

**Federal Communications Commission**  
*Office of the Managing Director*



**Privacy Impact Assessment<sup>1</sup> (PIA) for the  
Lifeline Program**

**May 20, 2015**

**FCC Bureau/Office:** Wireline Competition Division (WCB)  
**Division:**

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<sup>1</sup> This questionnaire is used to analyze the impacts on the privacy and security of the personally identifiable information (PII) that is being maintained in these records and files.

The *Privacy Act of 1974*, as amended, 5 U.S.C. 552a, requires Federal agencies to take special measures to protect personal information about individuals when the agencies collect, maintain, and use such personal information.

The Privacy Impact Assessment template's purpose is to help the bureau/office to evaluate the changes in the information in the system and to make the appropriate determination(s) about how to treat this information, as required by the Privacy Act's regulations.

### Section 1.0 Information System's Contents:

#### 1.1 Status of the Information System<sup>2</sup>:

- New information system—Implementation date: January 15, 2014  
 Revised or upgraded information system—Revision or upgrade date:

If this system is being revised—what will be done with the newly derived information:

- Placed in existing information system—Implementation Date:  
 Placed in new auxiliary/ancillary information system—Date:  
 Other use(s)—Implementation Date:

Please explain your response:

The Wireline Competition Bureau (WCB) created the Lifeline Program to provide discounts for voice telephony service to qualifying low-income individuals. The Lifeline Program is administered and managed by the Universal Service Administrative Company (USAC). Eligible Telecommunications Carriers (ETCs) must provide documentation on Lifeline Program applicants and participants to USAC to ensure that they qualify for this program's benefits, as required by 47 CFR Sections 54.404 and 54.410. USAC's management of the Lifeline Program includes third party contractors who staff a call center to verify an individual's eligibility as part of USAC's "exceptional management practices" as part of its management of the Lifeline Program.

#### 1.2 Has a Privacy Threshold Assessment (PTA) been done?

- Yes  
Date:  
 No

If a PTA has not been done, please explain why not:

A PTA was not required since it was established with the publication of FCC/WCB-1, "Lifeline Program" system of records notice (SORN) that the Lifeline Program's systems, databases, and files contained personally identifiable information or PII.

If the Privacy Threshold Assessment (PTA) has been completed, please skip to Question 1.15

#### 1.3 Has this information system, which contains information about individuals, *e.g.*, personally identifiable information (PII), existed under another name, *e.g.*, has the name been changed or modified?

- Yes

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<sup>2</sup> "Information system" is a general term that refers to electronic databases, licensing, and records systems and formats and also to paper based records and filing systems.

No

Please explain your response:

WCB created the Lifeline Program and received OMB approval for its operations in January 2014 (when the WCB-1 SORN became effective).

1.4 Has this information system undergone a “substantive change” in the system’s format or operating system?

Yes

No

If yes, please explain your response:

The Lifeline Program is a new information system. There have been no substantive changes since this system was created.

If there have been no changes to the information system’s format or operating system(s), please skip to Question 1.6.

1.5 Has the medium in which the information system stores the records or data in the system changed:

Paper files to electronic medium (computer database);

From one IT (electronic) information system to IT system, *i.e.*, from one database, operating system, or software program, *etc.*

Please explain your response:

1.6 What information is the system collecting, analyzing, managing, using, and/or storing, *etc.*:

**Information about FCC Employees:**

No FCC employee information

FCC employee’s name

Other names used, *i.e.*, maiden name, *etc.*

FCC badge number (employee ID)

SSN

Race/Ethnicity

Gender

U.S. Citizenship

Non-U.S. Citizenship

Biometric data

Fingerprints

Voiceprints

Retina scans/prints

Photographs

Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*

Birth date/age

Place of birth

Medical data

Marital status

- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s):
- Personal fax number(s)
- E-mail address(es):
- Emergency contact data:
- Credit card number(s)
- Driver's license
- Bank account(s)
- FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information:

**Information about FCC Contractors:**

- No FCC contractor information
- Contractor's name: Third party contractors working under USAC's "exceptional management practices"
- Other name(s) used, *i.e.*, maiden name, *etc.*
- FCC Contractor badge number (Contractor ID)
- SSN
- U.S. Citizenship
- Non-U.S. Citizenship
- Race/Ethnicity
- Gender
- Biometric data
  - Fingerprints
  - Voiceprints
  - Retina scans/prints
  - Photographs
  - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s):

- Personal fax number(s)
- Personal e-mail address(es):
- Emergency contact data:
- Credit card number(s)
- Driver's license number(s)
- Bank account(s)
- Non-FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information: Information, *i.e.*, records of telephone calls, pertaining to contractors who assist applicants and participants in the Lifeline Program at the contractor's call center.

**Information about FCC Volunteers, Visitors, Customers, and other Individuals:**

- Not applicable
- Individual's name: Lifeline Program participant or applicant.
- Other name(s) used, *i.e.*, maiden name, *etc.*
- FCC badge number (employee ID)
- SSN: Last four digits of SSN
- Race/Ethnicity
- Gender
- Citizenship
- Non-U.S. Citizenship
- Biometric data
  - Fingerprints
  - Voiceprints
  - Retina scans/prints
  - Photographs
  - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age:
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s):
- Personal fax number(s)
- Personal e-mail address(es):
- Emergency contact data:
- Credit card number(s)
- Driver's license number(s)
- Bank account(s)

- Non-FCC personal employment records
- Military records
- Financial history: Income or other relevant program participation
- Foreign countries visited
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information: Tribal identification number; other relevant program participation qualification(s); Lifeline service initiation/termination date(s); Lifeline monthly support payment, and date of provision of Link-Up support (if applicable);

