Information Governance Offers a Strategic Approach for Healthcare (2018 Update) - Retired

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Editor's Note: This Practice Brief supersedes the November 2015 Practice Brief titled "Information Governance Offers a Strategic Approach for Healthcare."

Information governance (IG) practices are increasingly being adopted across healthcare, according to The Pulse on Information Governance in Healthcare white paper, which is based on a study conducted by AHIMA in 2017.[1] Per this study's results, although still early in its adoption, IG recognition has increased as a strategy for addressing the integrity, quality, and protection of the increasing volumes of information in healthcare as compared to previous AHIMA studies. Evolving legal, regulatory, technology, privacy, and security, including cybersecurity, concerns are also frequent drivers for establishing an IG program or initiative. The purpose of this Practice Brief is to describe the essential focus of information governance as a strategic approach for managing information assets in healthcare organizations.

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

- Improving quality of patient care and safety
- Reducing or mitigating risk
- Ensuring operational efficiency
- Achieving and maintaining competitive advantage

The ability to effectively manage and optimize the utilization of information has become an essential competency for 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.

It is important to note that information governance goes well beyond the traditional boundaries of health information management (HIM) and extends into all types of enterprise-wide information, which may include financial, clinical, and operational. HIM focuses on ensuring the quality and integrity of health information through standardized processes, policies, and procedures, as well as enabling technologies. HIM professionals practice IG around health information and have the skillsets to take practices that focus on and lead enterprise 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-wide goals. IG strategy has a two-fold purpose:

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

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, regulatory, legal, and environmental requirements.[2]

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 Information Governance Adoption Model (IGAM™) was developed by AHIMA and has been validated by healthcare leaders from across the healthcare continuum in a variety of healthcare settings. The model defines, measures, and provides guidance for advancing organizational maturity relative to governance expectations within the 10 IGAM competency areas that contribute to the scope and success of the IG program.

The 10 competencies allow organizations to apply IG concepts to more easily identify gaps or areas of opportunity that exist between the functional areas or business units and prioritize initiatives based on risk, strategy, and operations. The competencies encompass a combination of IG best practices and IG disciplines meant to help the organization focus efforts on areas that are most critical to IG success as described below:

IG Structure: IG Structure defines and connects the organizational structure, programmatic structures, and supporting structures for IG. It ties together the three core programmatic structures of Enterprise Information Management, IT Governance, and Data Governance.

Strategic Alignment: Strategic alignment of IG with the organization's strategy demonstrates the value of information as a strategic asset and communicates that IG is an organizational imperative. Strategic alignment supports an information-driven, decision-making culture and assures that its workforce at all levels has access to the information they need to make good decisions in real time. It. It supports the expectation that information is used appropriately and strategically.

Enterprise Information Management (EIM): As one of the three core competencies, EIM includes the policies and processes for managing information across the organization, throughout all phases of its life: creation/capture, processing, use, storing, preservation and disposition. EIM also includes management of enterprise practices for information sharing, release and exchange practices, chain of custody, and long-term digital preservation. Enterprise information management incorporates the foundational functions of information organization and classification which envelop taxonomies and metadata management, and master data management.

Data Governance (DG): As one of the three core competencies, data governance provides for the design and execution of data needs planning and data quality assurance in concert with the strategic information needs of the organization. Data governance includes data modeling, data mapping, data auditing, data quality controls, data quality management, data architecture, and data dictionaries. DG collaborates with EIM in the functional components essential to the enterprise plans for information organization and classification.

IT Governance (ITG): As one of the three core competencies, ITG is seen as essential for any organization employing information technology. Organizations in healthcare must have certainty that IT serves as a vehicle to achieve organizational strategy, goals, and objectives. IT governance establishes a construct for aligning IT strategy with the strategy of the business, and a means of fostering success in achieving those strategies. In addition to this alignment, ITG includes use of best practices in technology solutions selection and deployment, ensuring and measuring the value/benefit created through IT investments, management of resources, mitigating risks, measuring the performance of the IT function, and ensuring stakeholder input is incorporated into IT strategy.

Analytics: An organization will not become mature in its governance of information without the ability to use its data and information to achieve its strategy, goals and mission. An organization's competence in that transformation is essential to moving from data to intelligence to knowledge. Competency in data analytics is therefore seen as essential to mature information governance.

