

AHIMA Information Governance

Information Governance: The Next Evolution of Privacy and Security

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Objectives

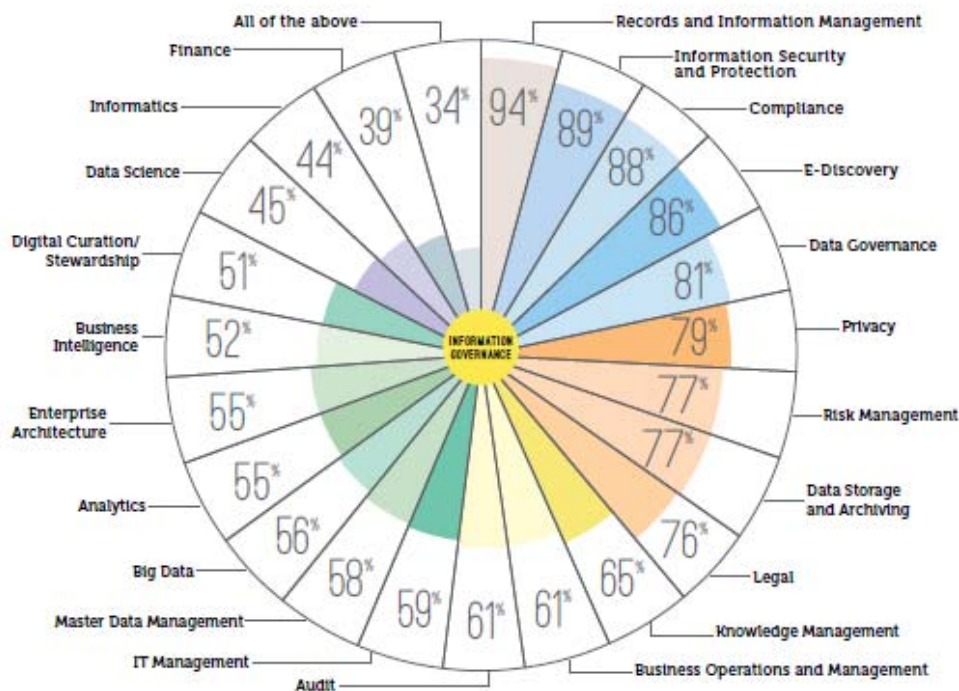
- Define information governance and discuss how it is used across industries
- Outline how the IG Principles of Compliance and Information Protection lay a framework for enterprise wide information governance
- Define how security and privacy officers transform into Chief Information Governance Officers

2015 IGI Annual Report



THE FACETS OF IG

THE FACETS OF IG: IG SERVES A COORDINATING FUNCTION



IGI Annual Report 2015 is available at: www.lginitiative.com



Our community told us these activities are included in their concept of IG (listed as a percentage of respondents). A strong majority (83%) said this list is a complete list.



Why Information Governance is Important



People

- Coordinating Care / Cost of Care / Quality of Care
- Patient Engagement
- Managing Patient Populations



Process

- Regulatory Compliance
- Managing Switch to Value Based Reimbursement
- Reducing Hospital Acquired Conditions
- Mergers and Acquisitions



Technology

- Managing Data
- Improving Information Security
- Trusted data exchange

IG Principles For Healthcare (IGPHC)

Accountability
Transparency
Integrity
Protection
Compliance
Availability
Retention
Disposition

What Will Trust in Our Information Enable?

- Safe Use of Health IT
- A State of Interoperability
- Reduced Information Risk
- Right Patient – Right Information
- Quality Care - Lower Costs
- Reliable Performance Measures
- Proof of the Value of Care Purchased
- Trust in Exchange Partners
- Appropriate and Ethical Use of Information
- Reliable Analytics – Decision Support
- A Learning Health System
- Research – Population Health

