "Records are stored in locked cabinets in rooms to which access is limited to those personnel who service the records."

Retention and disposal: This reveals the length or time the records are maintained and the means of disposal; e.g., "Records are maintained for 15 years after which they are destroyed by shredding."

8. System manager(s) and address: Here is listed the title and complete mailing address of the individual responsible for implementing the policies and practices regarding the system as outlined in the notice e.g.,

4-7

10/95

1325.01 REV-1

the Division Director.

9. Notification Procedures: Include the following standard language: "For information, assistance, or inquiry about the existence of records, contact the Privacy Act Officer

at the appropriate location, in accordance with procedures in 24 CFR part 16. A list of all locations is given in Appendix B."

10. Contesting record procedures: Include the following standard language: "The Department's rules for contesting the contents of records and appealing initial denials, by the individual concerned, appear in 24 CFR part 16. If additional information or assistance is needed, it may be obtained by contacting: (i) In relation to contesting contents of records, the Privacy Act Officer at the appropriate location (a list of all locations is given in Appendix A) and (ii) in relation to appeals of initial denials, the Department of Housing and Urban Development Departmental Privacy Appeals Officer, Office of General Counsel, Department of Housing and Urban Development, 451 Seventh Street, Southwest, Washington, DC 20410."
11. Record source categories: This describes who, where, or what the information is usually taken from, in general terms (i.e., specific individuals, organizations, or instructions need not be identified), e.g., "Information is obtained from the record subjects, their previous employers, ..."
12. Exemptions from Certain Provisions of the Act: If no exemption has been established for the system, indicate "None." If an exemption has been established, state under which provisions of reference (a) it is established (i.e., "Parts of this record system may be exempt under reference (a), subsection (k) (2).").

10/95

4-8

1325.01 REV-1

EXHIBIT 4-1 SAMPLE OF A NEW SYSTEM OF RECORDS NOTICE

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Office of the Secretary

[Docket No.]

Privacy Act of 1974; New System of Records

AGENCY: Department of Housing and Urban Development (HUD)

ACTION: Establish a New System of Records.

SUMMARY: The Department of Housing and Urban Development (HUD) proposes to establish a new record system to add to its inventory of systems of records subject to the Privacy Act of 1974 (5 U.S.C. 552a), as amended.

EFFECTIVE DATE: This action will be effective without further notice on (insert date thirty days after date published in the Federal Register) unless comments are received that would result in a contrary determination.

ADDRESSES: Interested persons are invited to submit comments regarding this new system of records to the Rules Docket Clerk, Office of General Counsel, room 10276, Department of Housing and Urban Development, 451 Seventh Street, SW, Washington, DC 20410-0500. Communications should refer to the above docket number and title. An original and four copies of comments should be submitted. Facsimile (FAX) comments are not acceptable. A copy of each communication submitted will be available for public inspection and copying between 7:30 a.m. and 5:30 p.m. weekdays at the above address.

FOR FURTHER INFORMATION CONTACT: Jeanette Smith, Departmental Privacy Act Officer, Telephone Number (202) 708-2374, or William H. Eargle, Director, Office of Finance and Accounting, Telephone Number (202) 708-3310. (These are not toll free numbers.)

SUPPLEMENTARY INFORMATION: Pursuant to the Privacy Act of 1974 (5 U.S.C. 552a), as amended, notice is given that HUD proposes to establish a new system of records identified as HUD/DEPT- entitled Departmental Accounts

4-9

10/95

entitled Departmental Accounts Receivable Tracking/Collection System (DARTS--D21).

Title 5 U.S.C. 552a(e) (4) and (11) provide that the public be afforded a 30-day period in which to comment on the new record system.

The new system report, as required by 5 U.S.C. 552a(r) of the Privacy Act was submitted to the Committee on Governmental Affairs of the United States Senate, the Committee on Government Reform and Oversight of the House of Representatives and the Office of Management Budget (OMB) pursuant to paragraph 4c of Appendix I to OMB Circular No. A-130, Federal Agency Responsibilities for Maintaining Records About Individuals, dated June 25, 1993 (58 FR 36075, July 2, 1993).

