


General Information		
PTA / PIA Name:	HRSA - ICS2.0 - QTR2 - 2025 - HRSA1445984	PTA / PIA ID: 3924305
Component Name:	HRSA - Injury Compensation System (ICS) 2.0 Salesforce	ATO Boundary Name: Injury Compensation System
Overall Status:	Complete 	# of Days - Open: 175
Submitter:		Submit Date: 11/20/2025
Next Assessment Date:	12/21/2028	Expiration Date: 12/21/2028
Office:		OpDiv: HRSA
Security Categorization:	Moderate	
Make PIA available to Public?:	Yes	PIA Required: Yes
General 01:	Identify the Enterprise Performance Lifecycle Phase of the system.	Operations and Maintenance
General 02:	Is this a FISMA-Reportable system?	Yes
General 03:	Does the system have or is it covered by a Security Authorization to Operate (ATO)?	Yes
General 04:	ATO Date or Planned ATO Date.	5/20/2025
General 05:	Is the system or electronic information collection, agency or contractor operated?	Contractor
History Log:	View History Log	

Privacy Threshold Analysis		
Privacy Threshold Analysis		
PTA 01:	Point of Contact (POC) Name	Ernest Boakye
PTA 01A:	POC Title and Organization	Information System Security Officer
PTA 01B:	POC Email Address	eboakye@hrsa.gov
PTA 01C:	POC Phone Number	301 443 0413
PTA 02:	Indicate the following reason(s) for this PTA. Choose from the following options.	PIA Validation (PIA Refresh)
PTA 02A:	Describe in further detail any changes to the system that have occurred since the last PIA.	No Changes
PTA 03:	Is the data contained in the system owned by the agency or contractor?	Agency

PTA 04:

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 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.

PTA 05:

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.

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 HRSA 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 (HHS, HRSA employees and direct contractors) and non-organizational (Claimants and Department of Justice (DoJ) employees). ICS 2.0 uses AMS, XMS and Salesforce for Logins.

1. AMS uses PIV Cards for Authentication
2. XMS does store usernames and passwords (Public Website Users access the external website)
3. Salesforce does store usernames and passwords (only those with the System Administrator Profile are able to login with this access)

Social Security Number
Mother Maiden Name
Certificates
Taxpayer ID
Legal Documents
Email Address
Date of Birth
Mailing Address
Name
Phone numbers
Military Status
Photographic Identifiers
Medical Records Number
Employment Status
Medical records (PHI)
Medical Notes
Biometric Identifiers
Financial Account Info
Other: company name and division

The PII is stored within the system based upon the NARA guidelines.

PTA 05A:	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.
PTA 05C:	Please identify the system that maintains the user credentials or controls access to this system.	HHS Access Management System (AMS) and External User Management System (XMS) and SalesForce
PTA 06:	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.	<p>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 HRSA 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 is direct and operate on behalf of the agency and use the agency's credentials. ICS is utilized by organizational (HHS, HRSA employees and direct contractors) and non-organizational (Claimants and (DoJ) employees).</p>
PTA 07:	Does the system collect, maintain, use, or share PII?	Yes
PTA 08:	Does the system include a website or online application?	Yes
PTA 08A:	Provide the URL(s).	<p>Public Website https://injurycompensation.hrsa.gov/ - Informational/No Authentication required.</p> <p>VICP - https://injurycompensation.hrsa.gov/VICP - AMS/XMS CICP - https://injurycompensation.hrsa.gov/CICP - AMS/XMS</p>
PTA 08B:	Are any of the website or online applications accessible by the public (including publicly accessible log in pages)?	Yes

PTA 09:	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 is used to allow people to create an account to submit a claim for the National Vaccine Injury Compensation Program (VICP) and Countermeasures Injury Compensation Program (CICP).
PTA 10:	Does the website have a posted privacy notice?	Yes
PTA 11:	Does the website contain links to non-federal government websites external to HHS?	No
PTA 12:	Does the website use web measurement and customization technology?	No
PTA 13:	Does the website have any information or pages directed at children under the age of thirteen?	Yes
PTA 13A:	Does the website collect PII from children under the age of thirteen?	No
PTA 13B:	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?	Yes
PTA 14:	Does the system have a mobile application?	No
PTA 20:	Are any third-party websites or applications (TPWA) associated with the system?	No
PTA 21:	Does this system use artificial intelligence (AI) tools or technologies?	No

