

American Health Information Management Association

INFORMATION GOVERNANCE

TOOLKIT 3.0

Building Critical Competencies
and Delivering Outcomes
through Excellence in Strategic
Information Management



INFORMATION GOVERNANCE

TOOLKIT 3.0

Copyright ©2017 by the American Health Information Management Association. All rights reserved. Except as permitted under the Copyright Act of 1976, no part of this publication may be reproduced, stored in a retrieval system, or transmitted, in any form or by any means, electronic, photocopying, recording, or otherwise, without the prior written permission of AHIMA, 233 N. Michigan Ave., 21st Fl., Chicago, IL, 60601 <http://ahima.org/reprint>.

ISBN: 978-1-58426-602-0

AHIMA Product No.: ONB201217

AHIMA Staff:

Chelsea Brotherton, Assistant Editor

Pamela Woolf, Director of Publications, AHIMA Press

Anne Zender, Senior Director, Periodicals

Limit of Liability/Disclaimer of Warranty: This book is sold, as is, without warranty of any kind, either express or implied. While every precaution has been taken in the preparation of this book, the publisher and author assume no responsibility for errors or omissions. Neither is any liability assumed for damages resulting from the use of the information or instructions contained herein. It is further stated that the publisher and author are not responsible for any damage or loss to your data or your equipment that results directly or indirectly from your use of this book.

The websites listed in this book were current and valid as of the date of publication. However, webpage addresses and the information on them may change at any time. The user is encouraged to perform his or her own general web searches to locate any site addresses listed here that are no longer valid.

CPT® is a registered trademark of the American Medical Association. All other copyrights and trademarks mentioned in this book are the possession of their respective owners. AHIMA makes no claim of ownership by mentioning products that contain such marks.

For more information about AHIMA Press publications, including updates, visit www.ahima.org/education/press

American Health Information Management Association
233 N. Michigan Ave., 21st Fl.
Chicago, Illinois 60601
ahima.org

AUTHORS

Beth Moodhard Acker, RHIA
Pamela Bankowski-Petz, RHIA, CHC
Stephanie Costello, RHIA
Stephanie Crabb, AM
Kristi Fahy, RHIA
Barb Glondys, RHIA
Suzanne Goodell, MBA, RHIA
Teresa Hall
Beth Just, MBA, RHIA, FAHIMA
Lesley Kadlec, MA, RHIA
Maria Victoria A. Kaneshiro, RHIA
Karen Lawler, RHIA, CHPS
Valerie Prater, RHIT, MBA
Linda Renn, RHIT, CCS, CHTS-TR, CPC, CPC-H, CHTS
Lori Richter, MA, RHIA, CPHIT, CPEHR, CHPS
Laura Rizzo, MHA, RHIA, FAHIMA
Maria Stolze-Epple, RHIA, MHCA
David Sweet, MA
Lydia Washington, MS, RHIA, CPHIMS
Jami Woebkenberg, MHIM, RHIA, CPHI

ACKNOWLEDGEMENTS

Casey Bryson
Anita Doupnik, RHIA
Katherine Downing, MA, RHIA, CHPS, PMP
Betty Dunagan, RHIA
Ann Meehan, RHIA
Nicole Miller, MS, RHIA
Brooke Palkie, EdD, RHIA
Bette Rockendorf, MS, RHIA, CHPS, CHTS-IM
Jim White, RHIA, MBA

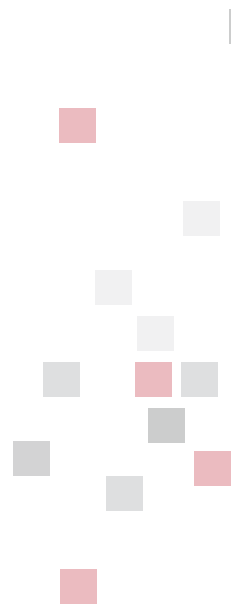
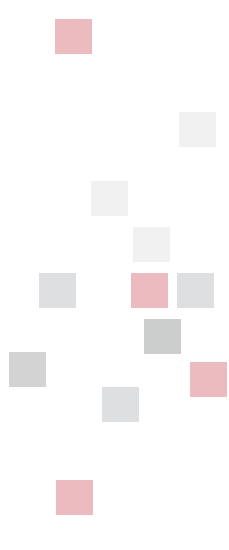
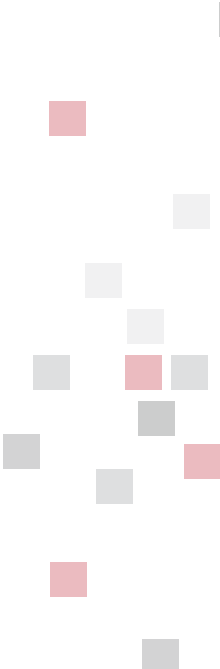


TABLE OF CONTENTS

Foreword	6
Introduction.....	7
The State of IG in Healthcare: AHIMA 2014 and 2015 Surveys of the Industry.....	8
Information Governance Adoption Model (IGAM™)	9
Getting Started with IG.....	12
Developing and Sustaining Information Governance: A Process	13
Capabilities, Readiness, and Needs Assessment	14
Engaging Stakeholders.....	16
Developing an IG Charter	18
IG Structure	18
Organization Structure and Getting Started with IG	19
Getting from “Here” to “There”	20
Engaging an Executive Sponsor	21
Establishing a Multidisciplinary Council.....	21
Involve IT and Business Units from the Start.....	21
Project Planning for IG.....	21
IG Operations	22
Enterprise Information Management (EIM).....	22
Supplemental Resources (Enterprise Information Management).....	22
Data Governance	23
Data Governance and Getting Started with IG.....	23
Supplemental Resources (Data Governance)	23
Privacy and Security.....	23
Supplemental Resources (Privacy and Security)	23
Regulatory/Legal	24
Supplemental Resources (Regulatory/Legal).....	24
Awareness and Adherence.....	24
Building Workforce Competency	24
Identifying IG Roles.....	25



- Performance Management: Embedding IG into Key Business Processes.....27
- Manage Change and Shift Organizational Culture.....27
- Communicate Expectations and Progress27
- Supplemental Resources (Communications)28
- Other Useful Tools29
- Request for Information/Request for Proposal (RFI/RFP).....29
- Information Management and Governance in Mergers and Acquisitions.....29
- Notes31
- Information Governance Case Studies.....32
- Information Governance Blogs.....33
- Supplemental Resources.....34



FOREWORD

This toolkit offers a variety of resources for healthcare organizations that are starting an information governance (IG) journey. Such a journey is a multi-year initiative that most likely evolves from one or more short-term projects to (ideally) a full-fledged program that is sustained by the notion that information in healthcare organizations is a critical asset that requires ongoing attention and resources. As with any journey, the required tools will change during its course. So it is with the current state of this toolkit. This iteration of the toolkit contains primarily foundational information for just getting started on the IG journey. However, it will evolve and more tools will be added as the journey continues and needs change. This is the third update of the information governance toolkit.

For far too long, healthcare has struggled with the same intractable problems related to information and its management. These challenges have kept the healthcare industry from optimizing its information resources without which it cannot operate. We believe IG provides the best opportunity and a more disciplined approach to address these issues in an effective way that enables healthcare organizations to keep up with technological advancements and the constant influx of information.

INTRODUCTION

With the emergence of value-based performance initiatives and constant change in healthcare, trusted information and data is at a premium as never before. As a strategic resource, information that is trustworthy is essential for decision making at every level, from a particular individual's care and treatment to predictive and prescriptive analytics required for managing health and financial risk on the population level.

Challenges such as those associated with standing up interoperable EHR systems that provide information when and where it is needed to clinicians; mergers and acquisitions of provider organizations that need to integrate information; patient identity management in the face of a lack of unique identifiers; ongoing information security breaches; the emerging markets of telemedicine and telehealth and the challenges to maintain secure and appropriate encounters between patients and providers; meeting requirements for meaningful use such as secure messaging and patient portals; and needs for analytics and new types of healthcare business intelligence are but a few of the examples of issues that are driving the need for information governance (IG).

AHIMA defines IG as:

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

Of note, while IG may be used as a tool to assist in governing health information, it applies to all information in the healthcare enterprise, not just health information.