AUTHORITY: 5 U.S.C. 552a

Issued at Washington, DC _____

Marilynn A. Davis
Assistant Secretary for Administration

10/95

4-10

1325.01 REV-1

HUD/DEPT-

SYSTEM NAME:

Departmental Accounts Receivable Tracking/Collection System (DARTS--D21)

SYSTEM LOCATION:

HUD Computer Center, Lanham, Maryland

CATEGORIES OF INDIVIDUALS COVERED BY THE SYSTEM:

Current or former HUD employees or individual participants in HUD programs whose debts to HUD are more than 90 days delinquent.

CATEGORIES OF RECORDS IN THE SYSTEM:

Delinquent debts owed by current or former HUD employees for advances, i.e., travel, payroll, etc., and debts owed by individuals arising from overpayments, audits, court order, et al.

AUTHORITY FOR MAINTENANCE OF THE SYSTEM:

Debt Collection Act of 1982, Pub. L. 97-365.

ROUTINE USES OF RECORDS:

In addition to those disclosures generally permitted under 5 U.S.C. 552 a(b) of the Privacy Act, these records, or information contained therein, may specifically be disclosed outside of the agency as a routine use pursuant to 5 U.S.C. 552a(b) (3) as follows, provided that no routine use listed shall be construed to limit or waive any other routine use specified herein:

- (a) Internal Revenue Service-- for the purpose of effecting an administrative offset against the debtor for a delinquent debt owed to the U.S. Government by the debtor.
- (b) Department of Justice-- for prosecution of fraud, and for the institution of suit or other proceedings to effect collection of claims.

4-11

10/95

1325.01 REV-1

- (c) General Accounting Office--for further collection action on any delinquent account when circumstances warrant.
- (d) Outside collection agencies and credit bureaus--for the purpose of either adding to a credit history file or obtaining a credit history file on an individual for use in the administration of debt collection for further collection action.

DISCLOSE TO CONSUMER REPORTING AGENCIES:

Disclosure pursuant to 5 U.S.C. 552a(b) (12) may be made from this record system to consumer reporting agencies as defined in the Fair Credit Reporting Act (15 U.S.C. 1681a(f) or the Federal Claims Collection Act of 1966 (31 U.S.C. 3701(a) (3)). The disclosure is limited to information necessary to establish the identity of the individual, including name, address, and taxpayer identification number (Social Security Number); the amount, status, and history of the claim, and the agency or program under which the claim arose for the sole purpose of allowing the consumer reporting agency to prepare a commercial credit report.

POLICIES AND PRACTICES, FOR STORING, RETRIEVING, ACCESSING, RETAINING

AND DISPOSING OF RECORDS IN THE SYSTEM:

Storage: Hard copy files are kept in a locked room, computer records are stored in limited access files in DARTS.

Retrievability: Records are retrieved by social security number (SSN) or name.

Safeguards: These records are available only to those persons whose official duties require such access. Records are kept in limited access areas during duty hours and in locked room at all other times.

RETENTION AND DISPOSAL: As prescribed in the General Records Schedule or for 10 years after debt is paid at a maximum.

SYSTEM MANAGER AND ADDRESS:

Director, Office of Finance and Accounting, 451 7th St S.W., Washington, D.C. 20410.

NOTIFICATION PROCEDURE:

Individuals seeking to determine whether information about themselves is contained in this system should address written inquiries to the particular HUD administrator or component listed in the "system manager" location above.

10/95

4-12

1325.01 REV-1

Individuals should furnish full name, Social Security Number, current address and telephone number.

RECORD ACCESS PROCEDURES:

Same as above.

