



MISSION POSSIBLE

with **IGHealthRate™**

ADVANCE INFORMATION GOVERNANCE IN YOUR ORGANIZATION.

Why Record Retention is a Major Security Issue

Katherine Downing, MA, RHIA, CHPS, PMP, CPHI
Vice President, AHIMA Informatics, Information Governance

2018





Agenda

Part	IG Topic Area
Part I	QUICK! Baseline of Information Governance
Part II	Why talk Record Retention??
Part III	Implementing effective information governance process to reduce security / breach risk
Part IV	ROI and IG Tools and Resources for Success Measuring outcomes and success

WHAT IS INFORMATION GOVERNANCE (IG)?

AHIMA DEFINES IG AS “AN ORGANIZATION-WIDE FRAMEWORK FOR MANAGING INFORMATION THROUGHOUT ITS LIFECYCLE AND FOR SUPPORTING THE ORGANIZATION’S STRATEGY, OPERATIONS, REGULATORY, LEGAL, RISK, AND ENVIRONMENTAL REQUIREMENTS.”



Establishes
policy



Determines
accountabilities
for managing
information



Promotes objectivity
through robust,
repeatable
processes



Protects
information with
appropriate
controls



Prioritizes
investments

What is Information Governance?

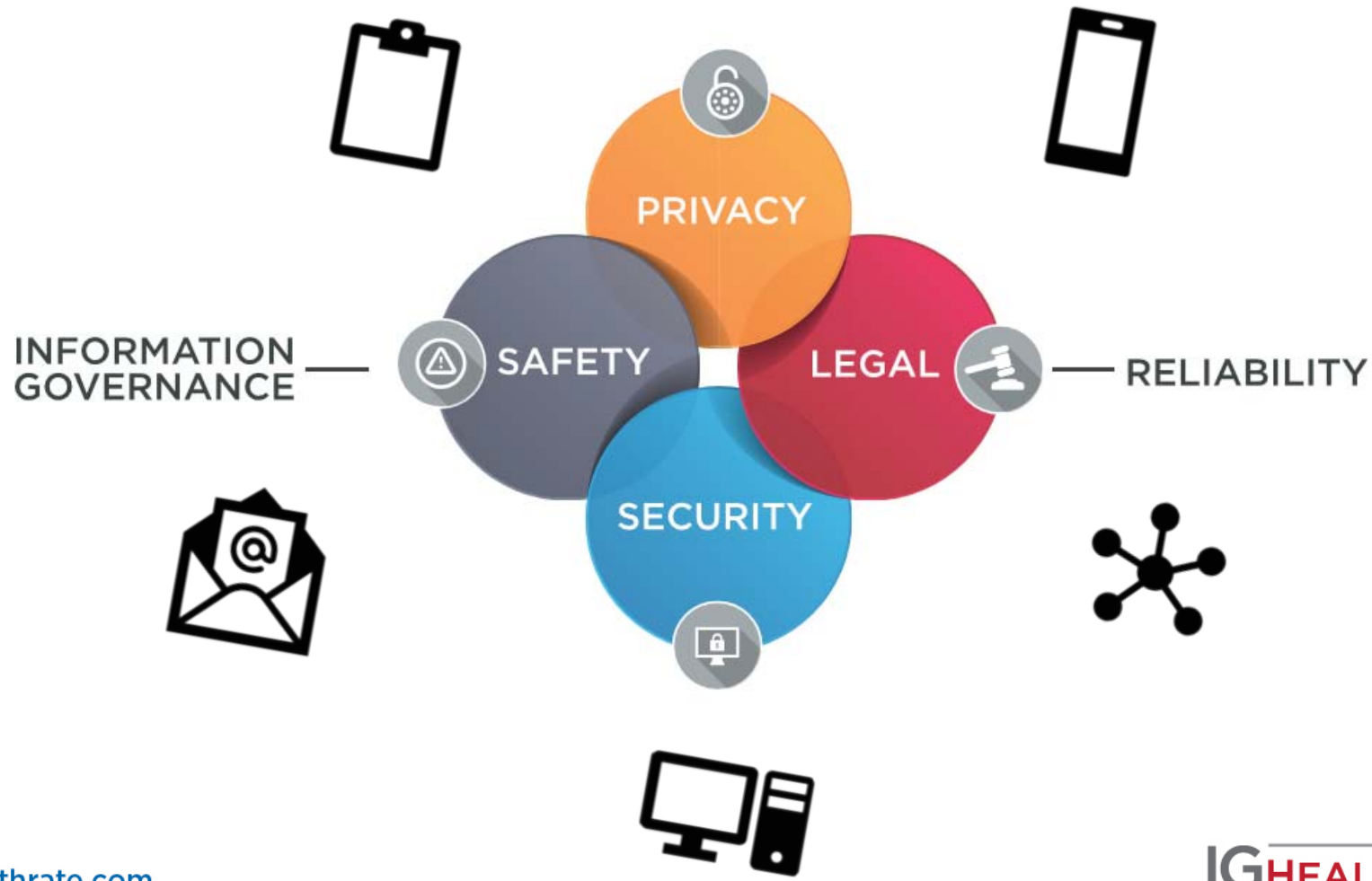
INFORMATION GOVERNANCE FOR HEALTHCARE INCLUDES:



