



Trusted Solutions for Higher Education

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## SUPPLEMENT

### THIRD PARTY SERVICER EVALUATION

#### RESPONSES

The answers to our Third Party Servicer Evaluation form (Appendix Form J-3) are shown below and supported by the additional documents in the Chapter 9 Supplement. This information is updated annually.

It is important that you print this document and transfer these answers onto our Third Party Servicer Evaluation form, then attach the remaining documents from this Chapter 9 Supplement, as well as our Audit and any other items referenced below. Do not simply print this document and attach the items referenced above, then provide them to your ED Program Review Officer as this could be misinterpreted as a lack of a serious evaluation.

#### **Legal Measures**

1. We previously provided this to your school. If you need an additional copy, create a Client Solution Center ticket and it will be provided to you.
2. All answers are "Yes".
3. All answers are "Yes".
4. All answers are "Yes".

#### **Performance Measures**

1. Our answer is "Yes".
2. Our answer is "Yes".
3. First question - our answer is "School".  
Second question - our answer is "Yes" and we are doing this on a regular basis starting 7/1/16.  
Third question – our answer is we will perform training for school personnel and review additional files if necessary.
4. First question - our answer is "School".  
Second question - our answer is "Yes" and we are doing this on a regular basis starting 7/1/16.  
Third question – our answer is we will perform training for school personnel and review additional files if necessary.
5. Our answer is we conduct daily returns of excess cash in G5 and weekly oversight by management & executive teams.
6. All answers are "Yes".
7. Our answer is "Yes".
8. Our answer is "Yes". All FISAPs have been filed timely for 40 years.
9. Our answer is by attending the FSA Annual Conference, various regional conferences, NASFAA webinars, evaluating the annual FSA Handbook and communicating directly with U.S. Department of Education (ED) contacts. Listings of internal & external trainings are provided following the Responses portion of this Supplement.
10. All answers are "Yes". FAME's Financial Aid Services Procedures Manual is available on FAME Connect.
11. The person at your school who is responsible for your school's annual Compliance Audit is provided annually a copy of our annual Compliance Audit when they request FAME's audit package. That person can provide you a copy.
  - Third Party Servicers were required to have annual Compliance Audits since 12/31/1996. Since that time, FAME has always had our Compliance Audit completed and submitted to ED within the required deadline.
  - FAME has never had any Compliance Audit findings.
12. ED performed a Program Review of FAME's systems in October 2011.
  - There were no findings.
  - ED has never placed any sanctions on FAME.
13. The school should go to the General Services Administration's (GSA) System for Award Management (<http://www.sam.gov>) to determine if ED has sanctions on FAME.
14. Our answer is "Yes". The latest internal audit was completed January 2018.

### **Security Measures**

1. We provide our FTC mandated plans following the Responses portion of this Supplement. The school can evaluate and determine their suitability.
  - Consumer Information Security Plan (data integrity) (Gramm-Leach-Bliley Act),
  - Identity Theft Prevention Program (ID Theft) (Red Flags Rule).
2. We comply with FERPA by not releasing student information to anyone unless permissible under FERPA regulations. We provide clients with a Record of Disclosure (FAME Form 5021) indicating any FAME staff that accessed a student's file on a particular date. Schools are instructed to place the form in the student's file.
3. We provide a copy of our Disaster Recovery Plan following the Responses portion of this Supplement. The school can review and determine its suitability.

### **Stability Measures**

1. Our answer is "Yes".
2. Our answer is 40 years.
3. The school should make this determination.
4. Our answer is "Yes".
5. Our answer is "Yes" to both questions.
6. Our spreadsheet showing this data follows the Responses portion of this Supplement.
7. Our answer is "No".
8. Our answers are
  - state financial aid association – Yes (FASFAA)
  - NASFAA - Yes
9. Our answer is "Yes". We are affiliated with Career Education Colleges and Universities (CECU), American Association of Cosmetology School (AACCS), Transnational Association of Christian Colleges and Schools (TRACS), Private Career Colleges and Schools (PCCS) and Career Colleges Ontario (CCO).

### **Considerations beyond ED Compliance**

1. Our answer is "Yes".
2. Our answer is "Yes".
3. Our answer is "Yes".
4. Our answer is "Yes".
5. Our answer is "Yes".

**FAME**  
**Third Party Servicer Evaluation - Responses**  
**External & Internal Training History Report**  
**7/1/2018 - 5/21/2019**