IG is a strategic initiative to be applied within and between all types of healthcare and health-related entities. The goal of this toolkit is to foster information trustworthiness by offering resources to assist in the development of organizational IG initiatives. It is intended for use by all types and sizes of organizations that have begun their IG journey. This toolkit is constantly evolving and therefore is not a mature tool. It is designed to be a starting point for healthcare organizations looking to develop or expand their enterprise IG initiative.



THE STATE OF IG IN HEALTHCARE: AHIMA 2014 AND 2015 SURVEYS OF THE INDUSTRY

AHIMA, in conjunction with Cohasset Associates, initiated the first major survey of IG practices at healthcare organizations in 2014. A [white paper](#) was published highlighting four key findings and recommendations¹ as follows:

1. Overall, IG programs are less prevalent and less mature in healthcare organizations than is warranted, given the importance of information.
2. Most organizations have not yet established a comprehensive strategy for IG.
3. The IG framework and its foundational components call for strengthening and expansion.
4. Information lifecycle management practices related to core functions require improvement.

AHIMA followed up on its 2014 study with a [second survey in 2015](#) examining the readiness of healthcare professionals to address the technical and strategic demands they face in an evolving IG environment, as well as the career opportunities from the advancement of IG in organizations.

Survey results provide evidence² that:

1. The work underway by healthcare professionals to advance IG is met with a growing prioritization of IG by their organizations.
2. Healthcare professionals positively assess their IG skills and competencies; their actual readiness will be proven over time.
3. Through their work to advance IG, healthcare professionals experience job satisfaction; however, opportunities exist to bolster the satisfaction levels.

Organizations seeking to better understand IG in healthcare, to introduce and foster multidisciplinary discussion about the merits of pursuing an IG program and to glean early benchmarking information about IG adoption in healthcare are encouraged to circulate the white papers that were published following each of these critical industry studies.

AHIMA has followed up on the 2015 IG survey and will publish the results of its 2017 survey in October 2017.

INFORMATION GOVERNANCE ADOPTION MODEL (IGAM™)

AHIMA's Information Governance Adoption Model (IGAM™) provides a scalable framework so organizations can assess what they are doing well and where they need improvement when applying and developing key IG competencies. The model organizes and measures IG risks, opportunities, and achievements in a structure that can be easily understood and implemented by many different stakeholders. Periodic audits will allow organizations to reevaluate their current IG status and determine top priorities as IG initiatives are accomplished and maintained.

The adoption model allows a healthcare organization to assess its processes and procedures according to IG best practices and a clear set of external benchmarks. Adoption is scored on a scale from one to five, with one being “at risk” and five being “actualized.”

Most organizations will not be at the same level of adoption in each IG competency, which is not only expected but acceptable. Sometimes an organization may even be in between levels. Few, if any, organizations will score 5 in every category, since IG is a continuous improvement process.

The adoption model permits an organization to focus on those areas of IG that it deems important. This can be certain competencies, a particular part of the organization, or even a specific process or procedure. This type of scalability promotes a natural progression of IG improvement in terms of expectations and, more importantly, resources.

Knowing an adoption level for each IG competency allows an organization to improve in that area and make decisions for future actions based on its risk appetite. The adoption model can be used for gap analysis, benchmarking, risk assessment, and program evaluation and development.



The IGAM™ examines 10 key organizational competencies and associated key performance indicators.

The 10 organizational competencies are:

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 valuation of information as a strategic asset and communicates that IG is an organizational imperative. Strategic alignment supports an information-driven, decision-making culture and ensures its workforce at all levels has access to the information they need to make good decisions in real time, and it supports the expectation that information is used appropriately and strategically.

Enterprise Information Management—Enterprise information management, a sub-domain of IG, 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. It also includes management of enterprise practices for information sharing, release and exchange practices, chain of custody, and long-term digital preservation. It incorporates the foundational functions of information organization and classification, which envelop taxonomies and metadata management, and master data management.

Data Governance—Data governance is the sub-domain of IG that 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 audit, data quality controls, data quality management, data architecture, and data dictionaries. It collaborates with enterprise information management in functional components essential to the enterprise plans for information organization and classification.

IT Governance—IT governance is a sub-domain of IG and 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, IT governance 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—The ability to use data and information to achieve its strategy, goals, and mission, or, in short, to realize the value of its information is critical to success with IG. An organization's competence is essential to moving from data to intelligence to knowledge. Competency in data analytics is therefore seen as essential to mature IG.

Privacy and Security—The privacy and security safeguards 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, confidential, and secret as required based on its classification.

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

Awareness and Adherence—This competency aims to ensure the IG program principles, 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, 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 ensuring its effectiveness, ongoing improvement, and alignment with the organization's strategy. Performance management includes addressing capability for mandatory business, regulatory reporting, reliability of information, and measures for each of the areas of IG organizational competence.

Organizations can assess themselves on the Information Governance Adoption Model™ through *IGHealthRate*™. *IGHealthRate*™ is the healthcare industry standard tool for assessing IG maturity that can be used by organizational IG committees. Organizations that use *IGHealthRate*™ will have the opportunity to perform a baseline self-assessment and that can be utilized as the initial platform and level set for their IG program. These organizations can use *IGHealthRate*™ to periodically re-evaluate and measure progress and performance against their baseline assessment and other peer organizations that are using *IGHealthRate*™.

HOW IGHEALTHRATE™ WORKS

IGHealthRate™ is designed to allow organizations to assess their current state of IG maturity through 75+ maturity markers that are within the 10 IGAM™ competencies. Once the initial or baseline assessment is completed, the system will give an overall IG score, individual IG competency scores, and the individual IG marker scores.

This information will allow an organization to determine where to prioritize their next steps. The organization can determine whether they will target the quick wins/markers/projects that can be advanced fairly quickly or can decide to target the markers that scored lower and have exposed gaps or areas of opportunities for their organization. (“Both” is always a good option). Typically, this depends on the organization and the culture.

Once an organization begins working on the IG projects and progress has been made, organizations can reassess their current state of IG. This could be a monthly, quarterly, or annual assessment.

The system also gives coaching at the competency and marker level to help organizations determine how to advance from one level to the next.

Completing subsequent assessments allows organizations to benchmark their achievements internally. There is also the ability to benchmark against other peers in *IGHealthRate*™.

WHY ORGANIZATIONS SHOULD USE IGHEALTHRATE™

It is difficult to recognize and demonstrate IG success and value if there is no baseline or way to measure an organization's ongoing progress. *IGHealthRate*™ allows organizations to easily identify areas to target for next steps and provides an organized approach to achieving and continuing to measure their IG maturity. It also provides a structured approach for an IG committee to determine accountabilities and priorities.

As mentioned above, organizations can use the benchmarking function to compare themselves to other organizations in the system as a way to validate their results. IG will help these organizations stay competitive.

AHIMA offers IGAM™ validations for organizations who achieve IGAM™ levels 4 or 5.

In addition to *IGHealthRate*™, AHIMA, through its professional services organization, IGAdvisors®, offers advisory and consulting services to assist organizations in completing a baseline assessment and implementing and maintaining an IG program action plan and a variety of other consultative services for other IG initiatives.

More information on the IGAM™ and *IGHealthRate*™ is available on the [IGHealthRate](https://www.ahima.org/IGHealthRate)™ web site and [IGIQ.com](https://www.ahima.org/IGIQ).