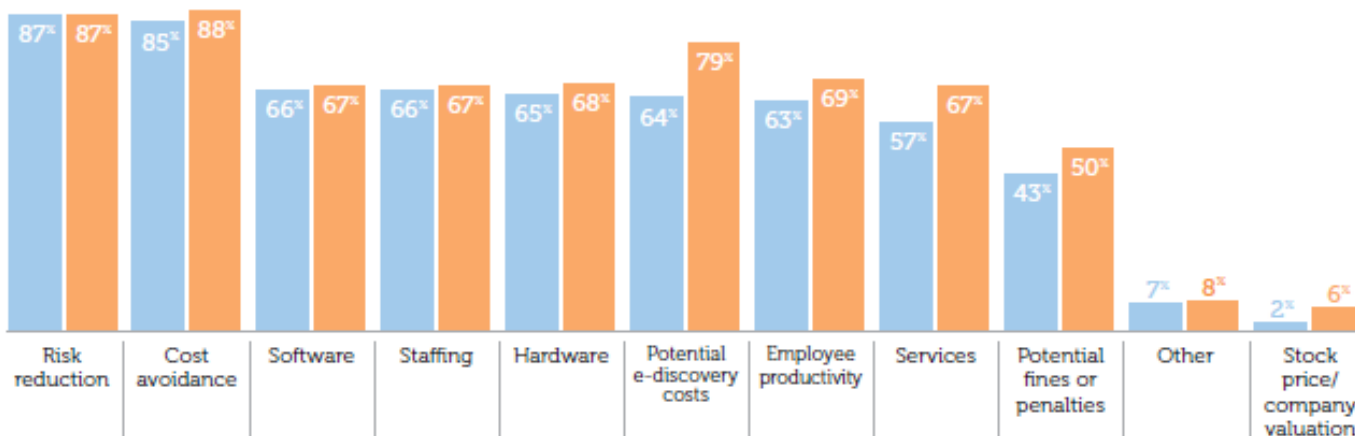


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WHAT MODELS ARE USED TO QUANTIFY THE BENEFITS OF IG?
WHAT FACTORS ARE CONSIDERED?

PRACTITIONERS	KEY FINANCIAL MODELS USED	PROVIDERS
77%	Return on Investment (ROI)	83%
47%	Total Cost of Ownership (TCO)	64%
14%	Full Cost Accounting	8%

WHAT GOES INTO THE MODEL?



