Information Governance Road Map: Mile Marker 4–Demonstrating the Value of Clinical, Financial, and Administrative Information to IG

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By Katherine Downing, MA, RHIA, CHPS, PMP

Editor's Note: This is the eighth and final article 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.

Our journey on the road toward a robust, enterprise-wide information governance (IG) program is winding down—which provides a good opportunity to reflect on where we have been. The road trip began with Mile Marker 1, which covers the creation of a business case for information governance, engaging executive sponsorship, information governance current state assessment, and preparation for the journey. Mile Marker 2 focused efforts on project choices and the overall strategy for the first year of an IG program. Mile Marker 3 included preparing budgets for planned IG projects, analysis of projects for return on investment, and completion of initial IG projects.

This article, the last of the series, will focus on Mile Marker 4 and identify steps that should be taken at the end of the first year of the journey, as well as outline areas where information can be leveraged to demonstrate excellence and value for an organization's IG initiative, including return on investment.

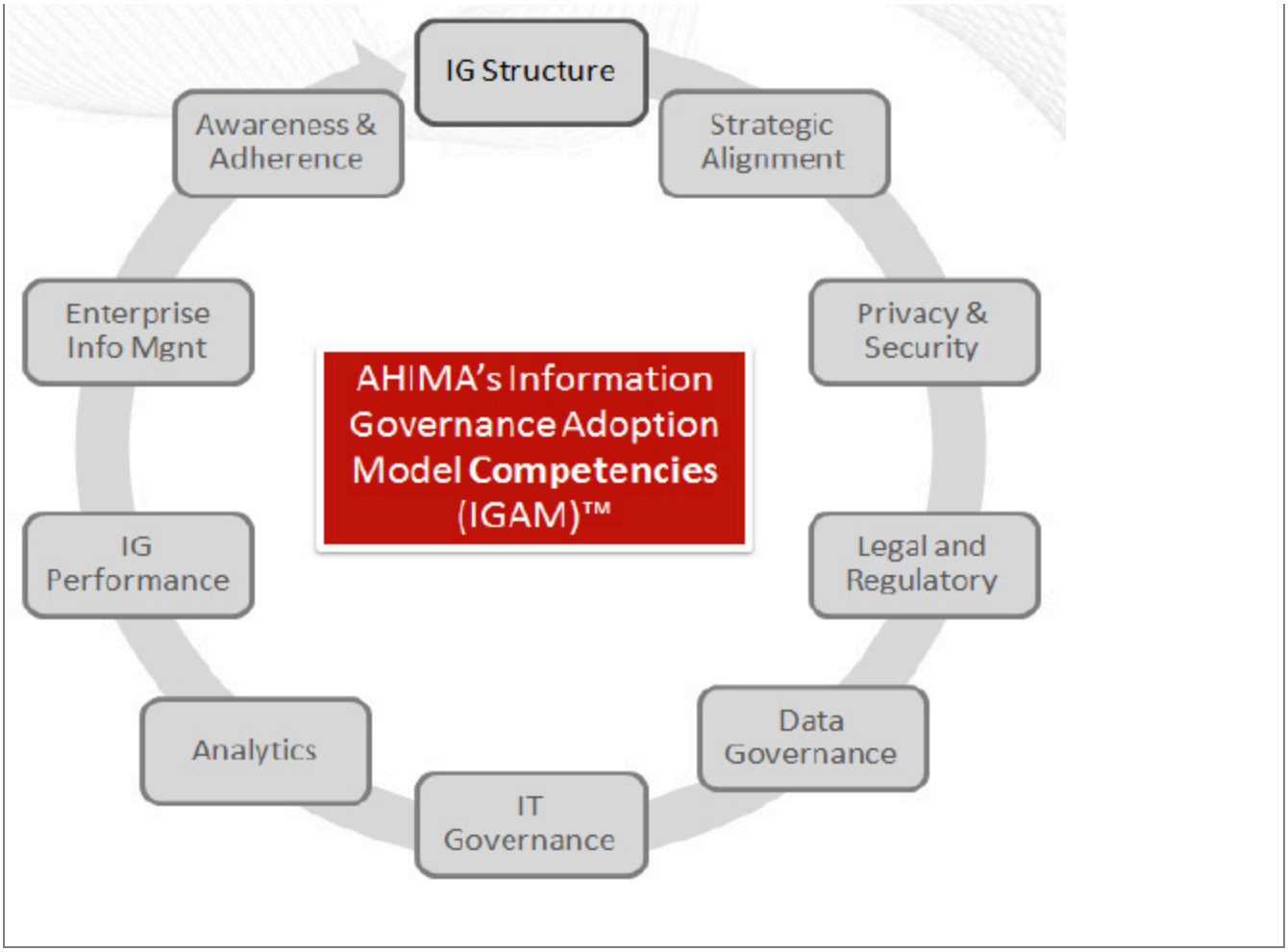
IG is not a one-time project, but rather an organization-wide effort to create an ongoing program that is ultimately a subset of corporate governance. It supports many tactical elements such as regulatory compliance, advanced analytics, data governance, risk management, value-based purchasing, HIPAA compliance, safe use of health information technologies, and patient safety. But, ultimately, information governance is a strategic initiative that will reduce costs and risk in an organization through policy, process, technology, and tool optimization, standardization, and application.