Adopting an IG program shows an organization's commitment to managing its information as a valued strategic asset.

© American Health Information Management Association

Over Retention Impacts \$\$\$



Security Impacts and Over-Retention

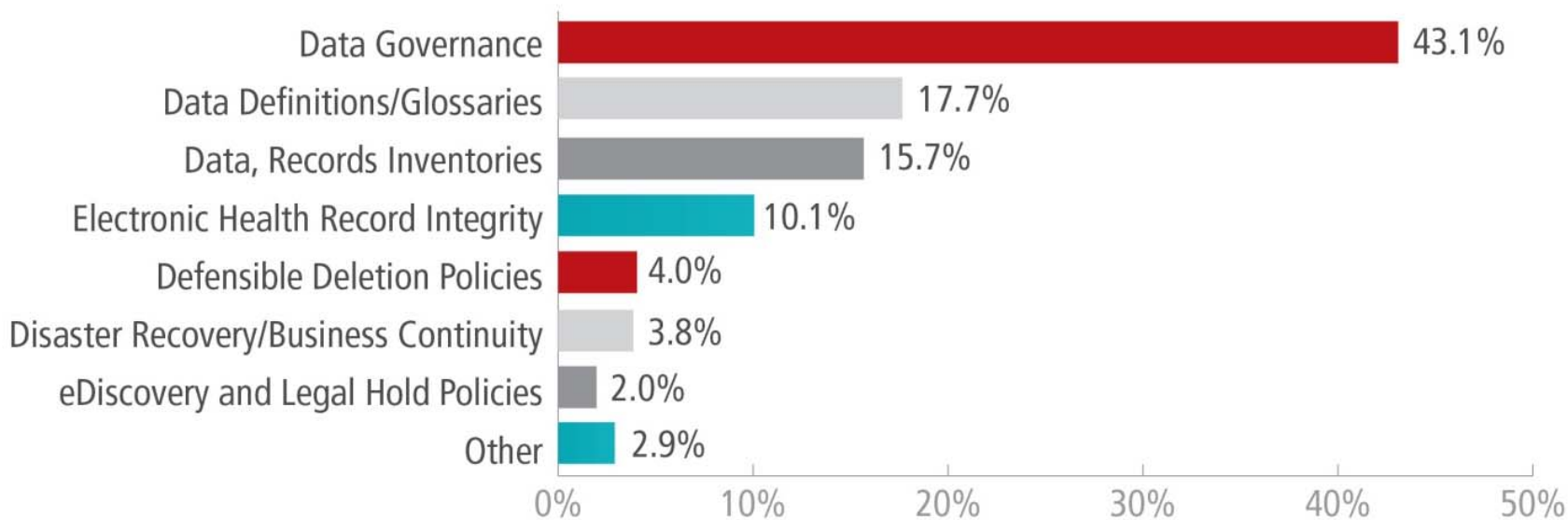
1. Attack surface in healthcare has broadened exponentially
2. Legacy hardware and software
3. The ability to perform and maintain a comprehensive risk assessment
4. Interconnectivity / exchange
5. Mobile device access / BYOD
6. Insider threat (malicious / accidental)
7. Backups (storage is not cheap!)
8. Disaster recovery / Business continuity
9. User access to “too much” / Access Creep



