



UNITED STATES
FEDERAL COMMUNICATIONS COMMISSION

PRIVACY IMPACT ASSESSMENT (PIA) FOR THE GENESIS BOUNDARY

July 2023
Annual Review Date

OFFICE OF GENERAL COUNSEL

Washington DC, 20554

Next Review Cycle: July 2024

Record of Approval

Document Approval	
Drafter Name: Kenneth Wisneski	Bureau/Office: OMD/IR
SAOP Approval	
Printed Name: Elliot S. Tarloff	Senior Agency Official for Privacy
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Signature & Date	

Record of Approval

Date	Description	Author
06/29/2023	Validation of information – System Owner	Dr. Hua Lu
07/01/2023	Validation of completeness – IT Compliance Lead	Liem Nguyen

Revision History

Date	Description	Name
3/21/2023	Initial Draft	ISSO – Kenneth Wisneski
6/9/2023	All sections updated based on IPA document	ISSO
6/21/2023	All sections updated	Privacy Officer’s Delegated Representative – Katherine Morehead
6/23/2023	Updated Section 1.3 B & D	ISSO
6/28/2023	Clerical edits and edits to Sections 1.2, 1.2B, 1.3B-D, 1.4A-B, 1.5C	Senior Agency Official for Privacy (SAOP) – Elliot S. Tarloff
6/28/2023	Comments from SAOP and Sections 1.2 and 1.3.	ISSO
6/29/2023	Formatting edits	SAOP

GENESIS System Boundary

1.1. Introduction

Section 208 of the E-Government Act of 2002¹ requires agencies to conduct a **Privacy Impact Assessment (PIA)** whenever they procure or develop an information technology system that will collect, maintain, or disseminate information about individual people. The PIA must document how the system will use information it collects about individuals and, unless it contains classified or sensitive information, it must be made available to the public. The PIA was intended to be a tool for agencies to protect personal information throughout a technology system's life cycle. The Office of Management and Budget (OMB) has commented: *"In general, PIAs are required to be performed and updated as necessary where a system change creates new privacy risks."*²

The FCC is subject to the requirements of the E-Government Act and is committed to identifying and addressing privacy risks whenever it develops or makes changes to its information systems. The questions below explore important privacy issues identified in the Act and in later guidance by the Office of Management and Budget (OMB) and the National Institute of Standards and Technology (NIST). A longer discussion of the FCC's PIA policies can be found in Chapter 9 of the FCC's Privacy Act Manual (FCC Inst. 1113.1).

System owners, in collaboration with the Information System Security Officers (ISSOs) should complete the **Initial Privacy Assessment (IPA)** prior to filling out the PIA. The FCC Senior Agency Official for Privacy (SAOP) uses the IPA to determine whether a system will collect the kind of information that would make it subject to the requirements of Section 208, including a PIA. A PIA should not be completed until an IPA is completed and the SAOP makes a determination.

If you have any questions, please contact the Privacy Team at privacy@fcc.gov.

¹ 44 U.S.C. § 3501 note.

² OMB Memorandum No. M-03-22 (Sep. 26, 2003), https://obamawhitehouse.archives.gov/omb/memoranda_m03-22

1.2. Authority To Operate (ATO) Boundary Overview

For each IT system that resides within the ATO Boundary, please use the table below to provide the system name, a brief description of the what the system does, whether it contains Personally Identifiable Information (PII) and a brief description of the PII (if applicable), the applicable System of Records Notice, the legal authorities to collect and maintain the PII, and whether the PII is shared with other systems (internal or external).