Privacy Impact Assessment

Privacy Impact Assessment

<p>PIA 22:</p>	<p>Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.</p>	<p>Identifying Numbers</p> <ul style="list-style-type: none"> Social Security Number Taxpayer ID Number (TIN) Financial Account Information (e.g., account numbers, credit card numbers) <p>Biographical Information</p> <ul style="list-style-type: none"> Name Date of Birth Mother Maiden Name Certificates (e.g., training certificates) Employment Status/History Legal Documents Military Status/History <p>Contact Information</p> <ul style="list-style-type: none"> Email Address (Personal) Mailing Address (Personal) Phone Numbers (Personal) <p>Biometrics/Distinguishing Features</p> <ul style="list-style-type: none"> Biometric Identifiers (e.g., fingerprints, retina scans, DNA samples) Photographic Identifiers <p>Medical Information</p> <ul style="list-style-type: none"> Medical Records Medical Records Number <p>Other</p> <ul style="list-style-type: none"> Other
<p>PIA 22A:</p>	<p>Identify the “other” type(s) of personally identifiable information (PII) not mentioned in the above list.</p>	<p>Medical Notes Company name and Division</p>
<p>PIA 23:</p>	<p>Indicate the categories of individuals about whom PII is collected, maintained, or shared.</p>	<p>Employees/HHS Direct Contractors Members of the public Vendors/Suppliers/Third-Party Contractors (Contractors other than HHS Direct Contractors)</p>
<p>PIA 24:</p>	<p>Indicate the approximate number of individuals whose PII is maintained in the system.</p>	<p>1,000,000 or more</p>
<p>PIA 25:</p>	<p>For what primary purpose is the PII used?</p>	<p>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, and company name.</p>
<p>PIA 26:</p>	<p>Describe any secondary uses for which the PII will be used (e.g., testing, training, or research).</p>	<p>PII may also be used in data reporting and research.</p>

PIA 27:	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID. If the Taxpayer IDs collected are only for businesses include that in your response.	A Social security number (SSN) or a Tax Identification Number (TIN) is used to process payment of awards or compensation to claimants or requesters
PIA 27A:	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID. If the Taxpayer IDs collected are only for businesses, you may respond N/A.	The Treasury Department requires either an SSN or a TIN 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.
PIA 28:	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)
PIA 29:	Are records in the system retrieved by one or more PII data elements?	Yes
PIA 29A:	Please specify which PII data elements are used to retrieve records.	Name E-Mail Address Phone numbers Date of Birth
PIA 29B:	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
PIA 30:	Identify the sources of PII in the system.	Directly from an individual about whom the information pertains Hard Copy Mail/Fax Online Government Sources Other HHS OPDIV Other Federal Entities Non-Government Sources Members of the Public Private Sector
PIA 31:	Is there an Office of Management and Budget (OMB) information collection approval number?	Yes
PIA 31A:	Provide the information collection approval number(s) and expiration date(s).	OMB Control Number: 0915-0334, expiration date of 4/30/2026

PIA 32:	Is the PII in the system shared directly with other organizations outside the system's Operating Division?	Yes
PIA 32A:	Identify with whom the PII is shared or disclosed.	Other Federal Agency/Agencies Private Sector Within HHS
PIA 32B:	For each disclosure, name the organizations/systems the system shares PII with and the purpose(s) of the disclosure.	Within HHS: Office of General Counsel (OGC) are the attorneys for the Secretary of HHS. Other Federal Agency/Agencies: US Court of Federal Claims, Department of Justice both have roles in the VICP. 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.
PIA 32C:	List any agreements in place that authorize the information sharing or disclosure (e.g., Computer Matching Agreement (CMA), Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).	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). Public Readiness and Emergency Preparedness Act of 2005 (Public Law 109-148).
PIA 32D:	Describe process and procedures for logging/tracking/accounting for the sharing and/or disclosing of PII. If no process or procedures are in place, please explain why not.	Both the VICP and the CICP 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 CICP is in the process of migrating its hard copies into the ICS.
PIA 33:	Is the submission of PII by individuals voluntary or mandatory as defined in the Privacy Act?	Voluntary
PIA 34:	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.	Individuals provide consent when they voluntarily submit a Request for Benefits Package to the CICP or file a petition with the VICP, which includes PII. They may opt-out by withdrawing their case.
PIA 35:	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.	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.