IG Survey - Project Prioritization if Funding was Available



If you had funding available for IG Projects, which would be your highest priorities? (Select up to five (5))



EIM Markers Related to Record Retention



Competencies

- IG Structure
- Strategic Alignment
- Enterprise Information Management
- Data Governance
- IT Governance
- Analytics
- Privacy & Security
- Regulatory & Legal
- Awareness & Adherence
- IG Performance

Make Baseline

Check the Box to make this Assessment your Baseline. By selecting, any previously selected baselines will be disabled.

Mock Assessment

Click on the Competency to the left to display its Marker. Click on the Marker to display the Level information for that Marker. When you select a Level you will be taken to the next Marker.

Notice: You are not the assignee of this assessment. As a result, some of the functionality may be unavailable or read-only.

MARKERS	ENTERPRISE INFORMATION MANAGEMENT ASSESSMENT LEVELS				
Establishment of Enterprise Information Management (EIM)	<input type="radio"/> Level 1	<input checked="" type="radio"/> Level 2	<input type="radio"/> Level 3	<input type="radio"/> Level 4	<input type="radio"/> Level 5
Records and Information Classification	<input type="radio"/> Level 1	<input checked="" type="radio"/> Level 2	<input type="radio"/> Level 3	<input type="radio"/> Level 4	<input type="radio"/> Level 5
Information Asset Inventory	<input type="radio"/> Level 1	<input type="radio"/> Level 2	<input type="radio"/> Level 3	<input type="radio"/> Level 4	<input type="radio"/> Level 5
Appropriateness and Transparency of Information Use, Policies, and Practices	<input type="radio"/> Level 1	<input type="radio"/> Level 2	<input checked="" type="radio"/> Level 3	<input type="radio"/> Level 4	<input type="radio"/> Level 5
Organization-Wide Storage Management Policies and Protocols	<input type="radio"/> Level 1	<input checked="" type="radio"/> Level 2	<input type="radio"/> Level 3	<input type="radio"/> Level 4	<input type="radio"/> Level 5
Information Architecture Developed and Maintained	<input checked="" type="radio"/> Level 1	<input type="radio"/> Level 2	<input type="radio"/> Level 3	<input type="radio"/> Level 4	<input type="radio"/> Level 5
Data Design and Capture	<input type="radio"/> Level 1	<input type="radio"/> Level 2	<input type="radio"/> Level 3	<input checked="" type="radio"/> Level 4	<input type="radio"/> Level 5
Electronic Clinical Systems Governance/EHR Governance	<input type="radio"/> Level 1	<input checked="" type="radio"/> Level 2	<input type="radio"/> Level 3	<input type="radio"/> Level 4	<input type="radio"/> Level 5
Retention and Disposition Management	<input type="radio"/> Level 1	<input type="radio"/> Level 2	<input checked="" type="radio"/> Level 3	<input type="radio"/> Level 4	<input type="radio"/> Level 5

Record Retention – Where to Start?

- Define Records and Information Classes
 - Classification or categorization of record types assists in enterprise-wide functions such as creation, protection, organization, storage, retrieval, management, and destruction of records.
 - Organization and classification mitigates risk and supports functions related to record retention and evidentiary usage.

