

## Copy PIA (Privacy Impact Assessment)

Do you want to copy this PIA ?

Please select the user, who would be submitting the copied PIA.

## Instructions


Review the following steps to complete this questionnaire:

- 1) Answer questions.** Select the appropriate answer to each question. Question specific help text may be available via the  icon. If your answer dictates an explanation, a required text box will become available for you to add further information.
- 2) Add Comments.** You may add question specific comments or attach supporting evidence for your answers by clicking on the  icon next to each question. Once you have saved the comment, the icon will change to the  icon to show that a comment has been added.
- 3) Change the Status.** You may keep the questionnaire in the "In Process" status until you are ready to submit it for review. When you have completed the assessment, change the Submission Status to "Submitted". This will route the assessment to the proper reviewer. Please note that all values list questions must be answered before submitting the questionnaire.
- 4) Save/Exit the Questionnaire.** You may use any of the four buttons at the top and bottom of the screen to save or exit the questionnaire. The button allows you to complete the questionnaire. The button allows you to save your work and close the questionnaire. The button allows you to save your work and remain in the questionnaire. The button closes the questionnaire without saving your work.

### 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>	SAMHSA - BHSIS - QTR2 - 2023 - SAMHSA1400655	<b>PIA ID:</b>	2186017
<b>Name of Component:</b>	SAMHSA - SAMHSA - SAMHSA - Behavioral Health Services Information System	<b>Name of ATO Boundary:</b>	Behavioral Health Services Information System
<b>Overall Status:</b>		<b>PIA Queue:</b>	
<b>Submitter:</b>		<b># Days Open:</b>	509
<b>Submission Status:</b>	Submitted	<b>Submit Date:</b>	9/9/2024
<b>Next Assessment Date:</b>	N/A	<b>Expiration Date:</b>	9/23/2027
<b>Office:</b>	SAMHSA	<b>OPDIV:</b>	SAMHSA
<b>Security Categorization:</b>		<b>OpDiv PIA ID:</b>	SAMHSA1400655
<b>Legacy PIA ID:</b>		<b>Make PIA available to Public?:</b>	Yes
<b>1:</b>	Identify the Enterprise Performance Lifecycle Phase of the system.		Operations and Maintenance
<b>2:</b>	Is this a FISMA-Reportable system?		Yes
<b>3:</b>	Does the system have or is it covered by a Security Authorization to Operate (ATO)?		No
<b>4:</b>	ATO Date or Planned ATO Date.		10/10/2023
<b>5:</b>	Is the system or electronic information collection, agency or contractor operated?		Contractor

## PTA

### PTA

<b>PTA - 2:</b>	Indicate the following reason(s) for this PTA. Choose from the following options.	PIA Validation (PIA Refresh)
<b>PTA - 2A:</b>	Describe in further detail any changes to the system that have occurred since the last PIA.	There have not been any changes since the last Privacy Impact Analyses
<b>PTA - 3:</b>	Is the data contained in the system owned by the agency or contractor?	Agency

<p><b>PTA - 4:</b></p>	<p>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.</p>	<p>The purpose of Behavioral Health Services Information System (BHSIS) is the operation of an integrated statistical data system that provides information at National, State, and Local levels on the facilities and services available for Substance Abuse treatment and Mental Health treatment in the United States, and on the characteristics of clients admitted to such treatment facilities. BHSIS is comprised of five inter-related core components: the Inventory of Substance Abuse and Mental Health Treatment Facilities (I-TF); facility surveys, including the National Survey of Substance Abuse Treatment Services (N-SSATS) and the National Mental Health Services Survey (N-MHSS); the Treatment Episode Data Set (TEDS), a collection of substance abuse treatment admissions and discharges to state-funded substance abuse treatment facilities; and the Mental Health-Treatment Episode Data Set (MH-TEDS) and the Mental Health-Client Level Data (MH-CLD), collections of mental health client level data from state-funded mental health treatment service facilities; as well as the Uniform Reporting System (URS) Tables required for Mental Health Block Grant application procedures. This last component represents data collection efforts in coordination with CMHS (Community Mental Health Services) Mental Health Block Grant program data needs as authorized by section 1911 of title XIX., Part B, Sub part I and III of the Public Health Service Act.</p> <p>BHSIS is contractor operated and the indirect contractors oversee all functions of the BHSIS database maintained by SAMHSA.</p> <p>The collection and reporting of service and program data depends upon the capability of providers and State agencies to collect and report such data, and on the uniformity and standardization of data content within and across data reports. BHSIS is a major source of service and program data within the United States. BHSIS uses data in a comprehensive and integrative way that will lead and influence Behavioral Health policy throughout the United States.</p>
<p><b>PTA - 5:</b></p>	<p>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.</p>	<ul style="list-style-type: none"> <li>• Name</li> <li>• E-Mail Address</li> <li>• Phone Numbers</li> <li>• Military Status</li> <li>• Date of Birth</li> <li>• Mailing Address</li> <li>• Employment Status</li> </ul> <p>BHSIS uses the data retention schedule as instructed by SAMHSA. Pertinent schedules for BHSIS consist of General Records Schedules 3.2 and 4.2</p>
<p><b>PTA - 5A:</b></p>	<p>Are user credentials used to access the system?</p>	<p>Yes</p>

