Getting Started with Information Governance. What Are You Waiting For: Taking a Simplified Approach to Information Governance

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Are you drowning in data and information? Do you feel as though your organization has lost its logical approach to the management of health information? As we continue to embrace the transformation that healthcare is undergoing, we recognize that electronic health records (EHRs) and other digital information play a leading role. The US healthcare industry is now truly in the post-EHR era. Healthcare today is undoubtedly far more information-intensive than just a few short years ago.

But EHRs are far from perfect. There are issues with too much data, duplicate data, inaccurate data, and lack of a single unified approach to creation, use, and disposition of data and information across the organization. The challenges are many, but the solution is not to go back to paper. The governance structures that were in place in the paper environment can be used as touchstones for information governance (IG) in the electronic age. Just as medical records and forms committees governed paper records, governance must expand to encompass all types of data and information—regardless of format—created throughout the healthcare organization. The good news for the professionals facing this challenge is that there are opportunities to address the issues through development of strong information governance practices in healthcare.

Our New Opportunity: HIM Leading IG in Healthcare

As healthcare organizations move away from a focus on volume toward the value proposition, executive leaders need quality information that contributes to effective planning and decision making more than ever. Executive leaders require accurate information to:

- Establish a single source of truth for publicly reported quality measures
- Perform health risk stratification of managed health populations
- Initiate and manage interventions for population health
- Give providers feedback data on clinical performance
- Marry cost and clinical data to measure value
- Negotiate at-risk contracts

Healthcare organizations must establish a governance framework to supply the right information at the right time to the right people. One way for HIM professionals to get started: assemble a team of executive leaders and key stakeholders for the organization's IG initiative—whether it's population health, reportable quality measures, or establishing provider feedback on clinical performance. Make the case for defining and governing information critical to the initiative's success. Ask to create a subcommittee to focus exclusively on information governance for the initiative.

This core team must identify key information requirements critical for success, do a gap analysis, establish sources for missing data, and disregard other data that is not critical to business success. Once the team identifies the information to be governed, define the steps that are needed to set up the governance framework. It is important to keep the governance initiative focused on data and information that are required to drive business strategy.

An example of how to begin an approach to a population health initiative is detailed below:

1. Assemble a subcommittee of key stakeholders.
2. Assess the current state of the information available to manage the health of specific populations. Inventory the data available to stratify the members of the population you are managing. This could be patients covered by an accountable

care organization (ACO), the uninsured population, or Medicaid patients. Do you have the appropriate data to identify which patients are healthy, have rising risk, or are at high risk for health crises?

3. Next, determine what data are required to develop and evaluate the effectiveness of clinical interventions.
4. Identify a future state, do a gap analysis, and develop a plan for how data required for business success will be created and governed.

Start IG Approach with Existing Committees

Creating a new committee may be met with resistance, and be unproductive. Instead, leverage an existing committee structure and expand their scope to include information governance. Consider drafting a discussion document for the committee's leadership to use in laying the groundwork for IG. Collaborate with other team members to identify critical processes that require governance oversight, eliminate the silo effect of one area being responsible for corrective action, and recognize that failure to operationalize in a collaborative manner will further compound errors and delay advancement and integrity of information. Ideal committees to begin this discussion and further develop IG processes include:

- **Core measures committee:** Concurrent identification of potential issues; develop robust reporting tools for continuous improvement rather than retrospective correction. Align with clinical documentation improvement activities, potentially combining two committees into one governance structure.
- **Content and records management committee:** Consolidate tasks through the EHR, leverage and educate team members for changing roles. Consider opportunity to develop IG structure with human resources and IT as a collaborative process for future state of patient information capture.
- **Patient engagement committee:** HIM professionals are uniquely positioned to identify issues preventing patients from increasing interaction with their EHR. Identify release of information challenges, portal activity, and availability of information online to the patient. Consider collaboration with patient relations, medical staff, and nursing leadership.

Approaching IG by Identifying a Pain Point

Another way to get started is by identifying a pain point, such as a security breach, litigation, or other issue. HIM professionals are uniquely positioned to lead the information governance journey in their organizations. Many HIM professionals get started by identifying a "pain point"—a strategic issue with which their organization is struggling. What is the biggest problem that people are having difficulty resolving in the organization?

One example of a common pain point in healthcare organizations includes the challenges of "super-utilizers" of inpatient care —repeat visitors to the emergency department with frequent hospital admissions.[1] These individuals have complex physical, behavioral, and social needs that are not well met through the current fragmented healthcare system. As a result, these individuals often bounce from emergency department to emergency department, from inpatient admission to readmission—all costly, chaotic, and ineffective ways to provide care and improve patient outcomes.

Goals of a new approach would include using data to:

- Improve efficiency and quality of care
- Reduce fragmentation of care
- Reduce population health risk and improve health outcomes
- Avoid financial loss/penalties for the organization under new reimbursement models

Using data to address a problem means more than collecting data. Healthcare providers need to take the story to the next level using a logical approach to effect information-driven change. Information governance will assist in managing the information securely, privately, and appropriately as "pain points" are addressed by healthcare organizations.