RECORD SOURCE CATEGORIES:

Information in this system of records is obtained from the subjects, Personnel and Payroll systems, HUD's Central Accounting Program System (CAPS), Office of the Inspector General, Office of General Counsel, and other government agencies such as the Department of Justice, General Accounting Office, the Office of Personnel Management, the Departmental Claims Officer (DCO) and documents submitted by various court systems.

EXEMPTIONS FOR CERTAIN PROVISIONS OF THE ACT:

None.

4-13

10/95

1325.01 REV-1

EXHIBIT 4-2 SAMPLE OF AN ALTERED OR AMENDED
SYSTEM OF RECORDS NOTICE
DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Office of the Secretary [Docket No.]
Privacy Act of 1974; Proposed Amendment
to a Systems of Records

AGENCY: Department of Housing and Urban Development (HUD).
ACTION: Notification of a proposed amendment to an existing system of records.
SUMMARY: The Department of Housing and Urban Development (HUD) proposes to amend its system of records entitled "Accounting Records, HUD/DEPT-2" in its inventory of systems of records notices subject to the Privacy Act of 1974 (5 U.S.C. 552a), as amended. Notice of this system was last published at 55 FR 17676, April 26, 1990.
EFFECTIVE DATE: This action will be effective without further notice on (insert date thirty days after date published in the Federal Register) unless comments are received that would result in a contrary determination.
ADDRESSES: Interested persons are invited to submit comments regarding the proposed amendment to the Rules Docket Clerk, Office of General Counsel, Room 10276, Department of Housing and Urban Development, 451 Seventh Street,

10/95

4-14

1325.01 REV-1

SW, Washington, DC 20410-0500. Communications should refer to the above docket number and title. An original and four copies of comments should be submitted. Facsimile (FAX) comments are not acceptable. A copy of each communication submitted will be available for public inspection and copying between 7:30 a.m. and 5:30 p.m. weekdays at the above address. FOR FURTHER INFORMATION CONTACT: Jeanette Smith, Departmental Privacy Act Officer, at (202) 708-2374, or Mary Felton at (202) 708-4256. These are not toll-free numbers.

SUPPLEMENTARY INFORMATION: HUD/DEPT-2 contains a variety of records relating to HUD's accounting functions. These records are maintained for the purpose of supporting HUD's administrative management and collection of delinquent debts, including past due loan payments, overpayments, fines, penalties, fees, damages, interest, leases, sales of real property, that are owed to HUD or to other Federal agencies. Pursuant to the Privacy Act of 1974 (5 U.S.C. 552a), as amended, notice is given that HUD proposes to modify some of the general routine uses and add new routine uses to this system of records. The revised routine uses (items (i), (k) and (l)) more specifically identify the categories of users (i.e., other Federal agencies) to whom records may be disclosed pursuant to authorized and approved computer matching programs undertaken for debt collection purposes. In addition, HUD is amending other routine uses (items (j), (m), (n), (o), and (p))

4-15

10/95

1325.01 REV-1

to permit more effective administrative management and collection of delinquent claims and debts owed to the U.S. Government under any programs administered by HUD.

The amended portion of the system notice is set forth below. Previously, the system and a prefatory statement containing the general routines uses applicable to all HUD systems of records was published in the "Federal Register Privacy Act Issuances, 1989 Compilation, Volume I."

Title 5 U.S.C. 552a(e) (4) and (11) provide that the public be afforded a 30-day period in which to comment on the new record system.

The system report, as required by 5 U.S.C. 552a(r), has been submitted to the Committee on Government Operations of the House of Representatives, the Committee on Governmental Affairs of the Senate, and the Office of Management and Budget (OMB), pursuant to paragraph 4c of Appendix I to OMB Circular A-130, "Federal Agency Responsibilities for Maintaining Records about Individuals" dated June 25, 1993 (58 FR 36075, July 2, 1993). AUTHORITY: 5 U.S.C. 552a; 88 Stat. 1896; sec 7(d), Department of HUD Act (42 U.S.C. 3535(d)).
Issued at Washington, D.C._____.

