

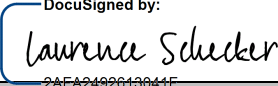
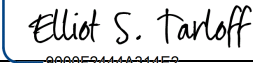


**Universal Service
Administrative Co.**

PRIVACY IMPACT ASSESSMENT FOR ENTERPRISE DATA SERVICES (EDS)

5/23/2024

Record of Approval

Document Approval		
USAC PRIVACY POC		
Laurence H. Schecker		Senior Advisor - Associate General Counsel and Privacy Officer
Signature DocuSigned by:  2AFA2492019041F...	Date 5/23/2024	
Accepted by:		
Elliot S. Tarloff		FCC Senior Agency Official for Privacy
Signature DocuSigned by:  9000F2444A314E2...	Date 5/24/2024	

Version History

Date	Description	Author
06/2022		Laurence Schecker, Mitchell Calhoun, Max Mansur, IT Security
12/05/2022	Draft	IT Security ISSO
04/17/2023	Draft addressing OGC feedback	IT Security ISSO
05/21/2024	Accepted edits from USAC and further proposed revisions to Sections 1.4A and B	FCC Senior Agency Official for Privacy (SAOP) – Elliot Tarloff

TABLE OF CONTENTS

EDS.....	1
1.1. INTRODUCTION	1
1.2. AUTHORITY TO OPERATE (ATO) BOUNDARY OVERVIEW	2
1.3. COLLECTION OF DATA	6
1.4. USE OF THE DATA.....	8
1.5. DATA SECURITY AND PRIVACY	9
1.6. ACCESS TO THE INFORMATION	10

Enterprise Data Services (EDS)

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 of the E-Government Act, including a PIA. A PIA should not be completed until an IPA is completed and the SAOP makes a determination that a PIA is necessary.

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/wp-content/uploads/2017/11/203-M-03-22-OMB-Guidance-for-Implementing-the-Privacy-Provisions-of-the-E-Government-Act-of-2002-1.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).

EDS is a collection of tools and applications that serve USAC's enterprise-wide business intelligence and reporting needs. EDS also provides data integration services across the programs and divisions of USAC. EDS is comprised of four systems: (1) the Enterprise Data Warehouse (EDW), consisting of three commercial-off-the-shelf (COTS) components: Vertica, Pentaho for Extract Transform Load (ETL), and Tableau; (2) various tools and reporting components comprised of Fuse (Enterprise Service Bus (ESB)), Socrata, Carto/Vector, EDS.net Tools and Java Tools, and various FCC Forms; (3) the Collibra Data Intelligence Cloud; and (4) the Central Geocoding Repository.

INFORMATION ABOUT THE SYSTEM
<p>NAME OF THE SYSTEM APPLICATION</p> <p>Enterprise Data Warehouse (EDW). This system is comprised of three commercial-off-the-shelf (COTS) components: Vertica, Pentaho for Extract Transform Load (ETL), Tableau</p>
<p>DOES THE SYSTEM CONTAIN PII?</p> <p>Yes, EDW (part of EDS³) contains business contact information originating from other USAC systems. It may also include individual PII provided by individuals instead of their business information. PII is not retrievable from EDS by any unique identifier.</p>
<p>PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PII (IF APPLICABLE)</p> <p>EDS does not create any data. Data within EDS is pulled from other USAC systems via Pentaho's Extract Transform Load (ETL) processes. During the ETL process, intentional individual PII residing in originating systems is not extracted into EDS. Incidental individual PII submitted instead of business PII from originating systems may exist in EDS, as it cannot be specifically omitted by Pentaho during the ETL processes.</p>
<p>IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPLICABLE)?</p> <p>N/A</p>
<p>WHAT ARE THE LEGAL AUTHORITIES FOR THE COLLECTION OF THIS PII?</p>

³ While this section covers EDW, EDS is mentioned and in each of these sections below because the subsystems are tools within EDS, so EDS is the system in question with regard to sharing PII.

47 U.S.C. § 254; 47 C.F.R. Part 54 Subparts D-H, Q, and R

DOES THIS SYSTEM SHARE THE PII WITH OTHER SYSTEMS?

No. EDS does not share any PII with other systems or tools outside of EDS. EDS does not create any of its own data. None of the business contact PII or individual PII incidentally contained in originating systems and extracted into EDS is shared with any other system.

