

Information Governance Offers a Strategic Approach for Healthcare

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For the past several decades, adoption of health information technology—specifically electronic health record (EHR) systems—has been a central focus in the effort to improve care and gain greater efficiencies. The healthcare industry is now earnestly beginning to shift emphasis from adoption and implementation of the technology to how data and information that has been captured can be optimized and leveraged for strategic advantage.

According to a 2014 study conducted by AHIMA, most healthcare organizations are still at the beginning of this journey.¹ Organizations are striving to address new imperatives for information afforded by tools such as business intelligence and predictive analytics. The ability to effectively manage and utilize information of all types has become an essential competency for the viability of healthcare organizations in an era of accelerated change and transformation.

Information governance is emerging as a strategy that aligns with and enables a healthcare organization to achieve its goals. Successful organizations recognize information as a valuable asset that must be carefully and thoughtfully managed throughout the information lifecycle. The purpose of information governance is two-fold:

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

The purpose of this Practice Brief is to describe the essential aim and focus of information governance as a strategic approach for managing the asset of information for healthcare organizations. It is important to note that information governance goes well beyond the traditional boundaries of health information and its management. 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.

Defining Information Governance

At this time there is not a singular definition for information governance. In many cases, organizations will define information governance for themselves. ARMA International offers a definition that includes many of the strategic components of information governance.

AHIMA defines information governance as:

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

Healthcare organizations achieve their organizational goals through a focus on the patient's interests. Therefore, the information governance framework must address issues unique to healthcare such as patient safety, quality of care, patient engagement, and clinical documentation improvement. This even pertains to non-care delivery organizations such as third party payers, health information exchange organizations, and suppliers. Information governance helps organizations structure, manage, and capitalize on information by:

1. Reducing risks
2. Increasing efficiencies
3. Achieving a competitive advantage

As a strategy, information governance ensures that information is utilized as an asset to support decision making for the organization. Information governance addresses all information, whether it is generated internally or externally to the organization, regardless of its state or location (i.e., finance, human resources, etc), including but not limited to:

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

Information governance ensures that tools are in place to promote the creation, validation, and adoption of new information. It allows an organization to leverage and determine the value of information for decision making, and it provides aid in determining appropriate access and disposition. The information governance processes thereby help define the information throughout its lifecycle for each organization.

Developing Information Governance Through a Strategic Approach

Many industries are already well versed in information governance, but for healthcare it represents a change in the approach to the management of information. When applied to healthcare, information governance highlights the need to have a plan and take a structured approach to how organizations manage all the information assets and resources within the organization.

The organizational culture must be taken into account when developing an information governance program. Strategies for developing a sustainable information governance program include aligning the information governance program with business goals, reviewing drivers that the organization is following, and determining what the organizational tolerance is for risk. In addition, demonstrating return on investment, or a cost/benefit analysis, will play into the development of the program. The information governance program must have its own budget, and thus requires an assessment and application of the resources necessary to the program, such as staffing, financing, and needed software and technology.

Information governance differs from traditional HIM in that it is an enterprise-wide program that requires leadership and support from the organization's executive leaders. This enterprise approach is vital because of the need to focus on assessing risks, evaluating for gaps, and pulling together the right package of policies, procedures, and tools to manage any identified risks and gaps. Resources need to be allocated to ensure that the work can be carried out. Information governance is about strategically managing all of the information that healthcare organizations are gathering, creating, and preserving in vast quantities each day. Information governance needs to be approached as a formal strategy.

Organizations need to take an integrated approach to managing information strategically at the enterprise level. Information governance in healthcare is an important step toward achieving the "Triple Aim" of:

- Improve the patient experience of care (including quality and satisfaction)
- Improve the health of populations
- Reduce the per capita cost of healthcare²

According to the Institute for Healthcare Improvement, organizations that attain the Triple Aim will have healthier populations—in part because of new designs that better identify problems and solutions further upstream and outside of acute healthcare.³ As the coordination of care beyond the acute care setting becomes increasingly widespread, governing all of that information is a part of the picture in meeting the Triple Aim. Information governance can help reduce and better manage the cost of healthcare and give organizations an opportunity to be more financially stable. The introduction of analytic tools can facilitate improved population health management and ultimately result in higher quality of care.

Aligning Information Governance with Organizational Goals

Successful information governance programs combine HIM, legal and compliance functions, IT, finance, human resources, and clinical areas to help healthcare organizations reduce risk and drive patient outcomes as well as improve business

performance. Accountability is key, since information governance is the means to ensuring that the rest of the organization's strategies are successful. To obtain engagement from the executive suite, start by focusing on the core strategic goals of collecting data, which include:

- Safe, effective patient care
- Stable business operations
- Financial viability

Use the organizational goals to promote the information governance program. For example, if the organization wants to become an accountable care organization (ACO), think about how information governance can help move this project forward. If the organization wants to focus on physician mergers, leverage information governance to help bring the companies and their information together into one organization. Having strong policies and procedures in place can help ensure there is coordinated patient care and a seamless transition for patients and staff. One of the ways to make money or save money for a healthcare organization and to achieve the goals outlined above is to be able to transform data into usable, meaningful information. If these objectives can be achieved, then the organization can derive business intelligence from data and information assets.

