

# Audit Case Management (ACM) System - Privacy Impact Assessment

<b>Application Name:</b>	Audit Case Management (ACM) System
<b>Date:</b>	September 1, 2020

## Record of Approval

Document Approval		
<b>Document POC</b>		
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<b>Signature:</b> /s/	<b>Date:</b> 6/21/2021	
<b>Approval Structure</b>		
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<b>Signature:</b> /s/	<b>Date:</b> 6/9/21	

## Record of Approval

Date	Description	Author
August 10, 2020	Initial Assessment Drafted	Samuel BowerCraft
June 3, 2021	Review by system owner	James Minder

\*Document created based on template from Federal Communications Commission (FCC) Information Technology (IT) department.

## Introduction

Section 208 of the E-Government Act of 2002<sup>[1]</sup> 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 will not be made available to the public. The PIA was intended to be a tool 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.*"<sup>[2]</sup>

Under the FCC contract Rolka Loube 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).

In accordance with FCC policy, system owners should complete the **Initial Privacy Assessment (IPA)** prior to filling out the PIA. The IPA helps system owners determine whether their systems will collect the kind of information that would make them subject to the requirements of Section 208. The PIA should not be completed if the IPA has not yet been completed first since it determines if your system requires a PIA.

If you have any questions, please contact [ITSecurity@rolkaloube.com](mailto:ITSecurity@rolkaloube.com)

[1] 44 U.S.C. § 3501 note.

System Overview

1	Avoiding technical terms and unexplained abbreviations, please provide a general description of this information system.	The ACM application provides a workflow tool for users to review user registration information in a secure, encrypted environment and to evaluate the appropriateness of that documentation for review and confirmation. This includes a database component and a file sharing component that is facilitated by the application to provide secure direct file access by users through the application only.
2	Is this a new information system or a significant revision of an existing system?	<input checked="" type="checkbox"/> New System <input type="checkbox"/> Revision of Existing System:
3	What is the purpose of this system?	The ACM system is a workflow system used to support audit processes involving audit work, review, and approval. The system provides an interface to allow users to review documentation and files relevant to the audit; record conclusions, findings, and notes; and pass items through the workflow for review and finalization. (see P-8)
4	If this system is going to be provided through a cloud-based computing system,[1] please check the box that best describes the service the FCC receives from the cloud computing provider:  <hr/> [1] See NIST, <i>The NIST Definition of Cloud Computing</i> , Special Pub. No. 800-145 (Sep. 2011), <a href="https://csrc.nist.gov/publications/detail/sp/800-145/final">https://csrc.nist.gov/publications/detail/sp/800-145/final</a> .	<input type="checkbox"/> The system is not cloud based. <input type="checkbox"/> The system uses provider-supported application(s) on the provider's cloud network (Software as a Service [SaaS]). <input type="checkbox"/> Rolka Loube has deployed application(s) on the provider's cloud network and the provider supports the applications (Platform as a Service [PaaS]). <input checked="" type="checkbox"/> Rolka Loube has deployed its own application(s) on the cloud network and controls how these application(s) are configured and operate (Infrastructure as a Service [IaaS]).
5	Under what legal authority is Rolka Loube developing, procuring, or revising this information system?	Rolka Loube has been awarded a contract to perform an audit of user eligibility for the TRS system which includes full review of documents to validate individuals as per the contract from the Federal Communications Commission (FCC).  Reference question 5 of the IPA response

Nature and Use of the Information that will be Collected

1	Specify what types of personally identifiable information (PII) may be collected, maintained, or processed in this information system. Check all that apply and add any types that are not listed below.
<p>PII Elements: This is not intended to be an exhaustive list. Specify other categories of PII, as needed.</p>	

