

TRS Determinations System - Privacy Impact Assessment

Application Name:	TRS Determinations System
Date:	September 1, 2020

Record of Approval

Document Approval		
Document POC		
Printed Name: Allan Jacks	Title/Role: CISO/Privacy Officer	
Signature: /s/	Date: 6/21/2021	
Approval Structure		
Printed Name: Sean Bull	Title/Role: COO/Authorizing Official	
Signature: /s/	Date: 6/9/21	

Record of Approval

Date	Description	Author
August 10, 2020	Initial assessment drafted	Samuel BowerCraft
June 1, 2021	Review by system owner	Garrett McGrath

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

Introduction

Section 208 of the E-Government Act of 2002^[1] 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.*"^[2]

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

[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 TRS Determinations application is a database that imports call detail records from service providers and applies logic to evaluate the calls to calculate reimbursement amounts to the service providers from the fund. Payment history is also stored in this system.
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 TRS Determination system is used to calculate reimbursement amounts for providers based on their monthly submissions for call detail records. The system evaluates the call detail records and based on evaluation logic calculates reimbursement amounts. This includes a calculation of the speed of answer metric for providers based on the records provided. (see task 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), https://csrc.nist.gov/publications/detail/sp/800-145/final .	<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 the contract to calculate and manage fund distributions to providers based on call detail records for the TRS fund by the Federal Communications Commission (FCC).

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.
PII Elements: This is not intended to be an exhaustive list. Specify other categories of PII, as needed.	

	<input type="checkbox"/> Full Name <input type="checkbox"/> Date of Birth <input type="checkbox"/> Home Address <input checked="" type="checkbox"/> Phone Number(s) <input type="checkbox"/> Place of Birth <input type="checkbox"/> Age <input type="checkbox"/> Race/Ethnicity <input type="checkbox"/> Alias <input type="checkbox"/> Sex <input checked="" type="checkbox"/> Email Address <input type="checkbox"/> Work Address <input type="checkbox"/> Taxpayer ID <input type="checkbox"/> Credit Card Number <input type="checkbox"/> Facsimile Number <input type="checkbox"/> Medical Information <input type="checkbox"/> Education Records <input 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 type="checkbox"/> Photographic Identifiers (e.g., image, xray, video) <input type="checkbox"/> Certificates (e.g., birth, death, marriage, etc.) <input type="checkbox"/> Legal Documents, Records, Notes (e.g., divorce decree, criminal records, etc.) <input type="checkbox"/> Vehicle Identifiers (e.g., license plates) <input type="checkbox"/> Financial Information (e.g., account number, PINs, passwords, credit report, etc.) <input type="checkbox"/> Geolocation Information <input type="checkbox"/> Passport Number <input checked="" type="checkbox"/> User ID <input type="checkbox"/> Internet Cookie Containing PII <input type="checkbox"/> Employment Status, History or Information <input type="checkbox"/> Employee Identification Number (EIN) <input type="checkbox"/> Salary <input type="checkbox"/> Military Status/Records/ID Number <input type="checkbox"/> IP/MAC Address <input type="checkbox"/> Driver's License/State ID Number (or foreign country equivalent) <input type="checkbox"/> Other (Please Specify):
2	Please explain why it is necessary to collect these PII data elements to carry out the purpose of this system.	The phone numbers are necessary to determine if the call is eligible for reimbursement under the rules of the TRS program. Email addresses are also needed if the email is used as a login identifier.
3	Will this PII be collected from individuals themselves, or from third parties?	The phone numbers and email addresses are collected from third parties, the service providers, and provided in the monthly submissions for evaluation for payment determination.
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?	The TDNs used for VRS are not owned by the user; as such consent is not required to collect or use the information.
5	Please explain how these PII data elements will be processed or used in the course of operating this information system.	The phone numbers are necessary to determine if the call is eligible for reimbursement under the rules of the TRS program.
6	What steps will Rolka Loube take to make sure this PII is accurate, complete, and up-to-date?	Auditing of the telephone numbers provided is performed to validate that the calls made for reimbursement are valid.
7	Are there procedures in place to allow individuals access to their PII or to correct inaccurate information?	No; the data collected is used to evaluate and calculate reimbursement. Testing of the data is done to confirm the validity of the telephone numbers and data is retained indefinitely for possible evaluation to prevent fraud, waste, and abuse.
8	How long will the PII be retained and how will it be disposed of?	Data is retained indefinitely as per instruction 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.
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?	Garrett McGrath, Amanda Coby, Brian Robinson, Sue Hurst, Derek Coates, James Muir, John Lamb
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
---	---	----