Information Governance Road Map: Approaching Mile Marker 4

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By Ann Meehan, RHIA

Editor's Note: This article is the seventh in a series that provides a road map for implementing an information governance (IG) program in any organization. Each month a set of concepts is discussed that tie to the IG Road Map Infographic developed by AHIMA. Any organization can take these implementation concepts and travel along The Road to Governance.

So far the information governance (IG) road trip has traveled along Route 66 and to some of the country's most beautiful sights—the US national parks. On any successful road trip there comes a time when the plan needs to be evaluated and a determination made on how it has gone. Did you miss anything along the way? Should anything be revisited? While it may not be easy to backtrack on a road trip due to time and money constraints, it is possible to reflect on an organization's information governance program and backtrack if needed. This article will focus on when and how to do this.

Revisiting the Trip Itinerary

In the April 2016 *Journal of AHIMA* Road to Governance column, the author addressed the AHIMA Information Governance Adoption Model (IGAM)™ as a means for keeping all users on the path to IG. In summary, this model:

- Defines five levels of IG maturity across 10 competencies with over 75 performance-driven maturity markers of an IG program
- Is rooted in IG best practices, standards, and requirements for managing information across the entire organization
- Creates a path to a fully mature IG program, resulting in IGAM Level 5

An assessment of maturity provides an objective, quantifiable result that anyone within an organization can understand and use to evaluate the maturity of their IG program, as well as the ongoing work effort and the impact it's having. It takes out the emotion and second guessing in terms of where the IG program really is, and allows the organization to determine both strengths and weaknesses—and provide a clear path for addressing them.

Adjusting the Course

Once the initial baseline assessment has been performed and the organization has determined gaps and prioritized next steps, it's important to periodically reassess. Reassessment may occur across the entire continuum of IG characteristics and requirements or may only be performed on specific focus areas. It's important to allow enough time between an initial baseline assessment before completing a reassessment. The recommended timeline is approximately 90 days. Waiting three months allows one to set up quarterly maturity level measurements that can be used for benchmarking and reporting up to executive leadership and the governing body.

Before performing a reassessment, review the following steps and make necessary decisions:

- Review the gap analysis from the baseline assessment.

  - Are any adjustments to the gap analysis needed?

- Review the areas prioritized for work during the first 90 days.

  - Were entire competencies addressed or only certain maturity markers within competencies?

- Were any adjustments made to the priorities originally identified?
- Determine when key stakeholders will be available to reassess prioritized areas.

  - Are key stakeholders on the same campus or will some need to be available by phone?

- Determine who will lead the reassessment.

  - Will this be led internally or will external resources be needed?
  - If external resources are needed, can this be done remotely?
  - When are resources, internally or externally, available?

- Establish a timeline for getting the reassessment completed and stay on schedule.

  - While minor adjustments to the original schedule may be necessary, attempt to stay within a tight timeframe to complete the reassessment, such as within a two-week period.
  - It is often easier to stay on schedule when assessments are led by an external resource.

- Settle on how reassessment results, including a comparison back to the baseline assessment, will be reviewed and addressed.

  - Will priorities need to be adjusted?
  - What happens when the needle has not moved on a competency/maturity marker?

- Determine how results will be reported to senior leadership and the governing body.

  - Will you report to the IG Steering Committee first, allowing those stakeholders the opportunity to discuss, prioritize, and determine next steps?
  - Determine who will report results up to the governing body.
  - How often does the governing body meet?
 - What's the best way to get this on the agenda, if it's not already there?

Once a plan is in place, proceed with making arrangements for the reassessment. If the reassessment is being led internally, challenge responses where needed. Be sure to consider responses across all types of information, across the entire organization. Discuss how someone can validate the response—in other words, identify what policies, procedures, inventories, etc., are in place that support the response.

After the reassessment has been completed, the organization may need to re-evaluate priorities. Questions to ask include:

- Was the result of the reassessment expected? If not, why not?
- Were there barriers that prevented expected progress?
- Were stakeholders engaged and kept accountable for expected actions?
- What adjustments need to be made to continue progress?