**Information about Business Customers and others (usually not considered “personal information”):**

- Not applicable
- Name of business contact/firm representative, customer, and/or others
- Race/Ethnicity
- Gender
- Full or partial SSN:
- Business/corporate purpose(s)
- Other business/employment/job description(s)
- Professional affiliations
- Business/office address
- Intra-business office address (office or workstation)
- Business telephone number(s)
- Business cell phone number(s)
- Business fax number(s)
- Business pager number(s)
- Business e-mail address(es)
- Bill payee name
- Bank routing number(s)
- Income/Assets
- Web navigation habits
- Commercially obtained credit history data
- Commercially obtained buying habits
- Credit card number(s)
- Bank account(s)
- Other information:

1.7 What are the sources for the PII and other information that this information system (or database) is collecting:

- Personal information from FCC employees:
- Personal information from FCC contractors: Records of telephone calls between contractors and applicants and participants in the Lifeline Program.
- Personal information from non-FCC individuals and/or households: Lifeline Program applicants and participants (residing in a single household).
- Non-personal information from businesses and other for-profit entities:
- Non-personal information from institutions and other non-profit entities:
- Non-personal information from farms:

- Non-personal information from Federal Government agencies:
- Non-personal information from state, local, or tribal governments:
- Other sources:

1.8 Does this information system have any links to other information systems or databases?

An information system (or database) may be considered as linked to other information systems (or databases) if it has one or more of the following characteristics:

- The information system is a subsystem or other component of another information system or database that is operated by another FCC bureau/office or non-FCC entity (like the FBI, DOJ, National Finance Center, etc.);
- The information system transfers or receives information, including PII, between itself and another FCC or non-FCC information system or database:
- The information system has other types of links or ties to other FCC or non-FCC information systems or databases;
- The information system has other characteristics that make it linked or connected to another FCC or non-FCC information system or database;
- The information system has no links to another information system (or database), *i.e.*, it does not share, transfer, and/or obtain data from another system.

If this system has any of these criteria or characteristics, please explain; otherwise please skip to Question 1.11:

As noted in Question 1.1, USAC administers the Lifeline Program and has a third party contractors to staff the Lifeline Program's call center. The Lifeline Program's databases constitute a separate information system with no links (*i.e.*, no information transfers or other connections) between it and the FCC's computer network.

1.9 What PII does the information system obtain, share, and/or use from other information systems?

- FCC information system and information system name(s):
- Non-FCC information system and information system name(s):
- FCC employee's name:
- (non-FCC employee) individual's name
- Other names used, *i.e.*, maiden name, *etc.*
- FCC badge number (employee ID)
- Other Federal Government employee ID information, *i.e.*, badge number, *etc.*
- SSN:
- Race/Ethnicity
- Gender
- U.S. Citizenship
- Non-U.S. Citizenship
- Biometric data
  - Fingerprints
  - Voiceprints
  - Retina scan/prints
  - Photographs
  - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age
- Place of birth
- Medical data
- Marital status

- Spousal information
- Miscellaneous family information:
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- E-mail address(es):
- Emergency contact data
- Credit card number(s)
- Driver's license
- Bank account(s)
- Non-FCC personal employment records
- Non-FCC government badge number (employee ID)
- Law enforcement data
- Military records
- National security data
- Communications protected by legal privileges
- Financial history
- Foreign countries visited
- Background investigation history
- Digital signature
- Other information:

**Information about Business Customers and others (usually not considered "personal information"):**

- Not applicable
- Name of business contact/firm representative, customer, and/or others
- Race/Ethnicity
- Gender
- Full or partial SSN:
- Business/corporate purpose(s)
- Other business/employment/job description(s)
- Professional affiliations
- Intra-business office address (office or workstation)
- Business telephone number(s)
- Business cell phone number(s)
- Business fax number(s)
- Business e-mail address(es)
- Bill payee name
- Bank routing number(s)
- Income/Assets
- Web navigation habits
- Commercially obtained credit history data
- Commercially obtained buying habits
- Personal clubs and affiliations
- Credit card number(s)
- Bank account(s)
- Other information:

- 1.10 Under the *Privacy Act of 1974*, as amended, 5 U.S.C. 552a, Federal agencies are required to have a System of Records Notice (SORN) for an information system like this one, which contains information about individuals, *e.g.*, “personally identifiable information” (PII).

A System of Records Notice (SORN) is a description of how the information system will collect, maintain, store, and use the personally identifiable information (PII).

Does a SORN cover the PII in this information system?

- Yes:  
 No

If yes, what is this SORN: FCC/WCB-1, "Lifeline Program."

Please provide the citation that was published in the *Federal Register* for the SORN: 78 FR 73535 (December 6, 2013).

## Section 2.0 System of Records Notice (SORN):

- 2.1 What is the Security Classification for the information in this SORN, as determined by the FCC Security Officer?

The FCC's Security Operations Center has not assigned a security classification to the Lifeline Program system of records.

- 2.2 What is the location of the information covered by this SORN?

Universal Service Administrative Company (USAC)/Contractor Server Address:  
Universal Service Administrative Company (USAC), 2000 L St., NW., Suite 200, Washington, DC 20036; and  
Federal Communications Commission (FCC), 445 12<sup>th</sup> Street, S.W., Washington, DC 20554.

- 2.3 What are the categories of individuals in the system of records covered by this SORN?