For descriptions of interdisciplinary approaches to the super-utilizer challenge, both of which rely on data collection and analysis for success (i.e., patient identification, risk assessment, utilization and cost tracking, and care plan development), visit the websites below:

- Association of American Medical Colleges' "Ten Steps to Hot Spotting," available at www.aamc.org/initiatives/hotspotter/357322/tenstepstohotspottingguide.html

- University of Illinois Hospital and Health Sciences System's article, titled "Program aims to reduce frequent ER visits," available at http://news.uic.edu/program-aims-to-reduce-frequent-er-visits

Key IG Players in Healthcare

There are a variety of key players in the IG model in healthcare. They include:

- **Executive leadership** drives the strategy for the organization; they are primarily responsible for achieving the mission or goals of the organization. Executive leadership, therefore, has the responsibility to declare the specific value of information to the degree to which it helps achieve the mission and goals of the enterprise itself, and this is driven by organizational strategy.
- **IT leadership** is responsible for storing and securing the information that is captured by the organization's technological solutions. IT leadership often endeavors to increase efficiency because they are typically under pressure to lower cost.
- **Health information management (HIM)** and compliance leadership are responsible for the different factors affecting clinical information and risk. The leadership in the legal department is responsible for defining what information to hold and collect for discovery, while HIM is typically responsible for ensuring that regulatory obligations for information are met.

Defining HIM's Role in Information Governance

One way HIM professionals can get started with information governance is by pulling together a group of stakeholders, IG champions, and department leaders who can work collaboratively to solve an identified challenge or "pain point," as discussed above. Use the success with this initiative as a model for future information governance initiatives.

Some suggestions for roles for HIM in the IG initiative include:

- Educating organizational leadership, highlighting a business need for IG
- Work with leadership to incorporate IG into the agendas of all ad hoc and standing committees; HIM professionals are well-qualified to be a participant and lead the conversation on this subject
- Serve in the role of data steward for patient data
- Identify areas of opportunity and quantify potential positive impact of an IG initiative (financial, quality, risk)
- Perform a current state assessment and look for gaps in policies and procedures
- Assist with strategic IG planning

The expertise that HIM professionals have today, coupled with the knowledge and confidence to lead others, can serve as the foundation for new roles in healthcare information governance. HIM experts are prepared by their training and experience in information management to succeed in governance of any and all types of data and information.

HIM professionals must challenge themselves to move to a proactive role, shifting their way of thinking to get in the driver's seat as IG leaders. HIM should not wait until we are in a position of having to remediate a problem, such as a major privacy breach.

HIM professionals have always managed legal, risk, and regulatory issues and are familiar with the information technology and how to use it efficiently. The challenge is to take this a step further, working with all information assets that are critical to business continuity and profitability of the organization.

According to the findings in a recent white paper from AHIMA and Cohasset Associates, 65 percent of those surveyed either did not have information governance plans in place or did not know whether their organizations had plans in place.[2] While IG is not limited to the patient information generated, maintained, and stored throughout the organization, HIM professionals can begin by developing a patient information roadmap, which will contribute to the development of an enterprise-wide governance structure and strategy.

IG Resources from AHIMA

To support the journey into IG, AHIMA is building a comprehensive IG framework with tools, guidelines, and other resources for healthcare organizations to utilize as they embark on an IG initiative. As part of this effort, AHIMA has introduced the Information Governance Principles for Healthcare (IGPHC)™, healthcare industry-specific IG principles adapted from ARMA International's Generally Accepted Recordkeeping Principles. In addition, along with Cohasset Associates, AHIMA published the 2014 Information Governance in Healthcare Benchmarking White Paper based on the results of the first industry survey of IG practices. AHIMA is developing additional guidelines, resources, and tools that will help healthcare organizations put IG into practice. AHIMA is continuing to launch additional educational programs and webinars to help healthcare professionals gain knowledge about the IGPHC and the introduction of IG into healthcare.

A Way Forward for Healthcare

Healthcare is virtually drowning in data. But this challenge presents an opportunity for HIM professionals to help executives and healthcare leaders call out, identify, and take a leading role in identifying what information has value as HIM manages the transition:

- Healthcare needs good information—it must be trustwor thy and actionable.
- Too much information is not good—retention and disposition are both important aspects to manage as a part of solid information governance.

Remember that IG is not an end unto itself; the goal is to achieve a state of trust in healthcare information such that safe, quality care and effective decision making are enabled and that patients, business partners, and other stakeholders can rely on the information.

Notes

[1] EDRM. "How the Information Governance Reference Model (IGRM) Complements ARMA International's Generally Accepted Recordkeeping Principles (GARP)." December 2011. www.edrm.net/wp-content/uploads/downloads/2011/12/White-Paper-EDRM-Information-Governance-Reference-Model-IGRM-and-ARMAs-GARP-Principles-12-7-2011.pdf.

[2] American Health Information Management Association and Cohasset Associates. "2014 Information Governance in Healthcare: Benchmarking White Paper." 2014. http://research.zarca.com/survey.aspx?k=SsURPPsUQRsPsPsP&lang=0&data=.

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