



**Universal Service
Administrative Co.**

**PRIVACY IMPACT ASSESSMENT FOR
THE NATIONAL VERIFIER LIFELINE
ELIGIBILITY DATABASE (NV)**

May 21, 2021

Record of Approval

Document Approval		
USAC PRIVACY POC		
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Version History

Date	Description	Author
10/17/2017	Privacy Impact Assessment for the National Verifier Lifeline Eligibility Database	J. Schreiber, J. Lee
5/11/2021	Privacy Impact Assessment for the National Verifier Lifeline Eligibility Database	L. Schecker, M. Sneed, M. Mansur, R. Mulligan, J. Ho

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National Verifier Lifeline Eligibility 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 Verifier Lifeline Eligibility 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 NV is collected from individuals (residing in a single household) to check their eligibility for federal universal service Lifeline and/or Emergency Broadband Benefit (EBB) Program benefits. The PII collected in Lifeline and EBB Programs include information to verify an individual’s identity, contact information, supporting verification of eligibility and to check whether the individual already receives a Lifeline and/or Emergency Broadband Benefit.</p>
<p>IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPLICABLE)?</p> <p>NV: 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>NV: 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>NV shares Lifeline and EBB data, with the National Lifeline Accountability Database (NLAD) to verify enrollment, State and Federal databases to check program eligibility, and TransUnion, USAC’s TPIV vendor, to verify an individuals identity.</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
The NV is built on the Accenture Insight Platform hosted on an AWS FedRAMP certified environment. The NV also uses ServiceNow hosted on an Terraform FedRAMP certified environment.
- No, none, or only some, of the IT systems are FedRAMP certified

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 PII is collected to identify and verify the eligibility of the individual seeking to receive Lifeline benefits under the Lifeline and EBB program.

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>.

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- 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 that is needed to perform the Lifeline and EBB Program missions.

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 NV, including PII obtained from consumers. In addition, USAC utilizes a third-party verifier 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 NV by an Eligible Telecommunication Carrier (ETC) to determine whether they are eligible for the Lifeline and EBB programs. The NV performs the following validations on the subscriber's data: (1) the Representative Accountability Database (RAD) is called to determine whether the ETC performing the subscriber eligibility check has been approved (if a consumer is checking their own eligibility, RAD is not called); (2) a State and Federal database check to determine

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.

whether an individual qualifies through a state or federal program; (3) a Third Party Identity Verification (TPIV) to determine the subscriber’s identity; (4) an address validation is called via United States Postal Service Address Matching System (USPS AMS) to validate the address to aid in the determination whether the subscriber’s address already receives the Lifeline benefit; and (5) a duplicates validation, via the NLAD duplicate check, is called to determine whether the subscriber already receives the Lifeline and/or Emergency Broadband benefit.

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 NLAD for duplicate benefit verification, State and Federal databases to check program eligibility, TransUnion, USAC’s TPIV vendor, to verify an individuals identity, 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 **High** **X** **Moderate** **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), that are absolutely necessary to manage the Lifeline and EBB programs, are collected by the NV system. In addition, NV 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 NV. Only a limited number of authorized USAC Lifeline and EBB program staff and BPO vendors have access to view sensitive PII such as date of birth or last four digits of Social Security Numbers that is stored in NV, 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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