The categories of individuals in this system include those individuals (residing in a single household) who have applied for benefits; are currently receiving benefits; are minors whose status qualifies a parent or guardian for benefits; or who have received benefits under the Lifeline Program, which serves low-income individuals by providing these qualifying individuals with discounts on telephone service for their household.

- 2.4 What are the categories of record<sup>3</sup> covered by this SORN?

The categories of records in in the system include, but are not limited to: the individual's name, residential address, date of birth, last four digits of social security number, tribal identification number, telephone number, means of qualification for Lifeline (*i.e.*, income or relevant program participation), Lifeline service initiation date and termination date, amount of Lifeline support received per month, date of the provision of Link-Up support (if applicable).

- 2.5 Under what legal authority(s) does the FCC collect and maintain the information covered by this SORN?

47 U.S.C. §§ 151-154, 201-205, 214, 254, 403. 47 C.F.R. §§ 54.404 – 54.410.

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<sup>3</sup> This refers to the types of information that this information system or database collects, uses, stores, and disposes of when no longer needed.

2.6 What are the purposes for collecting, maintaining, and using the information covered by this SORN?

The Lifeline Program provides discounts for voice telephony service, and the initial connection charge in tribal areas to support such service, to qualifying low-income individuals (i.e., one Lifeline telephone service per household). Individuals may qualify for Lifeline through proof of income or proof of participation in another qualifying program. The Lifeline Program system of records covers the PII that the Eligible Telecommunications Carriers (ETCs) must provide to prevent the individuals in a single household from receiving more than one Lifeline Program benefit, as required by 47 CFR §§ 54.404 and 54.410. The Lifeline Program system of records also covers the PII that enables USAC to recertify the eligibility of current Lifeline Program subscribers of ETCs who have elected this option, as required by 47 CFR §54.410. The PII in WCB-1 will include:

1. The information that is used to determine whether an individual in a household, who is applying for a Lifeline Program benefit, is already receiving a Lifeline Program benefit from one or more providers. In order to determine if this information is in fact accurate, the information is confirmed with a third-party verification service not in the control of USAC or the Commission;
2. The information that ETCs that elect to have USAC recertify their Lifeline subscribers. These ETCs must provide USAC with a subscriber list containing PII that includes the first name, last name, address, Lifeline telephone number, date of birth, and last four digits of social security number for each subscriber; and
3. The information that is contained in the records of the Lifeline Program pertain to the inquiries that the ETCs will make to the Lifeline Program contractor's call center to verify that an individual is eligible to participate in the Lifeline Program. USAC will designate a third party contractor to establish this call center as part of USAC's "exception management practices." The contractor will operate this call center, which individuals may use who are seeking to participate in or are already participating in the Lifeline Program. These individuals may call the center to ensure that they have not been improperly denied access to Lifeline Program benefits through the verification process. Any information generated by these inquiries will constitute a separate, distinct database, which will include, but is not limited to, recordings of live agent calls to be stored for 30 days from the date of the call, identity of the user initiating the request, brief description of the request, type of request, identification of the USAC-approved script used in responding to the request, resolution status, and whether the request was escalated (i.e., if the agents escalates the issue to the agent's manager or USAC program personnel). This information will be used, among other things, to verify the accuracy of the information stored in the Lifeline system (i.e., to determine the accuracy of the PII provided by the ETC.)

Records in the Lifeline system are available for public inspection after redaction of information that could identify the individual participant, such as the individual's name(s), date of birth, last four digits of social security number, tribal ID number, telephone number, or other PII.

2.7 What are the Routine Uses under which disclosures are permitted to "third parties," as noted in this SORN?

- Adjudication and litigation:
- Court or Adjudicative Body:
- Committee communications:

- Compliance with welfare reform requirements:
- Congressional investigations and inquiries:
- Contract services, grants, or cooperative agreements:
- Emergency response by medical personnel and law enforcement officials:
- Employment, security clearances, licensing, contracts, grants, and other benefits by the FCC:
- Employment, security clearances, licensing, contracts, grants, and other benefits upon a request from another Federal, state, local, tribal, or other public authority, *etc.*:
- FCC enforcement actions:
- Financial obligations under the Debt Collection Act:
- Financial obligations required by the National Finance Center:
- First responders, *e.g.*, law enforcement, DHS, FEMA, DOD, NTIA, *etc.*:
- Government-wide oversight by NARA, DOJ, and/or OMB:
- Labor relations:
- Law enforcement and investigations:
- National security and intelligence matters:
- Department of Justice, State Department, Department of Homeland Security, and other Federal agencies: DOJ
- Program partners, *e.g.*, WMATA:
- Breach of Federal data: OMB Memorandum M-07-16 (May 22, 2007).
- Others Routine Use disclosures not listed above:

Program Management;  
 Third Party Contractors;  
 State Agencies and Authorized Entities; and  
 Income and Program Eligibility Records.

2.8 What is the FCC's policy concerning whether information covered by this SORN is disclosed to consumer reporting agencies?

The Lifeline Program does not disclosure information to consumer reporting agencies.

2.9 What are the policies and/or guidelines for the storage and maintenance of the information covered by this SORN?

The information pertaining to the Lifeline Program includes electronic records, files and data and paper documents, records, and files. Both USAC and the contractor will jointly manage the paper document files and the electronic data, which will be stored in the computer network databases housed at USAC and at the contractor, and the paper documents, which will be stored in filing cabinets in their respective offices at USAC and the contractor.

2.10 How is the information covered by this SORN retrieved or otherwise accessed?

Information in the Lifeline Program may be retrieved by various identifiers, including, but not limited to the individual's name, last four digits of the Social Security Number (SSN), tribal identification number, date of birth, phone number, and residential address.

