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Owner: Heidi Ciske-Schmidt:

12008018-Manager-

Quality Assurance

Policy Area: Wraparound (REACH,

O'YEAH)-Administration

References:

#046 - Access to Protected Health Information Maintained in Synthesis

POLICY

It is the policy of Wraparound Milwaukee that minimum necessary access be allowed to client specific Protected Health Information (PHI). PHI 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 sub-chapter 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 PHI that is maintained in the Wraparound Milwaukee computer application known as Synthesis.

PROCEDURE

A. Access to Synthesis

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

1. Wraparound Milwaukee Central Office Staff:

- a. Administration
- b. Finance
- c. Enrollment
- d. Quality Assurance
- e. Court Liaisons
- f. Children's Mobile Crisis Team
- g. Information Technology
- h. Wraparound Milwaukee Provider Network
- i. Other Milwaukee County Departmental Staff

2. Business Associates / Care Coordination Agencies / FISS / Other Contract Agency Staff:

- a. Care Coordination / Transition Coordinators / FISS Supervisors and Leads
- b. Care Coordinators / Transition Coordinators / FISS Managers
- c. Clerical Support/Data Entry Staff
- d. FISS Administrative Staff
- e. Crisis Workers
- f. Crisis Supervisors

3. Wraparound Milwaukee Provider Network and Partner Agencies:

- a. Crisis Stabilization Providers/Supervisors
- b. Group Home Providers/Supervisors
- c. Transportation Vendors
- d. Vendor Billing Staff
- e. 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 *Application for Synthesis Login Identification (I.D.) & Access form (Attachment 1)*.
- 2. User ID requests will be routed as follows:
 - a. Billing Staff / Internal Users - Synthesis support staff
 - b. Crisis Providers - Synthesis support staff
 - c. Care Coordinators and other Agency Staff - designated Wraparound Program Manager

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 by the user
- A current 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 completion.

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. 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 provided (via email) their unique Login ID and a copy of the "INSTRUCTIONS FOR ACCESSING SYNTHESIS" (*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.

Wraparound Milwaukee Privacy Officer:

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Attachments:

[1. APPLICATION FOR SYNTHESIS LOGIN IDENTIFICATION \(I.D.\) & ACCESS](#)

[2: Instructions for Accessing Synthesis](#)

Approval Signatures

Step Description	Approver	Date
	Michael Lappen: 11008000-BHD Administrator	1/30/2018
	Brian McBride: 12010012-Mngr-Int Srvs CCS, Interim WRAP Director	1/30/2018
	Pamela Erdman: 12008005-Placement Resources Manager	1/30/2018
	Heidi Ciske-Schmidt: 12008018-Manager- Quality Assurance	1/30/2018

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