

## 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 - BWNS - QTR1 - 2024 - SAMHSA1815763	<b>PIA ID:</b>	1766889
<b>Name of Component:</b>	SAMHSA - SAMHSA - Buprenorphine Waiver Notification System	<b>Name of ATO Boundary:</b>	Buprenorphine Waiver Notification System
<b>Overall Status:</b>		<b>PIA Queue:</b>	
<b>Submitter:</b>		<b># Days Open:</b>	34
<b>Submission Status:</b>	Submitted	<b>Submit Date:</b>	2/7/2024
<b>Next Assessment Date:</b>	03/07/2027	<b>Expiration Date:</b>	3/7/2027
<b>Office:</b>	SAMHSA	<b>OPDIV:</b>	SAMHSA
<b>Security Categorization:</b>		<b>OpDiv PIA ID:</b>	SAMHSA1815763
<b>Legacy PIA ID:</b>		<b>Make PIA available to Public?:</b>	No
<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.		1/21/2021
<b>5:</b>	Is the system or electronic information collection, agency or contractor operated?		Contractor

## PTA

<b>PTA</b>		
<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.	<p>Since the last Privacy Impact Analyses in 2019 there has been one significant change to the Buprenorphine Waiver Notification System (BWNS) On November 2, 2021, the BWNS system was successfully migrated from the Substance Abuse and Mental Health Services Administration (SAMHSA) Amazon Web Services GovCloud (Government Cloud) to the newly provisioned SAMHSA Commercial Cloud. This transition required several significant changes to the application ranging from the physical migration of the software, data and supporting files from the GovCloud environment to the Commercial cloud, to the addition of BWNS to the Center for Behavioral Health Statistics and Quality, Wanda Alston Foundation (CBHSQ WAF) in the commercial cloud at cbhsq-all-vpc-prod-waf01 &amp; cbhsq-all-vpc-prod-waf02. In addition, updates to SAMHSA's (Domain Name System) DNS were required to facilitate the migration of BWNS production and staging applications from the GovCloud to the Commercial Cloud.</p>
<b>PTA - 3:</b>	Is the data contained in the system owned by the agency or contractor?	Agency

**PTA - 4:**

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 BWNS uses a web-based application form to collect information from physicians who wish to participate in the DATA (Drug Addiction Treatment Act) Waiver program. The Buprenorphine Waiver Management System (BWNS) allows physicians to enter notifications of their intent to prescribe and/or dispense buprenorphine, a DEA (Drug Enforcement Administration) designated Schedule III narcotic, for the treatment of opioid dependency. The BWNS consists of both web-based forms for data entry, and a database-driven work flow system that is used to verify the eligibility of applicants to participate in the DATA Waiver program. The BWNS also allows the Substance Abuse and Mental Health Services Administration (SAMHSA)/Center for Substance Abuse Treatment (CSAT)/Division of Pharmacologic Therapies (DPT) and their contractor to evaluate physician qualifications according to the terms of the Drug Addiction Treatment Act of 2000, and certify their waivers under the act. The BWNS provides information about physicians with certified waivers who have agreed to be listed in a public locator.

<b>PTA - 5:</b>	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>The BWNS uses a web-based application form to collect information from physicians who wish to participate in the DATA Waiver program. Physicians enter the system by entering their DEA registration number and their state license number. Other information that participating physicians provide about themselves include their full name, state where licensed, physical address, telephone number, fax number, and email address. SAMHSA and DEA users who are federal employees and the contractor (non- direct staff) also have access to the BWNS database through a web-based form that is accessed by entering their assigned user name, system generated password, and system generated personal identification number (PIN). Access for contractors (all non-Direct) requires the same user name, password and PIN combination as the SAMHSA and DEA staff.</p> <p>The software development team (all non-direct) accesses the BWNS through direct password protected access to the software development environment within the contractors (DSG, Inc.) computer network. User credentials are maintained for system administrators (SAMHSA employees and direct contractors) in BWNS. User credentials are maintained for system administrators (non- direct contractors) in BWNS. Log Files and Management Data could contain the following: Server User Access Authentication Logs, Server Resource Utilization including Central Processing Unit/Memory/Disk Read Write, Network events, and database user access authentication logs. The system captures non-PII data elements such as: the type of treatment the practitioner intends to provide, the physical setting where they intend to provide care, and the type of addiction medicine training they have received. SAMHSA, DEA, and the contractor all require system access to review and provide authorization to applying medical practitioners. Upon authorization by SAMHSA, the applying practitioner is provided a new certificate of registration with a business activity code to identify whether the physician is authorized to treat 30, 100, or 275 patients. The BWNS non-direct contractor staff (system administrators and application reviewers) can also access the BWNS through a desktop interface to the BWNS.</p>
<b>PTA - 5A:</b>	Are user credentials used to access the system?	Yes
<b>PTA - 5B:</b>	Please identify the type of user credentials used to access the system.	Non-HHS User Credentials Username Password