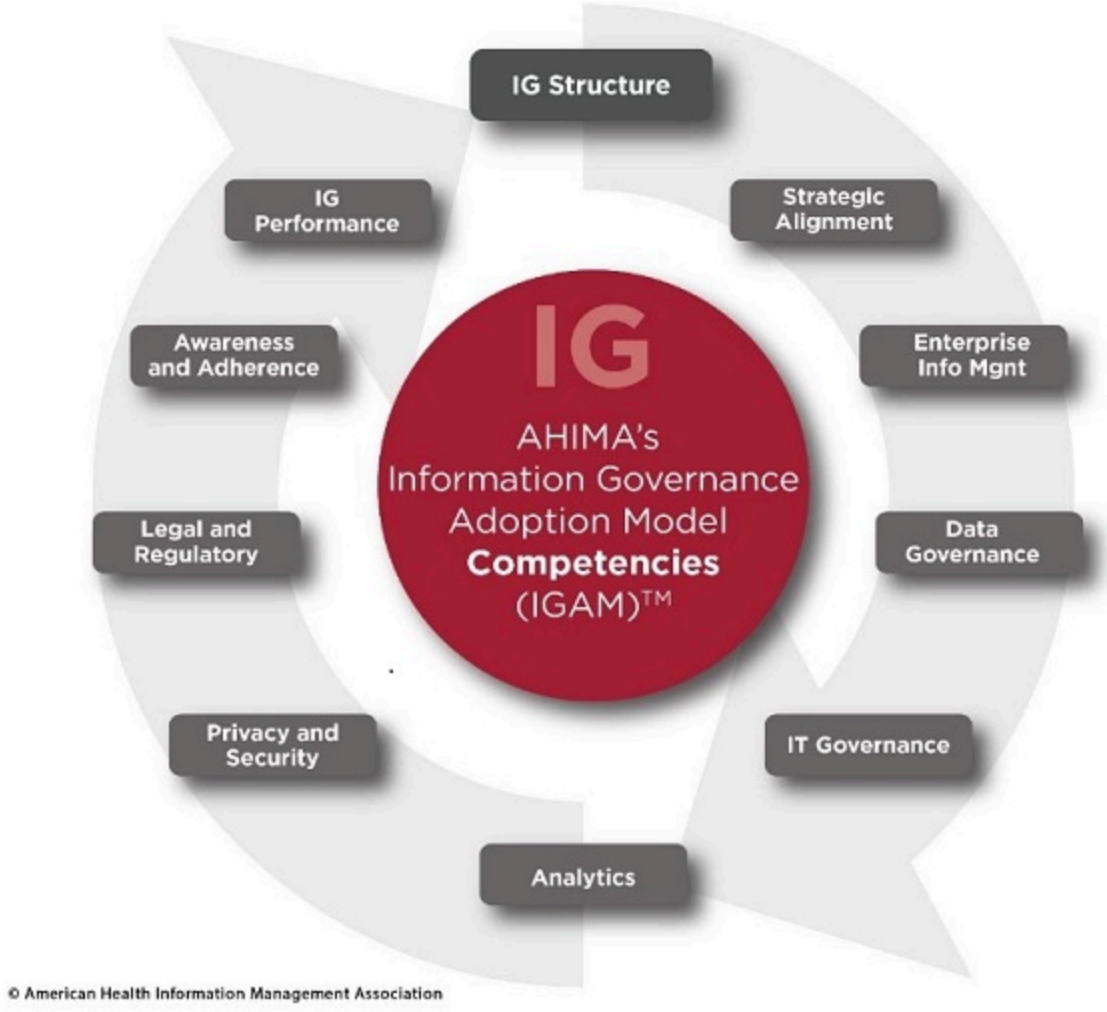
Privacy and Security: The Privacy and Security competency encompasses the processes, policies, and technologies necessary to protect data and information across the organization from breach, corruption, and loss. Protection also ensures information is kept private and confidential as required based on its classification.

Regulatory and Legal: This competency focuses not only on the organization's ability to respond to regulatory audits, eDiscovery, mandatory reporting, and releases to patients upon request, but also on compliance with information-related requirements of any/all regulatory and other bodies of authority.

Awareness and Adherence: This competency aims to assure that the IG program processes, practices, and procedures are learned and understood by the workforce, consistent with respective roles. Guidance is provided on compliant behaviors with respect to information creation, use, handling, access, sharing, storage, retention, and disposition. Beyond awareness, this competency includes adherence to, or compliance with required policies and practices. Formal documentation, training, and strategy are utilized to shift workforce behaviors.

