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|  WRAPAROUND MILWAUKEE Policy & Procedure | Date Issued: 8/1/03 | Reviewed: 4/26/12 By: MG Last Revision: 9/10/12 | Section: ADMINISTRATION | Policy No: 046 | Pages: 1 of 3 (2 Attachments) |
| | <input checked="" type="checkbox"/> Wraparound <input checked="" type="checkbox"/> Wraparound-REACH <input checked="" type="checkbox"/> FISS <input checked="" type="checkbox"/> Project O-Yeah | Effective Date: 1/1/13 | Subject: ACCESS TO PROTECTED HEALTH INFORMATION MAINTAINED IN SYNTHESIS | | |

I. POLICY

It is the policy of Wraparound Milwaukee that minimum necessary access be allowed to client specific protected health information (PHI). Protect health information is defined in 45CFR Part 164.501 of the Standards for Privacy of Individually Identifiable Health Information as “individually identifiable health information” that is transmitted by electronic media; maintained in any medium as described in 162.103 of the subchapter or transmitted or maintained in any form or medium (except education records covered by the Family Education Rights and Privacy Act) will be maintained by Wraparound Milwaukee allowing “minimum necessary access” to the protected health information as outlined in the HIPAA Privacy Standards.

Wraparound Milwaukee Synthesis support staff (in conjunction with the Wraparound Privacy Officer) will establish and maintain protocols for allowing “Minimum Necessary Access” to protected health information that is maintained in the Wraparound Milwaukee computer application known as “Synthesis”.

II. PROCEDURE

A. Access to Synthesis.

Access to Synthesis is by Agency and job related duties and includes, but is not limited to, the following categories:

1. **Wraparound Milwaukee Central Office Staff.**
 - Administration
 - Finance
 - Enrollment
 - Quality Assurance
 - Court Liaisons
 - Mobile Urgent Treatment Team
 - Information Technology
 - Wraparound Milwaukee Provider Network
 - Other Milwaukee County Department Staff
2. **Business Associates / Care Coordination Agencies / FISS / Other Contract Agency Staff.**
 - Care Coordination / FISS Supervisors and Leads
 - Care Coordinators / FISS Managers
 - Clerical Support/Data Entry Staff
 - FISS Administrative Staff
 - Crisis Workers
 - Crisis Supervisors
3. **Wraparound Milwaukee Provider Network and Partner Agencies**
 - Crisis Stabilization Providers/Supervisors
 - Group Home Providers/Supervisors
 - Transportation Vendors
 - Vendor Billing Staff
 - Vendor Program Staff

B. Requests for Access to Synthesis.

1. Requests for a Login/User ID to access Synthesis are made in writing and forwarded to Synthesis

Help Desk staff, using the appropriate REQUEST TO ACCESS SYNTHESIS LOGIN I.D. form (*see Attachment 1*).

2. UserID requests will be routed as follows:
 - a. Billing Staff / Internal Users – Janet Wegher
 - b. Crisis Providers – Theresa Randall
 - c. Care Coordinators and other Agency Staff – Aggie Hale

C. Verifying Appropriateness of and Creating Synthesis Login/User I.D.

I.D. requests will be reviewed:

- All areas must be completed
- I.D. request must be signed
- An existing Agency Supervisor or the Agency Director must have signed the request.

If information is missing, the I.D. request form should be returned to the user for follow up.

If the I.D. request is complete:

- Use the name search option to see if the user previously had an I.D.
 - a. If so – verify that the previous I.D. is inactive. If not, contact the user’s agency regarding the status of the employee, and consult with Wraparound Provider Network staff before issuing an ID.
- Check the Vendor / Status List to see if there are any entries for the user. If so, consult with the Provider Network Coordinator or System Administrator before creating the I.D.

After reviewing these areas, Synthesis support staff create a unique Synthesis Login I.D. Generally the I.D. will be the user’s first initial and last name, followed by at least two random numeric characters. A unique temporary password is also created. This temporary password must be reset by the user after initial login. The user also will create two unique challenge questions and responses that can be used in the future to reset the password if needed.