INFORMATION ABOUT THE SYSTEM
NAME OF THE SYSTEM GENESIS
NAME OF BUREAU Office of the Managing Director (OMD)
DOES THE SYSTEM CONTAIN PII? Yes.
PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PII (IF APPLICABLE) Genesis records current financial planning, purchasing, accounts receivable, accounts payable, disbursements (including payroll), and other financial and budget activities, including FCC employees' identity and government credit card information.
IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPLICABLE)? FCC/OMD-25, Financial Operations Information System (FOIS)
WHAT ARE THE LEGAL AUTHORITIES FOR THE COLLECTION OF THIS PII? 44 U.S.C. 3101, 3102, and 3309; Debt Collection Act as amended by the Debt Collection Improvement Act of 1996; Federal Managers Financial Integrity Act of 1982; Accountability of Tax Dollars Act, P.L. 107-289; and other government-wide federal financial statutes addressing debt collection, budget control, financial controls, fraud, waste and abuse, and internal controls codified in Title 31 United States Code.
DOES THE COMMISSION KEEP AN ACCURATE ACCOUNTING OF DISCLOSURES FROM THE SYSTEM AS REQUIRED BY SUBSECTION (c) OF THE PRIVACY ACT? Yes. The Privacy Team keeps an accurate accounting of disclosures of information.
DOES THIS SYSTEM SHARE THE PII WITH OTHER SYSTEMS? Yes.

INFORMATION ABOUT THE SYSTEM
NAME OF THE SYSTEM GENESIS Portal
NAME OF BUREAU Office of the Managing Director (OMD)
DOES THE SYSTEM CONTAIN PII? No.
PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PII (IF APPLICABLE) GENESIS Portal is a launch page for FCC users to use the GENESIS FCC Core Financial System which is located on the FCC intranet at intranet.fcc.gov. There is no PII associated with this launch page.
IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPPLICABLE)? N/A
WHAT ARE THE LEGAL AUTHORITIES FOR THE COLLECTION OF THIS PII? N/A
DOES THE COMMISSION KEEP AN ACCURATE ACCOUNTING OF DISCLOSURES FROM THE SYSTEM AS REQUIRED BY SUBSECTION (c) OF THE PRIVACY ACT? N/A
DOES THIS SYSTEM SHARE THE PII WITH OTHER SYSTEMS? No.

INFORMATION ABOUT THE SYSTEM
NAME OF THE SYSTEM GENESIS E2 Web Service Display Language (WSDL)
NAME OF BUREAU Office of the Managing Director (OMD)
DOES THE SYSTEM CONTAIN PII? No.
PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PII (IF APPLICABLE) N/A

IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPPLICABLE)? N/A
WHAT ARE THE LEGAL AUTHORITIES FOR THE COLLECTION OF THIS PII? N/A
DOES THE COMMISSION KEEP AN ACCURATE ACCOUNTING OF DISCLOSURES FROM THE SYSTEM AS REQUIRED BY SUBSECTION (c) OF THE PRIVACY ACT? N/A
DOES THIS SYSTEM SHARE THE PII WITH OTHER SYSTEMS? No.

INFORMATION ABOUT THE SYSTEM
NAME OF THE SYSTEM GENESIS E2
NAME OF BUREAU Office of the Managing Director (OMD)
DOES THE SYSTEM CONTAIN PII? Yes.
PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PII (IF APPLICABLE) PII data (i.e., User/Traveler name, phone, passport number and itinerary) is stored at and on Carlson Wagonlit Travel (CWGT) owned servers which provide the front end for FCC users to manage their travel business.
IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPPLICABLE)? FCC/OMD-25, Financial Operations Information System (FOIS)
WHAT ARE THE LEGAL AUTHORITIES FOR THE COLLECTION OF THIS PII? 44 U.S.C. 3101, 3102, and 3309; Debt Collection Act as amended by the Debt Collection Improvement Act of 1996; Federal Managers Financial Integrity Act of 1982; Accountability of Tax Dollars Act, P.L. 107-289; and other government-wide federal financial statutes addressing debt collection, budget control, financial controls, fraud, waste and abuse, and internal controls codified in Title 31 United States Code.
DOES THE COMMISSION KEEP AN ACCURATE ACCOUNTING OF DISCLOSURES FROM THE SYSTEM AS REQUIRED BY SUBSECTION (c) OF THE PRIVACY ACT? Yes. The CWGT Privacy Team keeps an accurate accounting of disclosures of information.

