

**Acronyms**

ATO - Authorization to Operate  
 CAC - Common Access Card  
 FISMA - Federal Information Security Management Act  
 ISA - Information Sharing Agreement  
 HHS - Department of Health and Human Services  
 MOU - Memorandum of Understanding  
 NARA - National Archives and Record Administration  
 OMB - Office of Management and Budget  
 PIA - Privacy Impact Assessment  
 PII - Personally Identifiable Information  
 POC - Point of Contact  
 PTA - Privacy Threshold Assessment  
 SORN - System of Records Notice  
 SSN - Social Security Number  
 URL - Uniform Resource Locator

**General Information**

<b>PIA Name:</b>	HRSA - ICS - QTR3 - 2021 - HRSA751663	<b>PIA ID:</b>	1377977
<b>OpDiv:</b>	HRSA	<b>Title:</b>	HRSA - Injury Compensation System
<b>Legacy PIA ID:</b>			

**PTA**

<b>PTA - 1A:</b>	Identify the Enterprise Performance Lifecycle Phase of the system	Operations and Maintenance
<b>PTA - 1B:</b>	Is this a FISMA-Reportable system?	Yes
<b>PTA - 2:</b>	Does the system include a website or online application?	Yes
<b>PTA - 2A:</b>	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?	

**URL Details**

Type of URL	List Of URL
Publicly accessible website with log in	Injurycompensation.hrsa.gov

<b>PTA - 3:</b>	Is the system or electronic collection, agency or contractor operated?	Agency
<b>PTA - 3A:</b>	Is the data contained in the system owned by the agency or contractor?	
<b>PTA - 5:</b>	Does the system have or is it covered by a Security Authorization to Operate (ATO)?	Yes
<b>PTA - 5A:</b>	If yes, Date of Authorization	5/16/2019
<b>PTA - 5B:</b>	If no, Planned Date of ATO	
<b>PTA - 8:</b>	Please give a brief overview and purpose of the system by describing what the functions of the system are and how the system carries out those functions?	The Injury Compensation System (ICS) is an information system to process the claims of individuals who are seeking compensation from

the Countermeasures Injury Compensation Program (CICP) and the National Vaccine Injury Compensation Program (VICP). The Injury Compensation System (ICS) supports HRSA with VICP and CICP program administration, claims administration and monitoring, management reporting, and secure document management.

Categories of Records in the System consist of documents that may include, but are not limited to, general or congressional correspondence, requests, case number assignment, HHS responses to correspondence, medical and legal documentation, employment documentation, documentation concerning services or benefits available from the United States or any third party (including any State or local governmental entity, private insurance carrier, or employer), payment information, and other related case processing documents. Documentation submitted includes the Requests for Benefits packages, Court filings, legal documents, medical records, financial documents, epidemiological information, and contractor personnel data. PII is a part of the documents mentioned previously. The data is collected in .pdf format and maintain on a HRSA secure server farm. The data is entered or uploaded into the ICS and stored on a unique server housed at the Sterling Data Center. It is processed and utilized by staff through the automated workflow of the ICS. The data is necessary to process all parts of claims and requests for benefits and will be used for reporting data and research. The Contractors are direct and operate on behalf of the agency and use the agency's credentials. ICS is utilized by organizational (HRSA employees and direct contractors) and non-organizational (HHS employees).

**PTA - 9:** List and/or describe all the types of information that are collected (into), maintained, and/or shared in the system regardless of whether that information is PII and how long that information is stored.

**PTA - 9A:** Are user credentials used to access the system?

Yes

**PTA - 9B:** Please identify the type of user credentials used to access the system.

HHS User Credentials  
HHS/OpDiv PIV Card

**PTA - 10:** Describe why all types of information is collected (into), maintained, and/or shared with another system. This description should specify what information is collected about each category of individual

The Vaccine Injury Compensation Program (VICP) is a no-fault alternative to the traditional tort system for resolving vaccine injury claims that

has been providing compensation to people found to be injured by certain vaccines for the last 25 years. The Countermeasures Injury Compensation Program (CICP), funded in 2009, provides compensation to individuals for serious physical injuries or deaths from pandemic, epidemic or security countermeasures identified in declarations issued by the Secretary of HHS. These programs provide an avenue for people adversely impacted by covered vaccines and countermeasures to receive compensation. The data needed for both Programs is collected from all the documents submitted from claimants and requesters. Documentation submitted includes the Requests for Benefits packages, Court filings, legal documents, medical records, financial documents, epidemiological information, and contractor personnel data. PII is a part of the documents mentioned previously. The data is collected in .pdf format and maintain on a HRSA secure server farm. The data is entered or uploaded into the ICS and stored on a unique server housed at the Sterling Data Center. It is processed and utilized by staff through the automated workflow of the ICS. The data is necessary to process all parts of claims and requests for benefits and will be used for reporting data and research. The Contractor are direct and operate on behalf of the agency and use the agency???'s credentials. ICS is utilized by organizational (HRSA employees and direct contractors) and non-organizational (HHS employees).