GETTING STARTED WITH IG

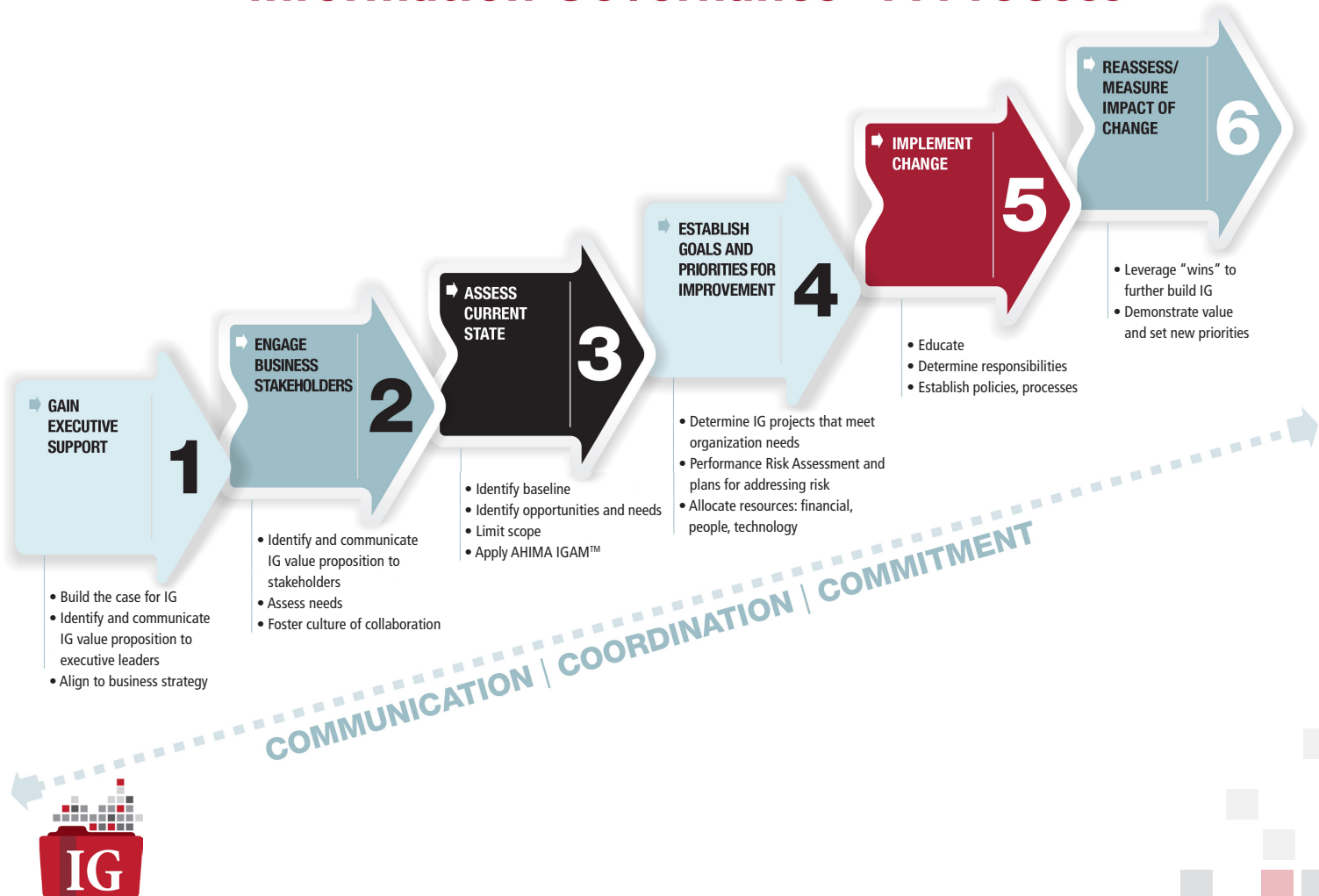
IG is an emerging discipline in healthcare. While other industries and sectors, like retail and finance, have more experience with IG, it is important to establish the business drivers and value proposition specific to healthcare in getting started.

The 2015 AHIMA Practice Brief, “[Information Governance Offers a Strategic Approach for Healthcare](#),” offers some helpful background and context-setting guidance.

A presentation at AHIMA’s 2015 IG Summit, “[Navigating the Transition to IG and EIM: Lessons from the Field](#),” addresses the importance of IG in enterprise information management and provides some thoughts for getting started.

The process map below provides an illustration of the process for developing and sustaining IG:

Developing and Sustaining Information Governance—A Process



DEVELOPING AND SUSTAINING INFORMATION GOVERNANCE: A PROCESS

1. **Gain Executive Support**—In order to gain executive support, you should identify what your organization may already be doing to support information governance as well as opportunities that exist. This can occur through a capabilities, readiness, and needs assessment as discussed in the next section. It will be important for your executive team to understand that IG is not a project but rather an ongoing operational initiative. Finally, support may be better gained by aligning to the organization's strategic initiatives and objectives with those of an IG program. AHIMA has made a video, "Ensure Your Competitive Edge," available at IGIQ.com, which focuses efforts at the executive level.
2. **Engage Business Stakeholders**—The first step in engaging stakeholders in developing an IG program is to meet individually or in a group to discuss functions, processes, or projects that may already be under way and tie into an overall IG program. Through these meetings, the organization can gain support for the IG program and determine stakeholders who have an interest in leading the development of the program. Stakeholders need to be fully engaged and willing to provide the necessary resources, especially in terms of time, in order to create a successful program. In addition, involving a variety of stakeholders in the IG program will increase interdepartmental communication and break down the existing silos between the teams. This will help to identify any opportunities or gaps in the organization that may exist.
3. **Assess Current State**—Organizations should assess current state by conducting a capabilities, readiness, and needs assessment, asking questions and thinking about areas similar to those listed in the next section. Another tool to use to assess current state is AHIMA's *IGHealthRate™*. This tool will allow an organization to score themselves on the 10 IGAM™ competencies, which can further guide the organization in establishing goals and priorities for the IG program, including determining what resources may need to be procured. By assessing the current state, identifying priorities and establishing accountabilities, organizations will be able to compare their future state to their previous state as changes are made in step 5.
4. **Establish Goals and Priorities for Improvement**—An important part of developing and sustaining an IG program is to create a charter, which includes establishing goals and priorities as well as outlining any obstacles. Results of the current state assessment should guide the organization in development of goals and priorities. They may also be impacted by risks, benefits, and resources such as time, finances, people, and technology.
5. **Implement Change**—In order to be successful implementing any changes related to an IG program, the organization should provide education to leaders and employees related to the need, benefits, and goals of the program. It may be necessary to create or amend current policies and procedures impacted by the changes. AHIMA has many educational resources available on IGIQ.com, which an organization may purchase or use free of charge; this is a great way to jumpstart your change process. Once change is successfully implemented, organizations will see a shift in the organizational culture as IG is recognized as an important program and is embraced and understood by the workforce.
6. **Reassess/Measure Impact of Change**—With any program or change, it is necessary to reassess or measure the impact. An IG program is no different. The organization should develop milestones for reassessing, monitoring, and measuring, utilizing tools such as the capabilities, readiness, and needs assessment or *IGHealthRate™*. A vital step in this process is to celebrate successes. Many organizations overlook this step, but it can help to sustain interest and engagement in the overall IG program. By celebrating wins and seeing successes, organizations can determine their next IG areas of focus. At this point, the IG process starts back at step 1.

Remember, IG is an ongoing process. These six steps will help to develop and sustain the IG program.



CAPABILITIES, READINESS, AND NEEDS ASSESSMENT

The first step in evaluating, developing and implementing IG is to take the time to learn about the information in your organization's care, the information environment and architecture, organizational structures, and workforce attitudes about information throughout its lifecycle.

Before your organization commits the resources required to be successful with IG, it is prudent to conduct a capabilities, readiness, and needs assessment. Taking stock of current capabilities and readiness often proves very instructive, but the truth-teller when taking on major initiatives is understanding and validating your organization's needs.

Some questions that should be considered in this assessment include but are not limited to:

- What information exists and where is it located?
- Who “owns” the source data and information today—which department or functional area is the primary owner?
- How is information being used and by whom?
- Is the organization able to respond quickly and effectively to internal/external information requests?
- Who can create and modify information structures?
- Why is information retained? What are the federal, state, or other regulations guiding retention?
- What are the disposition pathways for information?
- How is information shared with third parties and partners?
- How is information protected? Are there business continuity plans?
- How is the value of information perceived by the workforce?
- Are aspects of IG being implemented or in place in parts of the organization?

In this initial assessment, do not seek to be exhaustive; rather, start to document the information ecosystem to which additional detail can be added later. The goal is to discover and document enough information to make a “go vs. no-go” decision about proceeding with an IG program. Where to focus, who to include, and how much to invest are key questions that help to determine capabilities and readiness.

Determining whether your organization is a “go vs. no-go” in proceeding with a full IG program may depend on several factors, including executive-level support, stakeholder engagement, and availability of resources including time (considering competing projects), financials, technology, and people. If the organization is not ready to proceed with a full IG program, the team may want to step back to evaluate the goals, priorities, and opportunities. Key departments and stakeholders may want to proceed with implementing processes that would support IG in the absence of an official program.