2.11 What are the safeguards that the system manager has in place to protect unauthorized access to the information covered by this SORN?

Access to the electronic files is restricted to authorized USAC and the contractor's supervisors and staff. The FCC requires that these computer network databases be protected by various security protocols, which include, but are not limited to, controlled access, passwords, and other

security features. In addition, data in the network servers for both USAC and the contractor will be routinely backed-up. The servers will be stored in secured environments to protect the data. The paper documents are maintained in file cabinets that are located in the USAC and the contractor's office suites. The file cabinets are locked when not in use and at the end of the business day. Access to these files is restricted to authorized USAC and the contractor's staffs.

2.12 What is the records retention and disposition schedule for the information covered by this SORN?

The National Archives and Records Administration (NARA) has not established a records schedule for the information in the Lifeline Program. Consequently, until NARA has approved a records schedule, USAC will maintain the information in the Lifeline Program in accordance with the requirements of the Lifeline Reform Order.

The Lifeline Reform Order states that information in the Lifeline Program is maintained for ten years after the consumer de-enrolls from the Lifeline Program. See Lifeline and Link Up Reform and Modernization et al., WC Docket No. 11-42 et al., Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656, 6740, para. 195 (2012). Disposal of obsolete or out-of-date paper documents and files is by shredding. Electronic data, files, and records are destroyed by electronic erasure..

2.13 What are the sources for the information in the categories of records covered by this SORN?

The sources for the information in the Lifeline Program include, but are not limited to:

1. The information that the ETCs must provide prior to enrolling subscribers and/or to re-certifying subscribers (in qualifying households) for participation in the Lifeline Program; and
2. The information that individuals (in qualifying households) must provide to determine their households' eligibility for participation in the Lifeline Program, e.g., participating in other qualifying programs and/or services.

**Section 3.0 Development, Management, and Deployment and/or Sharing of the Information:**

3.1 Who will develop the information system(s) covered by this SORN?

- Developed wholly by FCC staff employees:
- Developed wholly by FCC contractors:
- Developed jointly by FCC employees and contractors:
- Developed offsite primarily by non-FCC staff:
- COTS (commercial-off-the-shelf-software) package:
- Other development, management, and deployment/sharing information arrangements: USAC administers the Lifeline Program and has third party contractors who develop and manage the Lifeline Program's systems and databases and staff the program's call center.

3.2 Where will the information system be housed?

- FCC Headquarters
- Gettysburg
- San Diego
- Colorado
- New York
- Columbia Lab
- Chicago

- Other information: USAC's offices in Washington, DC. and at the office(s) of the third party contractor.
- 3.3 Who will be the primary manager(s) of the information system, *i.e.*, who will be responsible for assuring access to, proper use of, and protecting the security and integrity of the information? (Check all that apply and provide a brief explanation)
- FCC staff in this bureau/office exclusively: WCB supervisors and staff will oversee USAC's management of the Lifeline Program.
- FCC staff in other bureaus/offices:
- Information system administrator/Information system developers:
- Contractors: USAC's third party contractors will develop and manage the Lifeline Program's databases and staff the program's call center.
- Other information system developers, *etc*:
- 3.4 What are the FCC's policies and procedures that the information system's administrators and managers use to determine who gets access to the information in the system's files and/or database(s)?
- As noted in Questions 2.11 and 3.3, access to the Lifeline Program's systems, databases, and paper document files is restricted to authorized USAC and the contractor's supervisors and staff. WTB supervisors and staff may also have access, as required.
- 3.5 How much access will users have to data in the information system(s)?
- Access to all data: USAC's administrators have access to all the Lifeline Program data, including the information that the third party contractors manage.
- Restricted access to data, as determined by the information system manager, administrator, and/or developer:
- Other access policy:
- 3.6 Based on the Commission policies and procedures, which user group(s) may have access to the information at the FCC: (Check all that apply and provide a brief explanation)
- Information system managers: USAC's Lifeline Program administrators and third party contractors.
- Information system administrators: USAC's Lifeline Program administrators.
- Information system developers: USAC and third party contractors.
- FCC staff in this bureau/office: WCB supervisors and staff, as required, to oversee this program.
- FCC staff in other bureaus/offices:
- FCC staff in other bureaus/offices in FCC field offices:
- Contractors: USAC's third party contractors who develop, manage, and staff the Lifeline Program's databases and the call center.
- Other Federal agencies:
- State and/or local agencies:
- Businesses, institutions, and other groups:
- International agencies:
- Individuals/general public:
- Other groups:

If contractors do not have access to the PII in this system, please skip to Question 3.9.

- 3.7 What steps have been taken to ensure that the contractors who have access to and/or work with the PII in the system are made aware of their duties and responsibilities to comply with the requirements under subsection (m) “Contractors” of the Privacy Act, as amended, 5 U.S.C. 552a(m)?

As noted in Question 2,11, access to the information in the Lifeline Program's systems, databases, and files, including the information related the third party contractors who develop the Lifeline Program software, help manage the program, and staff the call center, is restricted to authorized USAC and the contractor’s supervisors and staff. The FCC requires that these computer network databases be protected by various security protocols, which include, but are not limited to, controlled access, passwords, and other security features. The FCC also requires that USAC provide the appropriate privacy training for the contractors who develop and manage the Lifeline Program's systems, databases, and files.

- 3.8 What steps have been taken to insure that any Section M contract(s) associated with the information system covered by this SORN include the required FAR clauses (FAR 52.224-1 and 52.224-2)?