IG Performance: This competency enables development of a methodology for measuring the performance and impact of an IG program. IG Performance assessment and management is essential to assuring its effectiveness, ongoing improvement, and alignment with the organization's strategy. Performance Management includes addressing the organization's capabilities for mandatory business, regulatory reporting, reliability of information, and measures for each of the areas of IG Organizational Competence.[3]

Figure 1: Information Governance Adoption Model



The three core competencies of IG are Enterprise Information Management, Data Governance and IT Governance. When the three core competencies are aligned, the organization will have the enterprise-wide controls and processes in place to facilitate the advancement of other IG initiatives and competencies.

Often confused or used interchangeably with the term "data governance," information governance is really much broader in its reach and scope. IG is distinct from, but encompasses, both data governance and information technology 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, data standards, and data protection through DG initiatives, data owners, and data stewards. IT governance addresses the direction and decisions necessary for IT infrastructure investments—software, hardware, communications, and technology tools—that will enable organizations to do more with their data and information in alignment with the organization strategy. Information governance overarches both data governance and IT governance, as well as enterprise information management, and addresses the entire lifecycle of information from its creation at the data level all the way through to its final disposition.

IG is not a project; it is an ongoing and sustainable program that becomes embedded in the culture of the organization and has clear benefits and return on investment. IG is the framework that facilitates the people, processes, and technologies needed to standardize the way information is used at an organization. IG ensures that the information captures a more holistic view of the organization and can be leveraged to make more informed decisions. Ongoing monitoring, updates, and maintenance are critical for the success of the IG program. In addition, it is essential that organizations educate their workforce on the what and why of IG through policies, procedures, and educational programs, and provide guidance so that the workforce understands their respective role in the outcome of the program. This will help to avoid resistance to change and will lead to an IG culture. Only then can organizations truly see operational effectiveness and the benefits an IG program provides.

Defining IG Scope

IG addresses all information, organization-wide, regardless of its type, state, or location. Clinical documentation efforts or the reliability of legal health records are often initial drivers of IG, however IG has a much broader scope that goes beyond those drivers. An IG infrastructure can improve every initiative that is executed in an organization through policy and standardized processes.

When determining the scope of the IG program, organizations need to identify and capture all types of information including financial, operational, administrative, human resources, and ancillary sources. The location of information sources is also important as a way to inventory what information organizations possess and where it can be located. After identifying the information sources, records, and system locations, organizations should assess their current state of IG to determine priorities and high-risk areas.

IG should be implemented in all healthcare verticals to facilitate trusted exchange of information. Hospitals, ambulatory care centers, physician groups, health information exchanges, payers, vendors and other healthcare settings need to be positioned to manage their valuable information assets.

The state or format of the information also needs to be addressed in a governance plan, including, but not limited to:

- Unstructured information and discrete data
- Paper-based records and forms
- E-mail
- Social media
- Voice data
- Images
- Pathology slides
- Blocks and specimens
- 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

A successful IG initiative is driven from the board of directors and C-suite level down to the rest of the organization while simultaneously being driven up from the grassroots and recognizing the needs of the end-users of data and information. While top leadership should possess a broad understanding to support and champion the program, it is also important to designate an executive sponsor to support the IG program's initiatives, oversee operations, and help with the allocation of resources. Since information governance is enterprise-wide, it requires active leadership participation, and support of leaders to break down silos and manage competing priorities in addressing broad information needs and plans.

An executive sponsor will ensure:

- Appropriate resources (budget, personnel, tools, etc.) are available.
- IG goals and objectives support and align with organizational strategy and that executive sponsorship should convey the importance of IG to the workforce.

- Appropriate 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, in conjunction with other senior leaders and the board of directors, 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 individual 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 Innovation Officer
- Chief Legal Counsel or Officer
- Chief Strategy Officer
- Chief Medical Officer
- Chief Medical and Information 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

An effective IG program will have an executive sponsor and an IG leader who possesses the following key characteristics:

- Change Manager: New technology and the heavy regulatory environment surrounding healthcare requires a leader who can effectively and swiftly implement new processes, policies, and procedures throughout the organization.

