



FLORIDA DEPARTMENT OF JUVENILE JUSTICE PROCEDURE

Title: Confidential Information – MFMP Procedures

Related Policy: FDJJ - 1415

I. DEFINITIONS

Confidential Information (directly related to an individual) – Confidential information directly related to an individual is prohibited from being included in MyFloridaMarketPlace. This includes information included in the comments field, line item description as well as attachments. The following list is not exhaustive, but provides the common types of confidential information user should ensure is redacted from attachments included in MyFloridaMarketPlace. Agency specific questions about confidential information should be directed to the agency’s HIPAA privacy officer, MFMP Privacy Officer or General Counsel’s Office.

1. Names (clients, JPO officers)
2. All geographic subdivisions smaller than a state, including street addresses, city, county and zip codes.
3. All elements of dates (except year) directly related to an individual, including birth date, admission date, discharge date, and date of death.
4. Telephone numbers
5. Electronic mail addresses
6. Social security numbers
7. Medical record numbers
8. Health plan beneficiary numbers
9. Account numbers
10. Certificate/driver’s license numbers
11. Mother’s maiden name
12. PeopleFirst UserID number

eForm – Electronic invoice generated in MFMP as a result of a vendor “flipping” their direct order (DO) to generate an invoice sent electronically to the agency.

HIPAA – Health Insurance Portability and Accountability Act of 1996 – Law that provides compliance guidelines for handling of Protected Health Information and other confidential personal information.

HIPAA Compliance Officer – DJJ employee responsible for agency adherence to HIPAA rules and regulations.

MFMP – MyFloridaMarketPlace – Electronic procurement system for the State of Florida.

MFMP Privacy Officer – DJJ employee assigned to monitor compliance with this policy.

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Supporting Attachments –

1. Purchase Order and Master Agreement Processing

Attachments sent to vendor: Any necessary terms and conditions not entered into the system, but required for the vendor to have the complete description of the transaction, such as specification sheets, diagrams and sketches, or portions of statements of work or supplier contract forms that have not already been made available to vendor.

2. Payment Processing

Attachments made via the invoice eForm, Master Agreement setup, paper invoices received by the agency and input in to MyFloridaMarketPlace, and any other supporting documentation needed to support the transaction and/or show compliance with applicable laws, rules and regulations.

II. STANDARDS/PROCEDURES

A. Scanning and Attaching Documents into MFMP:

1. Purchase Orders:

- a. Quotes or backup documentation containing confidential information as outlined in the definition in Section I of this policy **shall not** be entered or attached into MFMP.
- b. MFMP users should comply with instruction outlined in the DFS Reference Guide for State Expenditures when determining what supporting documentation to attach to a requisition within MFMP to substantiate the request. The guide is available on the Internet at http://www.fldfs.com/aadir/reference_guide/.
- c. MFMP users **shall** copy supporting documentation for paper quotes, contractual service agreements, and any other payment documents, and edit or redact all confidential information prior to scanning into MFMP. Originals will be maintained for subsequent audit purposes.
- d. Any requisition or change order request found to contain confidential information during the MFMP review process by a subsequent approver must be denied back to the requester for deletion of the transaction and preparation of a new transaction.
- e. Staff **shall not** enter any confidential information into any of the comment boxes in MFMP.

2. Invoices:

- a. Any invoices containing confidential information as outlined in the definition in Section I of this policy **shall not** be entered or attached into MFMP.
- b. Invoices containing confidential information must be sent to Finance and Accounting for processing in MFMP. MFMP users outside of Finance and Accounting should not attach invoices with confidential information into MFMP. MFMP users outside of Finance and Accounting should also not redact information on invoices and then attach them into MFMP. The original

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invoice must be sent to Finance and Accounting for redacting and filing of the original invoice in the scanned imaging system used for record retention.

- c. MFMP users should comply with instructions outlined in the DFS Reference Guide for State Expenditures when determining what supporting documentation to attach to an invoice for payment within MFMP to substantiate the request. The guide is available on the Internet at http://www.fldfs.com/aadir/reference_guide/.
- d. Finance and Accounting staff **shall** copy supporting documentation for paper invoices, contractual service agreements, and any other payment documents, and edit or redact all confidential information prior to scanning into MFMP. Originals will be maintained for subsequent audit purposes.
- e. Any requisition or invoice found to contain confidential information during the MFMP review process by a subsequent approver must be denied back to the buyer for deletion of the transaction and preparation of a new transaction.
- f. Staff **shall not** enter any confidential information into any of the comment boxes in MFMP.