Using a Maturity Assessment to Demonstrate Areas of Excellence in IG

The Road to Governance column in the April 2016 issue of the *Journal of AHIMA* addressed the AHIMA Information Governance Adoption Model (IGAM)™ as a tool for exposing areas of risk and creating a road map for an organization's IG program. This assessment can also be used to determine areas where the organization is excelling in specific IG practices, including IGAM Level 5 maturity markers. If an organization has achieved IGAM Level 5 in a marker or competency area, they are at the actualized level of IG maturity for that specific maturity marker. These topics can be used as a focus for showing the benefits and return on investments for information governance.

AHIMA IG Level 5 (Actualized)

This level describes an organization that has integrated IG into its overall infrastructure and business processes to such an extent that compliance with program requirements and legal, regulatory, and other responsibilities are routine. This organization has recognized that effective IG plays a critical role in patient outcomes and consumer services and cost containment, competitive advantage, and patient and consumer service, and it has successfully implemented strategies and tools to achieve these gains on an integrated basis. This organization is a leader in building and sustaining vibrant and secure information, and ensuring information is trustworthy and actionable across the medical ecosystem.



Return on Investment for Information Governance

Information governance initiatives are an investment that have excellent returns. The AHIMA IGAdvisors™ pilot sites have been able to show return on investment in IG in the millions of dollars. This return on investment in IG is an example of leveraging information-related projects to cut costs and reduce risks.

Decreases in Operating Costs as a Result of Information Governance Initiatives

1. Paper record storage is a common area of return on investment with information governance initiatives—and not just with the storage of patient or clinical records but all other records as well. Remember, IG is not focused on clinical information, and the reduction of storage costs for all information stored in paper through a focused IG initiative can lead to significant cost savings. The process of inventorying and assessing what exactly is being stored on-site and off-site is the first step. The inventory will track type of record, date of record creation and last date of record use, storage location, the department where it originated, departments that might need access to it, and tracking of which retention policies or rules apply.[1] The healthcare organization's IG committee, a multi-disciplinary committee, should identify the goals for the initiative, such as cost and staffing reductions, freeing up space, and managing inactive records. For this inventory project executive support and a stakeholder communication plan are important. Organization stakeholders must receive the appropriate level of communication in order to assess their areas.