<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.	Physicians enter the system by entering their DEA registration number and their state license number. Other information that participating physicians provide about themselves include their full name, state where licensed, physical address, telephone number, fax number, email address, and type of waiver.
<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?	Yes
<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)?	No

<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>The BWNS uses a web-based application form to collect information from physicians who wish to participate in the DATA Waiver program. Physicians enter the system by entering their DEA registration number and their state license number. Other information that participating physicians provide about themselves include their full name, state where licensed, physical address, telephone number, fax number, and email address. SAMHSA and DEA users who are federal employees and the contractor (non- direct staff) also have access to the BWNS database through a web-based form that is accessed by entering their assigned user name, system generated password, and system generated personal identification number (PIN). Access for contractors (all non-Direct) requires the same user name, password and PIN combination as the SAMHSA and DEA staff.</p> <p>The software development team (all non-direct) accesses the BWNS through direct password protected access to the software development environment within the contractors (DSG, Inc.) computer network. User credentials are maintained for system administrators (SAMHSA employees and direct contractors) in BWNS. User credentials are maintained for system administrators (non- direct contractors) in BWNS. Log Files and Management Data could contain the following: Server User Access Authentication Logs, Server Resource Utilization including Central Processing Unit/Memory/Disk Read Write, Network events, and database user access authentication logs. The system captures non-PII data elements such as: the type of treatment the practitioner intends to provide, the physical setting where they intend to provide care, and the type of addiction medicine training they have received. SAMHSA, DEA, and the contractor all require system access to review and provide authorization to applying medical practitioners. Upon authorization by SAMHSA, the applying practitioner is provided a new certificate of registration with a business activity code to identify whether the physician is authorized to treat 30, 100, or 275 patients. The BWNS non-direct contractor staff (system administrators and application reviewers) can also access the BWNS through a desktop interface to the BWNS.</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?	No
<b>PTA - 11A:</b>	Is a disclaimer notice provided to users that follow external links to websites not owned or operated by HHS?	
<b>PTA - 12:</b>	Does the website use web measurement and customization technology?	No
<b>PTA - 12A:</b>	Select the type(s) of website measurement and customization technologies in use and if it is used to 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?	No
<b>PTA - 21:</b>	Does this system use artificial intelligence (AI) tools or technologies?	No

<b>PIA</b>		
<b>PIA</b>		
<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 Certificates Mailing Address
<b>PIA - 2:</b>	Indicate the categories of individuals about whom PII is collected, maintained or shared.	Business Partners/Contacts (Federal, state, local agencies)
<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?	Personal Identifying Information is collected from medical providers who wish to be included in the registry of buprenorphine prescribers. Inclusion in the registry is optional, medical providers supply their information for the purpose of being located by patients desiring the providers services. Providers must affirmatively acknowledge that they want their information to be shared publicly.

<b>PIA - 5:</b>	Describe any secondary uses for which the PII will be used (e.g. testing, training or research).	None
<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.	Authority of the Controlled Substances Act (21 U.S.C. 822 (f)) Drug Addiction Treatment Act of 2000 (DATA 2000) Narcotic Addict Treatment Act – 1974. Substance Use Disorder Prevention that Promotes Opioid Recovery and Treatment for Patients and Communities or SUPPORT for Patients and Communities Act of 2018 (SUPPORT Act)
<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.	Name, Business Name, Business E-Mail Address, Business Street Address, Business Phone Number, Medical License Number
<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.	Division of Pharmacologic Therapies, CSAT/SAMHSA System Notice 09-30-0052 1 <a href="https://www.samhsa.gov/privacy/sorns/systemnotice-09-30-0052-1">https://www.samhsa.gov/privacy/sorns/systemnotice-09-30-0052-1</a>
<b>PIA - 9:</b>	Identify the sources of PII in the system.	Directly from an individual about whom the information pertains  Online
<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.	SMA-167 Form Approved: 0930-0234 Date: 07/31/2018
<b>PIA - 10B:</b>	Identify the OMB information collection approval number expiration date.	7/31/2021
<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?	No
<b>PIA - 11A:</b>	Identify with whom the PII is shared or disclosed.	
<b>PIA - 11B:</b>	Please provide the purpose(s) for the disclosures described in PIA - 11A.	
<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)).	
<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.	
<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.	Providers are not required to be included in the registry. If they wish to cease their inclusion in the registry, they may contact SAMHSA/CSAT with their request to be removed from it.
<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 system is expected to be decommissioned. There are no new major changes planned to occur.
<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.	Individuals will contact SAMHSA (Substance Abuse and Mental Health Administration) with their concerns regarding the use or accuracy of their PII.
<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.	PII is reviewed on a regular basis with respect to the accuracy of the address and geocodes for the address. Identified discrepancies are reviewed and corrected by SAMHSA
<b>PIA - 17:</b>	Identify who will have access to the PII in the system.	Administrators Contractors
<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
<b>PIA - 18:</b>	Provide the reason why each of the groups identified in PIA - 17 needs access to PII.	Administrators required access to maintain the information in the system and ensure its accuracy.  Contractors are used to address the technical implementation of necessary changes where specialized knowledge of information technology tools is required.
<b>PIA - 19:</b>	Describe the administrative procedures in place to determine which system users (administrators, developers, contractors, etc.) may access PII.	Access to the system is granted on a strict "need-to-know" basis. Requests for access to the system are evaluated to ensure that any user requesting access is either a SAMHSA administrator tasked specifically with the maintenance and upkeep of BWNS and its information. Contractor access is restricted to only those individuals on contracts that support BWNS (Buprenorphine Waiver Notification System), have specialized knowledge of information tools used to support BWNS, and have an expressed need to provide support.
<b>PIA - 20:</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.	The default profile for each user contains all PII. Therefore privileged users have equal access to all PII information. Non-privileged users have access to their own PII information only.
<b>PIA - 21:</b>	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.	All SAMHSA and Contract personnel are required to take the HHS (Health and Human Services) / SAMHSA /CSAT Opioid Treatment Program Extranet and privacy training annually.