INFORMATION ABOUT THE SYSTEM

NAME OF THE SYSTEM APPLICATION

Tools and Reporting: This sub-system refers to a set of tools and forms used by USAC to process and report data from other USAC systems, including COTS tools such as Fuse (Enterprise Service Bus (ESB)), Socrata, Carto/Vector, and EDS .NET Tools / Java Tools, as well as FCC SL Form 470, SL Form 471, SL Form 471 ECF, RHC Form 461)

DOES THE SYSTEM CONTAIN PII?

Yes, EDS contains business contact information PII originating from other USAC systems. It may also include individual PII provided by individuals instead of their business information. PII is not retrievable from EDS by any unique identifier.

PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PII (IF APPLICABLE)

EDS does not create any data. Data within EDS is pulled from other USAC systems via Pentaho's Extract Transform Load (ETL) processes. During the ETL process, intentional individual PII residing in originating systems is not extracted into EDS. Incidental individual PII submitted instead of business PII from originating systems may exist in EDS, as it cannot be specifically omitted by Pentaho during the ETL processes.

IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPLICABLE)?

N/A

WHAT ARE THE LEGAL AUTHORITIES FOR THE COLLECTION OF THIS PII?

47 U.S.C. § 254; 47 C.F.R. Part 54 Subparts D-H, Q, and R

DOES THIS SYSTEM SHARE THE PII WITH OTHER SYSTEMS?

No. EDS does not share any PII with other systems or tools outside of EDS. EDS does not create any of its own data. None of the business contact PII or individual PII incidentally contained in originating systems and extracted into EDS is shared with any other system.

INFORMATION ABOUT THE SYSTEM
<p>NAME OF THE SYSTEM APPLICATION</p> <p>Collibra Data Intelligence Cloud (CDIC)</p>
<p>DOES THE SYSTEM CONTAIN PII?</p> <p>No.</p>
<p>PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PII (IF APPLICABLE)</p> <p>CDIC does not hold any PII. CDIC collects metadata⁴ from USAC systems, including information and characteristics about USAC data. Therefore no PII exists in CDIC.</p>
<p>IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPLICABLE)?</p> <p>N/A</p>
<p>WHAT ARE THE LEGAL AUTHORITIES FOR THE COLLECTION OF THIS PII?</p> <p>47 U.S.C. § 254; 47 C.F.R. Part 54 Subparts D-H, Q, and R</p>
<p>DOES THIS SYSTEM SHARE THE PII WITH OTHER SYSTEMS?</p> <p>No. CDIC does not hold any PII and therefore does not share PII with other systems.</p>

INFORMATION ABOUT THE SYSTEM
<p>NAME OF THE SYSTEM APPLICATION</p> <p>Central Geocoding Repository (CGR)</p>
<p>DOES THE SYSTEM CONTAIN PII?</p> <p>No</p>
<p>PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PII (IF APPLICABLE)</p> <p>The function of the CGR is geocoding. CGR takes an address and returns a latitude/longitude (lat/long) coordinate for that address. The address is not identified as a residential or business address. The lat/long is used to obtain geographic information (county name, congressional district, census tract, etc.) that is essential for reporting purposes. CGR does not contain any PII.</p>
<p>IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPLICABLE)?</p> <p>N/A</p>

⁴ NIST 800-53 APPENDIX A definitions p. 407 (“Information that describes the characteristics of data, including structural metadata that describes data structures (i.e., data format, syntax, semantics) and descriptive metadata that describes data contents (i.e., security labels).”).

WHAT ARE THE LEGAL AUTHORITIES FOR THE COLLECTION OF THIS PII?

47 U.S.C. § 254; 47 C.F.R. Part 54 Subparts D-H, Q, and R

DOES THIS SYSTEM SHARE THE PII WITH OTHER SYSTEMS?

No. CGR does not hold any PII and therefore does not share PII with other systems.

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),⁵ 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)
 USAC has deployed application/s on the provider's cloud network and the provider supports the applications (Platform as a Service (PaaS), such as Appian Cloud)
 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)
 ATO boundary includes systems that are not cloud based

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.

⁵ 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>.

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.

USAC was appointed by the FCC as the permanent administrator of the federal Universal Service Fund (USF) and the four universal service support programs as well as congressionally appropriated programs *See* 47 C.F.R. Part 54 Subparts D-H, Q, and R.

- High Cost (HC)
- Lifeline (LI)
- Schools and Libraries (SL)
- Rural Health Care (RHC)
- Emergency Connectivity Fund (ECF)
- Affordable Connectivity Program (ACP)

EDS primarily facilitates USAC's centralization of data (including business PII) for analysis and reporting purposes. EDS gathers business data from USF-related USAC systems. EDS then transforms and aggregates the data to provide insight to USAC programs and management, the public, and the FCC, through reporting tools such as Tableau, Pentaho, Socrata, and other custom public tools and APIs.