The USAC's third party contractors must abide by the requirements of Sections 52.224-1 and 52.224-2 of the Federal Acquisition Regulation (FAR), which are included in their contractual agreement(s).

If there are no information linkages, sharing, and/or transmissions, please skip to **Section 4.0 Data Quality, Utility, Objectivity, and Integrity Requirements:**

- 3.9 If the information system has links to other information systems (or databases), *i.e.*, it shares, transmits, or has other linkages, with what other non-FCC organizations, groups, and individuals will the information be shared?

(Check all that apply and provide a brief explanation)

- Other Federal agencies:
- State, local, or other government agencies:
- Businesses:
- Institutions:
- Individuals:
- Other groups:

Please explain your response:

- 3.10 If this information system transmits or shares information, including PII, between any other FCC systems or databases, is the other system (or database) covered by a PIA?

- Yes
- No

Please explain your response:

- 3.11 Since this information system transmits/shares PII between the FCC computer network and another non-FCC network, what security measures or controls are used to protect the PII that is being transmitted/shared and to prevent unauthorized access during transmission?

If there is no “matching agreement,” *e.g., Memorandum of Understand (MOU), etc.*, please skip to **Section 4.0 Data Quality, Utility, Objectivity, and Integrity Requirements:**

- 3.12 What kind of “matching agreement,” *e.g., Memorandum of Understanding (MOU), etc.*, as defined by 5 U.S.C. 552a(u) of the Privacy Act, as amended, is there to cover the information sharing and/or transferred with the external organizations?

- 3.13 Is this a new or a renewed matching agreement?

- New matching agreement  
 Renewed matching agreement

Please explain your response:

- 3.14 Has the matching agreement been reviewed and approved (or renewed) by the FCC’s Data Integrity Board, which has administrative oversight for all FCC matching agreements?

- Yes; if yes, on what date was the agreement approved:  
 No

Please explain your response:

- 3.15 Is the information that is covered by this SORN, which is transmitted or disclosed with the external organization(s), comply with the terms of the *MOU* or other “matching agreement?”

- 3.16 Is the shared information secured by the recipient under the *MOU*, or other “matching agreement to prevent potential information breaches?”

#### **Section 4.0 Data Quality, Utility, Objectivity, and Integrity Requirements:**

OMB regulations require Federal agencies to ensure that the information/data that they collect and use meets the highest possible level of quality and integrity. It is important, therefore, that the information the Commission’s information systems use meets the “benchmark standards” established for the information.

- 4.1 How will the information that is collected from FCC sources, including FCC employees and contractors, be checked for accuracy and adherence to the Data Quality guidelines?  
(Please check all that apply)

- Information is processed and maintained only for the purposes for which it is collected.  
 Information is reliable for its intended use(s).

- Information is accurate.
- Information is complete.
- Information is current.
- Not applicable:

Please explain any exceptions or clarifications:

If information is only collected from FCC sources, please skip to **Question 4.2**, or if the Data Quality Guidelines do not apply to the information in this information system (or database), please skip to **Section 5.0 Safety and Security Requirements**:

4.2 If any information collected from non-FCC sources, how will the information sources be checked for accuracy and adherence to the Data Quality guidelines?  
(Please check all that apply and provide an explanation)

Yes, information is collected from non-FCC sources: Individuals qualify for the Lifeline Program's benefits only if they meet the requirements, under 47 CFR Sections 54.404 - 54.410.

Information is processed and maintained only for the purposes for which it is collected:

Information is reliable for its intended use(s):

Information is accurate:

Information is complete:

Information is current:

No information comes from non-FCC sources:

Please explain any exceptions or clarifications:

As noted above, individuals must meet the Lifeline Program's requirements under 47 CFR Sections 54.404 - 54.410, to participate. The USAC's Lifeline Program administrators oversee the third party contractors who manage the Lifeline Program's databases and staff the call center. The contractors review and qualify these individuals for participation in the Lifeline Program, subject to USAC's oversight to ensure adherence to the program's regulations. Providing false or misleading information will disqualify an individual from participation in the Lifeline Program.

If the information that is covered by this SORN is not being aggregated or consolidated, please skip to Question 4.5.

4.3 If the information that is covered by this system of records notice (SORN) is being aggregated or consolidated, what controls are in place to ensure that the information is relevant, accurate, and complete?

4.4. What policies and procedures do the information system's administrators and managers use to ensure that the information adheres to the Data Quality guidelines both when the information is obtained from its sources and when the information is aggregated or consolidated for the use by the bureaus and offices?

- 4.5 How often are the policies and procedures checked routinely—what type of annual verification schedule has been established to ensure that the information that is covered by this SORN adheres to the Data Quality guidelines?

**Section 5.0 Safety and Security Requirements:**

- 5.1 How are the records/information/data in the information system or database covered by this SORN stored and maintained?

- IT database management system (DBMS)  
 Storage media including CDs, CD-ROMs, *etc.*  
 Electronic tape  
 Paper files  
 Other:

- 5.2 Is the information collected, stored, analyzed, or maintained by this information system or database available in another form or from another source (other than a “matching agreement” or *MOU*, as noted above)?

- Yes  
 No

Please explain your response:

The information in the Lifeline Program's third party contractor's systems, databases, and paper document files is not shared or transmitted outside the Lifeline Program.

- 5.3 What would be the consequences to the timely performance of the FCC’s operations if this information system became dysfunctional?

The FCC is required under Federal laws to oversee USAC's development and administration of the Lifeline Program and the third party contractors who manage the program's databases and staff the call center. The Lifeline Program is separate from the FCC's general operations.