<b>PIA - 22:</b>	Describe the training system users receive (above and beyond general security and privacy awareness training).	Developers and system administrators also have received HHS significant user training and COOP(Continuity of Operations) training
<b>PIA - 23:</b>	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).	All records are stored electronically in a secured database. Records are permanent, and remain a part of the system under the Persons Required to Keep Records and File Reports, 21 Code of Federal Regulations (CFR) PART 1304.03. Further assessment will be conducted to propose a schedule for BWNS under the SAMHSA Records Schedule. The data collected and maintained will not be deleted prior to the system being appropriately scheduled with National Archives and Records Administration (NARA).
<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.	<p><b>Administrative Controls</b></p> <p>Access to the system is granted on a strict “need-to-know” basis. Requests for access to the system are evaluated to ensure that any user requesting access is either a SAMHSA administrator tasked specifically with the maintenance and upkeep of BWNS and its information. Contractor access is restricted to only those individuals on contracts that support BWNS, have specialized knowledge of information tools used to support BWNS, and have an expressed need to provide support.</p> <p><b>Technical Controls</b></p> <p>The system is secured behind the SAMHSA VPN and multiple security servers that restrict access based on identity and credentials.</p> <p><b>Physical Controls</b></p> <p>The system is contained in the Amazon Web Services Cloud which is (Federal Risk and Authorization Management Program) FedRAMP compliant.</p>

## Review & Comments

### Privacy Analyst Review

<b>OpDiv Privacy Analyst Review Status:</b>	Approved	<b>Privacy Analyst Review Date:</b>	2/7/2024
<b>Privacy Analyst Comments:</b>	BWNS is being decommissioned and there is a current PIA in place which does not expires until 2025. This PIA was resubmitted for a PTA form to be generated by Archer.		<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>	2/13/2024
		<b>SOP Days Open:</b>	6

### Agency Privacy Analyst Review

<b>Agency Privacy Analyst Review Status:</b>	Approved	<b>Agency Privacy Analyst Review Date:</b>	2/14/2024
<b>Agency Privacy Analyst Review Comments:</b>	Reviewer: Nestor Villafuerte 2/14/2024 All comments have been addressed. This PIA is ready for SAOP review and approval.	<b>Agency Privacy Analyst Days Open:</b>	1

### 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>	3/7/2024
		<b>SAOP Days Open:</b>	22

### Supporting Document(s)

Name	Size	Type	Upload Date	Downloads
No Records Found				

## Comments

Question Name	Submitter	Date	Comment	Attachment
PIA - 1	VILLAFUERTE, NESTOR	2/13/2024	Please ensure that the PII data elements listed in PTA-5 matches this response. (e.g. Fax number)	
PIA - 8B	VILLAFUERTE, NESTOR	2/13/2024	Reviewer notes that when entering the URL provided, it leads to a SAMHSA webpage that states that it was not found. However, the following link seems to be correct: <a href="https://www.samhsa.gov/system-notice-09-30-0052-1">https://www.samhsa.gov/system-notice-09-30-0052-1</a>	
PIA - 10B	VILLAFUERTE, NESTOR	2/13/2024	Reviewer notes that the OMB information collection approval number in PIA-10A is expired.	

## Admin Section

Is OpDiv Privacy Analyst Approved ?:	1	Is OpDiv Privacy Analyst Return ?:	0
Is Agency Privacy Analyst Approve ?:	1	Is SOP Return ?:	0
Is SAOP Approved?:	1	Is Agency Privacy Analyst Return ?:	0
Total Approved:	4	Is SAOP Return ?:	0
Total Approval Required:	4	Total Return:	0

## Miscellaneous Fields

Last Updated:	3/7/2024 12:46 PM	History Log:	<a href="#">View History Log</a>
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