


General Information			
<b>PTA / PIA Name:</b>	HRSA - CART - QTR3 - 2025 - HRSA1446244	<b>PTA / PIA ID:</b>	3603524
<b>Component Name:</b>	HRSA - BPHC Claims Analysis Review Tracking	<b>ATO Boundary Name:</b>	BPHC Claims Analysis Review Tracking
<b>Overall Status:</b>	Complete 	<b># of Days - Open:</b>	135
<b>Submitter:</b>		<b>Submit Date:</b>	8/20/2025
<b>Next Assessment Date:</b>	11/19/2028	<b>Expiration Date:</b>	11/19/2028
<b>Office:</b>		<b>OpDiv:</b>	HRSA
<b>Security Categorization:</b>	Moderate		
<b>Make PIA available to Public?:</b>	No	<b>PIA Required:</b>	Yes
<b>General 01:</b>	Identify the Enterprise Performance Lifecycle Phase of the system.		Operations and Maintenance
<b>General 02:</b>	Is this a FISMA-Reportable system?		Yes
<b>General 03:</b>	Does the system have or is it covered by a Security Authorization to Operate (ATO)?		Yes
<b>General 04:</b>	ATO Date or Planned ATO Date.		8/22/2024
<b>General 05:</b>	Is the system or electronic information collection, agency or contractor operated?		Contractor
<b>History Log:</b>	<a href="#">View History Log</a>		

Privacy Threshold Analysis			
<b>Privacy Threshold Analysis</b>			
<b>PTA 01:</b>	Point of Contact (POC) Name		Michael Makinde Rebecca Andam
<b>PTA 01A:</b>	POC Title and Organization		HRSA
<b>PTA 01B:</b>	POC Email Address		MMakinde@hrsa.gov
<b>PTA 01C:</b>	POC Phone Number		301-3709562
<b>PTA 02:</b>	Indicate the following reason(s) for this PTA. Choose from the following options.		PIA Validation (PIA Refresh)
<b>PTA 02A:</b>	Describe in further detail any changes to the system that have occurred since the last PIA.		No changes since last PIA

<b>PTA 03:</b>	Is the data contained in the system owned by the agency or contractor?	Agency
<b>PTA 04:</b>	Please give a brief overview of the purpose of the system by describing what the functions of the system are and how the system carries out those functions in support of HHS.	The Bureau of Primary Health Care (BPHC) Claims Analysis Review & Tracking System (CART) will streamline and effectively catalog expert medical reviews, risk management reports, and other information pertinent to litigations, and track claims. It will create a more efficient, and accurate system for reviewers, BPHC, Office of General Counsel (OGC), and other litigation partners to better access and store information associated with claims and the expert reviews.
<b>PTA 05:</b>	List and/or describe all the types of information that are collected, maintained, and/or shared by the system regardless of whether that information is PII and how long that information is stored.	The system collects and maintain PHI (Protected Health Information), medical records, medical scans and medical claims cases under litigation in federal court system. Following PII are collected: name, date of birth, mother maiden name, legal documents, email address (Personal), mailing address (Personal), phone numbers (Personal), photographic identifiers, medical records, and medical record number. The information is used to assess the accuracy and validity of medical claims filed against the federal entities. The information contains some Personal Identifiable Information (PII) and the submission of personal information is mandatory to process the claims.
<b>PTA 05A:</b>	Are user credentials used to access the system?	Yes, but the user credentials are maintained in a separate system (e.g., AD, AMS) and not collected or maintained by this system.
<b>PTA 05C:</b>	Please identify the system that maintains the user credentials or controls access to this system.	Internal user credentials are managed by Okta and External medical reviewers credentials are managed by XMS+ID.me
<b>PTA 06:</b>	Describe why each type of information is collected, maintained, and/or shared by the system. Specify what information is collected about each category of individual.	A claims tracking system with basic reporting analysis, and advanced tools used by HRSA, the Office of the General Counsel and the Department of Justice. The system is used in tracking litigation through administrative hearings and the federal court system. The system collects medical malpractice claims data to make determinations on a claim. The data includes sensitive information such as PII, Personal Health Information, and adverse medical actions taken against a practitioner.
<b>PTA 07:</b>	Does the system collect, maintain, use, or share PII?	Yes
<b>PTA 08:</b>	Does the system include a website or online application?	Yes
<b>PTA 08A:</b>	Provide the URL(s).	Production: <a href="https://cart.hrsa.gov">https://cart.hrsa.gov</a>  QA: <a href="https://cart-qa.hrsa.gov">https://cart-qa.hrsa.gov</a>
<b>PTA 08B:</b>	Are any of the website or online applications accessible by the public (including publicly accessible log in pages)?	Yes
<b>PTA 09:</b>	Describe the purpose of the website, 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.	The website allows users to access the website to handle claims.
<b>PTA 10:</b>	Does the website have a posted privacy notice?	No