- Strategic Planner: IG leaders need to ensure IG alignment with overall organization goals. The leader must be able to meet business priorities while mitigating risk and exposure.

- Collaborator: The effective IG leader will have multi-directional impact within the organization. Upward impact to maintain support and guidance from senior leadership with IG initiatives; horizontal impact to coordinate processes among different departments and divisions; and downward impact to communicate and implement IG processes.

- Innovator: The IG leader will need to be able to identify and assess new technologies and processes that will enhance organizational performance. Often this requires training and engagement of appropriate staff, customers, and/or patients.

- Resilient: The resilient leader recovers quickly from setbacks, faces chaos with a positive attitude, and is a bold risk taker. These characteristics are key in determining the ability of the IG program to evolve and be successful over time.

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 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/program and those goals.[4]

A healthcare 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 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 that are reflective of organizational behavior and culture. Organizational behavior and culture are major considerations 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. These factors should be carefully considered in the rollout and sustainability of IG.

Governance processes have 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. 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 2017 AHIMA study validates that drivers for IG are improved analytic capabilities and data quality, the study also shows that quality care and patient safety, cost containment, performance improvement, and a changing payment environment are also strong drivers for IG.

There are many current and future changes in the healthcare landscape that are driving organizations to implement IG. The continuously evolving shifts in the industry have led to a world that is rich in data but the methods for handling data have not evolved or have not been properly implemented to ensure data protection, integrity, quality, reliability, and timeliness to better meet the ever-changing demands of healthcare. Topics such as payment reform, population health, regulatory compliance, cybersecurity, safe use of health IT, and interoperability are frequent drivers of IG.

As an example, one of those drivers, interoperability, is being addressed through regulations such as the 21st Cures Act[5] and the Trusted Exchange Framework and Common Agreement (TEFCA).[6] Interoperability requires organizations to take a thorough look at data to determine how it will transmit from one organization to the next, and how trustworthy the data being transmitted is.

When data is transmitted to receiving organizations, it is expected that the data and information is accurate and trustworthy and can facilitate the next steps in the information lifecycle and patient care paths. Interoperability in healthcare will ensure that each care provider has the most up-to-date patient record for accurate diagnosis and improved treatment, leading to better care outcomes and the prevention of duplicate testing, medication administration, and other causes of inefficient workflows. Solid IG practices will ensure that high quality data and information is available to be transmitted through enabling technologies and protections to facilitate trusted exchange and interoperability throughout the healthcare environment. As a result, the cost of healthcare per capita should be reduced and the health of populations should improve.

Other drivers include the development and evolution of new technologies and processes such as the Internet of Things (IoT), telemedicine, and artificial intelligence. Each of these innovations produce a significant amount of data and information that needs to be managed and integrated into enterprise-wide systems. The trustworthiness of the data and information produced directly impacts the decisions made based on that data and information. In addition, a new level of privacy and security should be implemented to keep these new data sources protected from threats. Healthcare organizations need to determine ways to incorporate these matters into existing strategies and keep up with industry trends as they continue to surface.

It is important to consider IG initiatives as a three-legged stool where the legs are people, processes, and technology, and the stool seat is the project or program. All of these "legs" need to support one another to support the "seat," and ensure the project is successful.

There are several areas where healthcare organizations commonly focus initial IG 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. 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

First and foremost, a successful IG strategy requires a dynamic framework that allows organizations to move from the beginning inception of a governance strategy to the implementation process and ongoing maintenance of the program. As technology and the delivery of healthcare changes, an organization needs a framework that will support future changes. AHIMA's IGAM™ provides a scalable framework that suits any organization. The IGAM™ consists of the 10 competencies described above, with which an organization can develop the strategy and framework that meets the needs and goals of their particular situation.

With the appropriate stakeholders in place, a scalable framework, a realistic strategy, and available resources, organizations should be positioned for success with IG. A successful IG strategy also incorporates the following characteristics:

