

Getting Serious About Information Governance

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Information governance is becoming a priority for healthcare organizations. Today's healthcare organizations invest in information technology at unprecedented rates, and IT generates more data than ever before. Stakeholders expect healthcare organizations to use health IT to bring improvements in care and cost savings to the healthcare system. What's needed now is for healthcare organizations to invest in ways to manage, control, and understand all that data, says Linda Kloss, RHIA, CAE, FAHIMA, founder of Kloss Strategic Advisors and former CEO of AHIMA. To succeed, healthcare organizations require an information governance strategy.

Information governance consists of the accountability framework and decision rights needed to ensure effective and efficient use of information across the enterprise to achieve its goals. Developing an information governance strategy, Kloss says, starts with policy. "We look for a tool to fix the problem, but the problem really is a policy problem. We should be thinking of policy first," she says.

Sutter Health Governance Case Study

After recognizing the organization's need for a defined governance structure focused solely on data, healthcare provider Sutter Health launched a full-scale governance program, focusing on critical data-dependent business needs related to organizational goals while working in partnership with appointed operational leaders. Sutter Health is a not-for-profit integrated delivery system of 45,000 employees with a network of 5,000 physicians in northern California, Oregon, and Hawaii.

Goals for the program included developing a better understanding of the organization's mission-critical data-dependent business needs that satisfy strategic and business objectives, as well as establishing consistent policies, standard operating procedures, and a clear monitoring system to ensure accuracy and availability of data for all patient care while minimizing associated costs and ensuring data security.

Sutter Health established a policy framework for enterprise information management, identifying its key domains as:

- Data architecture
- Security
- Quality
- Use
- Compliance
- Monitoring
- Master data management
- Classification
- Retention
- Archiving

Once a policy framework is established, an organization must move forward with current state assessment and implementation of processes and technologies to support information governance goals. However, to adequately define and prioritize the scope and breadth of an information governance program, and the policies it must include, it may be necessary to challenge cultural assumptions. For instance, organizations should look beyond the electronic health record and consider other data sources.

Creating a Data Governance Council

As part of the information governance initiative, Sutter Health created a Data Governance Council to help translate business objectives into a data management strategy and to mandate, monitor, and enforce compliance with approved data management

policies.

The council includes many senior executives of the organization, such as the chief information officer, chief medical officer, senior vice presidents of shared services and strategy and business development, and vice presidents of legal, research and development, clinical integration, risk management, and finance. The organization's governance initiative was developed with a focus on driving policy based on data-dependent business needs unique to the organization.

The policy framework developed as the team members progressed in their understanding of data governance and how the policies impact critical business functions. Initially focusing their efforts on master data management, Sutter Health's team expanded its focus and went on to successfully create policies covering almost all of the identified domain areas.

Defining the organization's information assets is an important step. In establishing a policy framework, organizations should agree on concepts, definitions, principles, policies, and practice guidelines, and set priorities related to their critical business functions, or other external drivers.

Getting Started with Information Governance

Recommendations on fostering an information governance program include:

- Create a vision to drive change. Use a data-dependent business need to raise awareness of the value of your organization's information assets, such as a breach or reimbursement issue resulting from a management or data integrity issue.
- Convene a steering committee, assign key roles, and engage C-level executive leadership in the steering committee. Other working committees may consist of key operational leaders from the IT, clinical, and business areas.
- Consider all functions of the information life cycle in defining your governance program's scope: information design and capture, content and record management, information analysis and use, data integrity/quality, access, security, and confidentiality.
- Conduct an assessment to determine the current state of control for all defined areas. Are policies and procedures in place? Are they being followed?
- Develop a time frame shaped by initiatives like the Centers for Medicare and Medicaid's "meaningful use" EHR Incentive Program or ICD-10 implementation. Be prepared for a multi-phased approach. The initial phases-establishing an oversight committee, identifying key business operations representatives, defining key policies, and conducting a state assessment-could easily take a year to 18 months to complete.
- Take an incremental approach. Although an information governance program should be comprehensive, identify areas to achieve the greatest impact. Strategy can be formalized.

AHIMA's Information Governance Initiative

AHIMA has made information governance a strategic priority for 2013 and is building resources that can help HIM professionals better understand this emerging issue and find ways to get involved.

As the healthcare system relies more heavily on data to drive improvements in care quality and efficiency, the need for accurate, trustworthy data has gained more recognition. Healthcare organizations are recognizing that applying information governance (strategic planning, prioritization, and accountability) to the organization's information is essential. HIM practitioners are uniquely qualified and positioned as data stewards and managers to guide organizations in the pursuit of quality data and information governance in order to help achieve healthcare innovation.

AHIMA has developed a web page specific to information governance, <http://www.ahima.org/resources/InfoGov.aspx>. The web page includes resources, such as links to helpful articles, and is an easy single destination for definitions on various information governance terms. New information and resources will be posted to the site as it becomes available.

The focus of AHIMA's 2013 Health Information Professionals Week was information governance. Materials created for this event include two articles: "Getting Serious About Information Governance," which includes practical tips for raising organization awareness, and "What Is Big Data, and How Does It Affect Healthcare?" which raises consumer awareness of the potential of data to bring improvements to the healthcare system. These articles are available, along with a presentation that includes a basic introduction to information governance, at <http://ahima.org/events/recogweeks.aspx>. Health information management professionals can use the education resources to spread the word about information governance in their organizations.

An Emerging Field

AHIMA is gathering information from healthcare organizations on the state of information governance to find out what successful programs look like and what drives them. Information gained from this research will be used to design resources and educational events and to shape the association's messaging around information governance in the healthcare industry. Those interested in participating in AHIMA's discussions around information governance may send comments to proprac@ahima.org.

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