PIA 36:	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.	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. 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.
PIA 37:	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.	Cases in the ICS go through multiple reviews throughout the process of case review, eligibility determination, and to process payments of awards & compensation.
PIA 38:	Identify who will have access to the PII in the system.	Users Administrators Developers Contractors Others
PIA 38A:	Select the type of contractor.	HHS/OpDiv Direct Contractors
PIA 38B:	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	Yes
PIA 38C:	Identify the additional person(s) who will have access to the PII in the system not mentioned in the list above.	Life Care Planners & Vocational Counselors
PIA 39:	Provide the reason why each of the groups identified in 38 needs access to PII.	Users: To perform the work of the Programs. Administrator: To maintain the workflow of the ICS as needed. Developers: To develop the appropriate functionality of the ICS. Contractors: To develop and maintain the ICS. Others: Life Care Planners & Vocational Counselors access to the ICS, to assess Requester's benefits needs, The previous also applies to Brokers to recommend annuities to provide compensation,
PIA 40:	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.
PIA 41:	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.	Roles are assigned to staff according to job duties and access to PII is limited based on role.
PIA 42:	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.	All employees must complete annual Records Management and General Security Awareness training.

PIA 43:	Describe the training system users receive above and beyond general security and privacy awareness training.	Users receive training through the HRSA security awareness training portal.
PIA 44:	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).	<p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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-</p>

15-0071, Countermeasures Injury Compensation Program 09-15-0056, National Vaccine Injury Compensation Program.

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.

ICS relies on network security controls provided by FedRAMP Cloud Service provider and additional controls configured by contractor on behalf of HRSA. The FedRAMP Cloud Service Provider that hosts 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.

Review and Comments

OpDiv Privacy Analyst Review

Privacy Analyst Review Decision:	Approved	Privacy Analyst Review Date:	12/10/2025
Privacy Analyst Review Comments:		# of Days - PA Review:	20

SOP Review

SOP Review Decision:	Approved	SOP Review Date:	12/15/2025
SOP Review Comments:		# of Days - SOP Review:	5

Agency Privacy Analyst Review

Agency Privacy Analyst Review Decision:	Approved	Agency Privacy Analyst Review Date:	12/16/2025
Agency Privacy Analyst Review Comments:	<p>Reviewer: Nestor Villafuerte</p> <p>12/16/2025 All comments have been updated. This PIA is ready for SAOP review and approval.</p> <p>11/20/2025 Please see comments and update accordingly:</p> <p>PTA-5: Per PIA-22, please list the PII that may be collected from the different type of documents collected. For example "The PII that may be collected includes: name, Social Security Number (SSN), Taxpayer Identification Number (TIN), date of birth (DOB), mother's maiden name, certificates, legal documents, employment and military status, financial information, contact information, medical information, biometric information, and company name/division."</p> <p>PIA-38: Please select "Contractor."</p> <p>PIA-38C: Remove "None" and replace with "Life Care Planners & Vocational Counselors ."</p>	# of Days - APA Review:	1

SAOP Review

SAOP Review Decision:	Approved	SAOP Review Date:	12/22/2025
SAOP Review Comments:		# of Days - SAOP Review:	6

SAOP Signature

Date	User	Type	Name	Original Value	New Value
12/22/2025 12:57 PM	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	VILLAFUERTE, NESTOR	10/22/2025	Disregard.	
PIA 38	BLAND, CRYSTAL	11/20/2025	Please select "Contractor."	
PIA 38C	BLAND, CRYSTAL	11/20/2025	Remove "None" and replace with "Life Care Planners & Vocational Counselors ."	
PTA 05	BLAND, CRYSTAL	11/20/2025	Per PIA-22, please list the PII that may be collected from the different type of documents collected. For example "The PII that may be collected includes: name, Social Security Number (SSN), Taxpayer Identification Number (TIN), date of birth (DOB), mother's maiden name, certificates, legal documents, employment and military status, financial information, contact information, medical information, biometric information, and company name/division."	