The majority of users are set up with a “template” of security access based on their role (care coordinator, MUTT staff, agency billing staff, etc).. These templates are created by the System Administrator, and determine security access to all screens. For those individuals for whom there is not a set protocol (generally Milwaukee County Administrative or other oversight staff), the individual access level to Synthesis is determined by the Information Technology Supervisor with input from the HIPAA Privacy Officer. Access levels can be modified to accommodate changes in individual or group job responsibilities.

The Synthesis application requires that a “unique” I.D. be issued for all I.D.’s that are maintained (including inactive I.D.’s).

Synthesis support staff will verify that the appropriate access to Synthesis has been issued by logging in to Synthesis using the I.D. to be issued and reviewing the Menu choices available using the specific I.D.

After verification that the individual I.D. access to Synthesis is appropriate, the Synthesis support staff creating the I.D. will “disable” the I.D. and then “re-enable” the I.D. so that a date and time stamped entry identifying the Synthesis support staff member who verified the I.D. is made in the Synthesis UserData Table.

D. Issuing Synthesis Login/User I.D.’s.

Staff who are issued a Login I.D. for Synthesis will be given (via fax or email) a copy of the “INSTRUCTIONS FOR ACCESSING SYNTHESIS” (*see Attachment 2*). The instruction sheet will include the following information:

- the Login I.D.
- instructions for accessing Synthesis.
- information about the “temporary” password and instructions for creating a new password.

- guidance on protecting passwords.
- information on how to access Synthesis support staff.

E. Misuse of Synthesis Login/User I.D.

Reports of abuse of or misuse of Synthesis Login I.D.'s are to be forwarded to the Wraparound Privacy Officer. Misuse/abuse may include:

- an individual with a valid Synthesis Login I.D. allowing other individuals to use the I.D. to access protected health information maintained in Synthesis.
- copying and reproduction of protected health information maintained in Synthesis without the appropriate authorization or permission.
- other misuse such as improper handling of protected health information obtained from Synthesis.

Reports of abuse or misuse of Synthesis Login I.D.'s will be reviewed and may result in one of the following actions:

- additional training on the HIPAA regulations.
- written/verbal reprimand or other disciplinary action (as appropriate).
- revocation of the individual Synthesis Login I.D.

All reports of abuse and misuse of Synthesis Login I.D.'s will be documented in the [Administrative File](#) area of Synthesis.

Reviewed & Approved By: _____



Bruce Kamradt, Director

MILWAUKEE COUNTY

APPLICATION FOR SYNTHESIS LOGIN I.D.

To request a Login in I.D. for Synthesis, complete the following application. **PLEASE PRINT LEGIBLY!**

Agency Name: _____ Staff Name _____
Phone No. _____ Ext. _____ Email: _____
Fax (if no email listed above): _____

Type of User: (Check one or more that apply)

- Care Coord / Worker ___ Worker ___ Lead ___ Supervisor ___ Clerical
- Crisis Stabilizer ___ Worker ___ Supervisor (submit credentials)
- Vendor Billing Staff ___ View Authorizations ___ Submit Invoices ___ View Reports Only
- Vendor Data Entry Staff ___ Trip Logs/Invoices ___ Resource Guide Update ___ Bed Availability
___ RCC Progress Reports ___ GH Progress Report ___ Day Tx Progress Rpt
___ Independent Living Progress Rpt ___ CCC Crisis Plan
- Authorization Level ___ Data Entry ___ Data entry and approval

(Authorization Level is required only for Progress Report entry requests)

- Reports only (list groups) _____
- Other (describe) _____

Programs: (Check one or more that apply)

- Wraparound Milwaukee
- REACH
- FISS
- MUTT
- Children's Court

The above named agency requests that a Synthesis Login I.D. be issued to the above named staff at their agency. The staff receiving the Synthesis Login I.D. agrees to the following terms regarding maintenance of the I.D. and access to confidential information in Synthesis.

The agency requesting a Synthesis Login I.D. for the above named individual agrees to notify the Synthesis Help Desk when this individual's I.D. is to be inactivated because the individual's job responsibilities no longer require access to Synthesis or the individual is no longer employed by the agency.

SYNTHESIS USER I.D. AGREEMENT

I agree to keep my Synthesis Login I.D. and password confidential and not to share it with any other individuals within or outside my agency. I understand that information provided through Synthesis is confidential and agree to protect this information, using it only as needed to perform my job duties.