DOES THIS SYSTEM SHARE THE PII WITH OTHER SYSTEMS?

Yes.

INFORMATION ABOUT THE SYSTEM

NAME OF THE SYSTEM

GENESIS Reports

NAME OF BUREAU

Office of the Managing Director (OMD)

DOES THE SYSTEM CONTAIN PII?

Yes.

PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PII (IF APPLICABLE)

GENESIS Reports (i.e., Business Objects) is a CGI Momentum COTS offered report generator, which serves as the FCC's official repository for the agency's financial reports. The PII in reports may include contact information, other identification information, financial information, location information, travel information, employment information, and network information, depending on the type of report is created.

IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPLICABLE)?

FCC/OMD-25, Financial Operations Information System (FOIS)

WHAT ARE THE LEGAL AUTHORITIES FOR THE COLLECTION OF THIS PII?

44 U.S.C. 3101, 3102, and 3309; Debt Collection Act as amended by the Debt Collection Improvement Act of 1996; Federal Managers Financial Integrity Act of 1982; Accountability of Tax Dollars Act, P.L. 107-289; and other government-wide federal financial statutes addressing debt collection, budget control, financial controls, fraud, waste and abuse, and internal controls codified in Title 31 United States Code.

DOES THE COMMISSION KEEP AN ACCURATE ACCOUNTING OF DISCLOSURES FROM THE SYSTEM AS REQUIRED BY SUBSECTION (c) OF THE PRIVACY ACT?

Yes. The Privacy Team keeps an accurate accounting of disclosures of information.

DOES THIS SYSTEM SHARE THE PII WITH OTHER SYSTEMS?

Yes.

A. Is this a new ATO Boundary or an existing ATO Boundary?

☐ New Boundary

☒ Existing Boundary

B. If the ATO Boundary is/will consist of cloud-based computing system(s),³ please check the box that best describes the service the FCC receives/will receive from the cloud computing provider:

- ☒ The FCC uses provider-supported application/s on the provider's cloud network (Software as a Service or SaaS): CGI's Momentum Application.
- ☐ The FCC has deployed application/s on the provider's cloud network and the provider supports the applications (Platform as a Service or PaaS)
- ☐ The FCC has deployed its own application/s on the cloud network and controls how these application/s are configured and operate (Infrastructure as a Service or IaaS) [list applicable system(s)]

C. If the IT systems in the ATO Boundary are in the cloud, are they FedRAMP certified?

- ☐ Yes, all the IT systems are FedRAMP certified
- ☒ No, none, or only some, of the IT systems are FedRAMP certified
- ☐ Not applicable, ATO boundary is not Cloud based.

1.3 Collection of Data

A. Please explain why it is necessary to collect PII to carry out the purpose of each of the system(s) that maintain PII within this Boundary.

The FCC collects PII in this system in order to (1) process and track payments made and monies owed from or to individuals; (2) create tax records to be reported to federal, state, and local tax authorities; (3) track auction loans and payment history; (4) track employee Government credit cards; and (5) track debts owed to the FCC.

B. For each system within this Boundary, will this PII be collected from individuals themselves, or from third parties? If collected from individuals themselves, link to the Privacy Act Statement⁴ for each system that is included with the online or paper form the system(s) use(s) to collect the PII.

The PII within the GENESIS boundary (on GENESIS, GENESIS Reports, and GENESIS E2 Web Service Display Language (WSDL)) is not collected directly from individuals, but instead is ingested from other systems. The GENESIS E2 (i.e., CWGT) home page does have a Privacy Act Notice that the information it maintains is protected under the provisions of the Privacy Act of 1974 (Public Law 93-579). Website: <https://e2.gov.cwtsatotravel.com>

³ See NIST, *The NIST Definition of Cloud Computing*, Special Pub. No. 800-145 (Sep. 2011), <https://csrc.nist.gov/publications/detail/sp/800-145/final>.

