Information Asset Inventory for Information Governance - Retired

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When an organization begins to implement an enterprise information governance (IG) program, one of the major initial tasks is to understand the scope and types of information in its possession. An inventory of an organization's information is necessary in order to facilitate decision making about how to manage enterprise information, including its access, use, protection, storage, retention, and disposition. Information governance programs focus on all of the organizational information including clinical, financial, business, human resources, and marketing.

An information asset inventory will include:

- Paper records being stored on-site or off-site
- Electronic records, by system in which they are stored
- Text-based and unstructured information, such as e-mails, scanned items, and COLD-fed documents
- Structured data and reports, such as financials, business records, and contracts
- Medical imaging media
- Records and information from external sources

Some healthcare organizations have a good handle on their inventory of electronic data stores due to requirements associated with HIPAA, and others may have a good grasp on the inventory of paper-based records necessary to meet state or other regulatory requirements for record retention. However, a combined information asset inventory is vital to a well integrated and effective IG program. The purpose of this Practice Brief is to examine the best practices associated with developing and maintaining an enterprise information asset inventory.

Defining an Information Asset Inventory

The term "information asset" means data or information that has business value to an organization or company. Thus, an "information asset inventory" will be a listing or accounting of these assets. Some examples of information assets in a healthcare organization include patient health records, employee records, registries, indices, financial reports, quality reports, medical images, tissue databases, written policies and procedures, and contracts. It is important to understand that the term information asset refers to a grouping of records or storage of information in a specific location—not individual records or documents. If information and records are electronic, the information asset may be reflective of the computer system or application—for example, e-mail, spreadsheets, or document management—in which it is stored.

An information asset inventory requires identifying and classifying information assets to understand their value to the organization. Classification consists of using criteria that categorizes assets according to what is deemed most important to the organization. Among the most common categories are criteria such as age or retention period, type of information (i.e., clinical, financial, administrative), the date of last use (i.e., legacy data vs. active/current data), security/protection levels, and ownership. A combination of any of these along with other factors will aid in the further development of a robust inventory. See Appendix A, located in the online version of this Practice Brief in AHIMA's HIM Body of Knowledge, for a sample information asset inventory.

Establishment of this classification system, often referred to as taxonomy, may also consider the identification and distinctions between core information and auxiliary information. Core data or information is that which is enterprise-wide in nature or impacts more than one critical business process of the organization; this includes shared data such as master data or reference data, or that which may have regulatory importance.[1] Information or data without these attributes may be considered as "auxiliary data or information." Examples of core information or data in a healthcare organization would include items such as the master patient/person index, chargemaster, code sets, etc.

Software is available for purchase to create an information asset inventory. Examples of software that can be used for this purpose include Access database software and Excel spreadsheet software. See Appendix A online for a sample inventory.

AHIMA's Information Governance Adoption Model for Healthcare (IGAM)

In accordance with AHIMA's Information Governance Principles for Healthcare (IGPHC)™ and AHIMA's Information Governance Adoption Model (IGAM)™, organizations should clearly designate accountability and responsibility for developing and maintaining the information asset inventory.[2] With many different information owners and custodians of information across the organization, it is important to understand the roles and responsibilities associated with maintaining the inventory—including policy development, protection, and employee education and training.

Additionally, a review of the principles related to integrity, protection, compliance, availability, retention, and disposition may help guide the development of a taxonomy that will assist in classifying information assets. Taking these principles into consideration may help to suggest ways that the information might be classified in order to understand its value to the organization.

Uses of the Information Asset Inventory

The information asset inventory is used to support and enable several important information management functions, including:

- Development of an enterprise-wide record retention schedule and associated scheduled destruction activities or preservation of archival information, as appropriate
- Classifications of data are assigned
- Management of the security of both paper-based and electronic records, including risk analysis and security level classifications associated with the information
- Development of the information-related requirements of the organization's disaster recovery/business continuity plan
- Location of records and information for e-discovery and other litigation-related matters
- Identification of redundancies in information
- Demonstration of compliance with legislative and regulatory requirements and audits thereof
- Providing the basis for employee training on information and records management
- Identification of the business owners who are responsible for the information
- Legacy data conversion and management as IT systems are updated or replaced
- Areas where information is integrated with external systems in the healthcare ecosystem
- Determination of the historical, administrative, or fiscal value of specific records or groups of records

This list is not all-inclusive. To the greatest extent possible, the organization should identify all of the potential uses of its information asset inventory before actually collecting data for the inventory.