Sample Form for IG Work Plan

**(Insert Organization Name) Work Plan Developed (Date)	Updated (Date)**
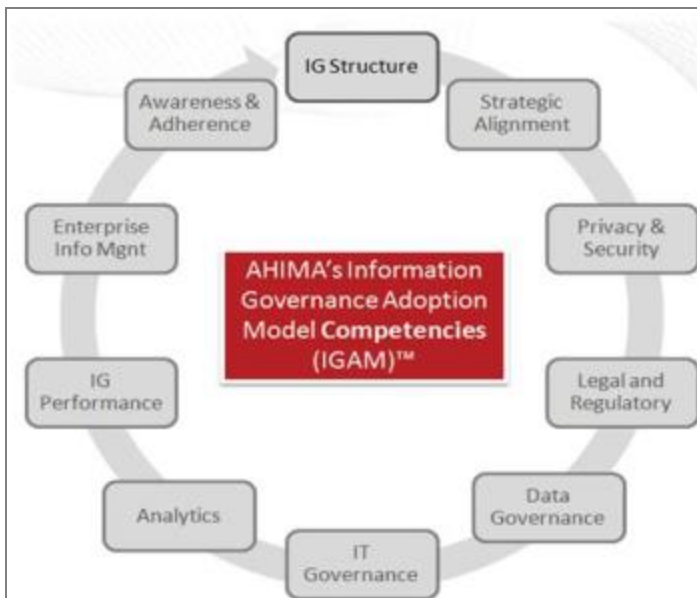
Competencies:
*IG Structure
*Strategic Alignment
*Privacy & Security
*Legal & Regulatory
*Data Governance (DG)
*IT Governance (ITG)
*Analytics
*IG Performance
*Enterprise Information Management (EIM)
*Awareness & Adherence

RELATED TOPIC/ISSUE	COMPETENCY (see above)	COMMENTS	ACTIONS/GOALS	KEY STAKEHOLDERS	TARGET DATE	NOTES
EXAMPLE: Data and Information Inventories	Data Governance (DG) Enterprise Information Management (EIM)	Inventories of 500+ applications (structured data) are currently being created by IT and IT Security. RMS, in collaboration with IT, is to follow up with content and retention assessments for each system, and add appropriate data to central inventory. The Master Application Inventory is centrally managed and located.	1. Conduct application surveys/inventories for business, research, and medical functions. 2. RMS/ITS collaboration in gathering and publishing inventories. 3. Identify content purpose, retentions, and any new series. 4. Identify systems with confidential/sensitive information. 5. Develop ongoing updates/audits of inventory locations of PHI as identified and protected.	ITS; IT Security; RMS, CIO; CISO	Q4 17	On track

Developed by University of Washington Medicine
Sally Beahan, RHIA, MHA, Director, HIM, Strategic Planning & Projects

Christine Taylor, Records Officer

Watching the Speedometer

How does an organization gauge progress between assessments? Sally Beahan, RHIA, MHA, director of HIM, strategic planning and projects, and Christine Taylor, records office, from the University of Washington Medicine (UW Medicine), developed an IG Work Plan that is used for tracking IG-related projects and initiatives. See Figure 1 above for a sample work plan.

"The UW Medicine IG Work Plan assists with short- and long-term strategic and tactical planning for incorporating information governance into new and existing health information management and records management projects, topics, and goals," Taylor says. "The work plan is reviewed quarterly and updated as necessary; projects may be added, or as project scopes change, action items increase or decrease. Priorities may adjust as well depending on the complexity of the project; the priority number is tied to each quarter (Q1-Q4) to keep us on track. When projects or actions are completed, they are deleted from the work plan.

"We are currently looking at ways to use this work plan to report IG successes and outcomes to leadership," Taylor continued.

This tool includes the following data elements for tracking IG activities:

- Related Topic/Issue—Used for a brief description of the activity that is being addressed.
- Competency—Links the activity back to the AHIMA IGAM competency. A list of the 10 competencies is at the top of this tool.
- Comments—Used for more detailed information about the activity.
- Actions/Goals—Used to outline the steps needed to address the activity.
- Key Stakeholders—Identifies all key stakeholders accountable for addressing the activity/issue.
- Priority Number—Tied to a quarter for tracking timelines.
- Notes—Used for providing updates and the status of the activity.

This tool provides a consistent way to document, review, and measure IG-related activities.

Information Governance Road Map

The journey to enterprise-wide information governance (IG) often seems difficult, but with the right direction and tools, successful navigation and realizing your IG vision is possible.

Compare quarterly assessment to baseline assessment and determine next steps

Reassess quarterly IG programs

Leverage clinical, financial, and administrative information to demonstrate excellence in impact and value of service provided

Use analysis to demonstrate IG return on investments

MILE MARKER 3

Internal and external audit of IG performance

MILE MARKER 4

Create formal budget for IG office and program

Achieve and Sustain IGAM Level 5™

In the Home Stretch

While reaching and sustaining IG maturity is an ongoing process, our journey is now nearing Mile Marker 4 on the road map—the end of the road! Next month, this column will discuss leveraging information to demonstrate value and strategic alignment, and internal/external audit processes.

Stay the course and enjoy the journey!

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