Information Governance for Healthcare

AHIMA Definition

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

Information Governance for Healthcare



IG Adoption – Findings

AHIMA Survey

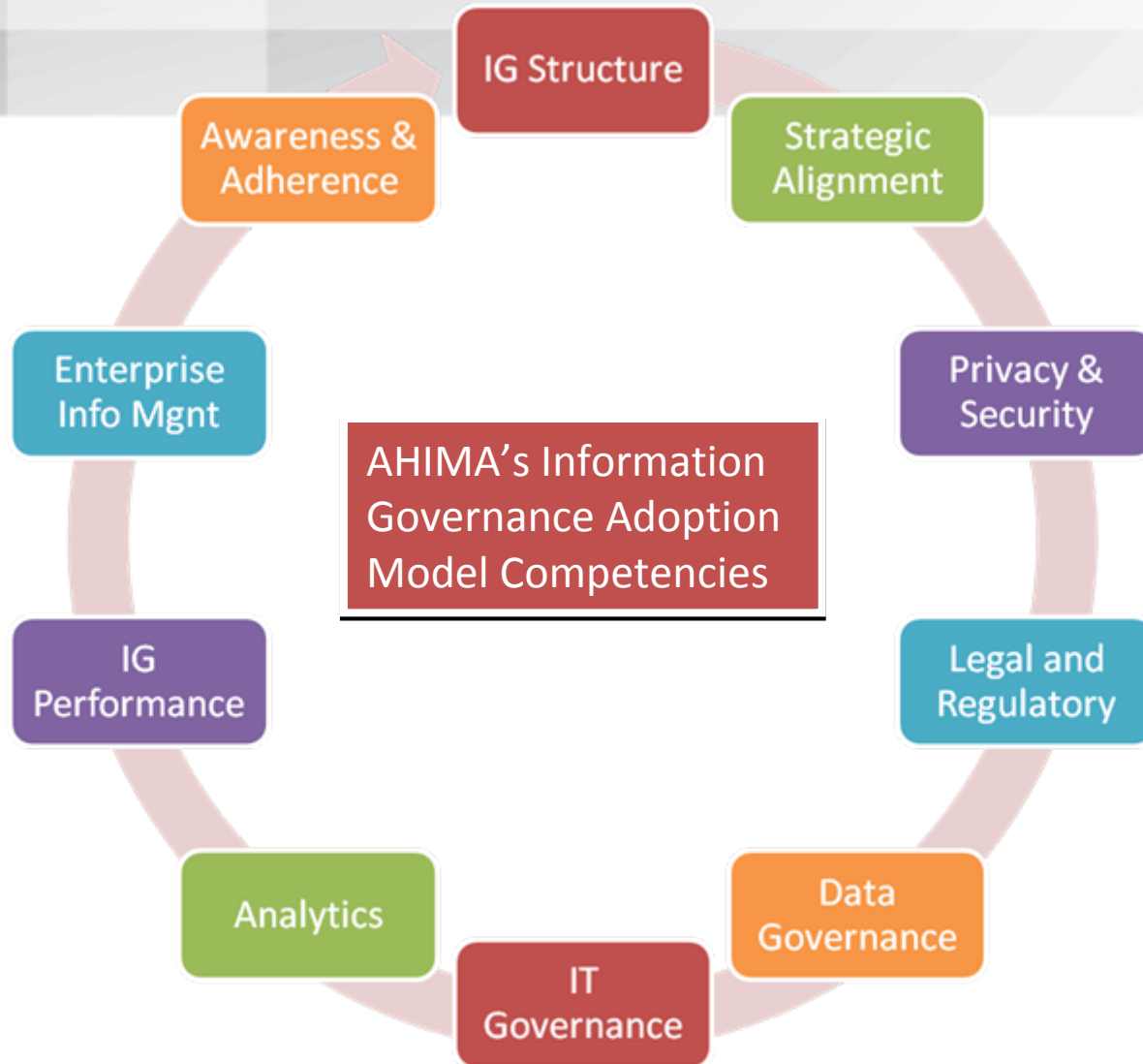
- **1260** Survey respondents, all healthcare, predominantly US
- **44%** Have established IG oversight bodies and **16%** are in process of establishing them
- **36%** Have designated senior executive sponsors
- **38%** Have included IG objectives in strategic goals
- **44%** Report modest or significant IG progress

Source © 2015 Cohasset Associates | AHIMA Information Governance in HealthCare, Professional Readiness and Opportunity

Capgemini Survey

- **1000** Survey respondents, 9 industries, 10 countries
- **43%** Restructuring to exploit data opportunities
- **33%** Have appointed a C-Level leader and **19%** of respondents will do so within 12 months

Source: Ralf Teschner, Capgemini Blog, 3/12/15 – CDO=IS+IG+IR+IE



AHIMA IG Adoption Model™

- Five-Level Model
- Defines characteristics of governance practices at advancing levels of maturity
- Rooted in IG best practices, standards and requirements
- Introduces constructs of IG Organizational “Core Competencies” that are enumerated by performance-driven “markers”

AHIMA IG Adoption Model™

Broad use of the Adoption Model will enable:

- A recognized scoring mechanism for IG adoption levels
- Peer group benchmarking
- An indication of trustworthiness of an organization's information
- An indication of partnerships desirability for accountable care, preferred provider networks, and information exchange participation

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MULTIPLE IG PROJECTS ARE IN FLIGHT

IG PROJECTS UNDERWAY OR PLANNED IN THE NEXT YEAR Comparing Practitioners' Responses to Those of Providers About Their Customers

	PRACTITIONERS	PROVIDERS
Updating policies and procedures	69 ^a 1 ^a	73 ^a 1 ^a
Scanning paper documents	50 ^a 2	46 ^a 7/8
Data consolidation and cleanup	47 ^a 3	65 ^a 2
Migration of unstructured information from one system to another	46 ^a 4	62 ^a 3
Defensible deletion	42 ^a 5	59 ^a 4
Decommissioning an archive or system	40 ^a 6	55 ^a 5
Implementation of a new corporate governance framework for IG	37 ^a 7	46 ^a 7/8
Data loss prevention	31 ^a 8	38 ^a 8
Implementing legal hold tracking	30 ^a 9	47 ^a 6
User rights audit and analysis	22 ^a 10	29 ^a 10
Big Data analytics	15 ^a 11	28 ^a 11
Creating a new senior role for IG and filling that role	9 ^a 12	21 ^a 12
Other	6 ^a 13	6 ^a 14
Monetizing data	5 ^a 14	10 ^a 13
I don't know.	5 ^a	2 ^a
We aren't doing any IG projects currently/don't plan to.	6 ^a	