<b>PTA - 5B:</b>	Please identify the type of user credentials used to access the system.	<p>Non-HHS User Credentials</p> <p>Username</p> <p>Password</p> <p>Email Address</p>
<b>PTA - 6:</b>	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.	<p>FindTreatment.gov - application receives daily automated data imports (*.csv) from the following locations:</p> <ol style="list-style-type: none"> <li>1. <a href="https://data.hrsa.gov/DataDownload/DD_Files/Health_Center_Service_Delivery_and_LookAlike_Sites.csv">https://data.hrsa.gov/DataDownload/DD_Files/Health_Center_Service_Delivery_and_LookAlike_Sites.csv</a></li> <li>2. <a href="https://buprenorphine.samhsa.gov/api/locator_export.csv">https://buprenorphine.samhsa.gov/api/locator_export.csv</a></li> <li>3. <a href="https://otp-extranet.samhsa.gov/webservice/ActiveOTPsWebServiceLatLongExport.aspx/getActiveOTPsWebServiceLatLongExport">https://otp-extranet.samhsa.gov/webservice/ActiveOTPsWebServiceLatLongExport.aspx/getActiveOTPsWebServiceLatLongExport</a></li> </ol> <p>DSS-CLD (Data Submission System- Client Level Data)</p> <p>Files uploaded through application interface by state user: admission, discharge to/from Mental Health treatment facilities. Data does not have the names, all fields have just the codes. Data in transit encryption via TLS (Transport Layer Security) 1.2 certificate (FIPS (Federal Information Processing Standard) 140-2 compliant).</p>
<b>PTA - 7:</b>	Does the system collect, maintain, use or share PII?	Yes
<b>PTA - 7A:</b>	Does this include Sensitive PII as defined by HHS?	No
<b>PTA - 8:</b>	Does the system include a website or online application?	Yes
<b>PTA - 8A:</b>	Are any of the URLs listed accessible by the general public (to include publicly accessible log in and internet websites/online applications)?	Yes
<b>PTA - 9:</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.	<p>FindTreatment.gov (<a href="https://findtreatment.gov">https://findtreatment.gov</a>) is an on-line source of information for persons looking for mental health treatment facilities in the United States or U.S. Territories. It includes a map-based tool that can help users find facilities and services in their area. The treatment facility repository is searchable by ZIP code, city, or state; a more detailed search by county, distance, service types, and/or facility name/organization may also be conducted. It is maintained with information from the annual survey of treatment facilities (i.e., National Substance Use and Mental Health Services Survey (N-SUMHSS)). This facility information (e.g., facility address, phone number, type of treatment setting, etc.) can be downloaded by the user. FindTreatment.gov is updated daily.</p>
<b>PTA - 10:</b>	Does the website have a posted privacy notice?	Yes
<b>PTA - 11:</b>	Does the website contain links to non-federal government websites external to HHS?	Yes
<b>PTA - 11A:</b>	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	Yes