<b>Date</b>	<b>Title</b>	<b>Target Audience</b>	<b>Duration</b>	<b># Attended</b>
05/21/2019	Freedom Training Part II	External	2 hrs	19
05/20/2019	Freedom Training Part I	External	1 hr 51 mins	31
05/15/2019	FAME Webinar 2019-20 Verification	External & Internal	1 hr 22 mins	268
05/07/2019	Freedom Training Part II	External	2 hrs 21 mins	1
05/06/2019	Freedom Training Part I	External	2 hrs 11 mins	1
05/03/2019	FIR070 - AFA Overview	External	2 hrs	1
05/02/2019	SCH003 - Custom Freedom Finaid Training	External	1 hr	1
05/02/2019	NAT201 - ESP Walkthrough	External	2 hrs	1
05/01/2019	Freedom FinAid Training	External	2 hrs 20 mins	1
04/30/2019	NAT201 - ESP Walkthrough	External	2 hrs 19 mins	1
04/22/2019	NAT201 - ESP Walkthrough	External	2 hrs	1
04/18/2019	ESP Training	External	1 hr 42 mins	1
04/17/2019	Freedom FinAid Training	External	1 hr 2 mins	10
04/16/2019	ESP Training	External	32 mins	1
04/16/2019	Freedom Training Part II	External	1 hr 34 mins	16
04/15/2019	Freedom Training Part I	External	1 hr 30 mins	17
04/11/2019	FAME Annual Conference	External & Internal	8 hrs	200
04/10/2019	FAME Annual Conference	External & Internal	8 hrs	200
04/09/2019	FAME Annual Conference	External & Internal	8 hrs	200
04/05/2019	PRO165 - Freedom Finaid Walkthrough	External	1 hr	1
03/26/2019	DSS418 - D&S School of Cosmetology AFA Walkthrough	External	1 hr	1
03/26/2019	GOO430 - Freedom Finaid Walkthrough	External	2 hrs	2
03/26/2019	UNI970 - Student Accounts & Financial Aid Training	External	1 hr 17 mins	2
03/22/2019	Christine Valmy - Special Freedom Training	External	2 hrs 8 mins	6
03/21/2019	RCBH Advantage Training - Academics and Faculty Modules	External	1 hr 14 mins	3
03/20/2019	Freedom FinAid Training	External	1 hr 41 mins	2
03/19/2019	PRO165 - Freedom Finaid Walkthrough	External	2 hrs	2
03/18/2019	DSS418 - D&S School of Cosmetology AFA Overview	External	2 hrs 19 mins	2
03/15/2019	MIX595 - FFA Walkthrough	External	2 hrs	2
03/14/2019	RCBH Advantage Training - Student Accounts and Placement Modules	External	1 hr 7 mins	6
03/14/2019	Financial Aid Training Series: Common Audit and Program Review Findings	External	58 mins	1
03/13/2019	Freedom FinAid Training	External	2 hrs 7 mins	4
03/13/2019	RCBH Advantage Training - Admissions and Financial Aid Modules	External	1 hr 36 mins	6
03/12/2019	Freedom Training Part II	External	2 hrs 20 mins	1
03/11/2019	Freedom Training Part I	External	2 hrs 4 mins	2
03/07/2019	PRO165 - Freedom Finaid Walkthrough	External	1 hr	1
03/06/2019	Americare Advantage Training - Placement & Student Accounts Modules	External	2 hrs 25 mins	4
03/05/2019	Americare Advantage Training - Academics & Faculty Modules	External	1 hr 51 mins	4
03/04/2019	Americare Advantage Training - Admissions & Financial Aid Modules	External	2 hrs 25 mins	4
02/28/2019	2019 Federal Update - Session 2	Internal	1 hr	40
02/28/2019	2019 Federal Update - Session 1	Internal	1 hr	44
02/27/2019	Freedom FinAid Training	External	2 hrs 40 mins	1
02/22/2019	VOC112 - ESP Training	External	2 hrs 7 mins	1
02/19/2019	ELE300 - ESP Overview	External	2 hrs	1
02/18/2019	Advantage Turnover 4.0 Internal Training	Internal	1 hr 44 mins	12
02/13/2019	PRO165 - Freedom Finaid Walkthrough	External	1 hr	1
02/12/2019	VOC112 - ESP Training	External	1 hr 30 mins	1
02/08/2019	CAL710 - ESP Training	External	1 hr	2

02/08/2019	PRO165 - Freedom Finaid Walkthrough	External	30 mins	1
02/06/2019	Freedom FinAid Training	External	1 hr 30 mins	1
02/06/2019	FAME Webinar - Cost of Attendance	External	1 hr 15 mins	136
02/05/2019	PRO165 - Freedom Finaid Walkthrough	External	1 hr	1
02/05/2019	Freedom Training Part II	External	2 hrs 46 mins	3
02/04/2019	Freedom Training Part I	External	2 hrs 25 mins	4
02/01/2019	PRO165 - Freedom Finaid Walkthrough	External	1 hr	1
01/31/2019	JOS165 - Freedom Finaid Walkthrough	External	1 hr	1
01/29/2019	Freedom Training Part II	External	2 hrs 27 mins	2
01/28/2019	Freedom Training Part I	External	1 hr 58 mins	2
01/28/2019	HEA571 - Freedom Finaid Walkthrough	External	30 mins	2
01/28/2019	CAL710 - ESP Training	External	1 hr	2
01/25/2019	CAL710 - ESP Training	External	1 hr	2
01/23/2019	NASFAA - Which is it: A correction, Update or a PJ?	External	1 hr 30 mins	2
01/22/2019	HEA571 - Freedom Finaid Walkthrough	External	45 mins	3
01/22/2019	ARI464 - AFA Overview	External	1 hr 41 mins	2
01/18/2019	CAL710 - ESP Training	External	1 hr 30 mins	2
01/17/2019	SOU105 - Freedom Finaid Walkthrough	External	30 mins	1
01/17/2019	CAL710 - ESP Training	External	45 mins	2
01/15/2019	HEA571 - Freedom Finaid Walkthrough	External	1 hr	3
01/14/2019	HEA571 - Freedom Finaid Walkthrough	External	45 mins	3
01/10/2019	ESP Training	External	2 hrs 54 mins	1
01/09/2019	ESP Training - Shawn Rauckman	External	1 hr 51 mins	1
01/09/2019	Freedom FinAid Training	External	2 hrs 6 mins	1
01/08/2019	Freedom Training Part II	External	2 hrs 53 mins	1
01/07/2019	Freedom Training Part I	External	1 hr 50 Mins	1
01/07/2019	CAL710 - ESP Training	External	2 hrs	2
01/04/2019	Mark Richardson Schools - Freedom Training Part II	External	1 hr 42 mins	5
01/03/2019	Mark Richardson Schools - Freedom Training Part I	External	2 hrs 16 mins	5
01/03/2019	CAL710 - ESP Training	External	45 mins	2
01/02/2019	Freedom FinAid Training	External	2 hrs 26 mins	10
12/13/2018	Penrose Academy Conference Training	External	54 mins	1
12/12/2018	NASFAA - A Day Short and a Dollar..Late?	Internal	1 hr	4
12/12/2018	FAME Webinar - Change: Practical Implication in a Work Environement	External	1hr 30 mins	76
12/12/2018	CAL710 - ESP Training	External	1 hr 30 mins	2
12/11/2018	Freedom Training Part II	External	1 hr 28 mins	6
12/10/2018	Freedom Training Part I	External	1 hr 17 mins	2
12/10/2018	CAL710 - ESP Training	External	1 hr 30 mins	2
12/05/2018	HAI210 - Freedom Finaid Walkthrough	External	30 mins	1
12/04/2018	ELE300 - ESP Overview Refresher	External	1 hr 3 mins	1
12/03/2018	CAL710 - ESP Training	External	1 hr 15 mins	2
11/28/2018	ELE300 - ESP Overview Refresher	External	2 hrs	2
11/27/2018	ELE300 - ESP Overview Refresher	External	1 hr 50 mins	2
11/21/2018	ELE300 - ESP Overview Refresher	External	2 hrs	2
11/16/2018	CAL710 - ESP Training	External	1 hr	1
11/15/2018	PII Awareness Annual Company Training : Session 3	Internal	1 hr 21 mins	20
11/15/2018	PII Awareness Annual Company Training : Session 2	Internal	1 hr 5 mins	28
11/15/2018	PII Awareness Annual Company Training : Session 1	Internal	1 hr 5 mins	28
11/14/2018	NASFAA 2019-20 Verification	Internal	1 hr 30 mins	
11/12/2018	Freedom Training Part I	External	1 hr 14 mins	1
11/08/2018	SOU105 - Freedom Finaid Walkthrough	External	30 mins	1
11/07/2018	UNI144 - Business Office Reports Training	External	2 hrs 23 mins	3
11/06/2018	MYB610 - Freedom Finaid Walkthrough	External	45 mins	2
11/05/2018	SOU105 - Freedom Finaid Walkthrough	External	30 mins	1