Marilynn A. Davis
Assistant Secretary for Administration

10/95

4-16

1325.01 REV-1

HUD/DEPT-2

System Name: Accounting Records.

Routine uses of Records Maintained in the System, including Categories of Users and the Purpose of Such Uses:

In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act, other routine uses are as follows:

- (a): To the U.S. Treasury--for disbursements and adjustments thereof.
- (b) To the Internal Revenue Service--for reporting of sales commissions and for reporting of discharged indebtedness;
- (c) To the General Accounting Office, General Service Administration, Department of Labor, Labor housing authorities, and taxing authorities--for audit, accounting and financial reference purposes.
- (d) To mortgage lenders--for accounting and financial reference purposes, for verifying information provided by new loan applicants and evaluating creditworthiness.

4-17

10/95

1325.01 REV-1

- (e) To HUD contractors--for debt and/or mortgage note servicing.
- (f) To financial institutions that originated or serviced loans--to give notice of disposition of claims.
- (g) To title insurance companies--for payment of liens.
- (h) To local recording offices--for filing assignments of legal documents, satisfactions, etc.
- (i) To the Defense Manpower Data Center (DMDC) of the Department of Defense and the U.S. Postal Service to conduct computer matching programs for the purpose of identifying and locating individuals who are receiving Federal salaries or benefit payments and are delinquent in their repayment of debts owed to the U.S. Government under certain programs administered by HUD in order to collect the debts under the provisions of the Debt Collection Act of 1982 (Pub.L. 97-365) by voluntary repayment, or by administrative or salary offset procedures.
- (j) To any other Federal agency for the purpose of effecting

administrative or salary offset procedures against a person employed by that agency or receiving or eligible to receive some benefit payments from the agency when HUD as a creditor has a claim against that person.

10/95

4-18

1325.01 REV-1

- (k) With other agencies; such as, Departments of Agriculture, Education and Veteran Affairs, and the Small Business Administration--for use of HUD's Credit Alert Interactive Voice Response System (CAIVRS) to prescreen applicants for loans or loans guaranteed by the Federal Government to ascertain if the applicant is delinquent in paying a debt owed to or insured by the Government.
- (l) To the Internal Revenue Service by computer matching to obtain the mailing address of a taxpayer for the purpose of locating such taxpayer to collect or to compromise a Federal claim by HUD against the taxpayer pursuant to 26 U.S.C. 6103(m)(2) and in accordance with 31 U.S.C. 3711, 3217, and 3718.
- (m) To a credit reporting agency for the purpose of either adding to a credit history file or obtaining a credit history file on an individual for use in the administration of debt collection.
- (n) To the U.S. General Accounting Office (GAO), Department of Justice, United States Attorney, or other Federal agencies for further collection action on any delinquent account when circumstances warrant.
- (o) To a debt collection agency for the purpose of collection services to recover monies owed to the U.S. Government under certain

4-19

10/95

1325.01 REV-1

programs or services administered by HUD.

- (p) To any other Federal agency including, but not limited to, the Internal Revenue Service (IRS) pursuant to 31 U.S.C. 3720A, for the purpose of effecting an administrative offset against the debtor for a delinquent debt owed to the U.S. Government by the debtor.

Disclosure to consumer reporting agencies:

Disclosures pursuant to 5 U.S.C 552a(b)(12). Pursuant to 5 U.S.C. 552a(b)(12), disclosures may be made from the record system to consumer reporting agencies as defined in the Fair Credit Reporting Act (15 U.S.C. 1681a(f) or the Federal Claims Collection Act of 1966, 31 U.S.C. 3701(a) (3)). The disclosure is limited to information necessary to establish the identity of the individual, including name, address and taxpayer identification number (Social Security Number); the amount, status, and history of the claim, and the agency or program under which the claim arose for the sole purpose of allowing the consumer reporting agency to prepare a credit report.

Policies and Practices for Storing, Retrieving, Accessing, Retaining, Disposing of Records in the System and Safeguards:

10/95

4-20