

Information Governance Offers a Strategic Approach for Healthcare (2015 Update) - Retired

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Editor's Note: This Practice Brief supersedes the October 2014 Practice Brief titled "Information Governance Offers a Strategic Approach for Healthcare."

Information governance (IG) is increasingly being adopted in healthcare organizations, according to a study conducted by AHIMA and Cohasset Associates in 2015.¹ Although still early in its adoption, IG is becoming recognized as a strategy for addressing the integrity, quality, and protection of the increasing volumes of information in healthcare. Legal, regulatory, privacy, and security concerns are also frequent drivers for establishing an IG program or initiative.

The ability to effectively manage and optimize the utilization of information has become an essential competency in the viability of healthcare organizations in this era of accelerated change and transformation. As a strategy, information governance aligns with and enables a healthcare organization to address these issues and achieve its larger business goals.

The purpose of this Practice Brief is to describe the essential aims and focus of information governance as a strategic approach for managing information assets in healthcare organizations. It is important to note that information governance goes well beyond the traditional boundaries of management of health information and extends into all types of organization information, which may include financial, clinical, and operational. Health information management (HIM) and other healthcare professionals will need to think and plan broadly for how information can be optimized and leveraged to achieve the organization's goals. IG strategy has a twofold purpose:

- Stewardship of information that supports compliance and risk management
- Leveraging information to achieve the goals of the organization

The ultimate goal of IG is to ensure the trustworthiness of an organization's information. Trustworthiness is essential for:

- Reducing or mitigating risk
- Ensuring operational efficiency
- Achieving and maintaining competitive advantage

Information Governance—What It Is and What It Is Not

AHIMA defines information governance as:

An organization-wide framework for managing information throughout its lifecycle and supporting the organization's strategy, operations, and regulatory, legal and environmental requirements.²

Often confused or used interchangeably with the term "data governance," information governance is actually much broader in its reach and scope. IG is distinct from, but encompasses, both data governance and information technology (IT) governance. Data governance, as its name implies, focuses on the granular level and nature of data and is concerned with ensuring its management and quality, establishing data definitions/single source of truth, and data protection. IT governance addresses the direction and decisions necessary for IT infrastructure investments—software, hardware, communications, and technology tools. Information governance is overarching of both data governance and IT governance and addresses the entire lifecycle of information from its creation at the data level all the way through to its final disposition.

Information governance provides the framework for strategic decision making, including policy, designated accountabilities, and metrics for managing information so that it can support decision making and manage compliance and risk throughout the organization. The AHIMA Information Governance Principles for Healthcare™ (IGPHC) are an important component of any IG framework.³ As an adaptation of ARMA's Generally Accepted Record Keeping Principles, they emphasize the

principles of accountability, transparency, integrity, protection, compliance, availability, retention, and disposition of information, and provide an excellent foundation on which to build an IG strategy.⁴

Defining IG Scope

Information governance addresses all information within the organization regardless of its state or location (i.e., clinical, finance, human resources), including but not limited to:

- Unstructured information and discrete data
- Paper-based records and forms
- E-mail
- Social media
- Voice data
- Images
- Any other storage medium or format of information

Information governance ensures that resources—including people, processes, and technology—are in place to effectively leverage information based on its value.

Positioning for Success

Because organizational strategy is driven from the leadership level, it is critical that any IG initiative start with the identification of an executive sponsor. Information governance differs from information management in that its focus is enterprise-wide and it requires active leadership, participation, and support from the organization's senior leaders. An enterprise approach is vital because of the need to break down silos and manage competing priorities in addressing broad information needs and plans.