I agree to report to Synthesis Help Desk staff (257-7547) any unusual activity or inappropriate access to information that occurs while using Synthesis.

Staff Signature _____ Date Signed: _____

Authorized by (signature) _____ Print Name: _____

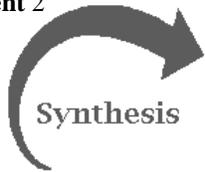
For Wrap/REACH staff only:

Pager No. _____ Cell No. _____ DOB: _____

FAX completed request to Synthesis Help Desk Staff at: (414) 257-7575

SYNTHESIS - OFFICE

Reviewed/Created by: _____ Date: _____



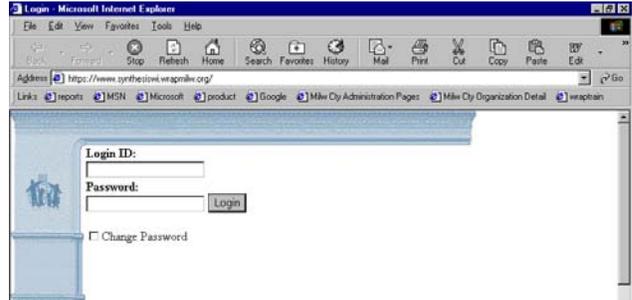
INSTRUCTIONS FOR ACCESSING SYNTHESIS

After you are logged on to your workstation (per your agency’s internal process), select the Internet Explorer icon.

In the address bar, type in <https://www.synthesiswi.wrapmilw.org>

The Synthesis Login screen should appear.

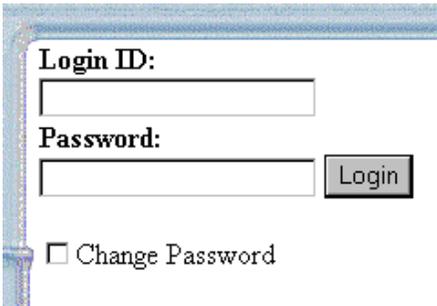
Synthesis is a secure web site and can only be accessed using “https” in the address.



SYNTHESIS LOGIN PROCEDURES

Your user I.D. for the Synthesis System is listed below.

| | |
|---------------------------|--|
| USER I.D. | |
| Temporary Password | |



THE TEMPORARY PASSWORD IS VALID FOR THREE LOGINS.

To login to Synthesis – type your User I.D. and password in the spaces provided on the login screen. Then click the Login Button.

If you DO NOT change the TEMPORARY password, your I.D. will be automatically inactivated after the third login.

Your new password must be at least 6 characters and include at least one letter and one number.

Be certain to change your password to a password that is unique FOR YOUR USE ONLY.

You will be required to change your password every 90 days. You will see a prompt to change your password at login when this occurs.

REMEMBER THAT THE INFORMATION THAT YOU VIEW WHEN USING SYNTHESIS IS CONFIDENTIAL. PROTECT THIS INFORMATION BY CHANGING AND PROTECTING YOUR PASSWORD.

PROTECTING YOUR PASSWORD

Include some type of punctuation or other non-alphabetic or numeric symbol in your password such as a dash or pound sign.

Do NOT write your password down or display it in writing on or near your computer.

If you must write your password down – store it in a secure place (not under the keyboard, telephone or other objects on your desk).

DO NOT share your password with co-workers or friends and if it is written down – where you keep it.

DO NOT use the “auto complete” feature on your Browser. (Remembers and automatically fills in your password for you.)



SYNTHESIS HELP DESK STAFF

A number of Wraparound staff have been trained to assist Synthesis system users. If you experience difficulty using the system, please be sure to contact one of the Help Desk staff who will help you log onto the system or “walk you through” portions of the software over the phone. **Please do not hesitate to ask for assistance if you experience any problems logging onto or using Synthesis.**

Who’s at the Synthesis Help Desk?

| | Help Desk Personnel | Telephone Number |
|---|------------------------|------------------|
| General Questions (Password Reset) | Help Desk Staff | 257-7547 |
| General Questions Invoicing | Janet Wegher | 257-5855 |
| General Questions Reports | Aggie Hale | 257-4766 |

Synthesis Staff