In addition, EDS receives whistleblower complaint data from EPC and stores this data within the EDW. While using the whistleblower module in EPC, a person may choose to provide personal information (often personal email address or personal telephone number) as part of his/her narrative in an open text field. Access to whistleblower data in EDS is limited to a small group of USAC staff and authorized third party vendors who handle these matters, plus some FCC employees who have access to and are engaged in resolution of whistleblower reports.

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 Notice⁶ for each system that is included with the online or paper form the system(s) use(s) to collect the PII.

Information in the EDS system is not collected from individuals themselves. It is gathered from separate USF-related or appropriated fund USAC systems. Those systems are functionally independent of EDS and each provides its own separate Privacy Act notices to users of those systems.

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

All data in EDS is drawn from existing USAC USF or appropriated funds systems. EDS does not collect PII from external stakeholders or individuals, nor can external stakeholders or individuals access EDS. The PII (described above) obtained by EDS from other independent USAC systems is limited to the business PII needed for the analysis and reports required by USAC and the FCC. This data cannot be retrieved by use of a personal identifier.

EDS relies on the controls in the source systems to limit PII collection. These systems include the following:

- E-rate Productivity Center (EPC);
- Schools & Libraries Legacy;
- Rural Healthcare (RHC) System;
- High Cost (HC) Systems;
- Lifeline (including ACP) includes the National Lifeline Accountability Database (NLAD) and National Verifier (NV) systems;
- Financial Operations Center (FOS);
- E-File; and
- General Support System (GSS).

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

All data in EDS is drawn from existing USAC USF or appropriated funds systems. EDS does not collect PII from external stakeholders or individuals, nor can external stakeholders or individuals access EDS. The accuracy, completeness, and timeliness of the data are ensured in the source systems that supply data to EDS. The transfer of data

⁶ 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.

into EDS does not affect the data. Stakeholders may direct inquiries about their data to USAC call centers or to USAC's Privacy Officer at Privacy@USAC.org.

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.

EDS primarily facilitates the centralization of data for analysis and reporting purposes. EDS gathers all business data from each of the systems listed below. EDS then uses the data to perform analyses and to create reports to provide insight to USAC programs for USAC, the FCC, and external constituents.

- E-rate Productivity Center (EPC);
- Schools & Libraries Legacy;
- Rural Healthcare (RHC) System;
- High Cost (HC) Systems;
- Lifeline and the ACP which includes National Lifeline Accountability Database (NLAD), and National Verifier (NV)—but neither NLAD nor NV PII subject to applicable program system of records notices (SORNs);
- Financial Operations Center (FOS);
- E-File; and
- General Support System (GSS).

B. 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")?

EDS has links to systems that are managed by third parties under contract with USAC. Maximus, the E-rate BPO, accesses the Appian EDS database on the EDS SQL Server to perform various specialized reports to track performance for the E-rate USAC contract. These systems access EDS directly from behind the USAC firewall. USAC connects directly to the cloud-hosted platform using Pentaho ETL tool. The Open Data platform itself provides API functionality for public users to query it, but the data are not loaded in that manner.

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

All data in EDS is retained in the source program for periods established by the FCC in schedules mandated by the National Archives and Records Administration (NARA). Currently the retention period for USF programs is 10 years (or longer if there is a business

need to retain the records). NARA has not adopted a schedule for ACP records, and until a schedule is adopted the ACP records will be retained indefinitely. Data from ECF is stored within EDS. At such time that any records are authorized to be destroyed, USAC will adhere to National Institute of Standards and Technology (NIST) guidelines for the destruction of records.

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.

EDS has been implemented with security and privacy controls in compliance with and assessed and authorized under NIST SP 800-53 Revision 5 controls, as documented in the System Security Plan (SSP) for EDS. The control sources include, both as shared and fully provided controls, the FedRAMP authorized controls as described in the EDS SSP, the Enterprise Common Controls (ECC) as described in the ECC SSP, and the General System Support (GSS) as described in the GSS SSP. System specific or system shared/hybrid controls are specified in the EDS SSP. All controls have been assessed by an independent third party.

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 privacy controls are inherited from an external provider.

1.6. Access to the Information

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

USAC employees, USAC contractors, and FCC employees who are engaged in the resolution of whistleblower complaints related to the USF or appropriated programs.

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

Yes, as discussed above in sections 1.3 C and 1.5 B, EDS inherits controls from other USAC systems.

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

No.