An executive sponsor will ensure:

- That appropriate resources (budget, personnel, etc.) are available
- That IG goals and objectives support and align with organizational strategy
- That controls and accountabilities are in place to achieve the goals and milestones of the program

IG initiatives rarely, if ever, succeed or are sustainable without effective executive sponsorship. The executive sponsor, with assistance from the IG executive or program manager, will set direction and engage information stakeholders in the decision-making process relative to information strategy, operations, regulatory, legal, and environmental requirements. Identification of an executive sponsor will depend on the priorities of the organization, but generally requires a high-level organizational leader of considerable influence. In healthcare organizations, an executive sponsor can come from the ranks of:

- Chief information or informatics officer
- Chief data or health information officer
- Chief financial officer
- Chief legal counsel or officer
- Chief strategy officer
- Chief medical officer
- Chief nursing officer
- Chief operating officer
- Chief executive officer (in smaller or specialized organizations such as health information exchanges)
- Other senior leaders with an interest in and understanding of the importance of IG

Regardless of any other role in the organization, the executive sponsor must fully support IG and be able to drive change through engagement and communication with key stakeholders.

Aligning Information Governance with Organizational Goals

Competing priorities, limited resources, and organizational culture are challenges that all organizations face as they start any major initiative—whether it is IG or something else.

IG in and of itself is a strategic function that helps to sort out competing priorities by aligning information needs and management with the larger organizational business strategy and goals. Because it involves valuing and valuation of information, it also helps to marshal limited resources, putting them where they are needed and avoiding the unnecessary costs associated with poorly managed or inadequate information. Identifying priorities and their alignment with business goals is essential when “making the case” for IG.

Whether it be enhancing the patient experience, improving population health, reducing costs (the “Triple Aim”), or other key goals, there must be demonstrable links between the IG initiative or program and those goals.⁵

A healthcare provider organization’s information governance framework must address issues unique to healthcare, such as patient safety, quality of care, patient engagement, and clinical documentation review. However, this may also pertain even to non-delivery types of healthcare-related organizations such as payers, health information exchanges, business partners, and suppliers.

Approaches to decision making, risk tolerance, and utilization of technology are all factors which are reflective of organizational behavior and culture. Organizational behavior and culture is a major consideration in starting and sustaining an IG program and will impact essential components like communication, approach to change management, employee engagement, and positioning in the organizational structure. All of these factors should be carefully considered in the rollout and sustainability of IG.

Governance process has been in place for many years in organizations as it relates to making selections and investments in information technology and managing other limited resources, such as capital, buildings, people, etc. IG applies that same type of thinking and decision-making process to information. So while competing priorities, limited resources, and organizational culture can all represent challenges to starting an IG initiative or program, they can also be transformed into opportunities for performance improvement as it relates to optimizing the management and use of information.

Drivers: Why IG Now?

As discussed above, IG is a change in approach to managing information resources that is required due to changes and requirements in the external environment. While the 2014 AHIMA/Cohasset study validates that typical early drivers for IG in many healthcare organizations are indeed related to regulatory compliance needs—98 percent of respondents listed this as their top driver—the data also shows that quality and safety, cost containment, analytics, and a changing payment environment are also strong drivers for IG.⁶

Organizations that are starting IG initiatives and programs can be overwhelmed with everything that needs to be accomplished and the expectations that are set for addressing issues. It is advisable to start by focusing or limiting the issues or areas to be addressed before expanding IG. Information governance programs often start with a specific need or challenge. The utility may be demonstrated on a small scale through a single project. The success of a small project may be used to begin building a larger program. There are several areas where healthcare organizations commonly focus initial efforts. Specific activities and/or projects related to these areas can help make a business case for kicking off IG:

- Data and information flows associated with an electronic health record (EHR) system that were not adequately addressed during implementation of the technology. Inappropriate planning for these can have adverse effects on patient safety, staff and clinician productivity, and operational efficiency as well as the ability to use data and information for legal and regulatory purposes.
- Evolving rules related to production and preservation of electronic records and information for e-discovery, litigation response, and forensic investigations.
- Data analytics and clinical or business intelligence that require standardization of data and common meanings or single source of truth through data governance processes and policies.
- Policies and procedures that enable health information exchange between and among entities, addressing issues such as semantic and technical interoperability as well as trust agreements and patient-directed exchange of information.