^aProjects were ordered from the most to least commonly selected option. Project numbering (1-14) corresponds to this ordering. A double number corresponds to a tie. Projects are listed from the most to least commonly selected option by practitioners.

IGI Annual Report 2015 is available at: www.iginitiative.com

Snapshot

- Organizations are mostly focused on foundational IG projects.
- Remediation and migration projects are common as organizations transition to the cloud and replace legacy infrastructure.
- Security-related IG projects are taking a higher profile.



Information Governance Office (IGO)

- **IG Infrastructure is Critical to Success**
 - Senior Leadership Support
 - Budget
 - IG Awareness Across Organization
 - Multi-Disciplinary IG Committee Reporting to Governing Body
 - CIGO (Chief Information Governance Officer)



Evolution of the IG Senior Leader – Chief Information Governance Officer (CIGO)

- **New Role or Included in an Established Role**
 - Focused on the business benefits of the organization's information
 - Sits in the business, but has a solid understanding of data technology and information architecture
 - Involved in board-level discussions on strategy
 - Owns and drives Information Strategy, Information Governance, Information Risk and Information Exploitation

Information Governance – How could it help?

- It's a shift to a larger focus
 - If your organization has a breach and patient information is not the target of the attack there is still reputational damage and local concern.
- IG creates enterprise wide effort to protect information, not just clinical information.

IG Principle of Protection

Appropriate levels of protection from breach, corruption and loss must be provided for information that is private, confidential, secret, classified, essential to business continuity, or otherwise requires protection.

Must address all sources, all media and must apply throughout the life of the information.

Security Roles and Information Governance

- Security Officers often focus efforts on:
 - Clinical data
 - Electronic data
- Expansion of the security officer's role to Information Governance
 - All data, all media, all locations, all types
 - Involvement in business continuity and disaster recovery planning
 - Involvement in access management

Privacy Roles and Information Governance

- HIPAA privacy rule 2003
- Privacy Officer, Privacy Official in Place
- Time to expand this role outside of clinical information.
- Enterprise wide standards
- Enterprise wide access
- Paper and electronic



Privacy and Security

The Insider Threat



- Consider the insider threat
- Malicious
- Accidental
- Solution
 - Trust and policy are not enough.
 - Organizations must invest in security, risk, and information governance training and enforcement.

Risk Assessment and Information Governance



- How will you **effectively know what the risks are** to your information?
- How will you **adequately determine if controls are implemented** and appropriate?
- How will management and stakeholders **make informed decisions**?
- How will you **establish an acceptable level of risk**?

Information Governance for Mobile Devices

- Information Governance for mobile computing can include building security into the mobile applications.
- Are your nurses texting your physicians?
- How are they identifying patients?
- Do you offer encrypted texting options?

Information Governance Mobile Device Policy

- Requires a cross functional IG team
- Clarify how mobile devices are being used
 - EHR Access
 - Financial system access
 - Email
- Consider legal and compliance issues
- Consider Mobile Device Management
- Develop your Communications and Training Plan
- Update and Fine-Tune – this one can't stay on the shelf!



Breach Investigation Process – not just for PHI

Breach Management for all types of Risks:

- Gather all the facts of the potential breach
- Document specifically who, when, where, why and how the situation occurred
- Identify those impacted and what ~~PHI~~ information was potentially compromised
- Analyze & evaluate all the facts objectively to determine whether or not an impermissible access, use, or disclosure of ~~PHI~~ information can be substantiated.