11/05/2018	CAL710 - ESP Training	External	2 hrs	1
11/01/2018	CAL710 - ESP Training	External	1 hr	1
11/01/2018	New Audit Guide and What Your School Should Know Now, Be Prepared Tomorrow : Session 2	External & Internal	1 hr 17 mins	116
11/01/2018	New Audit Guide and What Your School Should Know Now, Be Prepared Tomorrow : Session 1	External & Internal	1 hr 28 mins	130
10/31/2018	CEN333 - AFA Training	External	51 min	1
10/30/2018	Freedom Training Part II	External	2 hrs 53 mins	2
10/29/2018	Freedom Training Part I	External	2 hrs 28 mins	2
10/26/2018	Dallas Barber - Freedom Finaid Walkthrough	External	1 hr 41 mins	1
10/26/2018	Dallas Barber - Freedom Finaid Walkthrough	External	1 hr 41 mins	1
10/25/2018	SOU105 - Freedom Finaid Walkthrough	External	30 mins	2
10/23/2018	SOU105 - Freedom Finaid Walkthrough	External	15 mins	2
10/22/2018	SOU105 - Freedom Finaid Walkthrough	External	2 hrs	2
10/22/2018	SAL438 - ESP Overview	External	1 hr 32 mins	3
10/22/2018	Freedom Training Part I	External	2 hrs 15 mins	1
10/19/2018	SOU105 - Freedom Finaid Walkthrough	External	1 hr	2
10/18/2018	Dallas Barber - Freedom Finaid Walkthrough	External	1 hr	1
10/18/2018	AME144 - Freedom Training	External	1 hr	1
10/18/2018	Internal Advantage Overview - Part II	Internal	1 hr 30 mins	3
10/17/2018	Freedom FinAid Training	External	1 hr 43 mins	1
10/16/2018	Freedom Training Part II	External	1 hr 29 mins	1
10/16/2018	CEN333 - AFA Training	External	2 hrs	1
10/15/2018	Internal Advantage Overview - Part I	Internal	1 hr 15 mins	3
10/15/2018	Freedom Training Part I	External	2hrs 13 mins	1
10/08/2018	Career Care Institute Credit Hour Training	External	2 hrs	1
10/08/2018	SAL601 - Freedom Training Part I	External	21 mins	1
10/03/2018	TAY905 & TAY539 - Freedom Finaid Walkthrough	External	1 hr 33 mins	2
10/03/2018	NASFAA Citizenship Status & Title IV Aid Eligibility	Internal	1 hr 30 mins	2
10/01/2018	Freedom Training Part I	External	2 hrs	3
09/27/2018	Pro Way ESP Custom Training	External	33 mins	1
09/25/2018	Freedom Training Part II	External	2 hrs 11 mins	1
09/24/2018	Freedom Training Part I	External	1 hr 41 mins	1
09/21/2018	WOR516 - In House Client Training	External	4 hrs	2
09/20/2018	WOR516 - In House Client Training	External	8 hrs	2
09/19/2018	Legitimacy of High School Transcripts/Diplomas	External & Internal	1 hr 38 mins	134
09/18/2018	MOL350 - FFA Training	External	1 hr 15 mins	2
09/18/2018	Freedom Training Part II	External	1 hr 55 mins	3
09/17/2018	Freedom Training Part I	External	2 hrs 4 mins	3
09/12/2018	JOS224 - Freedom Finaid Walkthrough	External	30 mins	1
09/12/2018	NASFAA Webinar - 2019-20 FAFSA Brave New World	Internal	1 hr	3
09/12/2018	Freedom FinAid Training	External	2 hrs 59 mins	3
09/11/2018	KUL232 Freedom Training Part II - Kulture Kuts Barber Academy	External	1 hr 56 mins	1
09/11/2018	TAY905 & TAY539 - Freedom Finaid Walkthrough	External	1 hr	1
09/10/2018	Freedom Training Part I	External	2hs 20 mins	1
09/07/2018	Dallas Barber - ESP Walkthrough	External	1 hr	1
09/06/2018	FIR070 - AFA Walkthroguh	External	1 hr	1
09/05/2018	Dallas Barber - Freedom Finaid Walkthrough	External	1 hr 30 mins	1
08/30/2018	Dallas Barber - Freedom Finaid Walkthrough	External	1 hr 30 mins	1
08/29/2018	Dallas Barber - Freedom Finaid Walkthrough	External	1 hr 26 mins	2
08/29/2018	FIR070 - AFA Walkthroguh	External	50 mins	2
08/28/2018	Freedom Training Part II	External	2 hrs 59 mins	4
08/27/2018	Freedom Training Part I	External	2 hrs 16 mins	3
08/24/2018	FIR070 - AFA Walkthroguh	External	54 mins	2