**PTA - 10A:** Are records in the system retrieved by one or more PII data elements?

No

**PTA - 10B:** Please specify which PII data elements are used.

**PTA - 11:** Does the system collect, maintain, use or share PII?

Yes

### PIA

**PIA - 1:** Indicate the type of PII that the system will collect or maintain

Social Security Number  
 Name  
 Mother's Maiden Name  
 E-Mail Address  
 Phone numbers  
 Medical records (PHI)  
 Certificates  
 Military Status  
 Taxpayer ID  
 Date of Birth  
 Photographic Identifiers  
 Biometric Identifiers  
 Mailing Address  
 Medical Records Number  
 Financial Account Info  
 Legal Documents

		Employment Status
<b>PIA - 2:</b>	Indicate the categories of individuals about whom PII is collected, maintained or shared	Employees/ HHS Direct Contractors  Public Citizens  Vendors/Suppliers/Third-Party Contractors (Contractors other than HHS Direct Contractors)  Other
<b>PIA - 3:</b>	Indicate the approximate number of individuals whose PII is maintained in the system	Above 2000
<b>PIA - 4:</b>	For what primary purpose is the PII used?	PII is used in case review, to determine eligibility, and to process payments of awards & compensation. The Injury Compensation System (ICS) uses the credential from Alternative logon token (ALT) card for network and applications access. Credential may include username, password, work address, division, company name, etc.
<b>PIA - 5:</b>	Describe any secondary uses for which the PII will be used (e.g., testing, training or research)	PII may also be used in data reporting and research.
<b>PIA - 6:</b>	Describe the function of the SSN/Taxpayer ID.	A Social security number (SSN) or a Tax Identification Number (TIN) is used to process payment of awards or compensation to claimants or requesters
<b>PIA - 6A:</b>	Cite the legal authority to use the SSN	The Treasury Department requires either a SSN or a TIN in order to issue payment on behalf of the Federal Government. The statutory authority for the program is National Childhood Vaccine Injury Act of 1986, 42 U.S.C. 300aa-10.
<b>PIA - 7:</b>	Identify legal authorities, governing information use and disclosure specific to the system and program	Vaccine Injury Compensation Program (VICP): Section 2112(b)(2) of the PHS Act, 42 U.S.C. 300aa-12(b)(2) requires that within 30 days after the Secretary receives service of any petition filed under section 2111 the Secretary shall publish notice of such petition in the Federal Register." Countermeasures Injury Compensation Program (CICP): Section 319F-3(b) of the Public Health Service Act (PHS Act) (42 U.S.C. 247d-6d). provides compensation to certain individuals for serious physical injuries or deaths resulting from the administration or use of pandemic, epidemic, or security countermeasures identified in declarations issued by the Secretary of the U.S. Department of Health and Human Services (the Secretary)
<b>PIA - 8:</b>	Provide the number, title, and URL of the Privacy Act System of Records Notice (SORN) that is being used to cover the system or indicate whether a new or revised SORN is in development.	09-15-0071, Countermeasures Injury Compensation Program  09-15-0056, Injury Compensation Programs, HHS/HRSA/HSB.  Injurycompensation.hrsa.gov
<b>PIA - 9:</b>	Identify the sources of PII in the system	Directly from an individual about whom the

