

**ENCOMPASS FAMILY HEALTH HOME**  
**Care Management**  
**Policy & Procedure Manual**

**Care Management Policy #10 - Health Information Technology**

**Effective Date:** 5/1/16

**Revised Date:** 10/1/16, 12/1/16, 9/18/2017

**Policy:** Encompass Health Home will ensure that Care Management Agencies (CMAs) meet the NYS Department of Health (DOH) and Statewide Health Information Network of New York (SHIN-NY) standards for health information exchange, to securely utilize Health Information Technology (HIT) to link services, communicate with providers, enhance quality of care, and positively impact outcomes for Participants.

**Procedure:**

**A. Security Measures**

1. Encompass will ensure that CMAs develop and adhere to standard security practices according to the Health Insurance Portability & Accountability Act (HIPAA) and Health Information Technology for Economic and Clinical Health Act (HITECH).
2. All Care Management staff will be trained to HIPAA –HITECH Privacy and Security Rules, as well as initial Care Management training requirements, prior to requesting access to the EHR. (*see access process below*)
3. Internal practices that protect the confidentiality of protected health information will be utilized to include all methods of transmission: ability to view material; face to face communications; by phone; faxing; e-mail and postal mail.
4. Care Managers will be assigned unique user ID's and will create authenticated passwords to ensure users of the EHR system are appropriately identified.
5. Care Managers will keep all user IDs and password information confidential and secure.
  - i. Care Managers will notify the Health Home should this information become compromised.
6. Encompass and CMAs will assure that devices that connect to Netsmart contain updated Anti-Virus and Malware software, and are maintained regularly by trained IT staff, including prohibiting the installation of unauthorized hardware/software on devices.
7. Systems and devices will be password protected, secured when not in use, and should be set to lock after at least 15 minutes of inactivity.
8. Care Management staff will assure that computer/device screens are shielded from view, and that all paper PHI information is contained in secure areas.
9. Encompass and CMAs will assure that all access to Participant information is limited to those with a need to know, to provide treatment, support or coordination of services.
10. Care Management Staff will refrain from saving confidential information on any portable device.
  - i. Needed information or pictures on a device will be immediately saved to the Plan of Care, or a secure file and then immediately deleted from the device.
11. Encompass and CMAs will ensure all sensitive information is shared/transmitted securely, and encrypted when sent electronically.

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**B. Single Electronic Plan of Care**

1. Encompass will utilize Netsmart Care Manager as a centralized Electronic Health Record (EHR) to create, document, execute, and update Plans of Care.
  - i. The process for access, training, and use include but are not limited to the following:
    - a) CMA Supervisor will submit a New User request to the Health Home, identifying Agency; address; staff name; date of birth; gender; hire date; user role; e-mail address; phone number.
    - b) Health Home/HIT Director will send new user an e-mail, to validate e-mail address and user identity.
    - c) Health Home will provide new user a general overview of the Netsmart platform and process.
    - d) Health Home will assign a username and temporary password, and send an activation e-mail to the new user.
    - e) New user will log in and create new password. The password should contain contains at least 8 characters, both upper and lower case characters; and should contain at least one number or special character (such as @, #, \$, %).
      - 1) Passwords will be changed every 90 days.
    - f) Health Home/CMA will provide training in Netsmart, and will verify successful completion of tasks.
    - g) Once training has been completed, user will be granted full access to the live site.
  - ii. CMAs will inform the Health Home of information that affects the status of all users immediately, to prevent access by those who no longer have a need to access due to job changes or terminations.
  - iii. CMA's will submit to the Health Home, no less than quarterly, a list of current care Management Staff/ Netsmart users, for reconciliation of user access.
2. All Care Management contacts and Participant focused activities will be documented in Netsmart.
3. Consents, assessments and other Participant information will be scanned when completed and attached to the Plan of Care.

**C. Regional Health Information Networks (RHIOs)**

1. Encompass will connect to RHIOs within its service areas to utilize updated health information for ongoing Care Management.
2. CMAs will independently contract with local RHIOs to further enhance their HIT network and improve the continuity and quality of care.  
*See RHIO Policy.*

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**D. Medicaid Analytics Performance Portal (MAPP)**

1. The MAPP will be used to facilitate access to critical health care information from disparate systems to further promote and improve quality of care.
2. CMAs will complete a DOH approved Business Associate Agreement with the Health Home to access the MAPP.
3. CMA's will identify and notify the Health Home of their Single Point of Contact.
4. CMA's will submit organization information to DOH to set up access, and establish MAPP accounts for all users and roles.
5. All users will complete MAPP training that has been assigned based on role.
6. Ongoing trainings will be available through DOH and are recommended as best practice.

**E. Evidenced Based Clinical Decision Making Tools (PSYCKES, CANS-NY)**

1. The Health Home supports the use of evidence based clinical decision making tools, consensus guidelines, and best practices to achieve optimal outcomes and cost avoidance. At a minimum, the use of PSYCKES is recommended to gain clinical information required to develop an individualized Plan of Care.  
CANS-NY is a required tool for assessing children's strengths as well as Plan of Care needs.
  - i. **Psychiatric Services Clinical Knowledge Enhancement Systems (PSYCKES)** is a HIPAA-compliant web-based application providing access to Medicaid claims data and will be used for the purpose of clinical decision making and quality improvement.
    - a) CMAs will complete an application, and enter into a contract/confidentiality agreement with the Office of Mental Health, to allow PSYCKES access. (See *PSYCKES Access materials*)
    - b) CMAs will establish a PSYCKES implementation team/plan and commit to implementation within their organization.
    - c) CMAs will develop policies and procedures that align with that of PSYCKES, including necessary auditing to assure appropriate use and access.
    - d) CMA's will train relevant staff regarding PHI access, policies, procedures and confidentiality.
  - ii. **Child and Adolescent Needs and Strengths-New York (CANS-NY)** is an assessment tool to be used to identify and address the multi-system needs of children and adolescents. This assessment requires initial and yearly certification. The certification process includes but may not be limited to:
    - a) Completion of required training through the CANS-NY training website.
    - b) Completion of a training test with a score of 70% or better for general use and 80% or better for Supervisors.
    - c) Completion of annual recertification.

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**F. Auditing**

1. Audits of HIT usage will be conducted quarterly by CMAs to ensure all information is accessed and utilized appropriately.
2. Any breach or suspected breach will be reported to the Privacy Officer and investigated immediately.
3. Breaches will be reported to the Health Home per Business Associate Contracts.