Information Asset Inventory Scope

While it can prove to be an arduous and time consuming task, inventorying all of the organization's records and information vital to the purposes listed in the "Uses of the Information Asset Inventory" section of this Practice Brief is necessary to manage risk and support compliance. In conjunction with the information governance oversight group (such as the Information Governance Council or Steering Committee) the scope of the inventory should be identified and approved. This decision-making process will address and evaluate the required resources necessary for the inventory—time, dollars, tools, as well as the risks to be assumed by including or excluding specific types or groups of records and information.

Functional Practices: Information Asset Management Strategy

Information governance must start with an awareness of what information is in possession of the organization and an understanding of the risks and benefits associated with maintaining that information. Therefore, an inventory of all information with clear descriptions, identified business owners, and/or stewards is necessary.

The following are functional practices associated with developing and maintaining an information asset inventory:

1. A centralized inventory which includes both electronic and non-electronic records; information is developed and maintained.

- An organizational-level policy that describes the purpose, scope, and pertinent definitions related to the information asset inventory is developed.
- The inventory is centrally managed in order to have accountability for its maintenance and ensure completeness as well as minimize the potential for duplication, such as what might occur when the same record set or information is maintained in both paper and electronic form. (When the same record/information is maintained in multiple formats, such as in both paper and electronic form, the official record is designated.)
- The central inventory may classify information into any category deemed to be useful or relevant. For example, categories may designate which information is business-critical (i.e., information related to direct clinical care or financial operations).
- Information included in the inventory at a minimum should include the location or system in which it is maintained—such as e-mail, the electronic health record (EHR) system, document management system, or scanned image— as well as the department, owner, or originator; who has access to the specific system; description of the information; and pertinent dates (i.e., the dates of origination/creation, conversion, review/update, or destruction).

2. Responsibility for developing and maintaining the inventory is designated.

Designating the relevant responsibilities would include delineation of functions and responsibilities for:

- The central management authority and/or executive sponsor
- Information and/or stewards
- Oversight group, council, or committee
- Other identified stakeholders

3. Items in the central inventory are classified by meaningful categories.

Items in the central inventory should be classified by categories that are meaningful to the organization and which align with its business, compliance, risk, retention, and disposition requirements.

4. The organization acquires and utilizes appropriate technology, tools, and processes to facilitate inventory management.

The acquisition of the appropriate technology, tools, and processes may be as simple as a spreadsheet or as sophisticated as a special purpose IT system designed or developed specifically for this function.

5. The inventory is reviewed, updated, and approved on at least an annual basis.

Tools used for collecting information for the inventory may include:

- Surveys sent to owners and stewards that collect information about how the records/information are used (i.e., regulatory or other requirements), where and how records are stored, which records are under legal or other hold; and sensitivity level of certain data/information. The survey tool should include questions about an application's purpose, content, workflow, outputs, and legacy systems.
- Network diagrams for systems that contain electronic data and information that shows its flow, storage, location (including in the cloud or local), and accessibility by mobile devices.
- Interviews with users to determine where electronic records or legacy paper records and information might reside.

6. Researching, benchmarking, and adopting best practices.

The organization should research, benchmark, and adopt appropriate best practices for its information asset inventory.

Examples of Information Assets

Based on the organization's approach to information governance, the list of information assets may differ. Below are examples of assets that may be found in a typical healthcare organization:

- Record of care/official patient health records and personally identifiable patient health data
- Health information provided from external sources, such as patient-generated health data and information and health information exchanges
- Human resources department records (i.e., employee staffing, time/attendance records, payroll records, employee health records)
- Patient registries and indices
- Infection control information
- Financial/business/operations data (i.e., accounts receivable, capital asset records, expenditure reports, liability insurance)
- Research, clinical trials, and genomic projects
- Customer-related data such as that for marketing
- E-mails that contain organizational information that can be used to represent a specific record
- Quality and performance data
- Medical images
- Tissue and pathology data and images
- Claims data
- Security compliance data (i.e., HIPAA, data breach)
- Privacy compliance data (i.e., HIPAA)
- Risk and safety data
- Credentialing information
- Contracts and agreements (i.e., data use, acquisitions, mergers, business associates)
- Acquired information from practice acquisitions
- Legal data
- Policies and procedures

Checklist of Policies

The size and type of healthcare organization may dictate the policies or guidelines that are needed for the information asset inventory. Many of those policies will be focused on retention of information, use and disclosure, and methods for sharing—including privacy and security. Examples may include:

- Information asset inventory policy, including designated responsibility and roles of information handlers in maintaining the inventory.
    - It is important for an organization to have the advanced technologies and techniques that support the users of the information asset inventory.
    - Once an organization's information asset inventory is mature, the inventory reports should be run automatically based on the available data and information. Once in place, organizations should continuously use and audit the inventory to ensure that the policies and processes reflect the full potential of the information asset inventory.
- Access, use, and disposal of information assets, providing examples of how information is to be created, who has access to the information, how it is used, and how it should be disposed of to ensure privacy and security of information. If ownership of the information asset changes or if the media format changes (i.e., paper to electronic), it should be documented and maintained for legal and regulatory purposes.
- Retention schedule and policy that defines what information should be retained and for how long based on legal and regulatory guidelines and business needs. If the organization operates in multiple states, the retention guidelines may differ. They may also differ based on the type of information (i.e., fiscal vs. clinical or operations).
- Data classification or taxonomy policy.
- Legal and regulatory compliance in order to define discovery of information assets as well as regulatory review.

