

PERSONAL AUTHENTICATION SERVICE (PAS) FSA ID Data Elements Collected and Justification

| Data Element Collected | Justification |
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| First Name | Used in creating an account to distinguish users. Also, used for matching with the Social Security Administration to confirm identity and matching with FSA databases. |
| Middle Initial (optional) | For differentiation of individuals if first and last name are the same. |
| Last Name | Used in creating an account to distinguish users. Also, used for matching with the Social Security Administration to confirm identity and matching with FSA databases. |
| Acknowledgement that user is 13 or Older | Used to ensure users are 13 or older in order to comply with the Children's Online Privacy Protection Act of 1998 (15 U.S.C. 6501 et seq.). |
| Date of Birth | Used in creating an account to distinguish users. Also, used for matching with the Social Security Administration to confirm identity and matching with FSA databases. |
| Username | Self-created userid for use with password when accessing FSA systems. Used instead of PII to protect user information and strengthen security. |
| Password | Self-created password for use with the username when accessing FSA systems. Used instead of PII to protect user information and strengthen security. |
| Email Address | Unique email address used for communication with users. |
| Mailing Address (Address, City, State, Zip) | For confirming identity and communicating with users, if necessary by US mail. |
| Social Security Number | Public Law 89-329, Sections 401-495, the Higher Education Act of 1965, as amended (HEA), mandates that the Secretary of Education "shall produce, distribute, and process free of charge common financial reporting forms as described in this subsection to be used for application and reapplication to determine the need and eligibility of a student for financial assistance...". As part of this process the Social Security Number is used to create an account and distinguish users. It is also used for matching with the Social Security Administration to confirm identity and matching with FSA databases. |
| Telephone Number (optional) | For use when contacting the user. |
| Alternate Telephone Number (optional) | For use when contacting the user. |
| Challenge Questions | User selects 3 challenge questions to be used when they have forgotten their password or |

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| | |
|---|---|
| | username |
| Challenge Answers | User provides answers to the 3 Challenge Questions. One of the three answers must be numeric for account access through phone self-service (via Interactive Voice Response Unit (IVRU)) |
| Challenge Questions - User Created | User creates 2 questions to be used when they have forgotten their passwords |
| Challenge Answers for User Created Questions | User provides 2 answers to be used when they have forgotten their passwords. One of the two answers must be numeric for access to the FSA IVRU system. |
| Language Preference (optional) | Used to select a preference for presentation of information in English or Spanish. |