- **Business-led and Business-driven:** Ultimate accountabilities and responsibilities for data and information should rest with the business unit owners and stewards who lead the departments, or business units who create or generate data and information. Data and information owners and stewards should be subject matter experts in their respective areas and work with the data and information daily. This is as opposed to ultimate accountabilities and responsibilities resting in IT, where IT personnel may not fully understand the business unit's specific needs and uses of data and information. Instead, the business units should have a collaborative relationship with IT to facilitate their data and information needs.
- **Collaborative:** IG is an enterprise-wide effort and should include stakeholders from across the organization who will work together to achieve the same outcomes while moving away from working in silos. Increased collaboration allows for organizations to better identify risks and areas of opportunities more proactively and to mitigate potential negative outcomes on the organization. Increased collaboration also allows for the streamlining and standardization of policies, procedures, and processes across the organization leading to more efficient tasks and outcomes of new and existing initiatives.
- **Measurable:** Clear goals and objectives and related metrics should be established for performance improvements, reduction of risk, and optimization of data and information. These metrics will help define the expectations of the IG program, assess the benefits and return on investments realized, and determine where additional resources need to be allocated. Objectives and metrics should be monitored and reported on an ongoing basis.
- **Achievable:** Goals, objectives, and metrics should be realistic and achievable with consideration of the level of resources (funding, staffing, etc.) available to develop and sustain IG efforts. Additional resources should be approved and provided as new goals, objectives, and metrics are established.
- **Avoids complexity:** Initial goals and objectives should be focused and targeted to specific issues or problem areas. Goals and objectives should be prioritized based on risk and organizational strategy. As goals and objectives are met, the IG committee should reassess and determine new priorities and initiatives to sustain the program.
- **Communicable:** Creation of awareness and effective communication is critical for a successful IG program and a positive change in an organization's culture. Education for employees, clinicians, and business partners should be provided about their information management responsibilities as it relates to the information lifecycle. Awareness and adherence to the IG program will ensure that the workforce understands the what and why of IG and how they individually contribute to the program. Education should be provided during the onboarding process and in annual trainings. New and existing initiatives, developments, and benefits from the IG program should be communicated often to keep the workforce up-to-date.
- **Copes with uncertainty:** IG can be used to gain a more holistic view of an organization's information that will help to get a more accurate perspective of the organization's current state and needs. Standardization of processes leads to a

more consistent approach and response to threats and areas of opportunity 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 to carry out job duties. Reducing silos and streamlining processes across the organization will allow the workforce to more efficiently access the information they need, as appropriate, to perform their daily job duties. The workforce will have the ability to do more with the information when they know it has integrity, is of high quality, is up-to-date, and is accurate.
- **Celebratory:** Organizations should share stories, celebrate successes, and showcase the progress made and steps taken with the workforce. Whether it be the completion of a policy and procedure or the implementation of a large data warehouse, all wins should be celebrated. Continuous communication and demonstration of the IG program's worth and return on investment will help the workforce understand the true value of IG and reinforce why they should continue to practice IG in their daily activities. Each bit of progress made is one step closer to a mature IG program and a culture that embraces information-driven decision making.

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 will be different, it can be reasonably anticipated that initiating a program will take about 12 to 18 months.[7] Demonstrating the direct impact of information governance on the advancement of organizational goals and regulatory requirements is key in getting recognition for the importance of and need for a program.

Many of the current goals, strategies, and external requirements healthcare organizations are facing are driven by information. Compliance and quality outcomes are dependent on high quality, accurate, and timely information. A great way to engage stakeholders and get executive support is to cross-walk the current priorities of the organization and describe how IG is necessary. Some examples include:

- Value-Based Care/Payment Reform: Regulatory requirements such as MACRA ensures that providers are being reimbursed based on the quality of care delivered, not fee-for-services (or a fee-for-service methodology). Accurate and timely documentation is critical for accurate and timely reimbursement. Standardizing processes and definitions, using accurate and up-to-date patient information for care delivery, and using quality controls (templates, voice recognition dictation with validation, copy/paste controls), and clinical documentation improvement (CDI) amongst several other initiatives will ensure that organizations are being appropriately reimbursed based on the quality of the documentation provided that reflects the care delivered to patients.
- Patient Identity and Patient Safety: Many organizations struggle with their master patient index (MPI) duplication and error rates. Treating the right patient, at the right time, with the right information is critical for patient safety. IG will put controls and technologies in place to proactively prevent or flag potential duplicate records or errors from occurring versus cleaning up these errors on the back-end and putting patients at risk for medical errors. In addition, organizations can use and leverage their EHR data and information for analytics to better understand their patients, patient populations, and trends that can be used to make more accurate and informed patient care decisions and reducing patient safety risks.
- Interoperability: Interoperability is an ideal state of healthcare that many organizations are working to achieve internally (and eventually as an industry). Technological advancements and new innovations have left organizations with disparate systems that are not integrated and can't speak or exchange with one another. Creating data definitions and standards and using quality controls will allow organizations to more easily integrate new and existing systems with each other. This will ensure that there is one source of truth and that critical data and information is not lost.
- Cybersecurity: Cybersecurity is a huge challenge facing the healthcare industry, with health information and other valuable information being constantly at risk. IG is an enterprise-wide effort that helps organizations identify what information assets and systems they have, where they are located, who is the owner, and what kind of protections are in place. It is important that organizations have this holistic view of their information and systems so that cybersecurity and risk management teams know where and what they need to put controls around to protect information. Through IT Governance and privacy and security efforts, organizations can determine which cybersecurity investments are most appropriate for meeting the needs of the organization and mitigating potential risks. Without IG, it is possible that gaps exist, leaving organizations vulnerable for an attack.