Breach Response / Incident Management Team

- Chief Information Officer
- Chief Information Security Officer
- Chief Medical Information Officer
- Corporate Compliance Officer
- Director, Health Information & Privacy
- Director, Internal Audit
- Director, Office of Institutional Assurances
- Director, Risk Management
- General Counsel
- Hospital President
- SCRI President
- Research Integrity Officer
- VP Human Resources
- VP Marketing & Communications
- Leaders from affected departments



Information Governance & Social Media

- Not just Facebook!
- Web Publishing
 - Blogs, wikispaces
 - microblogging (twitter)
- Social Networking – LinkedIn
- File Sharing / storage
 - Google drive
 - Drop Box
 - Photo libraries



Biggest Risks of Social Media

- **Lack of a Social Media Policy**
 - Who can use social media
 - What they can state / discuss
 - Training is key
- **Employees – accidental or intentional**
- **Legal Risks**
 - This risk is avoidable with an information governance policy, guidelines, monitoring



IG Social Media Guideline Examples



- Specifies authorized individuals
- Clear distinctions between business and personal use of social media and whether a person can use social media while at work.
- Strictly forbids any profanity, statements that could be defamatory, inflammatory,
- Outlines sanctions
- Draws clear rules on use of company logos
- Instructs employees shall not have an expectation of privacy when using social media for company purposes.
- Outlines negative impact on brand.

Social Media Will Be Governed According to Policy

- In Gartner's report from March of 2013 on the "Six Questions to Drive Records Management in Your Social Initiatives," it is clearly stated that social media content requires records management, just like all other content, but many organizations don't know how to create an effective management process.
- In 2015, more organizations will look to incorporate social media content in their policy definition and explore methods on enforcing the policy across the various systems.

Information is an Organizational Asset

- Information is being created at a pace faster than organizations can analyze and extract value from it, which means that the potential value of the information may be far greater than the actual value an organization is able to derive.
- Organizations simply cannot afford to ignore the value of their information assets.

Where IG Begins:

- Information asset inventory
- Information asset classification
- Total cost of ownership
- Managed inventory of information
- Information Lifecycle Management
 - Retention & Destruction

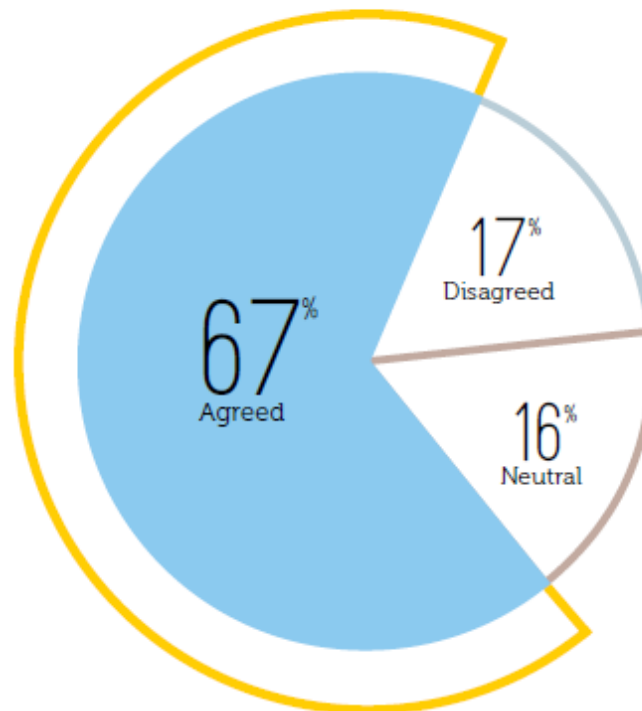
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THE CHIEF INFORMATION GOVERNANCE OFFICER IS ESSENTIAL

THE MAJORITY AGREES: THE CIGO IS ESSENTIAL TO IG SUCCESS

Please indicate your level of agreement with the following statement.

There is a leadership gap in IG that needs to be filled by the creation of a new senior executive IG role, like the Chief Information Governance Officer (CIGO), charged with owning and coordinating the solutions to our complex and overlapping information challenges. While steering committees play an important role in IG programs, they are insufficient to coordinate information activities. Ultimately, the information "buck" (so to speak) needs to stop with one primary person to ensure that the work of IG gets done. Content-focused information activities (e.g., determining what it is and what should we do with it decisions) are inadequately addressed simply by building up relevant facets of IG but rather require a designated executive leader in the same way that infrastructure or information security decisions do as embodied in the CIO/CTO or CISO roles. Committee decision-making processes are inadequate to balance stakeholder interests from each facet of IG and to develop the right operational model for the organization.