STRATEGIC ALIGNMENT: MAKING THE CASE FOR IG

IG in and of itself is a strategy for assuring that enterprise information is managed as an asset—not unlike capital, financial, and physical assets. Time, energy, and money are invested in information to enable decision-making, support operations at all levels of the organization, and mitigate various business risks. Resources for maximizing information benefit must be prioritized and aligned with the general business strategies of the organization.

It is difficult to start, let alone sustain, an IG initiative without some level of awareness of the role IG will play in this strategy. An IG program will struggle to survive if it is not aligned with and contributes to an organization's strategic objectives.

This alignment also assists with understanding exactly where it is best to start to jumpstart and begin to attain the value that IG brings. Strategic alignment recognizes that all information is not of equal value. As such, costs associated with its maintenance should be identified and resources allocated at the appropriate level. Decision making about the value of information requires broad participation by stakeholders in IG programming.

An IG initiative does not have to be overwhelming and should definitely be focused as an organization starts on its IG journey. A few examples of where organizations have started include, but certainly are not limited to:

- Breaking down silos and better defining data through a data governance program
- Enhancing the search ability, integration, and user satisfaction with one or more EHR systems
- Integrating information management policies across multiple facilities/organizations that have merged or are part of a larger system
- Patient identity management across and within health information exchanges
- Litigation and e-discovery response planning through retention policies and defensible disposition of enterprise information

You can best make the case for IG in your organization by communicating how it can help the organization achieve its business goals and minimize business risks.

There are several risks associated with poor information practices, including:

1. Poor business decisions that are made based on poor or inaccurate information
2. Susceptibility to breach or corruption by not expanding privacy and security safeguards and best practices beyond PHI (protected health information)
3. Compromised patient care from duplicate or merged patient records
4. Increased costs associated with poor record retention practices
 - a. Increased cost of storage
 - b. Storing records for longer than required—more records are susceptible to breach and the costs associated with a breach
 - c. Increased operational cost during e-discovery or patient requests to locate records
 - d. Increased costs for maintaining servers, patches etc.
5. Multiple data owners could compromise the integrity of records
6. Poor access control policies and practices could compromise the integrity of records

Strategic alignment is the process and the outcome of linking your organizational structure and resources with your strategy and business environment to achieve performance improvement—realizing measurable objectives for specific purposes. This alignment at the enterprise level requires resources on many fronts. Typically, most organizations look at how people, process, and technology are, and can be, mobilized to achieve this alignment. There is another critical factor that cannot be overlooked or underestimated when we talk about strategic alignment, and that is organizational culture.

Organizational culture is a powerful system of shared assumptions, values, and beliefs, which governs how people behave. This system influences, even dictates, how people perform. The successful execution of any strategy is heavily reliant on the culture.

“A strategy that is at odds with a company’s culture is doomed. Culture trumps strategy every time—culture eats strategy for breakfast.”—attributed to Peter Drucker

As you start to think about IG and strategic alignment, consider your organization’s culture and think about your ultimate destination. What does the future state look like? What does it need to be? How is it different from the current state? Does your organization have the cultural attributes that are critical for success?

When you start with the end in mind, when you think about the organization that you want to be or environment that you want to have, you will build with purpose and accountability to strategic alignment. You will also likely be more successful in creating/enhancing the organizational culture that will support and sustain that critical alignment.

“[IG Competency of the Month: Strategic Alignment](#),” part of AHIMA’s IG program, provides more in-depth discussion.

Case Study: Strategic Alignment

“[Strategic Alignment: The Driving Force for Information Governance](#)”

ENGAGING STAKEHOLDERS

It goes without saying that IG cannot take place in a vacuum and that it is a “team sport.” Education about IG is important for stakeholders at all levels. This toolkit contains an annotated bibliography of citations for readings on the development of IG, including suggestions on how to obtain buy-in for an IG program.

Of particular interest to healthcare professionals involved in the initial phases of IG, these articles may be useful to any healthcare professionals at all levels in an organization who deal with information and are curious about—or confused by—IG. Topics include but are not limited to: definitions and competencies of IG; rationale for the importance of information (and data) governance; challenges to IG adoption; issues in organizational change and change management; perspectives on prior initiatives and case studies within and outside of healthcare; leadership and data stewardship roles; IG implementation strategies; information standards; and information architecture and metadata. A short description is provided with each citation. The majority of listings are free to the public; a few, where noted, require purchase.

Given the dynamic nature of IG in healthcare, this list of resources is not intended to be comprehensive. Rather, it is made available to assist in researching a variety of topics that can be helpful as healthcare organizations embark on an IG journey.

It should be noted that nothing about IG is completely black and white; the articles referenced in the attached bibliographies are intended to serve as a starting point for those beginning the IG journey and as an additional reference for those who have begun. Only an individual organization can determine what is relevant, significant, or important in the context of initiating IG. We hope you find it useful.

Who is a Stakeholder?

A stakeholder refers to an individual, group, or organization that has a direct or indirect interest or stake in a particular organizational topic or process; these may be consumers, businesses, societal partnerships, governments, research institutions, and non-government organizations.⁴

A stakeholder is any group or individual who directly or indirectly affects or is affected by the level of achievement of an enterprise’s value creation processes.⁵

Key members of the legal and compliance groups, IT, C-suite executives, and line-of-business department/team leaders should come together to plan and implement an IG program. Many organizations form an IG committee, overseen by a chief IG officer, or other executive leader, which makes key decisions on the program. Key to success is carefully choosing the members of the committee to ensure commitment and decision-making power.

Ad hoc stakeholders can be added and subtracted to work on solutions designed for a specific problem or task at hand.



Checklist of Key Stakeholders and Ad Hoc Business Unit Representatives

Regardless of who is involved, enterprise IG efforts are most successful when sufficient collaboration among key and ad hoc stakeholders occurs. The following checklist provides additional granularity and perspective on key and ad hoc stakeholder considerations:

- C-suite execs, including the enterprise (IG) officer
- Information technology, information systems, and privacy and security
- HIM departments who oversee mechanics of information management
- Compliance
- Revenue cycle
- Business records management
- Department leaders including line-of-business department/team leaders
- Legal
- Risk management
- Regulatory and compliance departments who understand the organization's duty to preserve information beyond its immediate business value and provide oversight and governance for the business
- Business office and business unit users who need information to operate the organization
- Finance
- Quality improvement leadership
- Clinicians
- Clinical and ancillary informatics
- Patient safety
- Nursing
- Human resources
- Education
- Supply chain



Some organizations may have other key stakeholders to consider and these may include, but not be limited to, union representatives, business partners, customers, regulatory agencies, or vendors. It is important to understand that not all stakeholders will have the same influence or effect on a project, nor will they be impacted in the same manner. Identifying all stakeholders is important not only for determining who the stakeholders are but also for determining the best way or ways to manage their expectation. Every stakeholder will want or need something from the initiative and have a stake in its outcomes. It is also important that these stakeholders are aware of IG initiatives in order to reinforce the need for IG best practices on their end.

DEVELOPING AN IG CHARTER

After the readiness and needs assessment is completed and you have a better understanding of how IG will align with business strategy and have engaged the appropriate stakeholders, you are ready to develop a charter. Developing a charter to guide IG work should be relatively straightforward if the work above has been completed.

The IG charter document is a clear statement that specifies the exact purpose, authority, and scope of an IG oversight group or team. It is the first translation or implementation of strategic alignment to action.

The charter will define how the team operates and identify the final outcome that the group is expected to deliver. The charter serves as a road map to guide team members in understanding the goals of the initiative.

Begin drafting a charter by outlining the purpose and goals of the team. This section should detail the scope of the team's responsibilities and the anticipated outcomes. Next, define the key customers or stakeholders and the expected benefits from the work performed by the team. If the team reports to an executive, define that individual as a stakeholder. Then list the team members. Identify any assigned positions such as the team sponsor, team leader, facilitator, and record keeper. The charter should specify that the team will be ongoing. Include details on the expected frequency and duration of team meetings. Team members should reach agreement on how the team will function and develop a procedure for conducting team meetings.

The charter should outline how the team will communicate both internally and externally. It is useful to include a section in the charter stating which team member will be responsible for tracking goals and metrics that the team will use to measure success. Distribute a copy of the charter to each member as well as any other key individuals. The charter should be updated when changes in membership, conditions, needs, or goals occur. A template for an IG charter can be found [here](#).

