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Owner: *Heidi Ciske-Schmidt:
Integrated Services
Manager*

Policy Area: *Wraparound (Wrap,
REACH, youth CCS)-
Administration*

References:

#046 - Access to Protected Health Information Maintained in Synthesis

I. POLICY

It is the policy of Children's Community Mental Health Services and 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.

Children's Community Mental Health Services and Wraparound Milwaukee IT support staff (in conjunction with the Security/Privacy Officer) will establish and maintain protocols for allowing "Minimum Necessary Access" to PHI that is maintained in the Children's Community Mental Health Services and Wraparound Milwaukee internet-based application known as Synthesis.

II. 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. **Children's Community Mental Health Services and 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. Children's Community Mental Health Services and Wraparound Milwaukee Provider Network
- i. Other Milwaukee County Departmental Staff

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

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

3. Children's Community Mental Health Services and 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](#).
2. User ID requests will be routed as follows:
 - a. Central Office Staff / Internal Users - Synthesis support staff
 - b. Care Coordinators and other Agency Staff - Synthesis support staff

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 prior to being processed.

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 Children's Community Mental Health Services and Wraparound Milwaukee 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 Manager or System Administrator before creating the I.D.

After reviewing these areas, Synthesis support staff create an 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/when needed.

The majority of users are set up with a "template" of security access based on their role (care coordinator, CMC 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 System Administrator 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 1*). 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 Children's Community Mental Health Services and Wraparound Milwaukee Security 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 Security Officer:

Heidi Ciske-Schmidt, Security Officer

(414) 257-6024

heidi.ciske-schmidt@milwaukeecountywi.gov

Attachments

1. [Instructions for Accessing Synthesis](#)

Approval Signatures

Step Description	Approver	Date
	Michael Lappen: BHD Administrator	11/17/2020
	Brian McBride: ExDir2 – Program Administrator	11/17/2020
	Dana James: Consultant	11/3/2020
	Heidi Ciske-Schmidt: Integrated Services Manager	11/3/2020



INSTRUCTIONS FOR ACCESSING [SYNTHESIS](http://synthesis.milwaukee.gov/)

Synthesis Help Desk: 414-257-7547

The website address for Synthesis is: <http://synthesis.milwaukee.gov/>

- Users are required to use Internet Explorer 11.
 - Synthesis is not compatible with other browsers (i.e.: Firefox, Chrome, etc.) at this time.
 - Use of any other browser may result the user not getting proper on-screen cues to prevent errors.

INITIAL LOG-IN PROCEDURE

1. Go to the Synthesis website: <http://synthesis.milwaukee.gov/>
2. Enter your assigned unique “User Name” and your temporary “Password”

Users are required to use Internet Explorer 11 to access Synthesis. Other browsers (Firefox, Chrome, Edge, etc.) are incompatible.

System Update
Initial log-in on/after 01/29/2020?
Click on "Forgot Password?" to reset your password.

User Name:

Password:

[Forgot Password?](#)

3. You will be prompted to set up a “New Password” and enter your “Challenge Credentials” following the instructions on the screen. Then, click “Update Password & Challenge Credentials”.

PASSWORD CHANGE

To change your password, you must enter it the same way in both fields
It must be at least 8 characters long, and must include 3 of the following 4 items:

- 1) An UPPER CASE letter
- 2) A lower case letter
- 3) A number
- 4) A special character, such as: !,\$,%,*

New Password

Re-Enter New Password

CHALLENGE CREDENTIALS

Both questions and answers are required. Answers must be at least 5 characters long, are NOT case sensitive and cannot be the same as the questions.

Question 1:

Answer 1:

Question 2:

Answer 2:

4. You will be redirected to the log-in page. Enter your “User Name” and your new, unique “Password”.

HELPFUL TIPS

1. Forgot your password?
 - a. Click “Forgot Password?” on the Log-In Page and follow the prompts to reset your password
 - b. Enter a “New Password”
 - c. Click “Update Password & Challenge Credentials”
 - d. You will be redirected to the log-in page. Enter your “User Name” and your new “Password”.

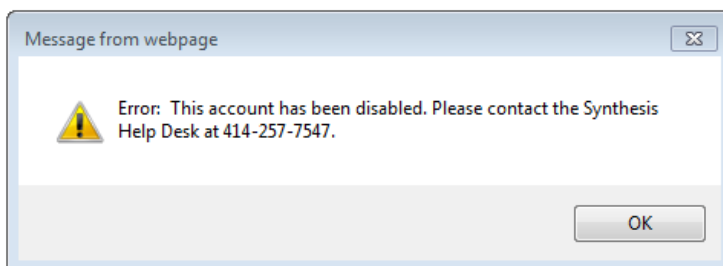
User Name:

Password:

Log In

[Forgot Password?](#)

2. Account Disabled?
 - a. If your password is entered 4 times incorrectly, your account will be disabled.
 - b. Contact the Synthesis Help Desk at 414-257-7547 to enable your account.



3. Need Help in Synthesis?
 - a. Synthesis Help Desk is here to help you with any questions, concerns and/or suggestions you may have related to Synthesis. Call us at 414-257-7547.
 - b. Synthesis Help Desk is open from 7:30am-4:00pm, Monday-Friday.