

From Custodian to Steward: Evolving Roles in the E-HIM Transition

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For decades, HIM professionals have been called upon in court cases to enter the medical record into evidence under the business records exception to the hearsay rule. This typically required the “custodian” or keeper of the physical record to testify under oath that the records were made in the regular course of business at the time of or shortly after an event and under circumstances that might reasonably be assumed to reflect the actual event.¹ Further, the custodian’s testimony was used to attest to the completeness and trustworthiness of the records in order to establish their authenticity.

With e-HIM, HIM professionals are no longer required to keep the record in a physical sense, and they may at times have no firsthand knowledge of how records are maintained in the variety of departments that now manage distributed electronic systems whose information comprise the electronic health record for legal and business purposes.

HIM professionals are moving from custodians of records to stewards of information. Their fundamental responsibility to ensure the integrity of health information, however, remains as important as ever.

Going Beyond the Custodian Role

As healthcare stakeholders move beyond “meaningful use” and EHR systems become ubiquitous, the healthcare industry will recognize this information as a strategic resource, which will have many implications for HIM professionals and others who own and manage departmental EHR systems.

Stewardship is a broader role than custodianship, going well beyond physical possession of the record to include responsibilities for ensuring integrity (accuracy, completeness, timeliness) and security (protection of privacy as well as from tampering, loss or destruction)-all within the context of electronic information and records management.

Managing electronic health information is fundamentally different than managing paper health information because of its ephemeral and distributed nature. It presents unique challenges when the information must fulfill its purpose as documentation for legal, compliance, or other business needs.

Stewardship is quickly coming to be regarded as a critical role in information governance.

Information governance can broadly be defined as the strategic management of enterprise electronic information including the standards, policies, and processes for access, use, and control of that information. Enterprise functions such as data quality management, privacy and security, and records management can and should be addressed by governance.

Governance also includes the identification of accountability or responsibility for managing enterprise information. Accountability or responsibility is embodied in the role of data or information steward.

Current research indicates that data steward roles should reside in the “owning” department for the greatest effectiveness.² This is because information management functions are seen as going beyond those performed by IT and are the responsibility of the department that has the greatest stake and control.

What implications does this have for today’s HIM professionals? Does it mean that they will perform IM and HIM functions in the owner departments as part of a decentralized model? Will they serve as a central resource for other departments, providing expertise and competencies, processes, and training in IM and HIM? Or will there be some other hybrid model?

Regardless of the model, the stewardship role will be absolutely critical for ensuring that high-quality electronic health information is accessible and available for legal and business purposes as well as secondary health data purposes.

Stewardship Issues and ECRM

Within the governance framework, stewardship will address such data quality issues as enterprise information policies and procedures; data standards such as data dictionaries; implications of system design for data quality; planning for and integration of legacy data; workflow considerations and downstream effects of information practices; and end-user training and education.

If current trends hold, much of the information will continue to be unstructured data and will require the application of technology to manage it. Currently known as enterprise content and records management (ECRM), this will require new competencies and will include technology such as document management, document imaging, indexing, workflow, content integration, e-mail management, search and records management, and archiving, just to name a few.

ECRM technology can be used to declare certain content to be records, and it offers taxonomy and organization; unified views of information from distributed systems; search capability; preservation and legal hold; and automated record retention and destruction. Data stewards will play a dual role of both identifying the requirements and monitoring or auditing compliance with the requirements.

Information governance will require significant resources in order to be effective. One of the resources found to be missing most often is trained information management professionals to serve in stewardship roles.

There is growing recognition that these valuable roles will be absolutely critical for future successful and strategic use of electronic information and will require understanding of the legal aspects of information management as well as practical application of IT tools to information management.³

Notes

1. Roach, William H., Robert G. Hoban, and Bernadette M. Broccolo. *Medical Records and the Law*. Sudbury, MA: Jones & Bartlett, 2006.
2. Friedman, Ted. "Data Stewardship Case Studies Show Increased Organizational Focus on Data Quality and Information Governance." Gartner. February 3, 2009.
3. Ibid.

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