Workforce Education

Workforce members may not be aware of the healthcare organization's requirements for management and protection of information assets. An organization-wide overview should be provided that explains basic records and information management and the organization's policies and requirements for the inventory. General education and training could be provided through electronic learning modules, in-person presentations, or e-mail communication. More specific departmental training should also be performed that uniquely addresses the types of information handled by a particular business unit—everything from e-mail to reports and other documents—and how it should be identified, maintained, and stored in accordance with the information asset inventory. This education should be commensurate with the value of the information to the organization. For example, patient information and records, as well as financial information, are considered to be business-critical in a healthcare organization. Workforce members must understand policies and procedures for its handling and management.

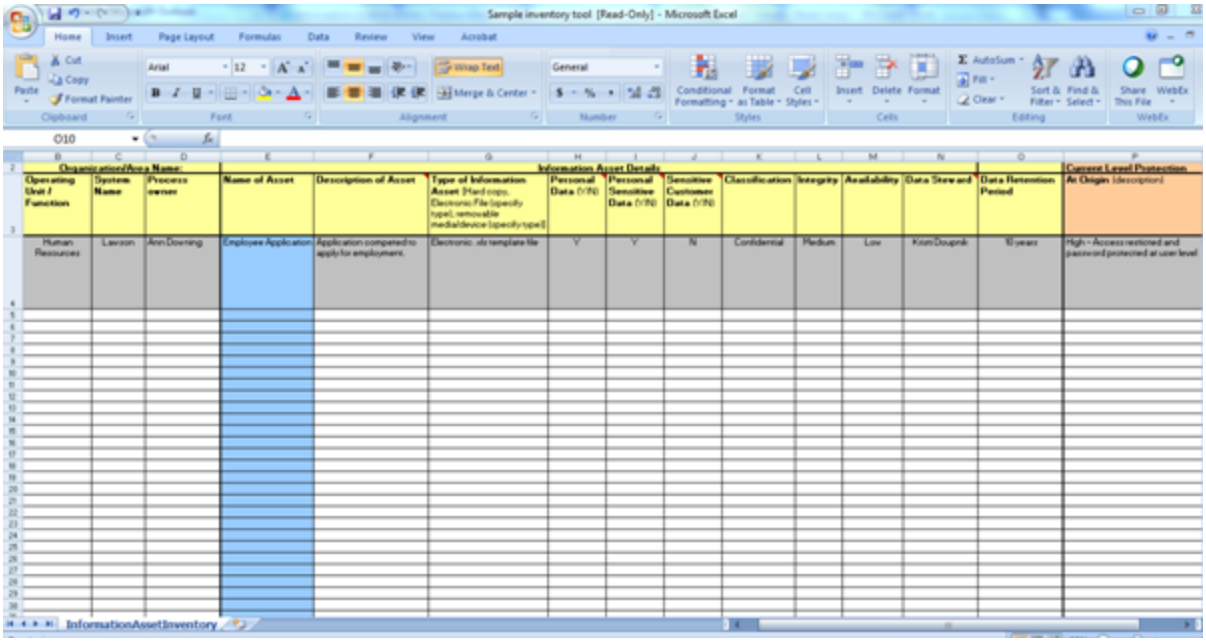
Acknowledgement

AHIMA thanks ARMA International for use of the following in adapting and creating materials for healthcare industry use in IG adoption: Generally Accepted Recordkeeping Principles® and the Information Governance Maturity Model. www.arma.org/principles. ARMA International 2013.

Notes

1. CMMI Institute. "Data Management Maturity℠ Model V1.0." August 2014. http://cmmiinstitute.com/resources/data-management-maturity-model-v10.
2. AHIMA. "Information Governance Principles for Health Care™." 2014. www.ahima.org/~/media/AHIMA/Files/HIM-Trends/IG_Principles.ashx.
3. Smallwood, Robert F. *Information Governance Concepts, Strategies and Best Practices.* Hoboken, NJ: John Wiley and Sons, 2014, pp. 154-164.

Appendix A: Sample Information Asset Inventory Tool



Source: International Standards Organization (ISO). ISMS Information Asset Inventory Template.

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