<b>PTA - 12:</b>	Does the website use web measurement and customization technology?	Yes
<b>PTA - 12A:</b>	Select the type(s) of website measurement and customization technologies in use and if it is used to collect PII.	Session Cookies - Does Not Collect PII Other technology - Does Not Collect PII
<b>PTA - 13:</b>	Does the website have any information or pages directed at children under the age of thirteen?	No
<b>PTA - 13A:</b>	Does the website collect PII from children under the age thirteen?	
<b>PTA - 13B:</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>PTA - 14:</b>	Does the system have a mobile application?	No
<b>PTA - 14A:</b>	Is the mobile application HHS developed and managed or a third-party application?	
<b>PTA - 15:</b>	Describe the purpose of the mobile application, who has access to it, and how users access it. Please address each element in your response.	
<b>PTA - 16:</b>	Does the mobile application/ have a privacy notice?	
<b>PTA - 17:</b>	Does the mobile application contain links to non-federal government websites external to HHS?	
<b>PTA - 17A:</b>	Is a disclaimer notice provided to users that follow external links to resources not owned or operated by HHS?	
<b>PTA - 18:</b>	Does the mobile application use measurement and customization technology?	
<b>PTA - 18A:</b>	Describe the type(s) of measurement and customization technologies or techniques in use and what information is collected.	
<b>PTA - 19:</b>	Does the mobile application have any information or pages directed at children under the age of thirteen?	
<b>PTA - 19A:</b>	Does the mobile application collect PII from children under the age thirteen?	
<b>PTA - 19B:</b>	Is there a unique privacy policy for the mobile application and does the unique privacy policy address the process for obtaining parental consent if any information is collected?	
<b>PTA - 20:</b>	Is there a third-party website or application (TPWA) associated with the system?	Yes
<b>PTA - 21:</b>	Does this system use artificial intelligence (AI) tools or technologies?	No

PIA		
PIA		
<b>PIA - 1:</b>	Indicate the type(s) of personally identifiable information (PII) that the system will collect, maintain, or share.	Name Email Address Phone numbers Military Status Date of Birth Mailing Address Employment Status User Credentials

<b>PIA - 2:</b>	Indicate the categories of individuals about whom PII is collected, maintained or shared.	<p>Business Partners/Contacts (Federal, state, local agencies)</p> <p>Employees/ HHS Direct Contractors</p> <p>Patients</p> <p>Vendors/Suppliers/Third-Party Contractors (Contractors other than HHS Direct Contractors)</p>
<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?	<p>Note: Behavioral Health Services Information System consists of the following web applications:</p> <p>aims.samhsa.gov</p> <p>asp.samhsa.gov</p> <p>brc.samhsa.gov</p> <p>docsite.samhsa.gov</p> <p>itf.samhsa.gov</p> <p>dea.samhsa.gov</p> <p>dssteds.samhsa.gov</p> <p>dsscd.samhsa.gov</p> <p>findtreatment.gov</p> <p>Behavioral Health Services Information System (BHSIS) components TEDS (Treatment Episode Data Set) and MH-TEDS (Mental Health- Treatment Episode Data Set) admission and discharge records contain a 'date of birth' field. It is used to calculate the age of the client - at admission, at update (Mental Health (MH)records only), and at discharge. The age validation is used for the following variables: Age of 1st Use, Education, Serious Emotional Disorder (SED)/Serious Mental Illness (SMI)(MH) and School Attendance (MH). It is meant to not be traceable to identify the client. Other than client date of birth, all other types of Personally Identifying Information (PII) collected and maintained in this system are used for user account registration, including confirmation of user organizational (state agency) affiliation, and user maintenance. System-specific user credentials for system users and administrators are used to control access to the BHSIS and for account management.</p>
<b>PIA - 5:</b>	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	There are no secondary uses for which the PII will be used.
<b>PIA - 6:</b>	Describe the function of the SSN, Truncated SSN, and/or Taxpayer ID.	
<b>PIA - 6A:</b>	Cite the legal authority to use the SSN, Truncated SSN, and/or Taxpayer ID.	