IG STRUCTURE

Organizational structure and capacity are fundamental considerations in any IG initiative. They inform and guide how we mobilize and sustain our people and processes to advance the strategic use of information. They ensure that we are continuously promoting and reinforcing our commitments to align information use with our organization's strategic priorities. They define requisite relationships and mechanisms for decision making, authority, investment, and risk management.

This does not mean that IG has to be invasive or threatening to the work, culture, and workforce. In fact, a properly constructed and well-conceived IG program is just the opposite. An IG program is not a "command and control" program but it is accountable; it is and should be an enabler to the organization and to each member of the workforce to use information in the most impactful way and in a manner consistent with their job function.

Without proper leadership, an organizational structure, and decision-making authority, the most competent and motivated individuals cannot catalyze change, sustain momentum, achieve desired outcomes, or influence culture.

One of the most noted critical success factors in IG performance is having the right people contributing in the right organizational model to lead and develop the program. Broad representation is critical to ensuring that the IG program can deliver tangible business value. However, broad representation does not translate into the creation of overly complex and highly bureaucratic "super structures." In fact, simplicity and clarity should be the goal. Many organizations are already going about the work of IG though it is often fragmented, uncoordinated, and/or duplicative. Few are truly starting from scratch. The challenge is to harmonize and align the work that is already underway in a practical, sustainable structure that serves the organization today and tomorrow.

ORGANIZATION STRUCTURE AND GETTING STARTED WITH IG

Why did AHIMA delineate IG Structure as one of the 10 organizational competencies in its Information Governance Adoption Model (IGAM™) in the first place? Let's start with a quick refresher on AHIMA's definition of **IG**:

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

Look at the bolded words in that definition. At face value, they suggest action (managing and supporting) in a defined system (organization wide and, we advocate, extended to our information sharing community). It is impossible to accomplish these actions in any organization, large or small, simple or complex, without a defined structure.

The pyramid below represents a high-level IG organization structure that you will see frequently referenced in the IG literature.



In its simplest form, an IG program that is positioned for long-term success will have these component parts to ensure engagement, participation, and enablement from the top-down and from the bottom up:

- Executive (oversight from the top)
- Strategic (IG council–senior leaders)
- Tactical (domain stewards and coordinators–functional leaders/subject matter experts)
- Operational (workforce stewards–functional area super users)

There are explicit roles and responsibilities for each component part. There are unique capabilities and skills that contributors at every level must possess. For many, there is an explicit hierarchy with defined accountabilities within the structure. While the pyramid certainly suggests a hierarchy of oversight, it also reflects workforce engagement—there are more contributors and participants at the operational layer than at the executive layer.

Finally, there will be participants who may very well contribute to more than one component part of the structure, based on their roles and job function.

Let's do a deeper dive into these component parts and as we do, think about what you already have in place today and how that does or can translate into the kind of organizational structure that we have introduced.

GETTING FROM “HERE” TO “THERE”

There is no doubt that, as with any major project or program, executive sponsorship is a critical success factor, and it is, in fact, one of the performance indicators articulated in the Information Governance Adoption Model (IGAM™).

The organization structure competency in the IGAM™ identifies several key performance indicators in addition to executive sponsorship such as trained staff, oversight committee, clear roles/responsibilities and funding. At its core, this competency addresses the “people” and “process” fundamentals that are required to make an IG program operational and impactful and that are represented in our graphical model.

Executive

WHO: The executive component of the structure can be a single individual or it can be a small committee.

WHAT: Its primary functions are to establish a positive “tone from the top” for IG, to ensure continuous alignment to the organization’s strategy, to provide necessary funding, and to provide general oversight. Think about the executive component the way you think about your organization’s Board of Directors or highest governing body.

Strategic

WHO: An “IG Council” or “IG Steering Committee” is the most common construct for the strategic component of an IG organization. This multidisciplinary stakeholder group typically comprises senior leaders from key functional areas like HIM, IT, strategy, legal, compliance, quality, operations, clinical services, and finance. Inclusion and broad representation is important. That said, the larger the group, the more important it is to establish and reinforce clear roles/responsibilities.

WHAT: Its primary functions are to establish the IG charter, provide planning guidance, create policies and procedures, establish and advise task forces/work groups, make decisions based on recommendations from those task forces/work groups, seek approvals and/or funding from the executive component as appropriate, track accomplishments, and measure and report progress.

Tactical

WHO: The tactical component is comprised of the various committees/subcommittees and work groups made up of departmental leaders and subject matter experts. In the ideal organizational structure, a member of the “IG Council” serves as a sponsor for each of the designated task forces and working groups.

WHAT: This is where the real work is done. The risk is that, for many, there are so many work groups and committees that have grown from the grass roots, from departmental initiatives, etc. that the work is getting done in silos and it is not coordinated and aligned with the explicit and “higher” objectives of IG in mind. It is also at this tactical level that workforce activation and enablement happens and that culture shifts and gains are realized. The tactical component is the IG “workhorse,” implementing the planning guidance of the IG Council, identifying new opportunities to advance IG, and generating recommendations for the IG Council for action.

Operational

WHO: The operational component is comprised of workforce stewards, starting with a network of designated “champions” that are distributed throughout all functional areas/departments of the organization, and growing to encompass the entire workforce. Think about the operational component in the same way that many organizations established “super users” and “peer trainers” for the implementation of the EHR.

WHAT: Its primary function is to establish “local” IG expertise, support the widespread adoption of IG, and advance the IG culture within every functional area, building a growing capacity of IG competence and talent. Remember, simplicity and clarity of purpose will meet with the most success. Create only the minimal amount of “structure” needed to get IG off the ground or correctly aligned in your organization to be most effective, then expand in a disciplined and thoughtful manner as IG matures. Create meaningful and well-defined roles and responsibilities for participants and contributors at every level. Build for the future state.

ENGAGING AN EXECUTIVE SPONSOR

IG initiatives rarely, if ever, succeed or are sustainable without effective executive sponsorship. Depending on the size and complexity of the organization, there could conceivably be more than one executive sponsor. No matter the number or focus, however, the executive sponsor(s), with assistance from the IG executive or program manager, 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 organizational leader of considerable influence. Regardless of any other role in the organization, the executive sponsor(s) must fully support IG and be able to drive change through engagement and communication with key stakeholders.

ESTABLISHING A MULTIDISCIPLINARY COUNCIL

An IG program will affect every part of the organization, so broad and deep collaboration representing key parts of the organization are essential. A multidisciplinary committee—often called a council—should be established to drive planning and execution. For more on this, see the section above on engaging stakeholders.

INVOLVE IT AND BUSINESS UNITS FROM THE START

Representation from IT is essential if the correct technology solutions are to be selected and the life cycle of IG projects are synchronized to the life cycle of IT systems. Business unit representatives are needed too, because they are best placed to determine the value of the information they use. They can determine which information they need access to, how they would like to access the information, and also what information is not required for business operations. The collaboration of IT and the business unit representatives is necessary in order to determine the IT investments and processes that are most beneficial for the organization and its business needs.

PROJECT PLANNING FOR IG

It should be noted that while project management tools can be helpful to kick start an IG program, IG is not a project. The IG program may start as a group of projects that are related and managed as one big task. However, a project is temporary in nature—it has a beginning and an end and is generally undertaken to get specified results in a given time along with constraints of cost and quality. It will require more than one project to get to the goal of a full IG program, and while the projects may end, the IG program continues indefinitely.

Successful projects don't just happen on their own; they happen through effective management and project planning. The first step when starting any kind of project is the development of a project plan. Sometimes planning gets overlooked in favor of getting started with the work. However, appropriate project planning can save both time and money and can help avoid many unforeseen problems that can occur when no plan has been put into place.

It is essential that healthcare professionals learn and practice solid project management skills to participate in their organization's IG initiative. Having the tools and knowledge required as outlined on the project plan will improve the process and help assure a positive outcome.

An IG project plan will be iterative; it can't be defined in its entirety at the beginning of the project. The stage should be set for communications and responsible parties as well as a minimum set of deliverables in the time period planned.

The samples provided in this toolkit will introduce project management and help define the components of a solid project plan which will ultimately allow organizations to ensure that their projects are kept on time, on budget, and in scope. A sample model/template for project planning can be found [here](#).