IGI Annual Report 2015 is available at: www.iginitiative.com

New Leaders Will Continue to Emerge / The Evolution of the Privacy and Security Officer

- In the last few years, there has been a tremendous uptick in the creation of information governance steering committees; however, there is still a need for an executive in each organization to drive the information governance initiative across their company.
- This executive must have the authority (and oversight) to manage the program.

Wrap Up

- Compliance +
- Privacy +
- Security=
- Chief Information Governance Officer

IG PulseRate – a quick check into your organization's IG maturity.

- Free instant assessment of the maturity level of IG in your organization available at www.IGIQ.com
- Review and rate the key success measures that impact organizational IG maturity
- Evaluate your organization's strengths and help identify weaknesses that may be impeding your organization's path to enterprise information governance



IG for HealthCare: Recommended Reading

- AHIMA. "Information Governance Principles for Healthcare™" 2014. Chicago, IL. AHIMA, 2014. Available at: www.ahima.org/infogov
- ARMA International. "Generally Accepted Recordkeeping Principles". ARMA International, 2013. Available at www.arma.org
- Cohasset Associates and AHIMA. "A Call to Adopt Information Governance Practices." 2014 *Information Governance in Healthcare*. Minneapolis, MN.
- Cohasset Associates, 2015. Cohasset Associates and AHIMA. "Professional Readiness and Opportunity" 2015 *Information Governance in Healthcare*. Minneapolis, MN. Cohasset Associates, 2015.
- *Implementing Health Information Governance*, 2015. Linda Kloss, MA, RHIA, FAHIMA
- *Enterprise Health Information Management and Data Governance*, 2015. Merida L Johns, PhD, RHIA.
- The Information Governance Initiative. "The Information Governance Initiative Annual Report". 2014 and 2015 . New York, NY. www.IGinitiative.com
- The Joint Commission. "Information Management (IM) Chapter", *Comprehensive Accreditation Manual for Hospitals, 2014*, Oakbrook Terrace, IL: The Joint Commission, 2014, pp.IM-1—IM-10.
- The Sedona Conference. "Commentary on Information Governance" The Sedona Conference® Working Group Series. A project of The Sedona Conference® Working Group on Electronic Document Retention and Production (WGI)

Resources

- The Final HITECH Omnibus Rule
(January 25, 2013)
<http://www.gpo.gov/fdsys/pkg/FR-2013-01-25/pdf/2013-01073.pdf>
- Combined HIPAA/Omnibus Rule
<http://www.hhs.gov/ocr/privacy/hipaa/administrative/combined/index.html>
- U.S. Department of Health and Human Services Office for Civil Rights: HIPAA Administrative Simplification - 45 CFR Parts 160, 162, and 164
- Information Governance, 2014. Robert F. Smallwood

What's Next? Moving your IG Forward.



- IG consulting and implementation services (project management)
- Gap analysis and assessment
- Focused gap remediation
- Onsite or virtual organization specific training
- Customizable one-on-one consulting with an AHIMA IG expert
- Score validation from the IG HealthRate™ system for AHIMA Level 5 sites



- IG ToolKit™ (Free to members)
- Publications
- Webinars
- Face-to-Face Meetings



- **NEW** White Paper: Professional Readiness and Opportunity
- **NEW** IG Infographic—What's the difference between IG and DG?
- IG for Healthcare Benchmarking White Paper
- Information Governance Principles for Healthcare (IGPHC)™
- IG Infographic – What is IG?



- Identify your true level of maturity and provide advisory services and additional resources
- Differentiate from your competition and other organizations AHIMA can arrange to validate your organizations maturity and your maturity level, which can then be used for marketing
- Provide extensive reporting, guidance, and comparison to other entities of your size and specialty

For more information contact us at (844) 554-4447 or visit ahima.org/Infogov.