08/22/2018	Freedom FinAid Training	External	2 hrs 3 mins	2
08/22/2018	SKI212 - Freedom Finaid Walkthrough	External	1 hr	2
08/22/2018	Medical Prep Institute of Tampa Bay - Student Accounts & Placement Modules	External & Internal	1 hr 24 mins	6
08/21/2018	Medical Prep Institute of Tampa - Academic & Faculty Modules	External & Internal	2 hours	7
08/20/2018	Medical Prep Institute of Tampa Bay Advantage - Admissions & Financial Aid Modules	External & Internal	2 hrs 30 mins	6
08/20/2018	JOS224 - Freedom Finaid Walkthrough	External	1 hr	1
08/17/2018	NYIB Custom Freedom Training	External	2 hrs 48 mins	3
08/15/2018	Freedom FinAid Training	External	1 hr 48 mins	2
08/14/2018	PRE384 - Freedom Finaid Walkthrough	External	1 hr	1
08/13/2018	TAY905 & TAY539 - Freedom Finaid Walkthrough	External	1 hr 30 mins	1
08/10/2018	PRE384 - Freedom Finaid Walkthrough	External	1 hr	1
08/09/2018	ESP Training	External	2 hrs 32 mins	1
08/09/2018	PRE384 - Freedom Finaid Walkthrough	External	1 hr	1
08/08/2018	PRO568/386 - ESP Walkthrough	External	1 hr	1
08/08/2018	Freedom FinAid Training	External	2 hrs	3
08/07/2018	Freedom Training Part II	External	2 hrs 54 mins	1
08/06/2018	TAY905 & TAY539 - Freedom Finaid Walkthrough	External	1 hr	2
08/06/2018	Freedom Training Part I	External	1 hr 50 mins	1
08/03/2018	COS570 - Freedom Finaid Walkthrough	External	2 hrs 30 mins	2
08/02/2018	Cosmetology Collge of Franklin County - Freedom Finaid Walkthrough	External	1 hr 30 mins	1
08/01/2018	NASFAA Webinar - A Deep Dive Into Campus Based Programs	Internal	1 hr 30 mins	4
07/31/2018	Goodfella Barber College - Freedom Finaid Sales Demo	External & Internal	43 mins	3
07/26/2018	PRE384 - Freedom Finaid Walkthrough	External	1 hr 30 mins	1
07/26/2018	HAI210 - Freedom Finaid Walkthrough	External	1 hr	1
07/26/2018	CEN333 - AFA Training	External	2 hrs	2
07/25/2018	TAY905 & TAY539 - Freedom Finaid Walkthrough	External	1 hr	2
07/25/2018	Freedom Finaid Training	External	1 hr 49 mins	2
07/25/2018	Bellus Academy Onsite & Kansas Team	External	8 hrs	5
07/24/2018	Bellus Academy Onsite & Kansas Team	External	6 hrs	5
07/23/2018	FIR070 - AFA Walkthroguh	External	2 hrs	1
07/23/2018	CHA392 - ESP Training	External	1 hr 45 mins	1
07/23/2018	JOS224 - Freedom Finaid Walkthrough	External	50 mins	1
07/23/2018	FIR070 - AFA Overview	External	1 hr 34 mins	1
07/20/2018	TAY905 & TAY539 - Freedom Finaid Walkthrough	External	30 mins	1
07/20/2018	ELA484 - Freedom Finaid Walkthrough	External	1 hr 44 mins	1
07/20/2018	RAP290 & INT140 - Client In House Training	External	4 hrs 30 mins	3
07/19/2018	RAP290 & INT140 - Client In House Training	External	8 hrs	3
07/19/2018	PRE605 - Freedom Finaid Walkthrough	External	3 hrs	1
07/18/2018	ELA484 - Freedom Finaid Walkthrough	External	2 hrs	1
07/18/2018	CAR540 - AFA Walkthrough	External	1 hr	1
07/17/2018	CAR540 - AFA Walkthrough	External	30 mins	1
07/17/2018	PRE605 - Freedom Finaid Walkthrough	External	1 hr	1
07/17/2018	Freedom Training Part II	External	2 hrs 54 mins	1
07/16/2018	CHA142 - Freedom Finaid Walkthrough	External	1 hr	1
07/16/2018	RCB214 - AFA Training Overview	External	2 hrs	1
07/16/2018	Freedom Training Part I	External	1 hr 55 mins	1
07/13/2018	JOS224 - Freedom Finaid Walkthrough	External	1 hr	1
07/13/2018	BSA Onsite Training	External	8 hrs	15
07/11/2018	PRE605 - Freedom Finaid Walkthrough	External	2 hrs	1
07/11/2018	Freedom Finaid Training	External	1 hr 57 mins	3
07/11/2018	JOS224 - Freedom Finaid Walkthrough	External	1 hr 30 mins	1
07/10/2018	DAL935 - ESP Walkthrough	External	1 hr	1
07/10/2018	BRO172 - Freedom Finaid Walkthrough	External	2 hrs	1

07/10/2018	PRO568/386 - ESP Walkthrough	External	1 hr 19 mins	1
07/09/2018	JOS224 - Freedom Finaid Walkthrough	External	30 mins	1
07/09/2018	UST650 - Freedom Finaid Walkthrough	External	1 hr	1
07/09/2018	TAY905 & TAY539 - Freedom Finaid Walkthrough	External	1 hr 16 mins	2
07/09/2018	ELI974 - Freedom Finaid Walkthrough	External	27 mins	1
07/09/2018	Freedom Training Part I	External	1 hr 14 mins	1
07/06/2018	FIR070 - AFA Overview	External	1 hr 31 mins	1
07/06/2016	ESP Training	External	1 hr 40 mins	3
07/05/2018	HAI210 - Freedom Finaid Walkthrough	External	45 mins	1
07/05/2018	ELI974 - Freedom Finaid Walkthrough	External	1 hr	1
07/05/2018	Freedom Finaid Training	External	2 hrs 21 mins	1
07/03/2018	KOH134 - Freedom Finaid Training	External	2 hrs	4
07/03/2018	TAY905 & TAY539 - Freedom Finaid Walkthrough	External	1 hr 24 mins	5
07/03/2018	CHA142 - Freedom Finaid Walkthrough	External	2 hrs	1
07/03/2018	UST 650 - Freedom Finaid Walkthrough	External	1 hr 7 mins	1
07/03/2018	ELI974 - Freedom Finaid Walkthrough	External	43 mins	1
07/02/2018	KOH134 - Freedom Finaid Training	External	2 hours	4
07/02/2018	JOS224 - Freedom Finaid Walkthrough	External	2 hrs 45 mins	1
07/02/2018	UST650 - Freedom Finaid Walkthrough	External	2 hrs	1
07/02/2018	PRE605 - Freedom Finaid Walkthrough	External & Internal	51 mins	2
07/02/2018	PRE384 - Freedom Finaid Walkthrough	External	1 hr 37 mins	1



