Keeping Your "I" on Information Governance

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Information governance is gaining increased momentum in healthcare. Health information management (HIM) professionals have the necessary skills in all aspects of information management to become experts in the facilitation, planning, and execution of information governance initiatives within their organizations.

It is critical that information governance initiatives be led, and not just sponsored, by executive leadership. Nonetheless, HIM professionals have an immediate and unique opportunity to capitalize on this surge of information governance interest by providing the knowledge needed to support the development of a program in their own organization.

The "Gartner IT Glossary" defines information governance as "the specification of decision rights and an accountability framework to ensure appropriate behavior in the valuation, creation, storage, use, archiving, and deletion of information. It includes the processes, roles and policies, standards and metrics that ensure the effective and efficient use of information in enabling an organization to achieve its goals."[1]

HIM professionals should keep the following six "I's" in mind as they start down the path toward enterprise information governance. While instituting a full-scale governance program can take months or even years to be fully functional, a few simple steps can help establish HIM professionals as pioneers in their organizations.

Illustrate the Need for Governance

In the AHIMA Practice Brief "Integrity of the Healthcare Record: Best Practices for EHR Documentation," the authors clearly illustrate the importance of addressing information governance in advance of universal adoption of health information exchanges (HIEs). Any healthcare organization contemplating participation in a HIE should be made aware of the impending need for a strong information governance program.

According to the brief:

> Poor data quality will be amplified with HIE if erroneous, incomplete, redundant, or untrustworthy data and records are allowed to cascade across the healthcare system. Healthcare organizations must manage information as an asset and adopt proactive decision making and oversight through information asset management, information governance, and enterprise information management (EIM) to achieve data trustworthiness.[2]

Participation in a HIE is only one driver for information governance. Every organization has an opportunity to look at their individual needs and establish a governance model that mitigates the risk associated with their unique strategic initiatives.

Information disposal and retention policies are an important part of an overall information governance program, as are privacy and security, access controls, and compliance with all regulatory and institutional policies and guidelines. This encompasses not only electronic data within the organization's EHR system, but all information that is used and captured or stored by the entire healthcare system, including how it is produced or used for e-discovery. Metadata that is created as a part of the information collection or documentation process has significant value to the healthcare organization and needs to be retained, managed, and producible when required.

Identify a Problem

It is important to recognize that information governance is a major organizational initiative. While it is the ultimate responsibility of executive leadership for developing and driving the information governance strategy throughout the organization, HIM professionals can assist in identifying problems in the organization that could be mitigated through an information governance initiative.

One way to obtain executive buy-in is to start with a plan to solve an existing problem. Look at an unresolved or upcoming challenge in the organization and develop a strategy around how an information governance program can assist in solving that problem. An example is integrating a newly acquired health system's electronic health record (EHR) with an existing system in the parent organization, or merging the master patient index from a physician practice into a hospital system. Then, present the strategy to executive leadership and ask to serve as the authority for the organization's information governance initiative.

Institute an Organizational Committee

In the past, HIM professionals typically were responsible for medical records management. Information governance requires a broader plan to manage all of the information within a healthcare organization, not just information contained in an EHR. In order to address the broader issues surrounding management of all types of information that healthcare organizations receive, many other key stakeholders should be involved.

When developing a committee of business unit leaders, in addition to health information management leadership, consider involving someone from the medical staff, nursing, legal department, information technology, risk, compliance, finance, and human resource departments. All of these departments not only touch important information on a daily basis, but they have a role as stewards of the information that they generate and receive in their areas. Depending on the organization and the types of information received and managed, representation from other areas may need to be included as well.

Inventory the Information Within the Organization

Most healthcare organizations have information that has been captured and stored in multiple systems in both paper and electronic formats. This may include multiple legacy systems that may or may not be incorporated into existing electronic records.

With the mergers and acquisitions of healthcare organizations becoming increasingly common, usually years of records need to be retained, stored, and managed. Old records and repositories in older systems can be easily overlooked, but still require management through a solid retention and destruction process. It is important to inventory all possible sources of information and develop a customized solution that encompasses all information regardless of its format or original source.

Implement Policies and Procedures and Begin Information Clean-up and Control

Start with the design and implementation of a multi-disciplinary team to evaluate existing policies and procedures, and implement new processes and controls at the enterprise level. Address any outdated information that should no longer be retained. Review the multiple sources that may contain information, such as computer disks or files, e-mail systems, or shared sites. Apply new policies to the retention or disposal of the old information that is uncovered on review. Move information to an appropriate records management or archival system and ensure that it is catalogued appropriately for efficient recall.

All of these activities, while challenging to complete for healthcare organizations, will ultimately result in the ability for organizations to leverage information, lower organizational risk, and reduce overall cost while at the same time assisting in ensuring that patients receive high quality, safe, efficient, and more affordable healthcare.

Infuse the Entire Organization with Governance

The development of a strong governance program that allows knowledge that is gained to be shared throughout the organization is a key to its ongoing success. Good communication from strong executive leadership will ensure that solutions

can be developed to serve all departments within the organization. Communication should occur at all stages of the process.

When implementation is complete, ongoing inclusion of measures of success should be publicized in balanced scorecards, town hall meetings, or other broad channels of communication that will allow the system to remain transparent. This will strongly leverage the program as an organizational asset by encouraging participation from all staff levels in the organization.

The implementation and dissemination of strong information governance policies and procedures that detail the appropriate collection, use, and disposal of information throughout a healthcare organization can lead to improved patient outcomes and assist in achieving organizational strategies, as well as reduce risk and liability. HIM professionals can lead information governance efforts for their organization and leverage their knowledge and skills to improve outcomes for both the organization and the patients they serve.

For more information on AHIMA's information governance initiatives, check out AHIMA's Information Governance page at www.ahima.org/topics/infogovernance.

Notes

1. Gartner. "IT Glossary: Information Governance." 2013. http://www.gartner.com/it-glossary/information-governance.
2. AHIMA. "Integrity of the Healthcare Record: Best Practices for EHR Documentation." *Journal of AHIMA* 84, no. 8 (August 2013): 58-62.

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Article citation:
Kadlec, Lesley. "Keeping Your "I" on Information Governance" *Journal of AHIMA* 85, no.1 (January 2014): 54-55.