<b>PIA - 7:</b>	Identify legal authorities governing information use and disclosure specific to the system and program.	Section 501(n) of the Public Health Service Act (42 USC 290aa(n))
<b>PIA - 8:</b>	Are records in the system retrieved by one or more PII data elements?	Yes
<b>PIA - 8A:</b>	Please specify which PII data elements are used to retrieve records.	First name  Last name  Email address  Phone numbers  Address
<b>PIA - 8B:</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.	BHSIS is currently covered by the regular 'Privacy Act of 1974; System of Records Notice' (System Notice '2016-27959' formerly '09-30- 0049').  Details are available at the following location; <a href="https://www.federalregister.gov/documents/2016/11/21/2016-27959/privacy-act-of-1974-systemofrecords-notice">https://www.federalregister.gov/documents/2016/11/21/2016-27959/privacy-act-of-1974-systemofrecords-notice</a>
<b>PIA - 9:</b>	Identify the sources of PII in the system.	Government Sources Within the OPDIV State/Local/Tribal Non-Government Sources Private Sector
<b>PIA - 10:</b>	Is there an Office of Management and Budget (OMB) information collection approval number?	Yes
<b>PIA - 10A:</b>	Provide the information collection approval number.	OMB:0930-0386- Expiration:03/31/2027  OMB:0930-0335- Expiration:12/31/2024
<b>PIA - 10B:</b>	Identify the OMB information collection approval number expiration date.	12/31/2024
<b>PIA - 10C:</b>	Explain why an OMB information collection approval number is not required.	
<b>PIA - 11:</b>	Is the PII shared with other organizations outside the system's Operating Division?	Yes
<b>PIA - 11A:</b>	Identify with whom the PII is shared or disclosed.	State or Local Agency/Agencies
<b>PIA - 11B:</b>	Please provide the purpose(s) for the disclosures described in PIA - 11A.	Single State Agencies (SSA) and State Mental Health Agencies (SMHA) can request data exports (reports) from Data Submission System Treatment Episode Data Sets (DSS TEDS) (BHSIS) to validate/update their own (state level) internal systems.

<b>PIA - 11C:</b>	List any agreements in place that authorizes the information sharing or disclosure (e.g., Computer Matching Agreement (CMA), Memorandum of Understanding (MOU), or Information Sharing Agreement (ISA)).	To receive report data (including indirect PII data elements), State SSAs (Single State Agencies) and SMHAs (State Mental Health Agencies) must first have access to BHSIS (specifically Data Submission System Treatment Episode Data Sets (DSS TEDS)). Access requires prior approval by BHSIS admin staff after signing either a 'BHSIS State Agreement with State Mental Health Agencies (SMHAs)' or 'BHSIS State Agreement with Single State Agencies (SSAs)' document. A request for a report (within DSS TEDS) requires additional approval by BHSIS admin staff. No PII data is shared outside of BHSIS applications.
<b>PIA - 11D:</b>	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.	All BHSIS user actions are tracked within system logs. These logs are searchable by admin staff if required.
<b>PIA - 12:</b>	Is the submission of PII by individuals voluntary or mandatory?	Voluntary
<b>PIA - 12A:</b>	If PII submission is mandatory, provide the specific legal requirement that requires individuals to provide information or face potential civil or criminal penalties.	
<b>PIA - 13:</b>	Describe the method for notifying individuals that their information will be collected and how they can opt-out of the collection or use of their PII. If there is no option to object to the information collection, provide a reason.	The method for individuals to opt-out of the collection is prescribed by each participating state. No opt-out system exists for Substance Abuse and Mental Health Administration (SAMHSA) users, administrators or contractors
<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.	The BHSIS Project has no immediate access to each individual for whom states submit client level data. Data are provided by the state/local/tribal agencies responsible in the delivery of substance abuse and mental health services. Notification and obtaining consent from individuals are handled at the state level. Users, administrators and contractors with user credentials are notified via email when major changes occur to the system.

<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>PII issues are handled at the state level. Each state has their respective processes in place and may differ from one another. The raw data that is maintained by the BHSIS project is not released to the public. The only data released to the public will be deidentified to include disclosure analysis done on the data to ensure no identifying information is released. The only PII collected is date of birth and that information is stripped from the dataset that is released as a public use file.</p> <p>BHSIS call center (1-877-250-4665) contractors maintain frequent contact with system users as part of the normal business process, which offers users the opportunity to inform the BHSIS project team of inaccurate contact information or user credentials in the system. Updates to inaccurate or outdated information are typically completed within one business day of receiving the request. User credentials are necessary to permit user access to the system. However, if requested by a user, those credentials will be removed from the system, along with removal of the user's ability to access the system.</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.	Data collected under the BHSIS Project are periodically reviewed by SAMHSA, the states, and the Project staff throughout the year as data is available to ensure data's integrity, availability, accuracy, and relevancy. Data are reviewed when updates from respondents are received, when survey in field has ended and at the time reports and files are needed. There is not a set scheduled for review of data, as it is ongoing. The process to review data may include automatic system checks, running skip patterns that may cause an error flag, and having project staff manually review data to check on outliers. The review process may also include comparing substance abuse facility data to mental health facility data, to ensure there are duplicates facilities in the system. Monthly and quarterly reports on data submission and quality are provided by the Project staff to SAMHSA and the state representatives for review.
<b>PIA - 17:</b>	Identify who will have access to the PII in the system.	<p>Users</p> <p>Administrators</p> <p>Developers</p> <p>Contractors</p>
<b>PIA - 17A:</b>	Select the type of contractor.	HHS/OpDiv Direct Contractors
<b>PIA - 17B:</b>	Do contracts include Federal Acquisition Regulation (FAR) and other appropriate clauses ensuring adherence to privacy provisions and practices?	Yes