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## CONSUMER INFORMATION SECURITY PLAN

### 1. COORDINATION AND MAINTENANCE OF THE CONSUMER INFORMATION SECURITY PLAN

The VP of Technology of FAME will coordinate, execute and maintain the Consumer Information Security Plan. In addition, the VP of Technology will provide guidance in complying with all privacy regulations. All correspondence and inquiries should be directed to the General Manager of FAME.

Each center of consumer information, listed below, is responsible for securing consumer information in accordance with FAME's Consumer Information Security Plan. In addition, the Information Technology (IT) Department maintains policies and procedures that protect against anticipated threats to security or integrity of electronic consumer information and that guard against the unauthorized use or attacks of such information from internal as well as external sources.

### 2. CENTERS OF CONSUMER INFORMATION

The following were identified as relevant areas to consider when assessing the risks to consumer information.

#### Executive Management

Consumer Information Collected: Consumer information is not collected on a regular basis; it is used solely to address specific issues that must be settled by Executive Management.

Consumer Information Shared With: Consumer information is only shared with entities that are approved by the U.S. Department of Education (ED) to receive such information, e.g. clients, ED and its subcontractors, state licensure agencies, accreditation agencies, CPA firms.

#### Development and Quality Assurance Departments

Consumer Information Collected: Consumer information is accessed solely to test software programs.

Consumer Information Shared With: None.

#### Sales & Marketing

Consumer Information Collected: None.

Consumer Information Shared With: None.

#### Finance Department

Consumer Information Collected: Consumer information is received from our processing centers, e.g. Financial Aid Service Center and Consulting Services.

Consumer Information Shared With: Consumer information is only obtained to invoice our clients.

#### Human Resources

Consumer Information Collected: None.

Consumer Information Shared With: None.

#### Administrative Services

Consumer Information Collected: Consumer information is received in the form of 1098T data from our school clients.

Consumer Information Shared With: Consumer information is shared in the form of 1098T Forms that are supplied to students, and electronically to their respective schools, and the IRS.

#### Financial Aid Service Center

Consumer Information Collected: Federally mandated consumer data is collected on a regular basis in order to determine eligibility for federal student aid.

Consumer Information Shared With: Consumer information is only shared with entities that are approved by ED to receive such information, e.g. clients, ED and its subcontractors, state licensure agencies, accreditation agencies, CPA firms.



**Fiscal Services**

Consumer Information Collected: Federally mandated consumer data is collected on a regular basis in order to meet the recordkeeping and reporting requirements of ED.  
 Consumer Information Shared With: Consumer information is only shared with entities that are approved by ED to receive such information, e.g. clients, ED and its subcontractors, state licensure agencies, accreditation agencies, CPA firms.

**Customer Service**

Consumer Information Collected: Consumer information is accessed in order to respond to client inquiries.  
 Consumer Information Shared With: Consumer information is only shared with clients who have rights to that information (i.e. their own students' information).

**Training & Implementation**

Consumer Information Collected: Consumer information is accessed in order to respond to client inquiries.  
 Consumer Information Shared With: Consumer information is only shared with clients who have rights to that information (i.e. their own students' information).

**Technical Support**

Consumer Information Collected: Consumer information is accessed in order to respond to client inquiries.  
 Consumer Information Shared With: Consumer information is only shared with clients who have rights to that information (i.e. their own students' information).

**Consulting Services**

Consumer Information Collected: Federally mandated consumer data is collected on a regular basis in order to determine eligibility for student aid and our clients' effectiveness in administering student aid programs.  
 Consumer Information Shared With: Consumer information is only shared with entities that are approved by ED to receive such information, e.g. clients, ED and its subcontractors, state licensure agencies, accreditation agencies, CPA firms.

**A. Potential Risks to Security of Consumer Information**

The following were identified as reasonable, foreseeable internal and external risks to the security, confidentiality and integrity of consumer information that could result in the unauthorized disclosure, misuse, alteration, destruction or other compromise of such information:

Category	Internal Risks	External Risks
Information systems: - in general  - network design  - software design  - communication	An employee may copy report files with sensitive information.	Servers can be hacked into and information stolen.
	A user may utilize other user's passwords to retrieve sensitive information.	FAME uses third party operating systems and applications which may have vulnerabilities.
		The network design is based on software supplied by third party vendors which may have vulnerabilities.
	Application crashes may provide information about the location of files.	Hackers may crack the password to the web applications.
	Data prepared for transmission may not be placed on a secure server.	Transmissions of sensitive data may not be encrypted.
	Data files may not be discarded after transmission.	Hackers may crack the encryption algorithm used in data transmission.
	A failure in transmission may cause an error message to display which may contain information about the location of files.	An employee of the following outside entities might steal the information: - ED: - ED subcontractors, - state licensure agencies, - accreditation agencies, - CPA firms, - IRS.
	Employees with restricted access may view sensitive information in order to troubleshoot a failed transmission.	