Case Study: IG Structure

[“Formalized Structure and Strategic Alignment—The Keys to IG Success”](#)

Read more in the IGIQ Blog: [Leveraging opportunities to Gain Buy-In for IG](#)
[Aligning IG Initiatives with Organizational Change](#)

IG OPERATIONS

ENTERPRISE INFORMATION MANAGEMENT (EIM)

Effective EIM requires policies and processes for managing information across the organization, throughout all phases of its life: creation/capture, processing, use, storing, preservation and disposition. At the foundation of an IG initiative is an inventory of all policies within the enterprise that relate to information management. Policies should not only establish the rules, but must also reflect all applicable regulatory and practice standards as well as establish best practices. Developing and maintaining an inventory of policies is a critical function for IG. Having solid policies and procedures contribute to strong IG. Healthcare professionals undertaking an IG initiative should develop a framework of policies and procedures as appropriate for their organizations needs which clarify who is responsible for implementing and enforcing the policies and that outline what the consequences will be if policies are not adhered to.

An inventory of sample enterprise information governance policies can be found [here](#). See also a sample [information asset inventory](#).

Supplemental Resources (Enterprise Information Management)

[Managing Nontext Media in Healthcare Practices](#)

[Consumer-Facing Health Information Practices](#)

[Identifying Issues in Facility and Provider Mergers and Acquisitions](#)

- [Appendix A: “Information Management Checklist for Mergers and Acquisitions”](#)
- [Appendix B: “HIM Worklist: Setting Up a New Clinic”](#)

[Retention and Destruction of Health Information](#)

[Retention and Destruction of Health Information. Appendix C: AHIMA’s Recommended Retention Standards](#)

[Managing through an Acquisition](#)

[Information Asset Inventory for Information Governance](#)

Case Studies: Enterprise Information Management

[HIM Students Help Build an Innovative Path to Information Governance](#)

[IG Case Study: Utah Health Information Network’s Information Asset Inventory](#)

[IG Case Study: Rady Children’s Hospital–San Diego. Prioritizing Information Governance Initiatives Already Underway](#)

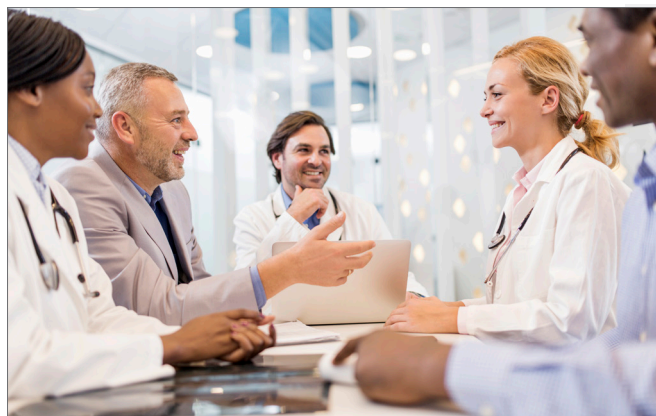
[Updating Organizational Policies and Procedures for Information Governance. Case Study #6: Enterprise Information Management at Children’s Health System of Texas](#)

Read More in the IGIQ Blog:

[Taking the Lead in Information Governance](#)

[Long Term Digital Preservation and IG: The Evolving When, Where, and How Strategy](#)

[Patient Engagement, Patient Portals, and Information Governance](#)



DATA GOVERNANCE

Healthcare organizations, and the industry in general, are learning systems that are constantly evolving and improving based on new information and insight. Data are the building blocks of information and insight.

In its broadest sense, data governance provides a structured approach to ensure that an organization's data is fit for required business purposes. While there are a number of similarities, data governance and IG are not the same thing. Data governance is a critical sub-domain of IG and provides the framework for the intersection of IT, HIM, clinical and operational areas, as well as business associates working together to establish confidence and credibility in the health system's data. It establishes and integrates a set of rules–policies, guidelines, principles, and standards–for managing the health system's highly valuable data assets.

Data Governance and Getting Started with IG

Most organizations have a difficult time getting people to adopt data governance practices because they believe that it is too expensive or that it takes control away from the stakeholders that are closest to the data. These are myths. Best-practice data governance recognizes that the subject matter experts closest to the data's creation and use are critical stakeholders in any data governance program. Further, the goal is to govern data in a manner where it is aligned with business requirements but not obstructionist.

Supplemental Resources (Data Governance)

- [Understanding Publicly Available Healthcare Data](#)
- [Rules for Handling and Maintaining Metadata in the EHR](#)
- [Assessing and Improving EHR Data Quality \(Updated\)](#)
- [Data Content for EHR Documentation](#)
- [Data Quality Management Model \(Updated\)](#)
- [Guidelines for Developing a Data Dictionary \(AHIMA Practice Brief\)](#)
- [Health Data Access, Use and Control](#)
- [HIM Principles in Health Information Exchange. Data Quality Attributes Grid](#)
- [Managing a Data Dictionary \(Updated\)](#)

Read More in the IGIQ Blog:

- [Yin and Yang: Data Governance and Information Governance](#)
- [The Importance of Data Stewards in Information Governance](#)

PRIVACY AND SECURITY

Because it is one of the largest areas of risk and vulnerability in today's healthcare ecosystem, information privacy and security are a pivotal component of IG and should be incorporated under the IG umbrella. Every other component of IG must have privacy and security as a major area of consideration. Privacy and security safeguards encompass 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, confidential, and secret as required based on its classification.

Supplemental Resources (Privacy and Security)

- [Performing a Breach Risk Assessment](#)
- [The 10 Security Domains \(Updated\)](#)
- [Privacy and Security Audits of Electronic Health Information \(Updated\)](#)
- [Security Risk Analysis and Management: an Overview \(Updated\)](#)
- [Disaster Planning for Health Information \(Updated\)](#)
- [Disaster Planning and Recovery Toolkit](#)



REGULATORY/LEGAL

IG can contribute significantly to an organization's ability to respond not only to regulatory audits, e-discovery, mandatory reporting and releases to patients upon request, but to compliance with information-related requirements of any/all regulatory and other bodies of authority. The organization and IG program must have a deep understanding of the laws and regulations to which it is subject to ensure it meets compliance requirements and other valid requests for disclosure.

Supplemental Resources (Regulatory/Legal)

[Guidance on the Genetic Information Nondiscrimination Act: Implications for Investigators and Institutional Review Boards](#)

[Preparing for a Deposition on an EHR: New Types of Information Lead to New Types of Questions](#)

[Regulations Governing Research \(Updated\)](#)

[Managing Governmental Audits](#)

AWARENESS AND ADHERENCE

IG is a strategic effort that requires executive sponsorship, leadership participation, and the support and contribution from everyone who creates, uses, or manages information within the organization. That said, it is imperative to build awareness and enable adherence to IG policies and processes at every level of the organization, working both “top down” and “bottom up,” to launch and sustain an IG program. Requirements for information management and governance should be reflected in clear role definitions, job descriptions, performance objectives for different information stakeholders, on-boarding education, continuous education on IG and IG roles, and any updates on IG initiatives.

Building Workforce Competency

IG training should focus on improving the current performance of all members of the workforce. An education and training plan should address the skill sets and competencies that are necessary for the success of IG initiatives. A strategic approach to education and training is essential. Training delivery methods may vary from e-learning to live classroom training to off-site programs and many other formats. The most important aspect of developing an IG training plan involves articulating the intended outcomes and laying out a plan for role specific training needed for IG and management.

A sample organizational training plan can be found [here](#).



