

CDI: A Cog in the Wheel of Information Governance

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By Katherine Downing, MA, RHIA, CHPS, PMP

Information governance (IG) is an emerging discipline in healthcare that focuses on how an organization ensures information is complete, accurate, trustworthy, and usable. The goal of information governance is to enable organizations to utilize a valuable strategic asset—information—to support the organization’s mission, vision, and goals. Governance of clinical and operational information improves an organization’s quality of care, patient safety, and population health. IG also increases operational efficiency and effectiveness while reducing costs and risk.

Clinical documentation improvement (CDI) activities are, at their base, information governance responsibilities. Information governance programs include policies, processes, and controls to ensure data are specific, complete, precise, timely, legible, consistent, and clear. CDI activities also aim for these goals with data and are in place to ensure compliance, substantiate claims, and improve revenue streams.

Clinical documentation improvement as a discipline is specifically a data governance role. CDI is also an important part of reviewing information as it begins its lifecycle, before it gets shared outside of the organization with patients, external physicians and clinicians, payers, accountable care organizations, and others in the healthcare ecosystem, which is a function supporting the Information Governance Adoption Model’s (IGAM’s™) Enterprise Information Management competency.

“Clinical documentation improvement is a practical example of the information governance program providing structure for a successful data quality-focused program. The IG principles of integrity, availability, and compliance are key components of a CDI program that supports maturity in the data governance and enterprise information management competencies,” says Launa Fackrell, director of coding and clinical documentation improvement at Children’s Medical Center of Dallas (Children’s Medical), based in Dallas, TX. “Children’s [Medical’s] CDI team worked to improve documentation by capturing data elements that are complete, specific, timely, and relevant through processes defined with information governance.

“Standardized templates with clinical definitions were a few of the tools employed. The goal was that the providers document correctly the first time and not rely on queries.”

Clinical documentation improvement processes work to achieve precise data elements that support the complexity and severity of the patient’s illness. CDI activities have been focused on ensuring that data used for coding and revenue decisions are accurate, but the outcomes of CDI include improvement in data quality. Data quality, as a part of data governance, includes processes to ensure data are meeting quality characteristics that foster organizational success. Data quality efforts are a continuous process of defining the parameters for specifying acceptable levels of data quality to meet business needs. At Children’s Medical, the information governance team focused on getting accurate and complete information available in a timely manner to facilitate efficient clinical delivery.

“The goal was to teach the providers how to document in such a way as that it captured quality data quickly and efficiently,” says Katherine Lusk, RHIA, MHSM, FAHIMA, chief health information management and exchange officer at Children’s Medical. “Providers requesting assistance with restructuring their notes is a testimony to the success. IG structure provided the foundation for management of this cultural change.”

Data quality attributes that are supported by clinical documentation improvement include accuracy, consistency, comprehensiveness, definition, granularity, precision, relevancy, and timeliness. AHIMA includes these data quality characteristics in the “Data Quality Management Model” Practice Brief.¹

CDI and the Information Governance Competency Circle

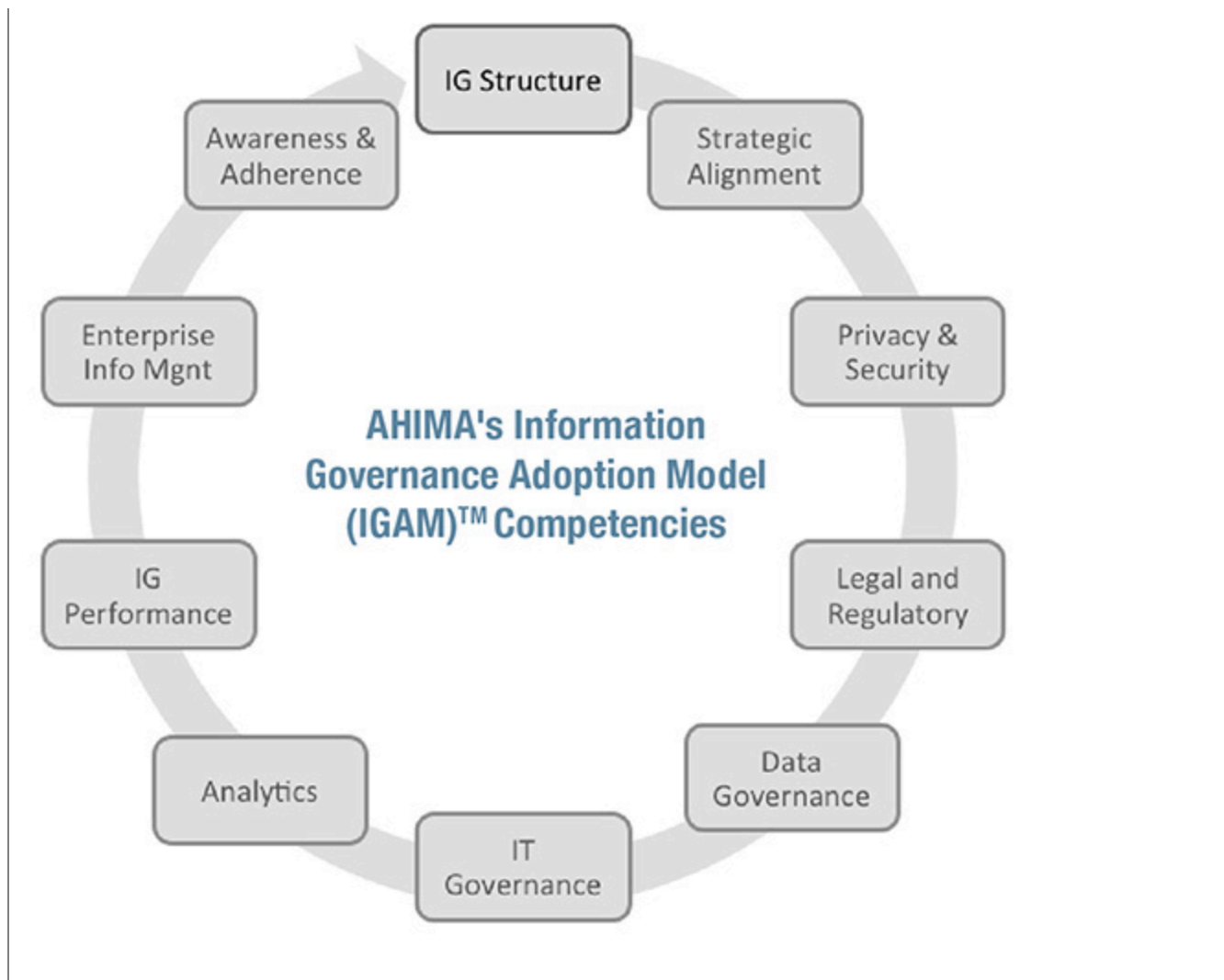
AHIMA's Information Governance Adoption Model (IGAM™) includes 10 IG organizational competencies, shown here. Each IG competency includes several key markers that identify critical requirements to achieve maturity in information governance. When used effectively, AHIMA's IGAM can help an organization develop a road map to excellence in IG.