<b>PTA 11:</b>	Does the website contain links to non-federal government websites external to HHS?	No
<b>PTA 12:</b>	Does the website use web measurement and customization technology?	No
<b>PTA 13:</b>	Does the website have any information or pages directed at children under the age of thirteen?	No
<b>PTA 14:</b>	Does the system have a mobile application?	No
<b>PTA 20:</b>	Are any third-party websites or applications (TPWA) associated with the system?	No
<b>PTA 21:</b>	Does this system use artificial intelligence (AI) tools or technologies?	No

### Privacy Impact Assessment

#### Privacy Impact Assessment

<b>PIA 22:</b>	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Biographical Information Name Date of Birth Mother Maiden Name Legal Documents Contact Information Email Address (Personal) Mailing Address (Personal) Phone Numbers (Personal) Biometrics/Distinguishing Features Photographic Identifiers Medical Information Medical Records Medical Records Number
<b>PIA 23:</b>	Indicate the categories of individuals about whom PII is collected, maintained, or shared.	Employees/HHS Direct Contractors Patients
<b>PIA 24:</b>	Indicate the approximate number of individuals whose PII is maintained in the system.	5,000 – 9,999
<b>PIA 25:</b>	For what primary purpose is the PII used?	The information is used to assess the accuracy and validity of medical (malpractice) claims filed against the federal entities and to also track medical (malpractice) claims.
<b>PIA 26:</b>	Describe any secondary uses for which the PII will be used (e.g., testing, training, or research).	NA
<b>PIA 28:</b>	Identify legal authorities, governing information use and disclosure specific to the system and program.	Authority includes: Federal Tort Claims Act (FTCA), 28 U.S.C. 261-2680, 1346(b); Military Personnel and Civilian Employees Claims Act, 31 U.S.C. 240-243; Federal Claims Collection Act, 31 U.S.C. 951-953; Federal Medical Care Recovery Act, 42 U.S.C. 2651-2653; Federally Supported Health Centers Assistance Act, 42 U.S.C. 233(a)-(n); 42 U.S.C. 233(o) and 5 U.S.C. 552a (including §§ 552a(d)(5), (k)(2), (k)(4)).
<b>PIA 29:</b>	Are records in the system retrieved by one or more PII data elements?	Yes