   Areas where successful organizations should focus their IG efforts include:

   - What is the organization's retention policy? Does it cover all types of information/records? Is it up to date?
   - Are there business or financial records that should be destroyed according to the organization's retention policy?
   - Are there clinical records or documents that should be destroyed according to the organization's retention guidelines?
   - Are legal records and shadow record versions being stored?

- Are there records being stored that are just a result of an organizational director leaving, packing up their office, and sending to storage "just in case"—when the records don't need to be stored at all?
- Are paper records for documents that have been scanned into the legal record still being stored, even though they should have been destroyed after quality control?

Types of return on investment for electronic inventory and storage projects include:

- One of the IGAdvisors pilot sites identified an annual savings of over $100,000
- Reduced risk of breach or e-discovery for defensibly deletable documents
- Increase in operational efficiencies, including staff time to find, scan, copy, and manage paper records stored on-site and off-site

2. Electronic record storage is another area of focus. An information asset inventory is a common project done during the beginning of IGAdvisors pilot projects. This centrally controlled inventory of electronic systems and electronic records is established to enable reliable risk management and lifecycle management of electronic information. The information asset inventory may include: department/operating unit, name of asset, description of asset, type of asset, level of confidentiality/sensitivity, retention period, data steward, and level of availability and security necessary, as well as the importance of the information to business continuity.

   One of the IGAdvisors pilot sites used HIM students on practicum to create the information asset inventory. The IG committee created the list of interviewees and the students created the questionnaire, overview, and explanation for the stakeholders, scheduled the interviews, documented the information asset inventory, and provided the inventory draft to the committee.

   a. Successful organizations that focus their IG efforts around electronic storage may ask themselves questions such as:

   - What is the master list of systems currently in production?
   - What is the master list of legacy systems that were replaced by the EHR or another system that are still being utilized?
   - What is the master list of legacy systems that were replaced by the EHR or another system that are rarely or never accessed?
   - Are we storing records according to the retention policy?
   - Does the system have the ability to delete specific records per retention policy?
   - Is the electronic version the business or legal version?

   b. Types of return on investment for paper record inventory and storage projects:

   - IGAdvisors pilot sites identified an annual savings by reducing the number of days e-mail is stored to only what is required by law.
   - IGAdvisors pilot sites included tasks like these in their legacy system projects:

     - Identify legacy systems and incorporate into centrally managed lifecycle processes

     - Identify retention periods

     - Identify solutions for alternate storage

     - Develop policy regarding access during inactive period

     - Develop a long term digital preservation plan for legacy applications

   - Reduced electronic/cloud/vendor storage costs
   - Reduced risk of breach, e-discovery for defensibly deletable documents
   - Increase in operational efficiencies including staff time to perform backups, system maintenance, and hardware and software upgrades to the system

The ultimate outcome of these combined record retention program projects identified in the examples above should be a pattern of continuous auditing, monitoring, and reporting that demonstrate gains in efficiency and reduction in cost and risk. An organization's workforce needs to be able to demonstrate aptitude for and operational understanding of retention/disposition policies and their role in the process.

Other Examples of Operational Cost Savings through IG

Other examples of operational cost savings that can be gained through IG initiatives include:

- IG projects helped reduce duplicates in master patient indices. The cost savings were due to staffing adjustments to fix and manage duplicates. This also presented a reduced risk to patient safety or adverse events from incorrect information in the patient record. IGAdvisors pilot sites that practiced advanced patient identity management potentially saved millions of dollars.
- Provider database cleanup projects create cost savings and reduced risk of security incidents, such as faxing PHI to an incorrect fax number. One pilot site project included identifying ownership of database content, developing a strategy to address ownership, accuracy, cleanup timeline, and recommending solutions to leadership. Operational efficiencies are created when the physician master is correct, and risk reduction stems from breach protection.
- Using medical records for research is another example of an IG project that creates cost savings through process efficiencies and improved regulatory compliance. For example, one pilot site changed its process for tracking appropriate access to paper medical records. They are developing a new process to ensure appropriate and legal access to all formats is done in a consistent manner throughout the enterprise. They have taken steps such as:
    - Implementing state law with regards to records for research in concert with HIPAA
    - Developing and implementing a standard process for releasing paper and electronic records
    - Partnering with their Human Subject Division and their Release of Information Department to develop processes
    - Documenting policies and procedures
    - Developing appropriate training

Information Governance Road Map

Information Governance Initiatives Decrease Organizational Risk

The following are examples of how organizational risk can be decreased through information governance initiatives.