		<p>information pertains</p> <ul style="list-style-type: none"> <li>Hard Copy Mail/Fax</li> <li>Government Sources <ul style="list-style-type: none"> <li>Other HHS OPDIV</li> <li>Other Federal Entities</li> </ul> </li> <li>Non-Government Sources <ul style="list-style-type: none"> <li>Members of the Public</li> <li>Private Sector</li> </ul> </li> </ul>
<b>PIA - 9A:</b>	Identify the OMB information collection approval number or explain why it is not applicable.	<b>OMB Control Number:</b> 0915-0334. <b>Expiration Date:</b> 3/31/2023
<b>PIA - 9B:</b>	Identify the OMB information collection expiration date.	9/16/2024
<b>PIA - 10:</b>	Is the PII shared with other organizations outside the system's Operating Division?	Yes
<b>PIA - 10A:</b>	Identify with whom the PII is shared or disclosed and for what purpose	<p>Other Federal Agency/Agencies</p> <p>Private Sector</p> <p>Within HHS</p>
<b>PIA - 10A (Justification):</b>	Explain why (and the purpose) PII is shared with each entity or individual.	<p>Within HHS: Office of General Counsel (OGC) are the attorneys for the Secretary of HHS.</p> <p>Other Federal Agency/Agencies: US Court of Federal Claims, Department of Justice both have roles in the VICP.</p> <p>Private Sector: Brokers purchase annuities as necessary. Life Care Planners and Vocational Counselors provide information on the types and amounts of compensation needed in certain cases.</p>
<b>PIA - 10B:</b>	List any agreements in place that authorizes the information sharing or disclosure (e.g., Computer Matching Agreement, Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).	<p>Inter-agency Agreement between the Office of the Secretary, HHS, and the Health Resources and Services Administration on behalf of OGC. National Childhood Vaccine Injury Act of 1986 (Public Law 99-660).</p> <p>Public Readiness and Emergency Preparedness Act of 2005 (Public Law 109-148).</p>
<b>PIA - 10C:</b>	Describe process and procedures for logging/tracking/accounting for the sharing and/or disclosing of PII	Both the VICP and the CICIP track the disclosure of all information. Call logs are maintained for telecommunications and written responses are kept for all written correspondence. The VICP has uploaded its communication records into the ICS and the CICIP is in the process of migrating its hard copies into the ICS.
<b>PIA - 11:</b>	Describe the process in place to notify individuals that their personal information will be collected. If no prior notice is given, explain the reason	The publication of a Systems of Records Notice in the Federal Register notifies individuals that their personal information will be collected.
<b>PIA - 12:</b>	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
<b>PIA - 13:</b>	Describe the method for individuals to opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason	Individuals provide consent when they voluntarily submit a Request for Benefits Package to the CICIP or file a petition with the VICP, which

		includes PII. They may opt-out by withdrawing their case.
<b>PIA - 14:</b>	Describe the process to notify and obtain consent from the individuals whose PII is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of original collection). Alternatively, describe why they cannot be notified or have their consent obtained	If a major change in information collection or usage is necessary for either the VICP or the CICP, that Program's SORN would be modified and published in the Federal Register according to standard procedures. In addition, letters to the impacted individuals may be sent providing information on the change and their rights regarding consent.
<b>PIA - 15:</b>	Describe the process in place to resolve an individual's concerns when they believe their PII has been inappropriately obtained, used, or disclosed, or that the PII is inaccurate. If no process exists, explain why not	<p>To contest a record in the system, the individual must contact the System Manager at the address specified in the SORN and reasonably identify the record, stipulate the information being contested, state the corrective action sought and the reason(s) for requesting the correction, along with supporting documentation to show how the record is inaccurate, incomplete, untimely, or irrelevant.</p> <p>To contest a record in the system, contact the System Manager at the address specified above and reasonably identify the record, stipulate the information being contested, state the corrective action sought and the reason(s) for requesting the correction, along with supporting documentation to show how the record is inaccurate, incomplete, untimely, or irrelevant.</p>
<b>PIA - 16:</b>	Describe the process in place for periodic reviews of PII contained in the system to ensure the data's integrity, availability, accuracy, and relevancy. Please address each element in your response. If no processes are in place, explain why not	Cases in the ICS go through multiple reviews throughout the process of case review, eligibility determination, and to process payments of awards & compensation.
<b>PIA - 17:</b>	Identify who will have access to the PII in the system and the reason why they require access	<p>Users</p> <p>Administrators</p> <p>Developers</p> <p>Contractors</p> <p>Others</p>
	<p>Provide the reason of access for each of the groups identified in PIA -17</p> <p>Users: To perform the work of the Programs.</p> <p>Administrator: To maintain the workflow of the ICS as needed.</p> <p>Developers: To develop the appropriate functionality of the ICS.</p> <p>Contractors: To develop and maintain the ICS.</p> <p>Others: Life Care Planners &amp; Vocational Counselors access to the ICS, to assess Requester's benefits needs, The previous also applies to Brokers to recommend annuities to provide compensation,</p>	
<b>PIA - 17A:</b>		
<b>PIA - 17B:</b>	Select the type of contractor	HHS/OpDiv Direct Contractor
<b>PIA - 18:</b>	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII	Access to PII in the ICS is role-based according to job duties.