<b>PIA 29A:</b>	Please specify which PII data elements are used to retrieve records.	Name  Date of Birth  Phone Number
<b>PIA 29B:</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.	SORN 09-90-0062  <a href="https://www.hhs.gov/foia/privacy/sorns/09900062/index.html">https://www.hhs.gov/foia/privacy/sorns/09900062/index.html</a>
<b>PIA 30:</b>	Identify the sources of PII in the system.	Government Sources  Other HHS OPDIV
<b>PIA 31:</b>	Is there an Office of Management and Budget (OMB) information collection approval number?	No
<b>PIA 31B:</b>	Explain why an OMB information collection approval number is not required.	The PII related data is received from another HHS OPDIV, i.e., HHS/OGC/GLD. It was confirmed that OMB clearance is not required of us or applicable in this case.
<b>PIA 32:</b>	Is the PII in the system shared directly with other organizations outside the system's Operating Division?	No
<b>PIA 33:</b>	Is the submission of PII by individuals voluntary or mandatory as defined in the Privacy Act?	Voluntary
<b>PIA 34:</b>	Describe the method in place to notify and obtain consent from individuals whose PII will be collected. If no prior notice is given or consent cannot be obtained, explain why.	HRSA, BPHC, and HRSA contractors qualify as "public health authorities" for the purposes of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) regulation, "Standards for Privacy of Individual Identifiable Health Information" (Privacy Rule), 45 CFR Parts 160 and 164. Under 45 CFR 164.512, a "covered entity" may disclose an individual's protected health information without the individual's written consent or authorization when such a disclosure is made to a "public health authority" that is authorized by law to collect information for the purpose of preventing or controlling disease, injury, or disability. Given the legal authority and mandate of the HRSA/BPHC, it has been determined that a "covered entity" may disclose certain individually identifiable health information to the HRSA/BPHC without written consent or authorization of the individual, when the disclosure furthers the HRSA/BPHC's statutory purposes and functions (including those indicated in 42 U.S.C. 233). The personal information collected is not disclosed in any way to anyone outside of the program. It is used for claims tracking and risk management related purposes and to support ongoing litigation only.

<b>PIA 35:</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). If they cannot be notified or have their consent obtained, explain why.	The personal information given to the program will be used only in connection with the administration and execution of the FTCA mission of protecting the public and providing quality health care. All web sites will have both a machine readable and HTML Privacy statement that can be viewed by the users at all times. Within this privacy statement, users are informed of how their information is protected and their rights as users in terms of the Federal system protecting their PII
<b>PIA 36:</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.	The claimant or individual may request that the Department of Health and Human Services (HHS) Office of General Counsel respond regarding the procedural processing status of a relevant claim and related use of PII. The claimant or individual may send a request to the following address: Office of the General Counsel General Law Division Claims and Employment Law Branch U.S. Dept. of Health and Human Services 330 C Street, SW Attention: CLAIMS Switzer Building, Suite 2600 Washington, D.C., 20201 HHS-FTCA-Claims@hhs.gov
<b>PIA 37:</b>	Describe the process in place for periodic reviews of the system to ensure the integrity, availability, accuracy, and relevancy of the PII in the system. Please address each element in your response. If no processes are in place, explain why not.	The accuracy of the PII entered into CART is validated during the data entry process. Additionally, cases are selected at random each month and the integrity, accuracy, availability, and relevancy of the PII is reviewed and verified during these monthly quality audits.
<b>PIA 38:</b>	Identify who will have access to the PII in the system.	Users Administrators Developers Contractors
<b>PIA 38A:</b>	Select the type of contractor.	HHS/OpDiv Direct Contractors
<b>PIA 38B:</b>	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	Yes
<b>PIA 39:</b>	Provide the reason why each of the groups identified in 38 needs access to PII.	Users need to verify that their information is accurate.  Administrators, Developers, and Contractors ensure that the date is captured correctly within the application.