<p><b>PIA - 18:</b></p>	<p>Provide the reason why each of the groups identified in PIA - 17 needs access to PII.</p>	<p>Hendall Inc. (BHSIS site maintenance) – need access to PII because their staff maintain the BHSIS sites, and require administrative rights to all applications.</p> <p>Sev1Tech (Amazon Web Services (AWS) hosting) – have no access to BHSIS applications, but have administrative rights to hosting infrastructure assets e.g. admin access to all Relational Database (RDS) instances (required to perform their hosting tasks)</p>
<p><b>PIA - 19:</b></p>	<p>Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.</p>	<p>By virtue of their responsibilities, the system Administrators, Developers, Project staff involved in data processing, and SAMHSA Project staff are provided full access to the database that may access PII. All data users execute the SAMHSA/CBHSQ (Center for Behavioral Health Statistics &amp; Quality). Data Security Agreement and are mandated to take an annual training on data security and privacy</p>
<p><b>PIA - 20:</b></p>	<p>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.</p>	<p>Permissions and privileges are granted on a per individual basis according to their assigned project responsibilities (always following the principle of least privilege). BHSIS project staff are given permissions to access ITF (Inventory of Treatment Facility) to make sure Locator stays up to date and processes information from facilities and states. This staff would also have access to data for purposes of creating reports and running data analysis. It is unlikely that project staff will access PII data during these routine activities, as the DOB (Date of Birth) variable isn't linked to any client. Information Technology (IT) staff is given permissions to ensure that they have access to data systems for support purposes. IT staff has permissions in order to make design and code changes and monitor the Locator. IT staff permissions are also used to run internal testing and development and production fixes on databases.</p>
<p><b>PIA - 21:</b></p>	<p>Identify the general security and privacy awareness training provided to system users (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.</p>	<p>Health and Human Services (HHS) role-based training is provided to BHSIS administrators and management staff, in addition to the annual general awareness training for security and privacy that includes modules for both regular and privileged users.</p>
<p><b>PIA - 22:</b></p>	<p>Describe the training system users receive (above and beyond general security and privacy awareness training).</p>	<p>Presently there are no specific training courses assigned for systems users, above and beyond general security and privacy awareness</p>
<p><b>PIA - 23:</b></p>	<p>Describe the process and guidelines in place with regard to 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>	<p>BHSIS uses the PII retention schedule as instructed by SAMHSA. Pertinent schedules for BHSIS consist of General Records Schedules 3.2 and 4.2</p>

**PIA - 24:**

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

BHSIS data is housed at physically secure locations (Amazon Web Services Region - US East (N. Virginia)) with access to the databases and servers strictly limited to Hendall Development Operations/Database Administrators (DevOps/DBA) staff and hosting oversight staff at Sev1Tech. All Elastic Compute/Relational Database (EC2/RDS) instances are only accessible by Government Furnished Equipment (GFEs) in the SAMHSA network via Personal Identity Verification (PIV/ALT(Token)) cards. EC2/RDS instances utilize encrypted storage (FIPS 140-2 minimum) for DAR (Data-at-Rest) and all communications (internal/external) are also encrypted for Data-in-Transit (DIT).

Websites log all access, and these logs are reviewed regularly. To ensure data integrity and availability, all BHSIS databases are backed up nightly.

For confidentiality purposes, state level employees have minimal access to the system based on administrative roles, allowing data entry and basic user functions (following the principle of least privilege).