Identifying IG Roles

Healthcare organizations pursuing an IG initiative may find new roles emerging as their program gets off the ground and new functions and needs come into clear focus. This does not necessarily mean new jobs, as the new functions associated with IG may be appropriately integrated into existing roles and responsibilities. That said, required skills and competencies not already existing in the organization may require talent acquisition in certain areas. The need for more or different resources with these skills and competencies is an area where the IG Council or other oversight body will want to weigh in. The following are emerging roles that the organization should determine the need for:

Information Governance Executive/Program Director

- Coordinates the implementation and development of the IG program with the aim of assuring that resources are identified and used appropriately to optimize information value while mitigating risk associated with information and its management
- Ensures the IG program has structure, direction, and accountability
- Responsible for developing a comprehensive assessment of information related practices, requirements, risks, and opportunities
- Works under the direction of the IG oversight group to identify and address workforce education/training, policy, and technology needs related to IG
- Develops methods for demonstrating success through metrics, key performance indicators, and third-party assessments
- Identifies information management and protection laws and regulations and implements actions to ensure compliance. Develops and implements a compliance monitoring system and coordinates the organization's company-wide risk assessment to identify potential risks and control solutions
- Creates internal partnerships with key stakeholders

Chief Health Information Officer (CHIO)

Organizations see this role as a complementary position to that of the chief medical information officer. "The CHIO is less clinically focused and more administrative, looking at the data being collected from hospital information systems and determining how it should be used and analyzed, thus increasing the potential impact of data on patient interventions and achieving value for the organization."⁶

Chief Data Officer

A chief data officer (CDO) "provides vision and strategy for all data management activities. The CDO takes the lead in global data management, governance, quality, and vendor relationships across the enterprise. Key responsibilities also include establishing data policies, standards, organization, and enforcement of enterprise information management concepts."⁷

Business Owner

- Has overall accountability for the data collected in their respective department, division, or business unit, ensuring that the data collected and entered is accurate, timely, and complete
- Responsible for ongoing auditing and monitoring of users who enter data, being mindful that all users are following and adhering to rules, regulations, policies, and procedures
- Works collaboratively with other business owners and data stewards to assure consistency of meaning and overall data quality

Data Steward

- Serves as the subject matter expert for business unit data
- Has overall responsibility for the data of one or more business units or departments
- Drives accountability in the way data and information is managed
- Serves as a liaison to IT
- Interfaces with other business units on issues of common interest
- Implements and carries out policies and procedures for data governance functions

Business Intelligence Analyst

- Derives new insights from the organization's data that target and deliver value to the organization
- Assists in defining and implementing the business intelligence (BI) strategy
- Identifies BI governance approach, definition, and implementation

Data Architect

- Creates and maintains enterprise conceptual, logical, and physical data models that conform to existing standards and conventions
- Provides leadership and guidance on enterprise data strategies
- Maintains data dictionary using appropriate standards
- Partners with security architects to ensure compliance with data security and privacy mandates
- Responsible for end-to-end life cycle management activities, evaluating and recommending new and emerging data management and storage technologies and standards, and ensuring consistency between data management, enterprise storage, and all other technical system components

Information/Data Governance Analyst

- Supports the development and implementation of the organization's information/data governance framework, policy, and standards
- Coordinates the resolution of data/information integrity gaps by working with business owners and IT
- Works with business partners to gather and understand functional requirements
- Provides reporting on key performance indicators for information/data governance
- In collaboration with subject matter experts and data stewards, defines and implements data strategy, policies, controls and programs to ensure the enterprise data is accurate, complete, secure, and reliable
- Serves as a subject matter expert in information/data governance operations

Sample job descriptions for these and other roles can be found in AHIMA's HIM Body of Knowledge™ (BoK).

- [Sample Job Description: Chief Information Governance Officer](#)
- [Sample Job Description: Chief Data Officer](#)
- [Sample Job Description: Information Governance Program Director](#)
- [Sample Job Description: Data Architect](#)
- [Sample Job Description: Data Stewardship and Information Strategy Services Lead](#)
- [Sample Job Description: Analytics Business Intelligence - Information Management](#)

Read More in the IGIQ Blog:

[Create a Learning Environment for Information Governance](#)

[Train your IG Workforce Now](#)

PERFORMANCE MANAGEMENT: EMBEDDING IG INTO KEY BUSINESS PROCESSES

Like other areas of the organization, those managing IG will want to establish clear goals and objectives as well as complementary metrics that describe the value and effectiveness of the IG program and the impact of improvements that are experienced because of it. Many healthcare provider organizations have robust quality and performance measurement methodologies in place for clinical care and business processes such as Lean, Six Sigma, and other approaches. These same methodologies can be applied to assure that IG processes and operations are achieving goals and desired outcomes. The program should be evaluated at least annually and outcomes reported to the senior leadership and governing body.

MANAGE CHANGE AND SHIFT ORGANIZATIONAL CULTURE

Organizational change management (OCM) facilitates managing the effects of a new business process such as IG, including helping people deal with any changes in the organizational structure or any cultural change. In simple terms, OCM addresses the “people side” of dealing with organizational change.

To help address change management, a formal strategy should be in place that outlines the common vision. Executive leadership should be called upon to communicate the strategic vision and to explain the business case for IG to the organization. Essential to change management is the need to have an approach to disseminating information.

Having an OCM structure in place can serve to help encourage staff to embrace the change, as well as help them take ownership in new roles and responsibilities.

COMMUNICATE EXPECTATIONS AND PROGRESS

An organizational communication plan serves as a guide to the communication efforts that will be needed throughout the initial phases of the IG initiative, as well as a plan for continued updates as the initiative progresses. It is a living document and should be updated frequently as stakeholder needs and requirements change. In developing the plan, consider what and why you need to communicate. Then determine who you need to communicate with and the best way to get the message to the intended audience. Make a list of staff or departments and develop a plan that helps ensure that the information that is needed reaches each stakeholder in a timely fashion. Consider the message that you want to convey and think about the best time to share the information.

Essential Elements of an Information Governance Communication Plan

- Purpose of communication plan:

A living communication plan affirms, clarifies, and shares the organization’s goals and priorities for IG.

- IG communication plan goals/objectives:
 - » Increase awareness of IG activities
 - » Provide consistent and relevant messaging to stakeholders
 - » Cultivate “ownership” in data governance processes
 - » Generate support for collaboration to achieve IG strategic goals
 - » Reflect corporate values and beliefs
 - » Ensure everyone has the right information at the right time
 - » Promote/implement data best practices—improve organizational behavior
 - » Enforce compliance of policies and standards
- Critical elements to consider when creating an IG communication plan:

- » Understand target audience and how to reach them; identify who is important to the success of IG
- » Determine best tools/methods to be utilized for communications (e-mails, employee portal, forums, etc.)
- » Identify who is responsible for communications
- » Define when communications will occur
- » Determine centralized place for storing all documents, files, policies, etc.
- » Keep it easy to read and simple
- » Connect the dots; good data equals good information to improve patient care, analytics, reporting, etc.
- » Must motivate and assist the business in managing information effectively
- » Promote data stewardship as an organizational behavior
- » Take into account the culture of the organization
- Other elements to include:
 - » IG initiative governance structure
 - » Program/initiative highlights; important high-level tasks and time frames
 - » Description of written outputs/deliverables
 - » Updates on activities
 - » Initiatives to retain commitment—need ongoing affirmation—what can the recipient do?

Key Aspects of Communication

WHY—Growth in data volumes; IG is essential to ensuring data accuracy and quality decision making; managing information as a key enterprise asset; demand for trusted information; business intelligence comes from data; data quality impacts the effectiveness of managing an organization and providing quality services

WHO—Provide names of leadership/organizational roles (sponsorship, oversight, implementers, etc.) and explain data stewardship roles/responsibilities and rules of engagement

WHAT—Data governance definition and explanation of IG program/initiative

WHEN—Outline key target dates for task completion

WHERE—Provide location of information, scorecards, and reference documents

HOW—Describe how the work will benefit the organization and how success will be measured (metrics)

Effective communication is:

CONCISE: Be straightforward, get to the point quickly, encourage efficient action

COMPLETE: Plan carefully; get all the information out the first time

CLEAR: Allow words to be easily understood

CONSIDERATE: Be open to questions/clarifications/feedback

Finally, the timing of the message may determine how and what you need to communicate. E-mail is convenient, but if the message is complicated, you may need an interactive approach such as in-person meetings or face-to-face communication. Plan to solicit questions and follow up if additional clarification is needed.

A sample communication plan can be found [here](#).

Supplemental Resource (Communication)

[More Than Just Talk: Effective Communication Skills for HIM Professionals](#)



OTHER USEFUL TOOLS

This section of the toolkit contains information of interest for specific use cases in which effective IG can bring value as an approach to common scenarios and issues.

REQUEST FOR INFORMATION/REQUEST FOR PROPOSAL (RFI/RFP)

A request for information (RFI) is a request that is made during the project planning phase when the organization cannot clearly identify what the product requirements are. The RFI will ask the vendor to provide them with the specifications and the purchase options that available to them.

A request for proposal (RFP) is a document that an organization drafts to elicit bids from potential vendors for a desired IT solution. The RFP specifies what the organization is looking for and establishes evaluation criteria for comparing and assessing the various proposals.