<b>PIA 40:</b>	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	All application users are assigned a user role within the application. Each user's role is defined by their job duties. Roles are assigned on the principle of least privilege. Users will only have access to PHI if their job requires access. The application does not display or provide access to PII for users whose role does not allow access to PII. Additionally, the entire database is encrypted to prevent unauthorized administrative staff from accessing the database. Employees acting as administrators, developers, etc. are only granted access to the database if their job duties require them to have access.
<b>PIA 41:</b>	Describe the technical methods in place to allow those with access to PII to access only the minimum amount of information necessary to perform their job.	Role-based access is provided within the CART application. A user's role defines whether that user can view PII. Roles are defined based on the principle of least privilege. The application provides access to only the information that the user requires to fulfill their job responsibilities.
<b>PIA 42:</b>	Identify the general security and privacy awareness training provided to system users (system owners, managers, operators, contractors and/or program managers) to make them aware of their responsibilities for protecting the information being collected and maintained.	CART users are provided with annual privacy and security training that provides details on rules of behavior regarding the use and protection of PII and PHI. This training must be completed prior to accessing CART and is a condition of employment. Additionally, CART users must acknowledge a warning message upon login. The message warns the user that CART is a U.S Government-owned system and is meant only for Government authorized use.
<b>PIA 43:</b>	Describe the training system users receive above and beyond general security and privacy awareness training.	NA
<b>PIA 44:</b>	Describe the process and guidelines in place for the retention and destruction of PII. Cite specific National Archives and Records Administration (NARA) records retention schedule(s) and include the retention period(s).	Paper Records are retained and disposed of under the authority of the National Archive and Records Administration (NARA) Job Number NC1-90-81-5, HSA Appendix B-351 Item 14. Office Services, Letter O. Administrative Tort Claims: Destroy 35 years after a claim is closed. HRSA is working with NARA to determine the appropriate retention, and scheduling of the electronic records for the CART System.

**PIA 45:**

Describe how the PII will be secured in the system using administrative, technical, and physical controls. Please address each element in your response.

PII will be secured in the following manner:  
System will reside at HRSA facilities and will inherit all physical controls associated with this site.  
Application security will be role based and will grant permission to end-users based upon least privilege. Application will record end-user transactions and maintain audit history. The web application will not be public facing and will only be accessible by users on local network or via HRSA approved remote access method. System servers and application will be scanned and vulnerabilities remediated on at least a quarterly basis. System servers will be protected by anti-virus. System Administrators / Database Administrator will be the only personnel given access to systems housing the application. The application database will be encrypted. The application will be subject to and must pass a formal Certification and Accreditation process prior to being allowed Production access. A formal Change Management process will be followed.

## Review and Comments

### OpDiv Privacy Analyst Review

<b>Privacy Analyst Review Decision:</b>	Approved	<b>Privacy Analyst Review Date:</b>	9/30/2025
<b>Privacy Analyst Review Comments:</b>		<b># of Days - PA Review:</b>	41

### SOP Review

<b>SOP Review Decision:</b>	Approved	<b>SOP Review Date:</b>	10/15/2025
<b>SOP Review Comments:</b>		<b># of Days - SOP Review:</b>	15

### Agency Privacy Analyst Review

<b>Agency Privacy Analyst Review Decision:</b>	Approved	<b>Agency Privacy Analyst Review Date:</b>	11/14/2025
<b>Agency Privacy Analyst Review Comments:</b>	<p>Reviewer: Nestor Villafuerte</p> <p>11/14/2025 All comments from the previous review have been addressed. A minor update on the next iteration of the PTA, PTA-10 should be "Yes" there is a posted privacy notice. This PIA is ready for SAOP review and approval.</p> <p>Reviewer: Shanai Shobowale</p> <p>8/20/2025 Please see comments for PTA-5 and update accordingly:</p> <p>PTA-5: Per PIA-22, please include the following PII elements in your response "name, date of birth, mother maiden name, legal documents, email address (Personal), mailing address (Personal), phone numbers (Personal), photographic identifiers, medical records, and medical record number."</p>	<b># of Days - APA Review:</b>	30

### SAOP Review

<b>SAOP Review Decision:</b>	Approved	<b>SAOP Review Date:</b>	11/20/2025
<b>SAOP Review Comments:</b>		<b># of Days - SAOP Review:</b>	6

### SAOP Signature

Date	User	Type	Name	Original Value	New Value
11/20/2025 11:30 AM	BAUR, VANESSA	Signature	SAOP (Email PIN)		Content Signed

### Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

### Comments

Question Name	Submitter	Date	Comment	Attachment
PTA 05	BLAND, CRYSTAL	8/20/2025	Added following PII "name, date of birth, mother maiden name, legal documents, email address (Personal), mailing address (Personal), phone numbers (Personal), photographic identifiers, medical records, and medical record number" to response	
PTA 10	BLAND, CRYSTAL	11/14/2025	On the next iteration please update this to "yes"	