



**Universal Service
Administrative Co.**

**PRIVACY IMPACT ASSESSMENT FOR
THE EMERGENCY BROADBAND
BENEFIT PROGRAM**

April 7, 2021

Record of Approval

| Document Approval | | |
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Emergency Broadband Benefit Program

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>Emergency Broadband Benefit Program</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 EBB program was established by the FCC to support access to broadband services and connected devices to help low-income households stay connected during the COVID-19 pandemic. Under the EBB program eligible low-income households may receive a discount off the cost of broadband service and certain connected devices during an emergency period relating to the COVID-19 pandemic, and participating providers can receive a reimbursement for such discounts. The PII in the EBB program includes information to verify identity, contact information, and documentation supporting verification of eligibility,</p> |
| <p>IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPLICABLE)?</p> <p>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>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>EBBP is implemented within and shares information with the Lifeline systems (National Lifeline Accountability (NLAD); National Lifeline Eligibility Verifier (National Verifier); and the Representative Agent Database (RAD)). EBBP also provides PII to the USAC Financial Operations System (FOS) to disburse payments.</p> |

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

- New Boundary
 Existing Boundary

EBBP is a new functionality being added as a feature of NLAD and NV.

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) [list applicable system(s)]
- 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)

National Verifier is deployed on Service Now in the cloud and on Accenture's Accenture Insights Platform (AIP).

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

Service Now; AIP

- 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.**

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 receive emergency broadband benefits under the EBB Program.

- 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 EBB program mission.

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

All participating EBB program providers and representative agents must certify under the penalty of perjury to the accuracy of the information provided to the EBB program, including PII obtained from consumers. In addition, USAC utilizes a third-party verifier to ensure the PII is accurate, and utilizes the functionalities of NLAD and NV to ensure the accuracy of PII.

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 will be entered into the NV to determine whether they are eligible to receive the broadband benefit under the EBB program qualifications. The NV performs the following validations on the applicants data: identity validation (via a third

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.

party identity verification (TPIV) service used in the NLAD), address validation (via United States Postal Service Address Matching System (USPS AMS) used in the NLAD), automated eligibility verification (via federal and/or state eligibility program eligibility data sources), manual verification if a consumer cannot be verified through the automated checks, and a duplicate validation (via the NLAD) to determine whether the individual already receives the broadband benefit. Individuals who qualify for the broadband benefit will have their PII data entered into the NLAD by a broadband provider for enrollment in the EBB program. The NLAD will share the individuals PII with the NV to verify their EBB eligibility status and perform an address and duplicate validation. The data flow is the same as the data flow in the NV and the NLAD.

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 (a) a TPIV service for identity verification; (b) federal and/or state eligibility program eligibility data sources to determine whether an individual qualifies for the broadband benefit through a federal and state program; and (c) the address data will be shared with the USPS AMS to validate the address.

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

The National Archives and Records Administration (NARA) has not established a records schedule for the information in the EBB program. Consequently, until NARA has approved a records schedule, USAC will maintain all information in accordance with NARA records management directives.

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 EBB functionality will reside in the NLAD and NV boundaries. The System Security Plan (SSP) for both NV and NLAD are being updated for this new feature. As such, the controls for EBBP will be defined in the NV and NLAD SSPs.

- 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.

NV and NLAD ISAs are being updated for the new EBB program feature. Computer Matching Agreements (CMAs) and Interconnection Security Agreements (ISAs) are being updated to reflect the new EBB program. A new category of service providers (non-ETCs) will also establish ISAs.

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