CDI is a Part of Data Governance

Data governance is the sub-domain of information governance in the IGAM that provides for the design and execution of data needs planning and data quality assurance in concert with the strategic information needs of an organization. The Data Governance competency includes data modeling, data mapping, data audit, data quality controls, data quality management, data architecture, and data dictionaries. Data governance collaborates with information management in functional components essential to the enterprise plans for information organization and classification. Clinical documentation improvement is an activity that contributes to the overall data quality in an organization.

CDI is a Part of Enterprise Information Management

Enterprise information management (EIM) is a sub-domain of information governance in the IGAM, and includes the policies and processes for managing information across the organization, throughout all phases of its life: creation/capture, processing, use, storage, preservation, and disposition. EIM also includes management of enterprise practices for information sharing, release and exchange practices, chain of custody, and long-term digital preservation. Enterprise information management incorporates the foundational functions of information organization and classification, which envelop taxonomies and metadata management, and master data management. Clinical documentation improvement is an activity that contributes to consistency in use of taxonomies across the information lifecycle, and therefore is a part of EIM.



A Shared Focus on Quality Measures

As payment models change and evolve for providers across the healthcare continuum, the focus on quality of care—shown only through quality information—will have a higher priority than ever before. CDI must be firmly embedded in the creation and capture of all clinical data to ensure success across the organization.² Ensuring compliance with quality measures and quality reporting requirements is another key aspect of information governance, which falls under the IGAM's Legal and Regulatory competencies.

CDI efforts are underway every day at many hospitals and physician offices to work against and clean up issues created by the lack of data standardization and unstructured data in most health records today. Universal terminology and data standards are essential to achieving specificity, reliability, and validity of healthcare data. Good data supports improved outcomes and revenue streams, mitigates risks, and ensures compliance.

Adoption Model Ties IG to CDI

AHIMA's Information Governance Adoption Model has a direct tie to CDI activities and an ultimate goal to assist organizations as they work to:

- Integrate information governance into the overall infrastructure and business processes to the extent that compliance with program requirements, legal, regulatory, and other responsibilities are routine
- Recognize that effective information governance plays a critical role in patient outcomes, consumer services, cost containment, and competitive advantage
- Successfully implement strategies and tools to achieve these gains across the organization

IG Programs Elevate the Need for Clinical Documentation Improvement

Information governance can, in turn, support and elevate the need for clinical documentation improvement activities by elevating the importance of trusted information and providing a framework that values efforts to improve data across the healthcare continuum. The information governance framework creates an organization-wide focus on standardization of data elements, policies, processes, and guidelines as well as creates the awareness of information as a strategic asset in the organization (see the sidebar above).

Information governance is defined by AHIMA as an organization-wide framework for managing information throughout its lifecycle and supporting the organization's strategy, operations, regulatory, legal, risk, and environmental requirements. Clinical documentation improvement supports information governance activities through its fundamental goal to support compliance, improve efficiency, and improve documentation for use across the healthcare ecosystem throughout the information lifecycle.

"CDI is a multifaceted program with focus on improving clinical documentation resulting in a positive impact to the organization's bottom line. Ensuring our organization met all applicable laws and followed coding guidelines was a must," Lusk says. "The compliance principle and legal/regulatory competency helped guide our educational efforts and policies and procedures overseeing the program. Our success in meeting these goals was illustrated with an annual review with minimal findings."

Notes

[1] Davoudi, Sion et al. "Data Quality Management Model (2015 Update)." *Journal of AHIMA* 86, no. 10 (October 2015).

[2] Kennedy, Angela. "Improve Data and Outcomes with CDI." *Journal of AHIMA* 85, no. 7 (July 2014): 10.

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