Examples of Information Classes

- Confidential
- Sensitive
- Restricted
- Public

Examples of Record Classes

- Medical/Health Record/ Record of Care
- Enterprise Records
- Industry Records
- Legal Hold Records

Record Retention

- Information Asset Inventory
 - A centrally controlled inventory of the organization’s records and information is documented and kept up to date and includes all information and records regardless of media.

Organization/Area Name			Information Asset Details						Current Level of Protection						
Operating Unit / Function	System Name	Process owner	Name of Asset	Description of Asset	Type of Information Asset (Hard copy, Electronic File (specify type), removable media/device (specify type))	Personal Data (Y/N)	Personal Sensitive Data (Y/N)	Sensitive Customer Data (Y/N)	Classification	Integrity	Availability	Data Steward	Data Retention Period	At Origin (description)	

Centralize / Standardize the Record Retention Schedule

- A records retention schedule is a comprehensive, organization-wide listing of the records and information an organization maintains that notes, at a minimum, how long they must be retained along with their ultimate disposition.
- The records retention schedule defines:
 - Who is responsible for carrying out the record retention schedule (e.g., business owner, data steward)
 - A legal or regulatory citation that mandates a specific retention period e.g. state or federal
 - How long the records should be maintained in active on-site files
 - How long it may need to be retained in off-site or inactive storage
 - Whether it is a vital business record

ONE Record Retention Policy

- The organization is required to retain its information for an appropriate time, taking into account legal, regulatory, fiscal, operational, and historical requirements.
- Standardizing and implementing enterprise-wide record retention and disposition policies, program, and schedule will ensure a consistently applied approach to support the information lifecycle.

Monitor Compliance with Retention Policy

- The status of retention and disposition of information should be continuously monitored and reported to the IG oversight body.
- Legacy systems and data must be addressed in the retention and disposition policy and include decommissioning of systems.
- Electronic data should be automatically deleted per the retention schedule and policy where appropriate and when no legal hold is applied.
- The routine disposal of electronic and paper records must be transparent, reliable, and up to date.

In Summary

- Define your information (knowledge of what you have, where it is, who has access, how long it must be retained.)
- Bring record retention under the IG umbrella versus having each department manage (not an IT issue!)
- Don't listen to the "Storage is Cheap" story any longer

Over-Retention is a Security Issue

- Lack of long term planning
- Legacy systems
- EHR / Clinical system vendors
willingness / ability to destroy records
per organization policy
- Reluctance from physicians
- Beyond PHI: e-mail over-retention is
an eDiscovery issue / expense

IGIQ.com Blogs Include Insights on Program Start Up (*New* bi-weekly)



Information Governance: Just Get Started

POSTED BY AHIMA STAFF ON DEC 10, 2015

Keep up with the latest on information governance as this key strategy emerges for addressing a myriad of information management challenges in healthcare. This blog will highlight the trends and opportunities IG presents for ensuring information is treated as an organizational asset.

[Read More](#)



Be the Hostess for Your IG Initiative

POSTED BY AHIMA STAFF ON NOV 30, 2015

Have you started to design a plan to bring IG to life in your healthcare organization? If you haven't started yet, the clock is already ticking.

[Read More](#)



Information Governance Provides the Framework for Data Governance

AHIMA is Enabling IG Success

IGIQ.com Tools and Resources

- May 2018 eBook – Advancing IG through the IG Adoption Model™
 - Based on IG Adoption Model™ Competencies
 - IG Maturity Markers Described
 - Advanced Techniques for Implementation
- 2018 Launch of *AHIMA Approved IG Consultant* Training Program



You don't need a crystal ball to see where the healthcare industry is going. What you need is the
Privacy, Cybersecurity, and Information Governance Institute
SEPTEMBER 22-23, 2018 | MIAMI, FL

AHIMA celebrates the Privacy and Security Institute's 12th anniversary with a name change to match the evolutionary changes in the industry. In 2018, this meeting will be called the Privacy, Cybersecurity, and Information Governance Institute. Watch ahima.org for more details!