- 5.4 What will this information system do with the information it collects:

- The system will create new or previously unavailable information through data aggregation, consolidation, and/or analysis, which may included information obtained through link(s), sharing, and/or transferred to/from other information systems or databases;  
 The system collects PII, but it will not perform any analyses of the PII data.

Please explain your response:

As noted above, the Lifeline Program will collect and analyze the PII that applicants provide to ensure that they meet the Lifeline Program's eligibility criteria, and while participating in this program they adhere to the requirements to maintain their eligibilty. Other than insuring that applicants meet the Lifeline Program's eligibility criteria, there is no data analysis.

- 5.5 Will the FCC use the PII that the information system (or database) collects to produce reports on these individuals?

- Yes  
 No

Please explain your response:

USAC is required to report to the FCC on its management of the Lifeline Program.

5.6 What will the system's impact(s) be on individuals from whom it collects and uses their PII:

- The information will be included in the individual's records;
- The information will be used to make a determination about an individual;
- The information will be used for other purposes that have few or no impacts on the individuals.

Please explain your response (including the magnitude of any impact(s)):

Individuals who apply to participate in the Lifeline Program must provide the requisite information, under the Lifeline Program's regulations, to USAC's third party contractors to enable them to determine whether an individual qualifies to participate in this program.

5.7 Do individuals have the right to the following?

They may decline to provide their PII?

- Yes
- No

They may consent to particular uses of their PII?

- Yes
- No

Please explain your response(s) (including the potential consequences for refusing to provide PII):

Participation in the Lifeline Program is voluntary. Individuals must consent to the use of their PII to participate in the Lifeline Program, *i.e.*, refusal to provide the requisite information may disqualify them.

If individuals do not have the right to consent to the use of their information, please skip to Question 5.10.

5.8 If individuals have the right to consent to the use of their PII, how does the individual exercise this right?

5.9 What processes are used to notify and to obtain consent from the individuals whose PII is being collected?

5.10 How will the information be collected and/or input into this information system (or database): (choose all the apply)

- The information system has a link to the FCC's Internet address at [www.fcc.gov](http://www.fcc.gov) or other customer-facing URL;
- The information system has a customer-facing web site via the FCC Intranet for FCC employees;
- The information is collected from the individual by fax;
- The information is collected from the individual by e-mail;

- The information is collected from the individual by completing a FCC form, license, and/or other document:
- The information is collected from the individual by regular mail; and/or
- The information concerning individuals is collected by other methods:

Please explain your response:

As noted above, USAC administer's the Lifeline Program through third party contractors. The Lifeline Program uses an application (with a privacy notice) for individuals to complete and has a call center for individuals to contact to inquire about participating. Individuals who contact the call center are also advised of their privacy rights.

5.11 How does this system advise individuals of their privacy rights when they submit their PII?

- The system contains a link to the FCC’s privacy policies for all users at the FCC’s website [www.fcc.gov](http://www.fcc.gov):
- A Privacy Notice is displayed on the webpage:
- A Privacy Notice is printed at the end of the FCC form(s), license(s), and/or other Commission document(s):
- The FCC Intranet site displays a Privacy Notice:
- The collection or input mechanism uses another method to provide individuals with the Privacy Notice: The Lifeline Program's application form includes a privacy statement, and contractors who staff the call center also advise inquirers of their privacy rights when they contact the center.
- No Privacy Notice is provided:

5.12 If a Privacy Notice is provided, which of the following are included?

- Proximity and timing—the privacy notice is provided at the time and point of data collection.
- Purpose—describes the principal purpose(s) for which the information will be used.
- Authority—specifies the legal authority that allows the information to be collected.
- Conditions—specifies whether providing the information is voluntary, and the effects, if any, of not providing it.
- Disclosures—specify the routine use(s) that may be made of the information.
- Not applicable, as information will not be collected in this way.

Please explain your response:

USAC follows Federal privacy guidelines as these pertain to the Lifeline Program's privacy notification to applicants and participants in this program.

5.13 Will consumers have access to information and/or the information system on-line via [www.FCC.gov](http://www.FCC.gov)?<sup>4</sup>

- Yes
- No

Please explain your response:

As noted in Question 5.12, USAC follows Federal privacy guidelines. Individuals will contact the call center if they have questions about the Lifeline Program, since it is administered by USAC and third party contractors. The Lifeline Program is not accessibel via the FCC webportal.

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<sup>4</sup> The FCC’s web policy does not allow anyone under 13 years of age to have access to the FCC website.

5.14 What safeguards and security measures, including physical and technical access controls, are in place to secure the information and to minimize unauthorized access, use, or dissemination of the information that is stored and maintained in the information system?

(Check all that apply)

- Account name
- Passwords
  - Accounts are locked after a set period of inactivity
  - Passwords have security features to prevent unauthorized disclosure, *e.g.*, “hacking”
  - Accounts are locked after a set number of incorrect attempts
  - One time password token
  - Other security features:
- Firewall
- Virtual private network (VPN)
- Data encryption:
- Intrusion detection application (IDS)
- Common access cards (CAC)
- Smart cards:
- Biometrics
- Public key infrastructure (PKI)
- Locked file cabinets or fireproof safes
- Locked rooms, with restricted access when not in use
- Locked rooms, without restricted access
- Documents physically marked as “sensitive”
- Guards
  - Identification badges
  - Key cards
  - Cipher locks
  - Closed circuit TV (CCTV)
- Other:

5.15 Please explain what staff security training and other measures are in place to assure that the security and privacy safeguards are maintained adequately?

