 WRAPAROUND MILWAUKEE Policy & Procedure	Date Issued: 8/1/03	Date Revised: 11/24/08	Section: ADMINISTRATION	Policy No: 046	Pages: 1 of 2 (3 Attachments)
<input checked="" type="checkbox"/> Wraparound <input checked="" type="checkbox"/> Wraparound/REACH <input checked="" type="checkbox"/> FISS	Effective Date: 1/1/09	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. Depending on the type of access being requested, the following forms are used to process “Login I.D.” requests.

- Application for Synthesis Login I.D. - Care Coordinator / Case Manager / Administrative Access (*see Attachment 1*).
- Application for Synthesis Login I.D. – Network Vendor Access (*see Attachment 2*).

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

After determining that the I.D. request is appropriate, Synthesis support staff create the Synthesis Login I.D. following the Synthesis access protocol associated with the type of staff making the request. In most cases, there is a predetermined access level assigned to each access classification group, based on job responsibilities associated with the individual request. 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 (when appropriate, faxed or mailed) a copy of the “INSTRUCTIONS FOR ACCESSING SYNTHESIS” (*see Attachment 3*). 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.

Reviewed & Approved By: _____



Bruce Kamradt, Director

**APPLICATION FOR SYNTHESIS LOGIN I.D.****Care Coordinator / Case Manager / Administrative Access**

To request a Login in I.D. for Synthesis, please complete the following application.

Agency Name: _____ Staff Name (print) _____

Phone No _____ Ext. _____ Cell: _____

Email address _____ Pager: _____

Agency Staff Authorizing I.D. Request _____
(Signature of agency supervisor)

Access Level Being Requested: (Check One or More that Apply)

_____ FISS Worker

_____ FISS Supervisor

_____ Care Coordinator

_____ Lead Care Coordinator

_____ Care Coordinator Supervisor

_____ Clerical Staff – Care Coordination Agency

_____ Reports (list report groups) _____

_____ Other (describe) _____

_____ Administrative

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
- 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 (414-257-7547) any unusual activity or inappropriate access to information that occurs while using Synthesis.

Staff Signature: _____ **Date:** _____

Fax this completed Form to Synthesis Help Desk Staff at: (414) 257-7575.

Your Login ID and Instructions will be emailed to you shortly.

SYNTHESIS - OFFICE USE ONLY

Reviewed/Created by: _____

Date: _____

**APPLICATION FOR SYNTHESIS LOGIN I.D.****Network Vendor Access**

To request a Login in I.D. for Synthesis, please complete the following application.

Agency Name: _____ Staff Name (print) _____

Phone No _____ Ext. _____ FAX: _____

**Email address _____

Agency Staff Authorizing I.D. Request _____

(Signature of agency supervisor)

Access Level Being Requested: (Check One or More that Apply)

<input type="checkbox"/> Crisis Worker	<input type="checkbox"/> Crisis Supervisor
<input type="checkbox"/> Billing Staff (view/invoice for services)	<input type="checkbox"/> Resource Guide Updates (includes posting bed availability)
<input type="checkbox"/> Progress Report Entry	<input type="checkbox"/> Progress Report Approval (includes entry)
Types of Progress Reports: <input type="checkbox"/> Day Treatment <input type="checkbox"/> Residential <input type="checkbox"/> Group Home	
<input type="checkbox"/> Other (describe) _____	

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SYNTHESIS - OFFICE USE ONLY

Reviewed/Created by: _____ Date: _____

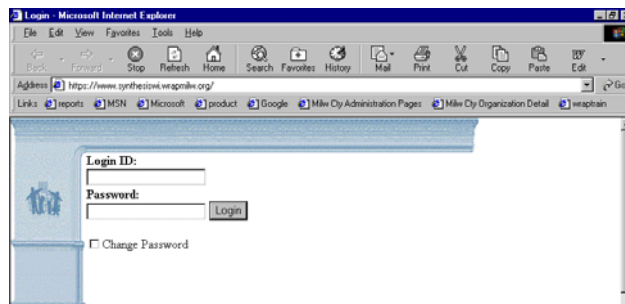
INSTRUCTIONS FOR ACCESSING SYNTHESIS

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.

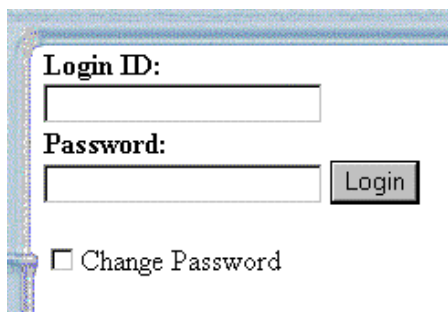


SYNTHESIS LOGIN PROCEDURES

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

USER I.D.	
Temporary Password	<i>milwaukee1</i>

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