Decision makers develop strategy based on a number of factors. While there are a multitude of business needs for information governance in today's healthcare environment, some key challenges have surfaced in recent years that can lead to the need for a strategic focus on information governance:

1. There is enormous pressure from all sides of the legal and regulatory world to access information electronically. Healthcare organizations need to create, manage, retrieve, maintain, archive, and dispose of information appropriately. There are growing demands for information to respond to RAC audits and HITECH-HIPAA requirements.
2. There is a need to collect a variety of clinical information, such as data for cancer research or test results, or for reporting to registries. Other clinical information may be collected to assess expanding or decreasing the organization's services, such as adding a children's hospital or cardiology center, or selling a clinic.
3. There is a need for access to patient information for multiple customers (i.e., patients, payers, regulatory agencies). Information is the lifeblood of any organization and increasingly healthcare enterprises will need to be able to manage it effectively in order to remain competitive and accountable with new care and payment models that are based on value and quality rather than fee for service. Clinical documentation improvement, new quality measures, and population management will all drive the need for analytics, which is dependent on sound information governance practice and application.
4. Retention and storage of information is very costly to manage. Combine that with the awareness that a great deal of information is redundant and not all of it has equal value. Information governance processes eliminate the waste incurred with managing information that is no longer needed.

Characteristics of a Successful Information Governance Strategy

Fundamentally, information used for analysis or reporting must be accurate and trustworthy for the analysis and reporting. Otherwise, comparisons may be inaccurate and lead to poor outcomes or lower scores on public rankings. Poor data may lead to poor patient outcomes—patients may be injured or even die. Hospitals and providers may be ranked low, giving the appearance that they are inadequate or incompetent. Analytics are now being applied more than ever and the data must be accurate. As more information is available, strong practices are needed to ensure validity.

There are a number of common characteristics that help ensure a successful information governance strategy:

- **Business-Led and Business-Driven:** Solid information governance begins with a clear strategy for the organization that is business-led and driven by strategy. At each stage, knowing the overall strategy helps staff remain focused on the organizational goal of meeting the needs of patients and all other consumers of healthcare information.
- **Measurable:** Successful information governance programs are founded on clear and consistent policies, rules, and training that result in measurable and repeatable outcomes.
- **Differentiated:** To successfully govern information for patient care, regulatory, risk, and business needs, the individual pieces of information must be differentiated from each other in some way.

- **Achievable:** To be effective, each healthcare organization must have a plan that is logical, realistic, and achievable, and which is dependent not only on the needs of the organization but also on the availability of resources to carry out the work.
- **Avoids Complexity:** Healthcare organizations can spend huge sums of money developing an information governance strategy, but if it is so complex that the organization cannot mobilize its workforce to implement the necessary changes, then the program will likely fail.
- **Communicable:** Results must be measurable and communicable. Educating staff on the progress of the program using scorecards, team meetings, and the intranet helps hold staff accountable for outcomes and keeps them engaged in the program.
- **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 governance programs must ensure that information and systems are secure, but must be designed to allow for flexibility where required to carry out job duties.
- **Not Prescriptive:** Information governance should facilitate discussion among business units by providing a common platform for decision-making based on the individual needs of the organization.

Information Governance Should Start Now

Why should information governance be a priority that gets started now when there are so many other pressing needs? Most healthcare initiatives and changes currently taking place involve data and information; there is a growing need to both produce and harness large amounts of data, and an information governance program is an invaluable addition to meeting those needs effectively.

Information governance is focused on strategy and not specific processes. However, some of the same skills that are used in managing health information can be applied to implementing information governance across an organization, such as at an enterprise-wide level developing policies and ensuring regulatory compliance.

Key information, both clinical and operational, often has been managed throughout the organization at the individual departmental level. Bringing all of this information together (financial, operational, and clinical) with enterprise-wide policies and guidelines can mitigate operational and regulatory issues, such as the requirement for infinite storage of unnecessary information and the associated costs, an inability to pull the correct information when needed, problems with versioning of policies, and a lack of clear ownership of information.

Many organizations have experienced challenges with information integrity. This has been complicated by the explosion of Big Data with its increasing volume, variety, and velocity of data across the continuum of care. For example, the accuracy of coded data has been called into question when it was time to do quality reporting or public reporting of the hospital's data. Other healthcare organizations have had situations that eroded trust in data or information. When trust is eroded people find workarounds and create inefficiencies that have downstream effects that can turn out to be very expensive. Healthcare organizations are beginning to realize how much time is spent on clean-up of data/information before it can be released (i.e., claims, state reporting, quality measurements, and outcomes).

A leading goal for many healthcare organizations is to be able to transform collected data into usable, meaningful information. Business intelligence is the process of using, applying, and converting information assets to assist in driving towards the achievement of strategic business goals.

One of the key objectives of an information governance program is to produce strategic business intelligence by leveraging the information assets of an organization. Information governance helps ensure the integrity of information. One of the biggest benefits to information governance is reducing how much time is spent on the clean-up of data/information that has to be sent out from within the organization (i.e., claims, state reporting, and quality measurements/outcomes).