5.16 How often are the security controls reviewed?

- Six months or less:
- One year:
- Two years
- Three years:
- Four years
- Five years
- Other:

5.17 How often are IT personnel (*e.g.*, system administrators, information system/information system developers, contractors, and other ITC staff, *etc.*) who oversee the Lifeline Program’s databases and related IT operations trained and made aware of their responsibilities for protecting the information?

- There is no training
- One year:

- Two years
- Three years
- Four years
- Five years
- Other: USAC's contract with the third party contractors who manage the Lifeline Program's databases and staff the call center includes provisions that they must provide privacy training comparable to what Federal agencies provide.

If privacy training is provided, please skip to Question 5.19.

5.18 What are the safeguards to ensure that there are few opportunities for disclosure, unavailability, modification, and/or damage to the information system covered by this SORN, and/or prevention of timely performance of FCC operations if operational training is not provided?

5.19 How often must staff be “re-certified” that they understand the risks when working with personally identifiable information (PII)?

- Less than one year:
- One year:
- Two years
- Three or more years:
- Other re-certification procedures: As noted in Question 5.17, USAC's contract with the Lifeline Program's third party contractors contains requirements covering privacy training that is comparable to Federal privacy training requirements, *i.e.*, they meet FISMA guidelines.

5.20 How do USAC’s training and security requirements for this information system conform to the requirements of the Federal Information Security Management Act (FISMA)?

As noted above, USAC's contract specifies that the privacy training for these third party contractors that must meet Federal privacy requirements.

If the Privacy Threshold Assessment (PTA) was completed recently as part of the information system’s evaluation, please skip Questions 5.30 through 5.33, and proceed to Question 5.34.

5.21 What is the potential impact on individuals on whom the information is maintained in the information system(s) if unauthorized disclosure or misuse of information occurs? (check one)

- Results in little or no harm, embarrassment, inconvenience, or unfairness to the individual.
- Results in moderate harm, embarrassment, inconvenience, or unfairness to the individual.
- Results in significant harm, embarrassment, inconvenient, or unfairness to the individual.

Please explain your response:

Unauthorized disclosure of PII in the Lifeline Program could pose a moderate harm to an individual. The FCC has tried to minimize this harm by requiring an individual to provide the minimal amount of PII necessary to comply with the Federal requirements and to ensure the proper functioning of this program, for example, only the last four digits of a participants SSN are required.

5.22 What is the impact level for the information system(s) covered by this SORN and is it consistent with the guidelines as determined by the FIPS 199 assessment?

TBD

5.23 When was the “Assessment and Authorization” (A&A) completed for the information system(s) covered this SORN—please provide the A&A completion date?

TBD

5.24 Has the Chief Information Officer (CIO) and/or the Chief Information Security Officer (CISO) designated this information system as requiring one or more of the following:

- Independent risk assessment:
- Independent security test and evaluation:
- Other risk assessment and/or security testing procedures, *etc.*:
- Not applicable:

5.25 Does this information system use technology in ways that the Commission has not done so previously, *i.e.*, Smart Cards, Caller-ID, *etc*?

As noted in Question 1.1, the Lifeline Program was established to provide voice telephone service for individuals who meet the program's qualifications, as required under 47 CFR 54.404 - 54.410. The Lifeline program requires applicants to provide their PII and/or to contact the call center with questions, but the program does not monitor the participants.

5.26 How does the use of the technology affect the privacy of the general public and USAC employees and third party contractors?

Lifeline Program applicants and participants must provide their PII for the USAC's third party contractors to make a determination about their eligibility. IT technology is used to collect the PII and to store it for documentation and verification purposes only, as required by the Lifeline Program's regulations, which were enacted to eliminate abuses in the program. There are no other impacts on an individual applicant/participant's privacy.

5.27 Does this information system (covered by this SORN) include a capability to identify, locate, and/or monitor individuals?

The Lifeline Program does not monitor an individual's participation, except to the extent that participants must adhere to the program's requirements.

If the information system does not include any monitoring capabilities, please skip to **Section 6.0 Information Collection Requirements under the Paperwork Reduction Act (PRA):**

5.28 If the information system includes the technical ability to monitor an individual's movements identified in Questions 5.34 through 5.36 above, what kinds of information will be collected as a function of the monitoring of individuals?

5.29 What controls, policies, and procedures, if any, does this information system (covered by this SORN) contain any controls, policies, and procedures to prevent unauthorized monitoring?

**Section 6.0 Information Collection Requirements under the Paperwork Reduction Act (PRA):**

If this information system or database only affects FCC employees, please skip to Section 9.0<sup>5</sup>

6.1 Does the information system or database covered by this SORN solicit information via paperwork and/or recordkeeping requirements that effect the general public (non-FCC employees), which may include any of the following (including both voluntary and required compliance):

- FCC forms, licenses, or other documentation;
- Participation in marketing, consumer, or customer satisfaction surveys or questionnaires;
- Recordkeeping or related activities.

If so, is this information system subject to the requirements of the PRA because it solicits information via paperwork and/or recordkeeping requirements

- Yes, the information system includes any paperwork and/or recordkeeping requirements that non-FCC employees and contractors must complete.
- No, the information system does impose any paperwork and/or recordkeeping requirements, *i.e.*, the information it collects does not constitute an “information collection” as defined by the PRA.

If there are no paperwork or recordkeeping requirements (or if only FCC employees and contractors are the effected groups), this information system is exempt from the requirements of the PRA. Please skip to **Section 7.0 Correction and Redress:**

6.2 Is there a website that requests information, such as the information necessary to complete an FCC form, license, authorization, *etc.*?