- storage	<p>An employee may obtain access to the server room and steal the servers or disk drives and gain access to the information.</p> <p>An employee with access to sensitive information may copy some data then leave FAME.</p>	<p>An employee of the off-site data storage service might steal the information.</p> <p>A robbery might occur and servers and disk drives are stolen.</p> <p>A hurricane may cause unplanned release of information.</p>
- disposal	<p>Certain tools on the market can read and reinstate erased data. An employee can use these tools to gain access to sensitive information.</p>	<p>A disposed computer may end up in the possession of someone with a tool that can read low level data.</p>
- detecting, preventing & responding to attacks	<p>User files getting corrupted.</p> <p>Entire system running very slow as a result of a virus consuming CPU cycles.</p> <p>Email activity at an alarming level, impacting performance.</p> <p>If the VP of Technology learns of an attack, such as the above, the VP of Technology will take prompt action to investigate the attack, adopt corrective measures and notify the General Manager.</p>	<p>Customers complain about slow responses.</p> <p>Excessive Firewall and server activities.</p> <p>Customers can't access web site.</p> <p>Customers complain about viruses spreading to their systems.</p> <p>If the VP of Technology learns of an attack, such as the above, the VP of Technology will take prompt action to investigate the attack, adopt corrective measures and notify the General Manager.</p>
- intrusions or other systems failures.	<p>An employee may obtain access to the server room and boot a server using a CD or portable hard drive and gain access to the data.</p>	<p>Hackers may crack the password to the servers.</p>
Paper Records: - in general	<p>An employee might steal the information.</p>	<p>An employee of the following outside services might steal the information:</p> <ul style="list-style-type: none"> <li>- property management (has passkey),</li> <li>- property management subcontractor,</li> <li>- post office (in or out),</li> <li>- mail delivery service (in or out),</li> <li>- courier services (in or out),</li> <li>- janitorial service,</li> <li>- shredding service.</li> <li>- ED,</li> <li>- ED subcontractors,</li> <li>- state licensing agencies,</li> <li>- accreditation agencies,</li> <li>- CPA firms,</li> <li>- IRS.</li> </ul> <p>A robbery might occur.</p> <p>A hurricane may cause unplanned release of information.</p>
- storage	<p>Same as above.</p>	<p>Employees of the following outside services might steal the information:</p> <ul style="list-style-type: none"> <li>- property management (has passkey),</li> <li>- janitorial service</li> <li>- shredding service.</li> </ul> <p>A robbery might occur.</p> <p>A hurricane.</p>
- communication	<p>Same as above.</p> <p>Employee might email a document to wrong party.</p> <p>Employee could mail an IRS Form 1098E</p>	<p>Employees of the following outside services might steal the information:</p> <ul style="list-style-type: none"> <li>- post office (in or out),</li> <li>- mail delivery service which prints IRS</li> </ul>

	to a student, without separating the 3 students per page form first. The 1098E forms are only available 3 forms per 8 ½ x 11 page, which once printed must be separated for mailing to the 3 students. This cannot occur with 1098T forms as these are prepared electronically with 1 student per page, then electronically transmitted to a third party mail delivery service which prints, folds, inserts the forms into envelopes, seals the envelopes, and applies postage totally electronically without personnel accessing the forms.	1098T Forms we generate and delivers them to Post Office, - courier services (in or out). ED, - ED subcontractors, - state licensing agencies, - accreditation agencies, - CPA firms, - IRS.
- disposal	An employee might place a document in a trash container instead of shred container.	Employees of the following outside services might steal the information: - shredding service.
- detecting, preventing & responding to attacks	Any violation of this Consumer Information Security Plan must be reported to the General Manager of FAME. All employees acknowledge in writing that they have read the Employee Policy that deals with our Consumer Information Security Plan. If the VP of Technology receives notification of a security violation, the VP of Technology will take prompt action to investigate the breach and adopt corrective measures.	If the VP of Technology learns of any attack, prompt corrective actions will be taken.
- intrusions or other systems failures.	If the VP of Technology learns of any attack, prompt corrective actions will be taken.	The VP of Technology will be notified of any physical attack e.g. robbery, and any electronic attacks, e.g. wireless, phone lines, data lines. The VP of Technology will take prompt action to investigate the breach and adopt corrective measures.

**B. Safeguards to Control the Security Risks to Consumer information**

The following safeguards are in place to control the risks identified through the risk assessment conducted in Section A.

(1) Human Resources (HR):

- Performs a criminal background check on every new employee hired to work at FAME. This provides information on any misdemeanors, including driving offences, theft, domestic violence, battery.
- Requires every employee at FAME to acknowledge in writing:
  - having read the Employee Handbook, which contains a copy of the policies that employees are required to abide by.
  - that the Consumer Information Security Plan is of paramount importance and that violations of these policies may result in termination of employment and in addition, prosecution by federal and other authorities.
- Annually instructs and reminds all employees of the Consumer Information Security Plan.

(2) Paper Records:

- Access to rooms, where paper records of confidential consumer information are kept, is restricted to authorized personnel.
- Janitorial Service personnel are bonded.
- Shredding Service personnel are bonded.
- All paper records of consumer information are shredded by a Shredding Service specializing in document destruction.
- A clean desk policy is enforced to ensure that no sensitive printed material is left unattended.
- If consumer information is faxed or mailed to the wrong party, and there is a confidentiality concern, FAME will purchase an Identify Theft protection policy for one year for those consumers.