Finally, organizations need to have a "single source of truth." Establishing a single source of truth is about two things:

1. Having an information architectural framework across disparate databases and networks
2. Determining which source will represent the primary "source of truth" for the enterprise

The information governance program should be designed to make sure that all information resources and investments support the business goals of an organization. Lack of a strong information governance program can pose serious consequences to a healthcare organization.

There are multiple compelling business and legal reasons right now in healthcare that highlight the need for information governance:

- The risk of privacy and security breaches that become more costly each day
- The need for a massive update of systems, processes, and education that must be undertaken to support ICD-10-CM/PCS implementation
- Trying to get the workflows and information right to qualify for attestation to the “meaningful use” EHR Incentive Program
- Changing payment models that make it impossible to survive without good quality clinical and financial information
- Courts that are promulgating new rules on e-discovery that can prove to be extremely costly, even when the healthcare institution is not a litigant or party in a lawsuit

Healthcare organizations need the functions that information governance programs provide to measure their compliance, effectiveness, benchmarks, and comparisons in areas such as:

- Population health
- Quality and cost effectiveness
- Public reporting
- Clinical research
- Business and financial performance
- Regulatory compliance

Managing all of these challenges and meeting the requirements becomes much less daunting when approached under the guidance of an effective information governance framework.

Creating the Information Governance Business Case

Navigating the regulatory environment today is challenging for any business, but especially so in healthcare. The quantity of new regulations is steadily increasing and auditors are cracking down on compliance, leaving healthcare organizations with little choice but to manage an ever-growing amount of information.

Because of this, healthcare organizations need to begin to effectively manage their information not only for regulatory reasons but also to avoid damage to their reputation should something go wrong. But for many information governance proponents, proving the value of information governance can be a complicated matter, particularly if senior leaders want to see a return on investment before offering support or allowing funding.

Here are some fundamental questions to answer before attempting to launch an information governance initiative in an organization:

- Is the entire business on board?
- Is the value of an information governance program understood?
- How will information governance improve business processes and decision making?
- How does each information governance program reinforce or benefit improvement?

If the information governance leadership team can provide concise and positive responses to these fundamental questions, they can dramatically increase the likelihood of building a strong information governance initiative. Gaining executive buy-in may well be the most important step of all in achieving a successful information governance program.

The program's success also needs to be measured through metrics to show its value to the organization. For example, the general selling point might include a statement that information governance will help improve patient outcomes. Once the information governance program is well established, organizations would develop specific metrics to demonstrate that the initiative is effectively supporting patient outcome improvement.

Sustainability is Key to Long Term Success

How can organizations keep information governance “front and center” in a dynamic environment? For information governance to succeed, proper planning and vision are essential to getting started. But once initiated, there can be a number of challenges encountered that make keeping the momentum difficult.

Get Stakeholders Involved

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 relevant staff members understand how the information governance initiatives will support the overall business strategy for the organization and what role each individual plays in the process.

Provide Ongoing Training

There is a need to not only train users on new processes, but to educate them on why it is being done. Untrained staff cannot anticipate the consequences of their actions on potential outcomes.

Auditing and Monitoring

Unlike old processes in a paper-based environment, a user error that may have gone undetected before could have catastrophic effects in an enterprise information governance environment. Internal auditing and monitoring can help mitigate this risk.

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.

Getting Information Governance Up and Running

There is no one-size-fits-all approach to information governance. Developing a program takes a minimum of 12 to 18 months.⁴ After the program is implemented, continuous review and refining is required to maintain the program and ensure it aligns with the current strategy for the organization.

An information governance program will not be embraced without first building awareness of its importance. Demonstrating the direct impact of information governance on the advancement of organizational goals is key in getting recognition for the importance of this program. All stakeholders must be educated on the importance of establishing an overarching information governance program to expand the benefits of interdisciplinary collaboration. Leaders must illustrate how information governance supports top goals for healthcare organizations.

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 the smaller project may be used to begin building a large program. For example, one project might be to organize/clean up shared drives, or another place to start could be with a project to attach retention schedules to all the various types of information within an organization.

Below are important factors to consider when developing the 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 about utilizing the data to make business decisions)
- Collaborate with the CIO/IT to gain support
- Begin with an assessment to identify gaps and risks in existing policies and processes
- Secure an executive sponsor, engage them in the process, and then plan the approach
 - Identify goals, define purpose
 - Determine who is in charge and who holds which responsibilities
 - Create a high level work plan
 - Define measures of success
 - Define budget and/or return on investment
- Identify a sponsor and start building relationships with stakeholders
- Create a charter
- Identify an interdisciplinary committee to oversee information governance
- Find the low hanging fruit and/or business need to focus on, such as:
 - EHR
 - Acquisition (and integration) of other organizations
 - Meaningful use
 - Denials/Readmissions
- Review/Update/Create policies and procedures
- Define success of the program
 - Create the metrics
 - Develop business metrics that link to the information governance program
 - Answer the question "What does success look like?" The current level of the organizational metrics must demonstrate the organization's definition of success

Notes

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