

Formalized Structure and Strategic Alignment—The Keys to IG Success

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In the quest to either start an information governance (IG) program or to move an existing program along a progressive path of maturity, having a formalized IG structure in alignment with the organization's strategic goals is key to the success of the program. These competencies will enable an organization to form a structure around all of the various IG-related activities, projects, and initiatives that are already in play.

An executive sponsor, IG committee or council, and workforce stewards must be defined, recognized, and driven throughout the healthcare organization. This oversight structure will guide decisions to help move information out of the individual departments and toward a more collaborative, organization-wide approach.

Additionally, IG must align with the strategic goals of the organization in support of its mission and values. Each organization must look inwardly and establish an IG program around its specific needs. Working closely with the executive sponsor of the IG program can help adjust the scope and alignment of the program as needed to ensure that trustworthy information is available and also supports business-critical objectives.

Below, Banner Health (Banner) shares its experience as an AHIMA IG pilot organization and how they looked inwardly to determine the best approach for implementing IG at their highly complex organization.

Banner Health Organizational Description

Banner is an independent non-profit health system. The corporate office is located in Phoenix, AZ. Banner operates 28 hospitals in six states, three academic medical centers, physician clinics, urgent care centers, and a health plan division. Banner is Arizona's largest private employer, and is the largest hospital system in Arizona.

Managing information in an organization with siloed business units was a challenge. Banner's health information management services (HIMS) leadership team had to seek agreement and buy-in across the organization for IG as an enterprise-wide program. Banner had many of the major components of information governance in place before it launched a formal program, including data governance, enterprise information management, IT governance, privacy, security, and regulatory and legal, but didn't have a formal, structured program.

Banner's electronic health record (EHR) team was identified as the ideal group for initial information governance discussions. This team was later restructured into the Enterprise Information Management Team (EIMT). The team was made up of a cross-section of key stakeholders: HIMS, physician informatics, clinical informatics, associate general counsel, business, loss control, IT operations, security, application, and clinical education. This team began its work on governance-type initiatives such as regulating the information life cycle and information integrity initiatives.

Banner identified the below IG projects in progress:

- Patient database
 - Cleanup and ongoing maintenance
 - Updating retention policy
 - Data/information destruction
- Patient portal

- Transition to another solution in support of patient engagement
- Implementation of proxy access
- Centralization of release of information
 - Centralized across the entire organization, including all business units and entities, for a standardized process
- Potential redesign of the EHR hierarchy
- Acquisitions of clinics and urgent care centers
 - Created a need for governance around data and information coming from various organizations and systems

Banner participated in the AHIMA IG pilot program in 2015, allowing Banner staff access to AHIMA resources and the ability to provide input into the AHIMA IG program tools.

Approach and Implementation

The Banner HIMS leadership team decided to start its IG pilot by defining information governance and by determining what the scope of information governance activities should be. Should it involve just clinical information and data, or other types of information and data, such as human resources and financial information? Additionally, Banner started by formally determining why IG was important for the organization.

From the 10 Information Governance Adoption Model (IGAM)TM competencies, Banner started small by focusing on two competencies. They focused on creating an IG organizational structure and on building IG awareness and education throughout the organization. They chose awareness and adherence as a key area of interest to underscore the cross-functional nature of the information governance initiative. Banner also used the AHIMA IG Toolkit and IG HealthRateTM to identify IG strengths and gaps, and to facilitate prioritization of work needed.

In January 2016, HIMS leadership gave an IG presentation called “Banner Health Adoption of Information Governance,” to key stakeholders. The presentation included reasons why information governance is important to Banner, including:

- A program could bring recognition of Banner as an industry leader in IG
- An IG program will provide an organization-wide accountability framework for managing information
- An IG program has defined value and benefits of a structured program

The HIMS leadership identified the following recommendations as next steps:

- Build workforce awareness of the importance of information governance and impact of an IG program on advancing Banner’s goals, initiatives, and interdisciplinary collaboration
- Designate senior sponsorship/executive champion
- Define overarching Banner IG strategy
- Charter a cross-functional IG steering committee or council
- Prepare a current state assessment of foundational IG components

In June 2016, HIMS leadership planned and facilitated an onsite IG HealthRate assessment. IG HealthRate is an IG assessment tool that is aligned with AHIMA’s Information Governance Adoption Model (IGAM). AHIMA’s IG AdvisorsTM and the key Banner IG stakeholders completed a current state assessment and were able to determine the future goals and desired outcomes of their information governance program. Next steps were to present the executive summary of the IG assessment to key stakeholders and review the assessment recommendations.

Key recommendations included establishing a formal information governance structure, establishing an IG roadmap to address competency gaps, and to improve organizational awareness of IG principles, concepts, and analytics.

Benefits Realized

Embarking on this information governance journey has so far resulted in the following benefits for the staff at Banner:

- The on-site IG HealthRate assessment with IG Advisors engaged, informed, and enabled collaborative communication among diverse stakeholders.
- An increased awareness and consensus among key stakeholders on the importance of an IG program was achieved.
- Banner now has a baseline assessment in which to benchmark (both internally and with peers) further progress as a formal IG program is established.
- Interviews by IG Advisors provided an objective and timely assessment with specific recommendations, while preventing inflated IG HealthRate results.

IG Doesn't Have to Start from Scratch

Banner continues to discuss taking an existing senior level committee and morphing it into the IG strategy committee for making IG decisions. The EIMT committee continues to focus on information management components of information governance. The organization was able to use existing projects, recognizing that these projects were a part of an IG program, to move their program along.

Additionally, through use of AHIMA's IGAM and IG HealthRate, Banner was able to define a road map and set priorities that included revised policies, procedures, practices, and training to augment and support the move toward a more mature IG program.

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