⁴ A Privacy Act Statement must inform individuals about (1) the authority to solicit information, (2) the principal purpose(s) for collecting the information, (3) the routine uses for disclosing the information, and (4) whether providing the information is mandatory or voluntary.

C. What steps is the FCC taking to limit the collection of PII to only that which is necessary?

The FCC's Financial Operations unit ingests the minimum PII necessary to process the financial transactions of individuals who conduct business with the Commission. The FCC's Financial Operations unit will continue monitoring the data and business needs to ingest the least amount of PII necessary in the future.

D. What steps will the FCC take to make sure this PII is accurate, complete, and up to date?

GENESIS (e.g., GENESIS E2, GENESIS E2 WSDL) ingests PII from other systems and relies on those FCC internal and external systems to ensure that the PII collected is accurate and complete. GENESIS ensures that the PII is current by ingesting records from these systems daily.

1.4 Use of the Data

A. Please explain the data flow, including whether the PII will be ingested from, or shared with, another system. Are internal connections reflected in the Cyber Security Asset Management tool (CSAM)? Are Information Sharing Agreements (ISAs) in CSAM for external connections?

GENESIS ingests and shares PII from multiple FCC internal and external systems which are identified in the FCC GENESIS System Security and Privacy Plan (SSP). Information Sharing Agreements (ISAs) are stored in CSAM for external connections.

B. Will the information be shared with third parties as part of the operations of the information system (e.g., through an application programming interface or "API")?

GENESIS shares information under the various congressionally mandated Federal financial statutes and regulations that cover debt collection, budget control, financial controls, fraud, waste and abuse, and internal controls codified in Title 31 United States Code. This information is shared with the third parties using a Simple Object Access Protocol (SOAP)-based web service call.

C. How long will the PII be retained and how will it be disposed of?

Information in the systems within this boundary is retained and destroyed in accordance with applicable FCC policies and procedures, as well as with the FCC records disposition schedule or General Records Schedules approved by the National Archives and Records Administration (NARA).

1.5 Data Security and Privacy

A. What are the system's ratings for confidentiality, integrity, and availability?

Confidentiality	<input type="checkbox"/> High	<input checked="" type="checkbox"/> Moderate	<input type="checkbox"/> Low
Integrity	<input type="checkbox"/> High	<input checked="" type="checkbox"/> Moderate	<input type="checkbox"/> Low
Availability	<input type="checkbox"/> High	<input checked="" type="checkbox"/> Moderate	<input type="checkbox"/> Low

B. Discuss the physical, administrative, and technical controls in place to protect the data in the system.

The FCC protects its information resources with a dynamic set of security measures. Some of these measures (e.g., network firewalls, physical security) protect the entire FCC enterprise, while other measures (e.g., user access restrictions, encryption) are applied to specific information systems. Following the risk-based policy established in the Federal Information Modernization Act (FISMA), the FCC applies more security measures (also known as security "controls") to information systems that present higher operational risks. Consistent with this policy, the FCC applies specific security controls to systems that collect and process PII. A comprehensive list of the security and privacy controls the FCC may apply to its information systems can be found in National Institute of Standards and Technology (NIST) Special Publication No. 800-53, Revision 5 [[NIST](#)].

C. Does the system inherit privacy controls from an external provider? If an Interconnection Security Agreement (ISA), Memorandum of Understanding (MOU), or similar document is in place, please summarize the privacy applicable portions of the document.

Yes, data will be stored, processed, and transmitted between the systems on this boundary and US Treasury. The PII will be protected by each external provider and in-transit to their respective database repositories, if applicable. Privacy controls are inherited from each external provider and based on their associative ISA/MOU.

1.6 Access to the Information

A. Which FCC employees and contractors will have access to the PII in this information system?

Only authorized FCC supervisors, employees, and contractors have access to the electronic records files.

B. Does this system leverage Enterprise Access Controls?

Yes. GENESIS uses OKTA for access control.