- Yes
- No or Not applicable

Please explain your response:

6.3 If there are one or more PRA information collections that are covered by this SORN that are associated with the information system’s databases and paper files, please list the OMB Control Number, Title of the collection, and Form number(s) as applicable for the information collection(s):

3060-0819, 08/31/2014, Sections 54.400 – 54.417, Lifeline Assistance (Lifeline) Connection Assistance (Link Up) Reporting Worksheet and Instructions, FCC Forms 497, 550, 555, and 560.

6.4 Are there are any FCC forms associated with the information system(s) covered by this SORN, and if so, do the forms carry the Privacy Act notice?

- Yes: FCC Forms 497, 550, 555, and 560.

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<sup>5</sup> PRA requirements exclude information collections, *e.g.*, forms, surveys, questionnaires, *etc.*, that pertain solely to Federal employees.

- No
- Not applicable—the information collection does not include any forms.

6.5 Have the system managers contacted the Performance Evaluation and Records Management (PERM) staff to coordinate PRA requirements and submission of the information collection to the Office of Management and Budget?

- Yes
- No

Please explain your response:

The Lifeline Program meets the requisite PRA information collection requirements.

### Section 7.0 Correction and Redress:

7.1 What are the procedures for individuals wishing to inquire whether this SORN contains information about them consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.554 – 0.555 for the Privacy Act and Freedom of Information Act (FOIA) requirements?

Individuals wishing to inquire whether FCC/WCB-1, “Lifeline Program” SORN, contains information about them may address their inquiries to the WCB and/or USAC system manager(s). This is consistent with FCC rules under 47 CFR §§ 0.554 – 0.555 for the Privacy Act, as noted in this SORN.

7.2 What are the procedures for individuals to gain access to their own records/information/data in this information system that is covered by this SORN consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.554 – 0.555 for the Privacy Act and Freedom of Information Act (FOIA) requirements?

Individuals who seek access to the information about them that is contained in FCC/WCB-1, “Lifeline Program” SORN, may address their inquiries to the WCB and/or USAC system manager(s). This is consistent with FCC policies and rules under 47 CFR §§ 0.554 – 0.555, as noted in the SORN.

7.3 What are the procedures for individuals seeking to correct or to amend records/information/data about them in the information system that is covered by this SORN consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.556 – 0.558?

Individuals seeking to correct or to amend information about in FCC/WCB-1, “Lifeline Program” SORN, may address their inquiries to the WCB and/or USAC system manager(s). This is consistent with FCC policies and rules under 47 CFR §§ 0.556 – 0.558, as noted in the SORN.

7.4 Does the FCC provide any redress to amend or correct information about an individual covered by this SORN, and if so, what alternatives are available to the individual, and are these consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.556 – 0.558?

Individuals seeking any redress to amend or correct information about them in FCC/WCB-1, “Lifeline Program” SORN, may address their inquiries to the WCB and/or USAC system manager(s). This is consistent with FCC policies and rules under 47 CFR §§ 0.556 – 0.558, as noted in the SORN.

7.5 Does this SORN claim any exemptions to the notification, access, and correction, and/or amendment procedures as they apply to individuals seeking information about them in this SORN, and if so, are these exemptions consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.561?

FCC/WCB-1, "Lifeline Program" SORN does not claim any exemption to the notification, access, and correction and/or amendment procedures, as they apply to individuals seeking information about themselves in this SORN.

7.6 What processes are in place to monitor and to respond to privacy and/or security incidents? (Please specify what is changing if this is an existing SORN that is being updated or revised?)

The USAC staff issue periodic reminders to the staff who work with the information in this information system, including the PII that is covered by FCC/WCB-1" SORN, that it is "non public for internal use only," and that they should keep the information confidential and safeguard any printed materials.

7.7 How often is the information system audited to ensure compliance with FCC and OMB regulations and to determine new needs?

- Six months or less
- One year
- Two years
- Three years:
- Four years
- Five years
- Other audit scheduling procedure(s):

**Section 8.0 Consumer Satisfaction:**

8.1 Is there a customer or consumer satisfaction survey included as part of the public access to the information covered by this information system or database??

- Yes
- No
- Not applicable

Please explain your response:

There is no consumer satisfaction survey attached to the Lifeline Program.

If there are no Consumer Satisfaction requirements, please skip to **Section 9.0 Risk Assessment and Mitigation:**

8.2 Have any potential Paperwork Reduction Act (PRA) issues been addressed prior to implementation of the customer satisfaction survey?

- Yes
- No

Please explain your response:

**Section 9.0 Risk Assessment and Mitigation:**

9.1 What are the potential privacy risks for the information covered by this system of records notice (SORN), and what practices and procedures have you adopted to minimize them?

<b>Risks:</b>	<b>Mitigating factors:</b>
a. Inadvertent disclosure of PII of individuals who participate in the Lifeline Program.	a.
b.	b.

9.2 What is the projected production/implementation date for the information system(s) or database(s):

Initial implementation: January 2014  
 Secondary implementation:  
 Tertiary implementation:  
 Other implementation:

9.3 Are there any ancillary and/or auxiliary information system(s) or database(s) linked to this information system that are covered by this SORN, which may also require a Privacy Impact Assessment (PIA)?

- Yes
- No

If so, please state the application(s), if a Privacy Impact Assessment (PIA) has been done, and the completion date for PIA:

The Lifeline Program has no ancillary or auxiliary information systems, other than those associated with the program's databases and call center. The PII that these systems use is covered under the WCB-1 SORN.