1. Increased breach avoidance can be obtained through standardized approaches to handling information across the organization, as well as through inventory of all information and analysis of how information is used, managed, stored, shared, and accessed. Audits of current and relevant policies and procedures as well as advanced technologies to control information flows are all key parts of IG providing reduced risk of breach.
2. Increased efficiency and effectiveness of electronic health record (EHR) systems through workflow and data capture initiatives.
3. Shift in privacy and security focus from only clinical information under HIPAA to an organization-wide approach to protecting information.
4. Decreased risk that information involved in health information exchange/interoperability will be incorrect, erroneous, or lack integrity.
5. Accountability through an IG steward program increases quality of information through application and enforcement of standard policies as well as reviews for integrity and quality.

Improved Information for Performance Based Reimbursement Models

Recorded documentation in healthcare has never been more vital since performance based payments are now directly linked to quality measures that require data and information. IG programs provide significant benefit to the new payment models since they allow a deep dive into information collection processes.

The information intensive Hospital Value-Based Purchasing (VBP) is part of the Centers for Medicare and Medicaid Services' (CMS) effort to link Medicare's payment system to a value-based system to improve healthcare quality, including the quality of care provided in the inpatient hospital setting. The program uses the hospital quality data reporting infrastructure developed for the Hospital Inpatient Quality Reporting (IQR) Program for regular data submission. IG is a set of initiatives that can help organizations identify problem areas where payments could be reduced due to lack of documentation or staff that is not properly trained on documentation processes and EHR fields.[2]

Another example involves the Medicare Access and CHIP Reauthorization Act of 2015's (MACRA) notice of proposed rulemaking, released on April 27, 2016 by the Department of Health and Human Services, that introduces a new approach to paying clinicians for the value and quality of care they provide. The proposed rule framework called the "Quality Payment Program" includes two paths: the Merit-based Incentive Payment Program (MIPS), or Advanced Alternative Payment Models (APMs). Both programs are information intensive and require use of IG practices to achieve proper payment.

Furthermore 25 percent of the proposed MIPS payment is based on measures that reflect how the clinician is interacting with and using their EHR in day-to-day practice with a focus on interoperability and information exchange—both of which are information governance maturity markers in the IGAM™.[3,4]

Obtaining IG ROI is a Team Effort

IG is a coordinating function that brings together a multidisciplinary approach to information control access, use, storage, integrity, and reliability. It relies heavily on engagement and collaboration among those responsible, including the compliance officer, privacy/security officer, information technology leadership, risk management, legal, education, finance, and information managers across the organization. This team, under guidance of the information governance officer or leader, will identify which projects or initiatives will result in the largest return on investment for the organization. All of these members are extremely invested in the ability to leverage trusted, reliable information as an asset.

Notes

[1] AHIMA. "Retention and Destruction of Health Information (2013 update)."

[2] Smallwood, Robert F. *Information Governance: Concepts, Strategies, and Best Practices*. John Wiley and Sons: Hoboken, NJ, 2014.

[3] Centers for Medicare and Medicaid Services. "Hospital Value-Based Purchasing." October 30, 2015.

[4] Centers for Medicare and Medicaid Services. "Notice of Proposed Rulemaking for the Medicare Access and CHIP Reauthorization Act of 2015: Quality Payment Program."

Katherine Downing (Kathy.Downing@ahima.org) is the senior director of IGAdvisors Consulting at AHIMA.

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