<b>PIA - 19:</b>	Describe the technical methods in place to allow those with access to PII to only access the minimum amount of information necessary to perform their job	Roles are assigned to staff according to job duties and access to PII is limited based on role
<b>PIA - 20:</b>	Identify training and awareness provided to personnel (system owners, managers, operators, contractors and/or program managers) using the system to make them aware of their responsibilities for protecting the information being collected and maintained	All employees must complete annual Records Management and General Security Awareness training.
<b>PIA - 21:</b>	Describe training system users receive (above and beyond general security and privacy awareness training).	Users receive training through the HRSA security awareness training portal.
<b>PIA - 23:</b>	Describe the process and guidelines in place about the retention and destruction of PII. Cite specific NARA records retention schedule(s) and include the retention period(s)	Retention and disposal for the VICP: The records shall be disposed of by shredding twenty-five years after the termination of all administrative

and judicial proceedings, determined by a final adjudication. Upon written notification to the Government, the petitioner shall have the right to reclaim the original medical records submitted to the Government, after the final adjudication. The plan is the same for the CICP. Records will be retained in accordance with the Records Control Schedule of HRSA. The records shall be disposed of 25 years after closed case files. (N1-512-96-1).

**Authorized users:** Access will be limited to the System Manager, authorized HRSA/HSB personnel responsible for administering these programs, and authorized HHS Office of the General Counsel personnel responsible for advising these programs. HRSA/HSB will maintain a current list of authorized users.

**Physical safeguards:** All hard copy files will be stored in filing cabinets which will be kept in locked and secured rooms during non-work hours; portable electronic storage and computer equipment will be retained in areas where fire and safety codes are strictly enforced. All electronic and hard copy documents will be protected on a 24-hour basis in security areas. Security guards will perform random checks of the physical security of the record storage area.

**Procedural safeguards:** HRSA/HSB will establish stringent safeguards in line with the sensitivity of the records. These will include transmitting records to consultants by Federal Express, United Parcel Service, or other courier service to ensure that a signature is required upon receipt of the records; escorting visitors into areas where records are maintained; utilizing two-factor authentication for computer access; and securing areas where records are stored. Job-specific assigned roles will control the release of data only to authorized users. All users of personal information in connection with the performance of their jobs will protect information from public view and from unauthorized personnel entering an unsupervised office.

**Perform risk assessment:** Risk assessments and continuous monitoring activities will ensure that vulnerabilities, risks, and other security concerns are identified and addressed in the system design and throughout the life cycle of the project. This will be consistent with the Information Security Program Policy, HHS IRM Policy 2004-002.001 (Dec. 15, 2004), Section 3.7.3. **Implementation guidelines:** DHHS Chapter 45-13 "Safeguarding Records Contained in Systems of Records;" the Information Security Program Policy, HHS IRM Policy 2004-002.001 (Dec. 15, 2004); and Appendix III to OMB Circular No. A-130 "Security of Federal Automated Information Resources;" Appendix I to OMB Circular No. A-130, "Federal Agency Responsibilities for Maintaining Records About Individuals. ICS utilizes the following System of Records Notice (SORN) to cover the system: 09-15-0071, Countermeasures Injury Compensation Program 09-15-0056, National Vaccine Injury Compensation Program



<b>PIA - 24:</b>	Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response	ICS relies on network security controls provided by the contractor and HRSA managed through HRSA's General Support System (GSS). The HRSA GSS has a separate PIA. The ICS implements firewalls, network, and host base intrusion detection to secure its facilities. Boundary entry points are controlled by firewall rules and protected by Intrusion Detection Servers to prevent unauthorized access.
<b>PIA - 25:</b>	Describe the purpose of the web site, who has access to it, and how users access the web site (via public URL, log in, etc.). Please address each element in your response	<p>The Injury Compensation System (ICS) is an information system to process the claims of individuals who are seeking compensation from the Countermeasures Injury Compensation Program (CICP) and the National Vaccine Injury Compensation Program (VICP). The Injury Compensation System (ICS) supports HRSA with VICP and CICP program administration, claims administration and monitoring, management reporting, and secure document management.</p> <p>Users: To perform the work of the Programs.</p> <p>Administrator: To maintain the workflow of the ICS as needed.</p> <p>Developers: To develop the appropriate functionality of the ICS.</p> <p>Contractors: To develop and maintain the ICS.</p> <p>Others: Life Care Planners &amp; Vocational Counselors access to the ICS, to assess Requester's benefits needs, the previous also applies to Brokers to recommend annuities to provide</p>
<b>PIA - 26:</b>	Does the website have a posted privacy notice?	Yes
<b>PIA - 27:</b>	Does the website use web measurement and customization technology?	No
<b>PIA - 27A:</b>	Select the type of website measurement and customization technologies is in use and if it is used to collect PII	
<b>PIA - 28:</b>	Does the website have any information or pages directed at children under the age of thirteen?	No
<b>PIA - 28B:</b>	Is there a unique privacy policy for the website and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
<b>PIA - 29:</b>	Does the website contain links to non-federal government websites external to HHS?	No