(3) Information Systems:

- In General: Only standard tools with a reputable company behind them are used for networks and application development.
  - In General: Screen savers activate after a period of inactivity on all computers which are not in a physically secured location (i.e. the Server Room), and require a password to close.
  - In General: Passwords must be complex (i.e. at least 8 characters long, with a combination of upper-case letters, lower-case letters, numbers and symbols).
  - In General: Software requires that passwords be changed every 365 days. New passwords cannot repeat any of the previous 20 passwords.
  - In General: Employees are not permitted to post passwords near their computers.
  - In General: Employee access to consumer information uses a least-privilege policy. Access is restricted by department, and is limited to the information the employee needs in order to perform his/her job.
  - In General: User access to the network for terminated employees is disabled immediately.
  - In General, & Network Design: All critical security and system patches provided by the vendors are tested and applied within one week of release.
  - Network Design: Network design is segmented such that only authorized users have access to the servers.
  - Network Design: Firewalls are used at all points of access from the Internet to FAME networks.
  - Network Design: For FAME's Software-as-a-Service applications, the production environments are hosted on either Azure which is SOC 1, 2 and 3 compliant (<https://www.microsoft.com/en-us/trustcenter/compliance/soc>) or Remote App Hosting (<http://www.remoteapphosting.net/>).
  - Network Design: For FAME's Software-as-a-Service applications, the database servers and firewalls are not shared with other companies.
  - Software Design: Application design requires all error messages not to display detailed information about files and their locations on the servers.
  - Information Processing: For all FAME products, data is encrypted before being transmitted over public networks. For FAME's Software-as-a-Service applications, data at rest, including backups, are also encrypted.
  - Information Processing: The algorithm used for encrypting databases containing consumer data complies with FIPS 140-2 standards.
  - Information Processing: Data prepared for transmission is placed in a secure server and removed immediately after transmission.
  - Physical Security: Computer room access is restricted to only authorized users.
  - Storage: Data backup is performed daily and weekly. In addition, weekly tapes are stored in a secure offsite vault.
  - Storage: Employees of the off-site data storage service must be bonded.
  - Disposal: Decommissioned computers have to go through a "Clean" process whereby disk drives are written several times and reformatted.
  - Detecting, Preventing & Responding to Attacks: Anti-virus and anti-spam software runs on all components 24/7. Management software installed on the systems notifies the network manager of excessive traffic in the systems.
  - Detecting, Preventing & Responding to Attacks: Reported system performance issues are urgently attended to by IT staff.
- (4) Miscellaneous:
- The General Manager will refer calls or other requests for consumer information that are outside of our normal business activity to appropriate law enforcement agencies.

**C. Testing and Monitoring of Consumer Information Security Program**

The safeguards identified in Section B above are regularly tested and monitored to determine the effectiveness of the controls, systems and procedures that are in place. FAME adjusts its Consumer Information Security Plan periodically based on the results of these periodic evaluations and any material changes to operations or any other circumstances that are known to have a material impact on the Consumer Information Security Plan.

**3. CONTRACTS WITH SERVICE PROVIDERS**

FAME does business with two general categories of Service Providers; governmental agencies and private firms.

- The governmental agencies; ED, the IRS, the USPS, and state licensing agencies must adhere to their own regulations to protect consumer information. FAME does not need, nor would it be able, to enter into agreements with these agencies.
- The private firms listed below either are required to have their own Consumer Information Security Plan, or they are not given access to consumer information in the normal course of business. Thus, FAME does not need to enter into any contracts with them for protection of consumer information.

Item	Firm Type	Required by law to have their own Consumer Information Security Plan	Given access to consumer information in the normal course of business
1.	Property management (has passkey)		No
2.	Property management subcontractors		No
3.	Mail delivery service (in or out)	Yes	
4.	Courier services (in or out)	Yes	
5.	Janitorial service		No
6.	Shredding service	Yes	
7.	ED subcontractors	Yes	
8.	State licensing agencies	Yes	
9.	Accreditation agencies	Yes	
10.	CPA firms	Yes	

**4. AUDITING OF THE CONSUMER INFORMATION SECURITY PLAN**

This Consumer Information Security Plan is evaluated and adjusted in light of relevant circumstances, including changes in FAME's business arrangements or operations, or as a result of testing and monitoring of the safeguards. Auditing of each relevant area's compliance is done regularly. Risk assessment is done through the internal auditor's office. Evaluation of the risk of new or changed business arrangements is done through the legal counsel's office.



Trusted Solutions for Higher Education

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## **IDENTITY THEFT PREVENTION PROGRAM**

### **1. PURPOSE**

The Gramm-Leach-Bliley Act of 1999 enacted administrative, technical and physical safeguards for consumer financial information. FAME developed, implemented and maintains a Consumer Information Security Plan to address these extensive protections.

Subsequently, the Fair and Accurate Credit Transactions (FACT) Act of 2003 was expanded to include Identity Theft Red Flags rules in 2007 which required additional protections to consumer financial information in order to specifically address the growing issue of identity theft. As such, FAME developed this Program in order to combat identity theft by:

- a) identifying relevant patterns, practices, and specific forms of activity that are red flags signaling possible identity theft,
- b) detecting red flags incorporated in this Program,
- c) responding appropriately to any red flags that are detected, and
- d) annually reviewing the Program to reflect any changes in risks from identity theft.

### **2. PROGRAM MANAGEMENT**

The VP Technology of FAME coordinates, executes and maintains the Identity Theft Prevention Program. In addition, the General Manager provides guidance in complying with this Program. All correspondence and inquiries should be directed to the General Manager.

### **3. OVERSIGHT OF SERVICE PROVIDERS**

FAME does business with two general categories of Service Providers; governmental agencies and private firms:

- The governmental agencies, ED, the IRS, and the USPS, must adhere to their own regulations to protect against identity theft. FAME does not need, nor would it be able, to enter into agreements with these agencies.
- The private firms either may or may not be required to have their own Identity Theft Prevention Program, and as such are required to provide an Identity Theft Prevention Program to FAME annually. If no such Program is in place, a letter from the service provider's attorney stating that the company is not legally required to have such a Program in place is required.

### **4. RISK ASSESSMENT**

To determine the necessary scope of this Program, a risk assessment is conducted annually. As FAME does not evaluate or extend credit, and does not maintain transaction accounts for borrowers (as defined by the Federal Reserve System regulations), risk is primarily limited to the accuracy of input from FAME's clients. This assessment has determined that the risk of identity theft by the public is minimal, and as such, FAME's exposure is minimal. Since the identity theft potential is minimal, several aspects of an exhaustive Identity Theft Protection Program are not extensively detailed in our Program

### **5. IDENTIFICATION AND DETECTION OF RED FLAGS**

The majority of the red flags identified by the Federal Trade Commission (FTC) do not apply to FAME accounts or activities.

