

# Evaluating the Information Governance Principles for Healthcare: Accountability and Transparency

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*Editor's note: This is the first in a series of four articles that will discuss the eight Information Governance Principles for Healthcare.*

AHIMA's newly introduced Information Governance Principles for Healthcare (IGPHC) provides a framework for healthcare organizations to conduct their operations effectively, while ensuring compliance with legal requirements and other duties and responsibilities. IGPHC is a set of eight principles that, when considered in whole or in part, are intended to inform an organization's information strategy. This article is the first in a series of four articles that will explore the meaning and intent of the principles, two at a time.

## Accountability Principle

At the heart of the principle of accountability is a senior leader who is formally designated as responsible for overall information governance (IG) program development and its implementation. According to IGPHC, an information governance program should:

- Establish an information governance structure for program development and implementation
- Designate a qualified accountable person to develop and implement the program
- Document and approve policies and procedures to guide its implementation
- Remediate identified issues
- Enable auditing as a means of demonstrating the organization is meeting its obligations to both internal and external parties

One question that arises with the development of the IG principles is: Why a "senior leader?" Only a person situated at the top level of an organization's hierarchy can be held accountable for all of the elements of an information governance program as described above. Likewise, only a senior leader could be expected to secure the input of stakeholders, business process owners, and domain experts for the IG program.

The senior leader of an IG program does not do tactical work. Instead, through the collaborative approach espoused by the principle of accountability, the senior leader should help appropriate parties build, implement, and update a comprehensive IG program. "Accountability" equates to "responsibility" and signals that, ideally, the buck should stop with one person. In other words, senior-level accountability demonstrates that an organization following this IG principle supports holistic information governance from the top down. Some examples of possible senior leaders are CEOs, chief technology officers, head of legal or compliance, or the chief medical officers, while in a small practice it can be the partner(s) themselves.

## Transparency Principle

Hand in hand with accountability is the IGPHC principle of transparency, which states: "[a]n organization's processes and activities relating to information governance shall be documented in an open and verifiable manner." Documentation should be available to an organization's workforce and other appropriate interested parties, according to the principle. Furthermore, the best evidence of an organization's "operations, decisions, activities, and performance are its records and information." Hence, records should be of such character as to instill confidence. According to IGPHC, records demonstrating transparency of the information governance program should:

- Document the principles and processes that govern the program
- Accurately and completely record the activities undertaken to implement the program
- Be available to legitimately interested parties in a timely and reasonable manner

In being transparent, however, healthcare organizations must take into account obligations to protect confidential and proprietary information and to control access to such information. “Transparency” equates to “trust.” Here, trust is not related to the integrity of information. Instead, the principle of transparency is focused on trust that an organization’s information governance processes are understood by, and visible to, all legitimately interested parties. Additionally, transparency refers to organizational processes. In healthcare, this is particularly critical as patient information should be handled in a manner transparent to the consumer.

## Accountability and Transparency are Related

Transparency is another word for openness. Openness requires oversight in the design, implementation, and monitoring of any program, whether or not related to information governance. Oversight implies that someone internally will watch over design, implementation, and monitoring and will be in a position within the organization to supervise the program. The relationship between accountability and transparency is thus a simple one—both are interrelated. Accountability ensures that transparency flourishes.

## Accountability and Transparency Improve Information Governance

At its basic level, governance requires trust in decision makers and the decisions they make. Without that trust, there is no buy-in for decisions regarding information created and used by an organization in its everyday affairs. Trust in who supports an information governance program and the processes used to carry out that program are particularly important to stakeholders.

Information governance has a synergistic relationship with accountability and transparency, just as accountability and transparency have a similar relationship with each other. AHIMA defines information governance as an “organization-wide framework for managing information throughout its lifecycle and for supporting the organization’s strategy, operations, regulatory, legal, risk, and environmental requirements.” Accountability and transparency encompass trust, so that records are created and maintained in an understandable manner and are available when needed.

In fact, information shows what an organization does and how the organization accomplishes its tasks. When considered together or separately, accountability and transparency provide buy-in that an organization governs its information responsibly and openly. This in turn increases trust in the overall information governance program.

### Link

#### Read the Full IGPHC Principles

[www.ahima.org/topics/infogovernance](http://www.ahima.org/topics/infogovernance)

For a detailed look at all eight Information Governance Principles for Healthcare, as well as other information governance resources, visit [www.ahima.org/topics/infogovernance](http://www.ahima.org/topics/infogovernance).

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