



**Universal Service
Administrative Co.**

**PRIVACY IMPACT ASSESSMENT FOR
THE NATIONAL LIFELINE
ACCOUNTABILITY DATABASE (NLAD)**

May 21, 2021

Record of Approval

Document Approval		
USAC PRIVACY POC		
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National Lifeline Accountability Database

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 USAC Privacy Officer, in consultation with 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 USAC Privacy Officer at privacy@USAC.org or the FCC Privacy Team at privacy@fcc.gov.

¹ 44 U.S.C. § 3501 note.

² OMB Memorandum No. M-03-22 (Sep. 26, 2003), https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2003/m03_22.pdf.

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).

Please copy the table as necessary to complete the information for each system within the boundary.

INFORMATION ABOUT THE SYSTEM
<p>NAME OF THE SYSTEM</p> <p>National Lifeline Accountability Database</p>
<p>DOES THE SYSTEM CONTAIN PII?</p> <p>Yes</p>
<p>PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PII (IF APPLICABLE)</p> <p>The PII in NLAD is collected from individuals (residing in a single household) who have applied for federal universal service Lifeline/EBB program benefits; are currently receiving Lifeline benefits; are minors whose status qualifies a parent or guardian for Lifeline/EBB benefits; or who have received benefits under the Lifeline Program. The PII collect in Lifeline/EBB program includes information to verify identity, contact information, eligibility for the Lifeline/EBB benefit, and to check whether the individual already receives the Lifeline benefit.</p>
<p>IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPLICABLE)?</p> <p>NLAD: FCC/WCB-1, Lifeline Program, 86 Fed. Reg. 11526 (Feb. 25, 2021).</p> <p>EBB Program: FCC/WCB-3, Emergency Benefit Broadband Program, 86 Fed. Reg. 11523 (Feb. 25, 2021).</p>
<p>WHAT ARE THE LEGAL AUTHORITIES FOR THE COLLECTION OF THIS PII?</p> <p>NLAD: 47 U.S.C. §§ 151-154, 201-205, 214, 254, 403. 47 C.F.R. §§ 54.404-54.410.</p> <p>EBB Program: 47 U.S.C. 254; Consolidated Appropriations Act, 2021, Public Law 116–260 div. N, tit. IX, § 904; 47 CFR Part 54 Subparts E and P.</p>
<p>DOES THIS SYSTEM SHARE THE PII WITH OTHER SYSTEMS?</p> <p>NLAD shares information, including EBB Program Data, within the National Verifier.</p>

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 USAC receives/will receive from the cloud computing provider:

- USAC uses provider-supported application/s on the provider's cloud network (Software as a Service or SaaS) [AWS S3]
- USAC has deployed application/s on the provider's cloud network and the provider supports the applications (Platform as a Service or PaaS) [list applicable system(s)]
- USAC 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)

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

FedRAMP is designed for companies who sell services to be used by the federal government. The NLAD uses an AWS S3 (cloud service) bucket for data storage that is FedRAMP certified. The rest of the NLAD infrastructure resides in USAC's data center.

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.**

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>.

The PII is collected to identify and validate the individual seeking to receive Lifeline benefits under the Lifeline and EBB programs.

- 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 Notice⁴ for each system that is included with the online or paper form the system(s) use(s) to collect the PII.**

The PII will be collected both from individuals and from third parties representing those individuals. The Privacy Act Notices are available at:

- <https://www.usac.org/about/privacy-policies/>
- https://www.checklifeline.org/lifeline?id=nv_privacy&ln=RW5nbGlzaA%3D%3D
- <https://lifelinerad.org/rad/#/privacyStatement>

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

USAC only collects PII as directed by the FCC and which is needed to perform the Lifeline and Emergency Broadband Benefit Program mission.

What steps will USAC take to make sure this PII is accurate, complete, and up-to-date?

All participating Lifeline and EBB program providers and representative agents must certify under the penalty of perjury to the accuracy of the information provided to the Lifeline, including PII obtained from consumers. In addition, USAC utilizes Third Party Identity Verification (TPIV) (TransUnion) to ensure the PII is accurate.

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.**

An individual's PII data is entered into NLAD by an Eligible Telecommunication Carrier (ETC) to determine whether they can enroll in the Lifeline and EBB programs. The NLAD performs the following validations on the subscriber's data: (1) RAD is called to determine whether the ETC performing the subscriber enrollment has been approved;

⁴ A Privacy Act Notice 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.

(2) an address validation is called via United States Postal Service Address Matching System (USPS AMS) to assist in determining whether the subscriber’s address already receives the Lifeline benefit; (3) a duplicate validation, via the NLAD duplicate check, is called to determine whether the subscriber already receives the Lifeline benefit, and (4) NV is called to see whether the subscriber eligibility application is approved. If the subscriber is enrolling in EBB, they can be enrolled in NLAD through an Alternative Verification Process (AVP), which bypasses the eligibility check. Alternatively, the subscriber can be enrolled in EBB by checking their existing Lifeline eligibility.

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”)?

The PII data will be shared with the NV for Lifeline and EBB eligibility verification and the USPS AMS (address data only) to validate the address.

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

The Lifeline information in this system is maintained and disposed of in accordance with the National Archives and Records Administration (NARA) General Records Schedule DAA-0173-2017-0001-0002. The records shall be destroyed 10 years after the year it was created or when no longer needed for business or audit purposes, whichever comes later. USAC disposes of paper documents by shredding. Electronic records, files, and data are destroyed either by physical destruction of the electronic storage media or by erasure of the data.

The EBB information in this system is maintained and disposed of in accordance with the National Archives and Records Administration (NARA) General Records Schedule DAA-0173-2017-0001-0002. The records shall be destroyed (TBD) years after the year it was created or when no longer needed for business or audit purposes, whichever comes later. USAC disposes of paper documents by shredding. Electronic records, files, and data are destroyed either by physical destruction of the electronic storage media or by erasure of the data.

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.

Only the PII elements mandated for collection by the Federal Communication Commission (FCC) rules (i.e., 47 C.F.R. Part 54 Subparts E and P), or absolutely necessary to manage the Lifeline and EBB programs are collected by the NLAD system. In addition, NLAD utilizes role-based permissions so that only authorized users have access to PII as necessary. Sensitive PII such as date of birth or the last four digits of Social Security Numbers are not displayed or available via reports to external users of NLAD. Only a limited number of authorized USAC Lifeline and EBB program staff have access to view sensitive PII such as date of birth or last four digits of Social Security Numbers that is stored in NLAD, which is necessary to support data requests for audits or program reviews by USAC and/or the FCC.

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.

No.

1.6. Access to the Information

A. Which types of users will have access to the PII in this information system?

USAC users (including USAC contractors), FCC users, service providers, representative agents, State Agencies, and Tribal agencies.

B. Does this system leverage Enterprise Common Controls (ECC)?

Yes, it inherits controls from USAC ECC.

C. Does the system leverage the FCC's Accounting for Disclosure control?

Yes









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Final Audit Report

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