## Review & Comments

### Privacy Analyst Review

<b>OpDiv Privacy Analyst Review Status:</b>	Approved	<b>Privacy Analyst Review Date:</b>	9/9/2024
<b>Privacy Analyst Comments:</b>		<b>Privacy Analyst Days Open:</b>	

### SOP Review

<b>SOP Review Status:</b>	Approved	<b>SOP Signature:</b>	
<b>SOP Comments:</b>		<b>SOP Review Date:</b>	9/9/2024
		<b>SOP Days Open:</b>	0

### Agency Privacy Analyst Review

<b>Agency Privacy Analyst Review Status:</b>	Approved	<b>Agency Privacy Analyst Review Date:</b>	9/11/2024
<b>Agency Privacy Analyst Review Comments:</b>	Reviewer: Nestor Villafuerte 9/11/2024 This PIA is ready for SAOP review and approval.	<b>Agency Privacy Analyst Days Open:</b>	2

### SAOP Review

<b>SAOP Review Status:</b>	Approved	<b>SAOP Signature:</b>	Archer Signature_Bridget Guenther.docx
<b>SAOP Comments:</b>		<b>SAOP Review Date:</b>	9/23/2024
		<b>SAOP Days Open:</b>	12

### Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

### Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 1	Data Feed Service, piafrmos_Release	9/9/2024	BHSIS stores data in the following locations: Amazon Web Services Relational Database (AWS RDS) databases, AWS Elastic File System (EFS) volumes, AWS Simple Storage Service (S3) buckets, BHSIS Lightweight Directory Access Protocol (LDAP) server  Within these data stores, PII data is	

found in the following areas:

1. BHSIS application user information (PII indirect identifiers): Full name, Email address (work/home), Phone numbers (work/home), Physical address state only (work).
2. BHSIS external contact information (including providers/physicians - PII indirect identifiers): Full name, Prefix/suffix, Title (work), Division name (work), Email address (work), Phone numbers (work), Fax numbers (work), Physical address full (work), Package address full (work) and Mailing address full (work)
3. BHSIS patient information (de-identified aggregate data used for reporting only - PII indirect identifiers only!): Client ID (provided by state/cannot be linked externally to a person), Provider ID (provided by state/cannot be linked externally to a facility), Physical address (state only), Date of birth, Date of admission, Sex, Race, Ethnicity, Education status, Employment status, Methadone use, Pregnancy status, Veteran status, Income level, Criminal/arrest status, Marital status, Diagnosis type, Legal status, Treatment status, Age

PIA - 10B

Data Feed Service,  
piafrmos\_Release

9/9/2024

OMB:0930-0386-  
Expiration:03/31/2027

OMB:0930-0335- Expiration:  
12/31/2024

PIA - 11

Data Feed Service,  
piafrmos\_Release

9/9/2024

*PII data elements (indirect PII only) are shared with Single State Agencies (SSA) and State Mental Health Agencies (SMHA) upon request via the DSS TEDS application (a component of BHSIS). A complete list of SSA/SMHAs is displayed below:*

*Alaska Department of Health and Social Services, Division of Behavioral Health*

*Alabama Department of Mental Health*

*Arkansas Department of Human Services, Division of Aging, Adult, and Behavioral Health Services*

*American Samoa Department of Human and Social Services*

*Arizona Health Care Cost Containment System (AHCCCS)*

*California Dept of Health Care Services, Behavioral Health Services*

*Colorado Department of Human Services Office of Behavioral Health*

*Connecticut Department of Mental Health & Addiction Services*

*DC Department of Behavioral Health*

*DC Department of Behavioral Health*

*Delaware Health and Social Services Division of Substance and MH*

*Florida Department of Children and Families, Office of SA and MH*

*FSM Behavioral Health & Wellness Programs, Department of Health & Social Affairs*

*Georgia Department of Behavioral Health and Developmental Disabilities*

*Guam Behavioral Health and Wellness Center*

*State of Hawaii Department of Health, Adult Mental Health Division*

*Hawaii Department of Health, Alcohol and Drug Abuse Division, Planning, Evaluation, Research & Data Office*

*Iowa Department of Public Health*

*Iowa Department of Human Services*

*Idaho Division of Behavioral Health*

*Illinois Dept of Human Services, Div of Substance Use Prev and Recov*

*Illinois Department of Human Services, Division of Mental Health*

*Indiana Family and Social Services  
Administration, Division of Mental  
Health and Addiction*

*Kansas Department for Aging &  
Disability Services*

*Kentucky Dept for Behavioral Health,  
Developmental and Intellectual  
Disabilities*