### **6. PERIODIC UPDATE OF PROGRAM**

The General Manager reviews the Program annually to determine if any changes are needed due to:

- a) experiences in identity theft within the past year,
- b) new methods of identity theft,
- c) new methods of detecting or preventing identity theft, and
- d) changes in the scope of FAME's activities.

A new risk assessment is performed upon identification of any such changes. The Program is updated accordingly.



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## **DISASTER RECOVERY PLAN**

### **SUMMARY**

#### **Overview**

FAME has developed a comprehensive Disaster Recovery Plan to ensure the safety of FAME staff, maintain client communication and restore services rapidly in the event of a disaster. The plan includes a detailed communication plan for both staff and clients, infrastructure resiliency to avoid service disruption and contingency plans to restore operations in various disaster and service disruption scenarios.

The plan has been successfully exercised in the past for major weather events, including Hurricane Wilma in 2005 & Hurricane Irma in 2017, which left much of the region without power, water or communications for weeks. FAME, however, was operational within days.

The complete details of the plan are covered in a 24-page Disaster Recovery Plan document, which FAME evaluates annually. Because the Disaster Recovery Plan document includes staff contact information, vendor details, account numbers and other confidential or sensitive information, we cannot share the original document outside of FAME. Instead, the major features of the plan are summarized below. If you have specific questions, contact the Director of our Consulting Services Dept. whose contact information is provided in Appendix document J-1 of this Manual.

#### **Communication**

To ensure safety of FAME staff and coordinate resumption of operations after a disaster, FAME has developed a comprehensive staff communication plan. Contact information including home and mobile numbers for all employees are maintained in cloud storage and kept in hard copy by key management staff, ensuring availability of the information in the event of FAME systems are down or the building closed. A well-defined SOP for chain of communication from building management to FAME management to all employees is defined to ensure dissemination of information and coordination of efforts. Finally, a cloud hosted voice mail box is also updated continuously with the latest information and instructions for FAME staff.

In the event FAME phone systems are down, client communication will be maintained via the FAME corporate web site (<http://www.FAMEinc.com>) and the Client Solution Center support portal (<http://support.FAMEinc.com>), both hosted by geographically dispersed cloud service providers. The latest FAME operational status information will be posted on the FAME corporate website. FAME clients can continue to utilize the Client Solution Center support portal. Even in a scenario where FAME offices are completely closed, remote FAME staff will be able to help with the most urgent issues.

#### **Infrastructure Resilience**

FAME's building and network infrastructure are designed to help avoid downtime due to power and communications loss. The building is connected to two independent power grids, either of which is capable of supplying 100% power for the building. For the building to be without power, both grids would have to be down.

Similarly, FAME has redundant internet connectivity from two separate providers over different mediums: a primary fiber optic line and a secondary cable internet line. These are configured with automatic failover capability.

As the FAME phone system is internet-based (VOIP), this means our phone system shares this same redundancy and fail-over capability.

To avoid any possibility of data loss, all FAME systems employ internal redundancy (RAID/SAN, redundant power supplies, battery backup power, etc.) and all data is backed up on a rigorous daily schedule. Weekly backups are sent to a secure hardened facility where the last four weekly, last twelve monthly, and last seven annual backups are maintained.

### **Restoration of Operations**

FAME has developed contingency plans to restore operations depending on building access, power or communications loss, etc. Some of the key elements include restoration of power, availability of funds to aid recovery operations and facility and equipment restoration.

FAME contracts with a leading national disaster recover provider, Agility Recovery, to supply a generator capable of powering the entire operation. The provider has nation-wide supply of both generators and fuel, so regional conditions will not affect availability.

FAME also carries substantial disaster insurance that will provide sufficient funds to cover any recovery expenses, including total loss relocation.

Finally, FAME also has the option with Agility Recovery to request on demand facilities, power, communication and equipment.



FAME  
**Third Party Servicer Evaluation - Responses**  
**Years of Financial Aid Knowledge & Years of Service at FAME**  
**May 31, 2019**

Financial Aid Employee	Full Time	Part Time	Years of Financial Aid Experience	Years of Service at FAME
Employee 1	X		40	30
Employee 2	X		38	38
Employee 3	X		38	38
Employee 4	X		38	29
Employee 5	X		37	37
Employee 6	X		34	28
Employee 7	X		31	31
Employee 8	X		30	30
Employee 9	X		29	29
Employee 10	X		29	29
Employee 11	X		29	12
Employee 12	X		28	12
Employee 13	X		28	7
Employee 14	X		27	15
Employee 15	X		26	26
Employee 16	X		26	19
Employee 17	X		26	19
Employee 18	X		25	9
Employee 19	X		23	23
Employee 20	X		23	23
Employee 21	X		23	8
Employee 22	X		18	18
Employee 23	X		18	7
Employee 24	X		17	10
Employee 25	X		16	16
Employee 26	X		16	10
Employee 27	X		16	8
Employee 28	X		16	6
Employee 29	X		15	5
Employee 30	X		14	14
Employee 31	X		14	14
Employee 32	X		13	13
Employee 33	X		13	13
Employee 34	X		11	7
Employee 35	X		11	6
Employee 36	X		11	3
Employee 37	X		10	10
Employee 38	X		10	10
Employee 39	X		10	10

Employee 40	X	10	10
Employee 41	X	10	10
Employee 42	X	10	10
Employee 43	X	10	10
Employee 44	X	9	9
Employee 45	X	9	9
Employee 46	X	9	9
Employee 47	X	9	6
Employee 48	X	8	8
Employee 49	X	8	8
Employee 50	X	8	8
Employee 51	X	8	8
Employee 52	X	8	8
Employee 53	X	8	8
Employee 54	X	8	4
Employee 55	X	7	7
Employee 56	X	7	7
Employee 57	X	7	7
Employee 58	X	7	2
Employee 59	X	6	6
Employee 60	X	6	6
Employee 61	X	5	5
Employee 62	X	4	4
Employee 63	X	2	2
Employee 64	X	2	2
		<b>Total</b>	<b>1,062</b>
			<b>845</b>