<input checked="" type="checkbox"/> Full Name <input checked="" type="checkbox"/> Date of Birth <input checked="" type="checkbox"/> Home Address <input checked="" type="checkbox"/> Phone Number(s) <input checked="" type="checkbox"/> Place of Birth <input checked="" type="checkbox"/> Age <input type="checkbox"/> Race/Ethnicity <input checked="" type="checkbox"/> Alias <input checked="" type="checkbox"/> Sex <input checked="" type="checkbox"/> Email Address <input type="checkbox"/> Work Address <input checked="" type="checkbox"/> Taxpayer ID <input type="checkbox"/> Credit Card Number <input type="checkbox"/> Facsimile Number <input type="checkbox"/> Medical Information <input checked="" type="checkbox"/> Education Records <input checked="" type="checkbox"/> Social Security Number <input type="checkbox"/> Mother's Maiden Name <input type="checkbox"/> Biometric identifiers (e.g., fingerprint, voiceprint) <input type="checkbox"/> Audio Recordings	<input checked="" type="checkbox"/> Photographic Identifiers (e.g., image, xray, video) <input checked="" type="checkbox"/> Certificates (e.g., birth, death, marriage, etc.) <input checked="" type="checkbox"/> Legal Documents, Records, Notes (e.g., divorce decree, criminal records, etc.) <input checked="" type="checkbox"/> Vehicle Identifiers (e.g., license plates) <input checked="" type="checkbox"/> Financial Information (e.g., account number, PINs, passwords, credit report, etc.) <input type="checkbox"/> Geolocation Information <input checked="" type="checkbox"/> Passport Number <input type="checkbox"/> User ID <input type="checkbox"/> Internet Cookie Containing PII <input checked="" type="checkbox"/> Employment Status, History or Information <input type="checkbox"/> Employee Identification Number (EIN) <input checked="" type="checkbox"/> Salary <input checked="" type="checkbox"/> Military Status/Records/ID Number <input type="checkbox"/> IP/MAC Address <input checked="" type="checkbox"/> Driver's License/State ID Number (or foreign country equivalent) <input checked="" type="checkbox"/> Other (Please Specify): <ul style="list-style-type: none"> <li>• Minor's date of birth</li> </ul>	
2	Please explain why it is necessary to collect these PII data elements to carry out the purpose of this system.	To perform the audit of user eligibility, the PII noted above must be reviewed to confirm that the user meets eligibility requirements.
3	Will this PII be collected from individuals themselves, or from third parties?	The information is provided by third parties: service providers of the TRS program.
4	Will individuals be able to consent to the collection or particular uses of the information? What will the form of the consent be? What happens if individuals do not consent to the collection or particular uses?	Use of the TRS program includes consent to use this information to validate user eligibility. If a user refuses consent, access to TRS services will be terminated.
5	Please explain how these PII data elements will be processed or used in the course of operating this information system.	To perform the audit of user eligibility, the PII noted above must be reviewed to confirm that the user meets eligibility requirements. The PII reviewed is maintained as evidence to support the eligibility conclusions.
6	What steps will Rolka Loube take to make sure this PII is accurate, complete, and up-to-date?	Limited user access is in place with least privilege used to limit access. Connection to the main production network via virtual private networking (VPN) is required to access the application and the files containing PII.
7	Are there procedures in place to allow individuals access to their PII or to correct inaccurate information?	Yes, individuals can contact service providers to review and update their information. Corrections are then submitted to the company by the providers for review and finalization.
8	How long will the PII be retained and how will it be disposed of?	The data is retained indefinitely based on direction from the agency.

## Data Security

1	Are there administrative procedures and technical safeguards in place to protect the data in the system? What controls are in place to ensure proper use of the data?	Yes; access controls are in place that limit user access to the system and the user's rights within the system. IP restriction limits remote user access to the system with multifactor authentication and data is encrypted at rest and in transit.
2	Has the system undergone the appropriate security risk assessment and received authority to operate?	An ATO for this system is anticipated to be issued as of September 30, 2021. The ATO project is currently underway in collaboration with the FCC.

## Access and Sharing of the Information

1	Which Rolka Loube employees and contractors will have access to the PII in this information system?	Rolka Loube employees: <ul style="list-style-type: none"><li>• Sue Hurst, Amanda Coby, Sean Bull, Danielle Hulock, Emily Guidy, Tim Katz, Jaylene Ortiz, Cori Knicerbocker, James Minder</li></ul> Contractors (auditors)
2	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")?	No

## Privacy Act System of Records Notice

1	Is the FCC planning to publish or has it already published a Privacy Act System of Records Notice (SORN) for this information system? If the FCC has already published a SORN, please provide a citation to the Federal Register.	No SORN has been issued relative to this application.
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