*Louisiana Department of Health,  
Office of Behavioral Health*

*Massachusetts Department of  
Mental Health*

*Massachusetts Dept of Public Health,  
Bureau of SA Addiction Services*

*Maryland Dept of Health*

*Maine Dept of Health & Human  
Services, Office of Behavioral Health*

*Marshall Islands Ministry of Health*

*Michigan Department of Health and  
Human Services, Behavioral Health  
and Developmental Disabilities  
Administration*

*Minnesota Department of Human  
Services, Behavioral Health Division*

*Missouri Department of Mental  
Health, Division of Behavioral Health*

*Commonwealth Healthcare  
Corporation, Northern Marianas  
Health System*

*Mississippi Department of Mental  
Health, Bureau of Alcohol and Drug  
Services*

*Mississippi Department of Substance  
Use*

*Montana Department of Public  
Health & Human Services, Addictive  
and Mental Disorders Division*

*North Carolina Department of Health  
and Human Services, Division of  
Mental Health, Developmental  
Disabilities and Substance Abuse  
Services*

*North Dakota Department of Human  
Services, Behavioral Health Division  
Department of Health and Human*

*Services*

*Nebraska Dept of Health & Human  
Services Div of Behav Health*

*New Hampshire Department of  
Health and Human Services, Division  
for Behavioral Health, Bureau for  
Drug and Alcohol Services*

*New Hampshire Department of  
Health and Human Services*

*New Jersey Department of Human  
Services, Division of Mental Health  
and Addiction Services*

*New Mexico Human Services  
Department, Behavioral Health  
Services Division*

*Nevada Department of Health and  
Human Services, Division of Public  
and Behavioral Health*

*New York State Office of Addiction  
Services and Supports*

*New York Office of Mental Health*

*Ohio Department of Mental Health &  
Addiction Services, Bureau of Quality,  
Planning and Research*

*Oklahoma Department of Mental  
Health and Substance Abuse Services*

*Oregon Health Authority, Health  
Policy & Analytics*

*Pennsylvania Dept of Human  
Services, Office of MH and SA Services*

*Pennsylvania Department of Drug  
and Alcohol Programs*

*Puerto Rico Mental Health & Anti-  
Addiction Services Administration,  
Division of Mental Health Services*

*Palau Ministry of Health*

*RI Dept of Behavioral Healthcare,  
Developmental Disabilities & Hosp*

*South Carolina Department of Mental  
Health*

*South Carolina Department of  
Alcohol & Other Drug Abuse Services*

*South Dakota Department of Social  
Services, Division of Behavioral*

*Health*

*Tennessee Department of Mental Health and Substance Abuse Services*

*Tennessee Department of Mental Health and Substance Abuse Services*

*Texas Health and Human Services Commission, Medical & Social Services Division, Behavioral Health Services*

*UT Dept of Human Servs, Div of Substance Abuse and Mental Health*

*Virginia Department of Behavioral Health & Developmental Services*

*Virgin Islands Department of Health, Behavioral Health, Alcoholism & Drug Dependency Services*

*Vermont Department of Health Division of Alcohol and Drug Abuse Programs*

*Vermont Department of Mental Health*

*Washington State Health Care Authority Division of Behavioral Health and Recovery Services*

*Wisconsin Department of Health Services, Division of Care and Treatment Services, Bureau of Prevention Treatment and Recovery*

*West Virginia Department of Health and Human Resources, Bureau for Behavioral Health*

*Wyoming Department of Health, Behavioral Health Division*

PIA - 17A	Data Feed Service, piafrmos_Release	9/9/2024	Hendall Inc. - BHSIS site maintenance staff (Developers/DevOps/Quality Assurance (QA))  Sev1Tech – SAMHSA authorized AWS hosting provider
PIA - 1	VILLAFUERTE, NESTOR	9/10/2024	Please remove the bullet points in PTA-5 for 508 compliance.
PIA - 1	BLAND, CRYSTAL	9/11/2024	on the next iteration of the PIA, please add user credentials.

### Admin Section

Is OpDiv Privacy Analyst Approved ?:

1

Is Agency Privacy Analyst Approve ?:

1

Is SAOP Approved?:

1

Total Approved: 4

Total Approval Required: 4

Is OpDiv Privacy Analyst Return ?:

0

Is SOP Return ?:

0

Is Agency Privacy Analyst Return ?:

0

Is SAOP Return ?:

0

Total Return: 0

### Miscellaneous Fields

Last Updated: 9/23/2024 5:16 PM

History Log:

[View History Log](#)