A request for information (RFI) is typically used before putting out the RFP. It is helpful at times when you believe you know what is desired, but you need more information from the vendors to make a choice. An RFP is used when you know you have a problem but don't know how you want to solve it, or when you have multiple potential vendors who can solve the issue and you want to know which vendor has the best or most cost-effective solution to meet your needs.

A simplified version of an RFP is outlined [here](#).

INFORMATION MANAGEMENT AND GOVERNANCE IN MERGERS AND ACQUISITIONS

Healthcare is increasingly facing the reality of the necessity of mergers and acquisitions. Financial concerns and rising regulatory demands have permeated the healthcare industry, resulting in a need to make tough decisions and prepare for whatever further challenges lie ahead. As mergers and acquisitions have grown more common in healthcare, many organizations have faced an atmosphere of uncertainty.

It has become evident that to ensure a smooth transition, it is critical that healthcare organizations adopt successful IG strategies and employ them in a shifting healthcare environment. Inevitably, when a merger or acquisition occurs, it is necessary to clarify roles and responsibilities. IG can assist in defining these roles and making sense of an otherwise confusing process. The information maintained by each organization involved in a merger is a critical consideration in the consolidation process and should be addressed in a well-thought-out plan.

Successful transition can be achieved as a result of the structured approach to IG which can assist in taking the merged organizations in the same direction. It is through the use of a solid IG approach that organizations can paint a picture of where they want to be to create the desired outcomes and inspire staff to move forward in a strategic manner.

Healthcare organizations should assess the records management and IG capability of the organization to be acquired as part of the pre-acquisition investigative process that occurs when considering a merger or acquisition. The mergers and acquisitions team should include HIM, privacy, and e-discovery staff from the outset as part of the due diligence process. It is important that the team assess any known or potential gaps and understand the risks that may be posed as well as how much of a barrier this may be to combining the organizations. A merger and acquisition checklist such as this one, based on “A Records Management Checklist for Mergers and Acquisitions,” can be helpful:⁸

1. Understand the mergers and acquisitions framework for the organization, develop a plan and outline checklist requirements. Start this process as soon as your mergers and acquisitions team is formed.
2. Establish a preliminary project plan and schedule with your project team. This plan should address steps for integration of all information into the newly combined entity. Collect and document any enterprise or departmental information management policies or procedures. Assess records management organizational structure, risk and compliance. It may be helpful to audit findings related to the information management policies that are in place currently.
3. Identify all information and records storage locations. Ask about off-site storage locations. Assess whether all locations have current inventories and where there is an existing process for routine deletion or destruction of documents.
Develop a map of where all electronic information resides and on what types of systems.
4. Ask for an inventory of all backup tapes as well as other removable media that may exist such as inventories of CDs, DVDs, films, or microfiche.
5. Document any current or potential legal or compliance risks including any active litigation or ongoing investigations, information on legal holds that are currently in place, and preservation of custody. Review the current legal hold processes and the documentation that supports the holds. Ensure these processes are consistent with current legal standards. Identify any current litigation that could put the organization at risk for discovery. Investigate any history of regulatory or compliance issues related to production of information.
6. Consider any special requirements for the protection of sensitive, private, confidential and personal information. Identify any potential compliance conflicts for migrating data and assess for intermingled privacy information.
7. Understand locations of any intellectual property, what format it is stored in, and how accessible this information is. Documentation of this information can be key both in leveraging any existing intellectual property, as well as defending ownership against future claims.

For more information see [Managing through an Acquisition and Identifying Issues in Facility and Provider Mergers and Acquisitions.](#)

Read More in the IGIQ Blog

[Healthcare Mergers and Acquisitions Have a Profound Impact on the Need for IG](#)

NOTES

1. AHIMA and Cohasset Associates. “2014 Information Governance in Healthcare: A Call to Adopt Information Governance Practices.” 2014. <http://www.ahima.org/topics/infogovernance>.
2. AHIMA and Cohasset Associates. “2015 Information Governance in Healthcare: Professional Readiness and Opportunity.” 2015. <http://www.ahima.org/topics/infogovernance>.
3. “Multi-stakeholder governance model.” February 14, 2015.
4. Nightingale, Deborah. “Value and Enterprise Stakeholders.” Cambridge, MA: Massachusetts Institute of Technology, September 21, 2005.
5. *Health Data Management*. “8 Hottest Jobs in Healthcare IT.”
6. Ibid.
7. Diamond, Mark. “A Records Management Checklist for Mergers and Acquisitions.” *Inside Counsel*, March 20, 2013.

INFORMATION GOVERNANCE CASE STUDIES

To assist in understanding the challenges associated with developing an IG initiative in healthcare, AHIMA has documented the following case studies, which detail the experiences of different types of healthcare organizations that have initiated IG programs. The intent of the case studies was to explore the various types of structures and processes being used with the IG initiatives around the IGAM™ competencies. Along the way, some of the overarching goals of IG in healthcare were uncovered.

All of the IG case studies are published in the *Journal of AHIMA* and can also be found on AHIMA's Body of Knowledge.

COMPETENCY: ENTERPRISE INFORMATION MANAGEMENT

Case Study—University of Washington Medicine

This case study was previously published in the AHIMA Body of Knowledge as "[HIM Students Help Build an Innovative Path to Information Governance](#)."

Case Study—Utah Health Information Network

This case study was previously published in the AHIMA Body of Knowledge as "[IG Case Study: Utah Health Information Network's Information Asset Inventory](#)."

Case Study—Rady Children's Hospital- San Diego

This case study was previously published in the AHIMA Body of Knowledge as "[IG Case Study: Rady Children's Hospital—San Diego. Prioritizing Information Governance Initiatives Already Underway](#)."

Case Study—Children's Health System of Texas

This case study was previously published in the AHIMA Body of Knowledge as "[Updating Organizational Policies and Procedures for Information Governance. Case Study #6: Enterprise Information Management at Children's Health System of Texas](#)."

COMPETENCY: STRATEGIC ALIGNMENT

Case Study—Unity Health Care

This case study was previously published in the AHIMA Body of Knowledge as "[Strategic Alignment: The Driving Force for Information Governance](#)."

COMPETENCY: IG STRUCTURE

Case Study—Banner Health

This case study was previously published in the AHIMA Body of Knowledge as "[Formalized Structure and Strategic Alignment—The Keys to IG Success](#)."



INFORMATION GOVERNANCE BLOGS

AHIMA releases monthly IG blog articles through the IGIQ Blog. These monthly blog posts address challenges, trends, and hot topics in the healthcare industry about IG. The wide variety of authors allows readers to gain many perspectives of IG as they think about IG at their own organizations.

A full list of the IGIQ blogs can be found [here](#).

[Journal of AHIMA Launching Monthly IG Case Study Series](#)

[Taking the Lead in Information Governance](#)

[HHS Report: IG Vital to a Cybersecure Future in Healthcare](#)

[Information Integrity in Ambulatory Care](#)

[A Simple API: Will it solve healthcare's interoperability problems?](#)

[Healthcare Mergers and Acquisitions have a Profound Impact on the need for IG](#)

[Long Term Digital Preservation and IG: The Evolving When, Where, and How Strategy](#)

[21st Century Cures Act and Information Governance](#)

[Why Unstructured Data is Still Important to Healthcare Providers](#)



SUPPLEMENTAL RESOURCES

[Information Asset Inventory Practice Brief](#)

[Information Governance Charter Template](#)

[Information Governance Sample Project Plan](#)

[Three Practical IG Projects You Should Implement Today](#)

Sample Job Descriptions

- [Chief Information Governance Officer \(CIGO\)](#)
- [Chief Data Officer \(CDO\)](#)
- [Analytics Business Intelligence–Information Management](#)
- [Data Architect](#)
- [Data Stewardship and Information Strategy Services Lead](#)
- [Information/Data Governance Analyst](#)
- [Master Data Analyst](#)
- [Records Management and Information Governance Consultant](#)
- [Information Governance Program Director](#)
- [Information Analyst](#)
- [Chief Medical Information Officer](#)

[Sample Information Asset Inventory](#)

[Sample Information Governance \(IG\) Communication Plan](#)

[Sample Organizational Training Plan](#)

[Sample Inventory of Information Governance Policies](#)

[Sample RFP/RFI Elements](#)