Identifying pain points such as the above will help to make the case for IG and engage executives and stakeholders. After engaging an executive sponsor and the appropriate stakeholders, it is important to assess the current state of the organization as it relates to IG. Often, organizations "don't know what they don't know." Assessing the current state will reveal those areas of opportunities and high-risk pain points. Then organizations can begin to prioritize their approach and roadmap to a mature IG program.

Once the organization has identified their priorities, it is important to develop policies and procedures to reflect the new changes and explain the importance of these initiatives. Ideally, the policies and procedures will be role-based and provide guidance on what individual roles need to do and the challenges that will arise if the work is not done according to the policy and procedure. The workforce should be educated on the policies and procedures, and sanctions should be in place for non-compliance.

The IG committee, comprised of a robust group of stakeholders across the organization, will be responsible for determining how IG initiatives are executed, and who needs to be involved. Then the IG committee will assess the changes made, measure the benefits and returns on investment and determine next steps and priorities. This is where the ongoing IG process starts over. New initiatives will be identified and current initiatives underway will be maintained and updated as needed. Eventually, the IG process will be an enforced expectation of the workforce and will become a part of the culture.

Sustainability for IG

How can organizations keep information governance "front and center" in a dynamic environment? For information governance to succeed, strategic planning and visions are essential.

Steps for the development of an information governance program or initiative closely parallel those of any other organizational initiative or program. 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 accountable care organization (ACO), buying new physician practices, or population health management)
    - Timing is critical; determine current pain points and industry demands
    - 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 competencies 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 investment 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

Remember, information governance is an ongoing program—not a project—and these steps will change and evolve as the program matures. AHIMA offers its Information Governance Toolkit, a growing and developing source of information on IG, for the reader's reference. The toolkit is available in the AHIMA HIM Body of Knowledge.[8]

Return on Investment

Implementing information governance will provide several avenues for return on investment (ROI). ROI can be realized in hard dollar returns, cost avoidance, risk mitigation, improved operational efficiency, brand recognition, and more. Whatever the return may be, organizations should track the returns and benefits to emphasize the true value of IG.

Every IG initiative has a return. Below are examples of the different types of returns to be realized:

- **Hard Dollar:** Accurate and timely reimbursement based on value-based reimbursement requirements.
- **Cost Avoidance:** Implementing a records retention and disposition schedule and policy will save organizations a tremendous amount of money in storage costs.
- **Risk Mitigation:** Implementing best fit IT investments that meet strategy and span enterprise-wide will identify potential threats before they occur and avoid the hefty fines associated with a breach.
- **Operational Efficiency and Employee Productivity:** Standardizing and streamlining processes and using high quality data and information to get tasks done will reduce work-arounds, duplicative efforts, and unnecessary time spent on cleaning up data inconsistencies, leading to more productive employees.
- **Brand Recognition:** Consumers have more trust in organizations that value the quality of the data and information that they use and share. In addition, risk and breach avoidance will help keep organizations' names out of the news fostering a trustworthy reputation for organizations to take pride in and grow upon.

There are many case studies included in AHIMA's HIM Body of Knowledge that describe the real-life returns realized by organizations who have implemented IG. These case studies can help others make the case for IG and spark ideas about where to start first.

Overall, IG puts organizations at a competitive advantage by being more proactive. The flood of Big Data is going to continue to grow, and organizations must implement IG to stay ahead of the curve and manage the flood. These organizations will be better prepared to face whatever is coming in the future.

Notes

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