B. Scanner Settings and File Attachment Sizes

1. Scanner Settings:

- a. The Department of State requires scanned images be captured at a minimum resolution of **300** dots per inch (DPI). Scanning documents at 300 DPI provides good image resolution for printed text. Modern scanners have no problem meeting this image resolution requirement. Capturing images at a higher resolution greatly increases the size of the files created by the scanner. Additionally, capturing document images in color (as opposed to black and white) further increases the size of the document file. Larger files take longer to upload which slows down processing of transactions in MyFloridaMarketPlace. Increased file sizes can have a dramatic impact on the time required to attach documents in MyFloridaMarketPlace.
- b. Users should take the necessary steps to configure scanners are properly configured to capture images in the most efficient manner, e.g. 300 dpi, black and white.

2. File Attachment Sizes:

- a. Attachments on a MyFloridaMarketPlace transaction should be **less than 4 megabytes** in size (includes sum of all attachments on the transaction). The Sourcing tool is the only exception to this rule and it supports file attachments of up to **20 megabytes**. The tool will appear to continue loading larger files (i.e., > 20 megabytes); however, the system will only save the first 20 megabytes- resulting in an incomplete upload.

3. Valid File Types:

- a. For documents attached to purchase orders, there are specific file types supported by MyFloridaMarketPlace. Attaching invalid file types to a purchase order will result in a failed order transmission that will slow down submission of the order to the vendor.

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b. Recommended file attachment types are:

Recommended File Types for MyFloridaMarketPlace
.bmp – Bitmap Image
.doc – MS Word
.pdf – Adobe Acrobat Forms Document
.csv – MS Excel Comma Separated Values File
.rft – Rich Text Format
.xls – MS Excel Worksheet
.pcx – PCX Image Document
.tif – TIF Image Document
.wri – Write Document

C. Confidential Information Monitoring:

1. On a monthly basis:

- a. The MFMP Privacy Officer shall conduct a sampling of 5% of transactions (purchase orders and invoices) and review attachments and comments to ensure confidential information has not been included.
- b. A monthly report will be produced listing invoices or direct orders processed in MFMP that may contain potentially confidential or HIPAA related information. The list is generated based on certain DMS purchasing commodity codes that have been identified to relate to confidential or HIPAA related services/commodity purchases.
- c. If any attachments or comments are found to include confidential information, the Privacy Officer should initiate the Attachment Removal Request Process described in detail in Section D below.

2. On a quarterly basis:

- a. The MFMP Privacy Officer shall send an e-mail to remind all users within the agency of their responsibilities for identifying, removing and protecting confidential information.
- b. Review agency training to ensure it includes information regarding (1) the redaction of confidential information from attachments that are to be included in MyFloridaMarketPlace, and (2) the attachment removal process that can be initiated by completing form PUR 3785 should confidential information be identified in the system.

3. On an annual basis:

- a. The MFMP Privacy Officer shall review the agency's confidentiality policies.
- b. Submit the policies to the Governor's Office and the Department of Management Services no later than August 1, 2006, (and every subsequent year by August 1st).

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- c. Should a violation be identified or if there are specific questions about this policy, staff should immediately consult with the MFMP Privacy Officer.

D. Removing Scanned/Attached Documents:

- 1. If it is discovered a purchase order or invoice has been processed through MFMP with confidential information contained in the attachments, the approver will reject the current invoice returning it to the requester to remove the original attachment and upload a new invoice with redacted information.

E. Training:

- 1. DJJ will develop training to incorporate requirements around confidential information and protection of secure information. Specifically:
 - a. All new employees shall be provided with this MFMP confidentiality policy and verification of receipt, Attachment A, shall be completed and filed in their Personnel file.
 - b. In addition to MyFloridaMarketPlace system training and prior to being granted access to MyFloridaMarketPlace, each new hire will receive training on DJJ's MFMP confidentiality policy, including escalation procedures should confidential information be identified.

III. RESPONSIBILITY AND DUTIES

A. MFMP Privacy Officer Responsible Office/Bureau/Program

- 1. Responsible for ensuring all DJJ MFMP users receive training on this confidentiality policy and for monitoring policy compliance. Should confidential information be found in the system, the MFMP Privacy Officer will be responsible for identifying the nature of the confidential information, notifying the DJJ's Inspector General, and expediting a purge request.

B. General Counsel

- 1. Responsible for ensuring all confidential information items are accounted for in this policy and policy meets criteria necessary to ensure DJJ is compliant with all applicable confidentiality rules and regulations.

C. HIPAA Compliance Officer

- 1. Responsible for ensuring all HIPAA confidential information items are accounted for in this policy and policy meets criteria necessary to ensure DJJ is compliant with all applicable HIPAA confidentiality rules and regulations.

IV. ATTACHMENTS

Attachment A - Acknowledgement of Receipt of MyFloridaMarketPlace Confidentiality Policy