



Privacy Impact Assessment

Full Entry Name: **Adobe LiveCycle Electronic Forms System (becoming part of the NASA NEF replacing FileNet forms solution)**

NASA Center: **Marshall Space Flight Center**

Office/Mission Program/Project Supported: **Office of the Chief Information Officer**

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System Overview: The Adobe Live Cycle Electronic Forms environment is a web-based electronic forms platform, offering end users access to forms via a browser and providing support for on-going forms development, routing and approval. Some forms contained in this system will collect sensitive unclassified information such as Personally Identifiable Information, Privacy Act, Proprietary and other categories which have specific protection requirements. At this time, there is a single data repository within the system, which temporarily houses information submitted via forms input, solely for the purposes of forms processing, routing and task completion. Information retained by this repository, is protected in a proprietary format, accessible only by System Administrator personnel, and is encrypted in any transmission after the fact. Forms are fully processed, and are thereafter made available to the specific form/information owner. At predetermined intervals, all form input data (including sensitive data) is purged from this temporary proprietary repository and not retained further. Forms and data are further retained by the individual information/form owner only, and as information owners they are directly responsible for ensuring the information is protected and managed in full compliance with all associated Federal laws, statutes, Government-wide and NASA policies and procedures. To that end, form/information owners will be required to conduct individual Initial Privacy Threshold Analysis (IPTAs) and any required Privacy Impact Assessments (PIAs) directly associated with their collections, prior to final approval and information collection via this system.

Privacy

Collection contains the following: (check the applicable items)	Cell phone number, Date of Birth, Driver's license number, Education records, Financial account information, Home mailing address, Home phone number, Medical notes, Medical records numbers, Military status and/or records, Mother's maiden name, Name, Passport number, Personal e-mail address, SSN, URL, UUPIC, Vehicle identifier (license plate), Work e-mail address, Work mailing address, and Work phone number
The application/website/information system stores, collects, or maintains Information in Identifiable Form (IIF).	Yes
Information is collected on the following:	Business Partners/Contacts, Grantees (including, but not limited to federal, state, local agencies), Contractors/Vendors/Suppliers, Government Employees, Members of the Public (excluding contractors and partners), and NASA Contractors
The collection of PII is justified.	Yes
Law, regulation, or Government-wide policy justifies the collection of the information.	Information collection justifications are outlined and assessed through separately required IPTAs and PIAs associated with each form and individual information collection. This requirement will be verified as fulfilled by the Adobe LifeCycle Electronic Forms System Administrator review and approval authority prior to any forms being authorized for functional release into production.
NASA will use the information in the following ways:	NASA's use of the data collected in a form is dependent on the specific form and its purpose. Information collection justifications are outlined and assessed through the required individual IPTAs/PIAs associated with each form and related information collection, by the form/information owners.
The collection is the minimum necessary to accomplish the purpose of the collection.	Yes
Consent	
The IIF is collected.	Voluntary, Comment: Information will be collected as required by the specific form and information owner, and may be either voluntary or mandatory, as stipulated in the IPTA or PIA directly associated with that collection.
There is a process in place for the following	
Ensuring consent is obtained from the individuals whose IIF is stored, collected, or maintained.	Yes (Each individual form/information owner will address the specifics and requirements for compliance associated with the information being collected. Forms developed for use through this system will undergo a development and life-cycle management process, including confirmation that any required IPTAs and any required PIAs have been completed prior to authorization and release into production. This is currently being implemented to ensure all individual collections of information within the Central Adobe LifeCycle data repository are fully compliant in addition to the overall system security standards and procedures.)

Allowing the individual whose IIF is stored, collected, or maintained to choose how their IIF is used.	Yes (Each individual form/information owner will address the specifics and requirements for compliance associated with the information being collected. Forms developed for use through this system will undergo a development and life-cycle management process, including confirmation that any required IPTAs and any required PIAs have been completed prior to authorization and release into production. This is currently being implemented to ensure all individual collections of information within the Central Adobe LifeCycle data repository are fully compliant in addition to the overall system security standards and procedures.)
Security Controls	
Monitor and Response to privacy and/or security incidents policies.	Yes
Access controls:	Yes
Technical controls (safeguards) are in place to minimize the possibility of unauthorized access, use, or dissemination of the IIF in the application/website/information system/cloud system.	Yes
Information Sharing Practices	
The application/website/information system/cloud systems collect IIF from other resources (e.g., databases, websites)	Yes (Information may be pulled from other resources such as IDMax to pre-populate certain elements of a form.)
The application/website/information system/cloud system populates data for other resources (e.g., databases, websites, or external agencies, people, or organizations).	No
Accessibility, Redress, Complaints	
There is a process in place for periodic reviews of IIF in the system to ensure data integrity, availability, accuracy, and relevance.	N/A (Covered under the individual form and information collection assessments (IPTAs) and PIAs as appropriate. Additionally, the Adobe LiveCycle System is configured to automatically purge expired workflow information upon completion of processing at a per-determined time set by the System Administrator. PIAs are required to be reviewed and updated upon any significant systematic changes, and annually at a minimum. This applies to both system and any data stored therein.)

Children's Online Privacy Protection Act (COPPA)	
The website intentionally stores, collects, or maintains information about minors (e.g., the targeted audience is minors).	Yes
Personal Information is collected from or about children under the age of 13.	Yes

Paperwork Reduction Act

The record/application/website/information system collects information (PII, IIF or any other information), in a standard way (via forms, surveys, questionnaires, etc.), from 10 or more persons (e.g., members of the public, NASA contractors, grantees or other).

Yes

There is an OMB Control Number.

Does not currently have one (NASA PRA Clearance Officer determined one is not required)

Justification

Each form collecting information will require a review and assessment (IPTA and/or PIA if required). Form templates/information collection instruments that collect information from members of the public as defined by the Paperwork Reduction Act (PRA) of 2002, will trigger the PRA and as a result, must bear the PRA statement, including the approved information collection number and expiration date. If this information is not provided and included on the instrument of collection, (the form actively used to collect), NASA will be in violation of the PRA, and the information collection will be reportable to Office of Management and Budget (OMB) as such. Because this site is publicly accessible, the OMB has the ability to review its contents at any time, and NASA will be held accountable for any violations. Commensurate with this understanding, the forms development and management process will include validation of completion of any IPTAs or PIAs (as required), to ensure full compliance prior to issuing authorization for any form to be released into production for active data collection.

Web Measurement and Customizing Technology

The Application/Website/Information System Utilizes Web Measurement and Customization Technology (Cookies/Persistent Tracking).

No

Concur:

/s/ Concurred

RICHARD RODGERS

System Owner

Date: 12/12/2013

Concur:

/s/ Concurred

STAYCE HARRIS HOULT

Center Privacy Manager

Date: 12/12/2013

Concur:

/s/ Concurred

BRYAN MCCALL

NASA Privacy Program Manager

Date: 12/16/2013

Approve:

LARRY SWEET

Senior Agency Official for Privacy

Date: 12/17/2013