Characteristics of a Successful Information Governance Strategy

A successful IG strategy incorporates the following characteristics:

- **Business-led and Business-driven:** Accountability and responsibility for data and information rests with the business owners who lead the departments or business units who create or generate the data and information, as opposed to IT
- **Measurable:** Clear goals and objectives and related metrics are established for performance improvements, reduction of risk, and optimization of data and information
- **Achievable:** A realistic level of resources (funding, staffing, etc.) is provided to develop and sustain IG efforts
- **Avoids complexity:** Initial goals and objectives should be focused and targeted to specific issues or problem areas
- **Communicable:** Creation of awareness and effective communication and education for employees and clinicians about their information management responsibilities is provided
- **Copes with uncertainty:** Standardization of processes leads to a more consistent approach and response to threats that can help the organization cope with ambiguity or uncertainties
- **Flexible:** Information management functions provide adequate controls but are also designed to allow for flexibility where required to carry out job duties

Getting Started with IG

An information governance program will not be embraced without first building awareness of the importance of IG. Although each organization's drivers, culture, and engagement is different, it can be reasonably anticipated that initiating a program will take a minimum of 12 to 18 months.⁷ Demonstrating the direct impact of information governance on the advancement of organizational goals is key in getting recognition for the importance of and need for a program. After engaging an executive sponsor, stakeholders must be educated on the importance of establishing an overarching information governance program with the aim of obtaining interdisciplinary collaboration. Leaders must illustrate how information governance supports top goals for healthcare organizations.

Sustainability for IG

How can organizations keep information governance "front and center" in a dynamic environment? For information governance to succeed, proper planning and vision are essential. Once initiated, there can be a number of challenges encountered that make maintaining the momentum difficult. Sustainability depends on the following:

- **Involvement and engagement of stakeholders:** It is important that all stakeholders are involved in the information governance program. Leadership needs to keep the focus aimed on key information governance initiatives and create a culture of accountability. Sponsorship and participation from both clinical and operational leadership are critical for information governance program success. Continued efforts to keep these relationships engaged create an environment conducive to sustainable information governance program strategies.
- **Communication:** Ensure that all staff understands how the information governance initiatives will support the overall business strategy for the organization and what role each individual plays in the process.
- **Ongoing awareness and education:** There is a need to train users on how to do things and to educate them on why it is being done. Untrained staff cannot anticipate the consequences of their actions on potential outcomes.
- **Auditing and monitoring:** Necessary to maintain accountability at all levels of the organization.
- **Report results:** Continue to assess and modify information governance processes to ensure organizational goals and strategies are being met and report the outcomes of information governance initiatives through a scorecard or similar reporting tool.

Steps for the development of an information governance program or initiative closely parallel those of any other organizational change initiative. Below are best practices for development and sustainability of an effective IG program:

- Build a compelling business case
 - Start with the organization's pain points, or look for a strategic business opportunity (i.e., participation in an ACO, buying new physician practices, or population health management)

- Timing is critical; determine current pain points
- Acknowledge and get others to understand that this is not just another IT project (it is important to note that this is not necessarily about acquiring IT resources, but utilizing the data to make business decisions)
- Identify and collaborate with an executive sponsor and key stakeholders
 - Identify an interdisciplinary committee to oversee information governance
- Create a charter that describes the purpose, goals, and scope of the IG program
- Begin with an assessment to understand gaps and risks in existing policies and processes
 - Employing a competency-based maturity model can identify needs as well as provide a means of benchmarking and best practices
- Employ IG principles as a guide in the development of information policies, processes, and practices
- Engage stakeholders to do the following:
 - Identify goals, define purpose
 - Identify information owners and stewards
 - Create a high-level work plan
 - Define measures of success, including returns on investments and metrics that link IG to other strategic goals
- Communicate with staff (engage end users) using change management tools so that all staff understand IG initiatives and the roles they play
- Conduct orientation and training to advance the skills and competencies of the IG team
- Develop a budget and other resources
- Identify targeted, focused projects for immediate action
- Review/update/create policies and procedures

Information governance is an ongoing program—not a project—and these steps will change and evolve as the program matures. AHIMA offers its “IG Toolkit,” a growing and developing source of information on IG, for the reader’s reference.⁸

Notes

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