Mark Your Calendars.
REGISTRATION OPENS MAY 2018!



IG Executive Training Video



IGIQ.com: ONE STOP for all Tools and Resources for Information Governance



GET BOOTS ON THE GROUND TRAINING WITH VIRTUAL BOOT CAMPS

The virtual IG Boot Camps are two half-day, hands-on workshops that provide an intensive deep-dive into the application of IG tools and resources to help you create your organization's information governance (IG) plan!

HEADLINES

INFORMATION VULNERABILITIES: TECHNICAL FAILURES AND LACK OF IG MAY CAUSE...
Journal of AHIMA
Information governance (IG) practices. The best way to start IG at your facility is to assemble a multidisciplinary information governance...

AHIMA, INFORMATION GOVERNANCE: AN ASSET IN THE VALUE-BASED CARE MODEL
DOTmed.com
is at the top of major health care industry leaders' lists of trends and challenges for 2017. Health care experts often debate what it will

HHS CALLED ON TO ELIMINATE HEALTH INFORMATION BLOCKING
EHRIntelligence.com
practice entirely. Tagged athenahealth DirectTrust EHR Interoperability Health Information Exchange Healthcare Information Governance HHS

IGIQ BLOG
Strengthen your IGIQ
Find the latest IG discussions
TODAY'S BLOG:
Information Vulnerabilities: Technical Failures an...

IG Advisors
Consulting and Training Solutions
EXPERT IG IMPLEMENTATION

IGHEALTHRATE™
Aligned with AHIMA's IGAM™
REQUEST A FREE DEMO
FIND OUT MORE

View this interactive video for healthcare executives that demonstrates how IG addresses each of their top challenges and provides a competitive edge.
Ensure Your Competitive Edge

Learn about AHIMA's IG Adoption Model (IGAM™) which measures IG maturity in ten IG organizational competencies.
IGAM™

Make sure to receive the most up-to-date IG news. Click here to sign up for the quarterly IGIQ Beat Sheet newsletter.

Access copies of AHIMA's IG resources including the IG road map, whitepapers, IG Principles, and more.

IGAM™ Levels

AHIMA's Information Governance Adoption Model™ for Healthcare



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



Organization where a proactive IG program is present throughout its operations and IG issues and considerations are routinely integrated into business decisions. The organization is compliant with good practice and easily meets its legal and regulatory requirements. However, organizations at IGAM Level 4 have not yet seen the business and productivity benefits that could be achieved by increasing enterprise-wide information availability, mining information for a better understanding of patients' and consumers' needs, and otherwise transforming the organization through increased and advanced uses of information across the organization.



Organization where the essential requirements that must be addressed to meet the organization's legal, regulatory, and business requirements are present in basic form. This level is characterized with defined policies and procedures and the implementation of processes by department or siloed. Organizations that identify primarily with IGAM Level 3 descriptions still may be missing significant opportunities for streamlining business, improving the care experience, and controlling costs, but they have the key basic components of a sound program in place and are likely to be at least minimally compliant with legal, operational, and other responsibilities.

What's Next? Move Your Organization's IG Forward.



- IG consulting and implementation services (project management)
- Analysis and assessment
- On-site or virtual organization-specific training
- Score validation from the IGHealthRate™ system for IGAM Level 4 or 5 sites



- Identify your organization's true level of IG maturity
- Differentiate your organization from its competition and other organizations
- Validate your organization's maturity level
- Receive extensive reporting, guidance, and comparison to other entities of your size and specialty



- Webinars
- Virtual IG Boot Camps
- Meetings
- Books



- IG ToolKit
- White papers
- Infographics
- Blog

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