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AUTHORS
Beth Moodhard Acker, RHIA
Pamela Bankowski-Petz, RHIA, CHC
Stephanie Costello, 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
Laura Rizzo, MHA, RHIA, FAHIMA
Maria Stolze-Epple, RHIA, MHCA
David Sweet, MA
Lydia Washington, MS, RHIA, CPHIMS

ACKNOWLEDGEMENTS
Kathy Alberson, RHIA
Lisa L. Campbell, PhD, CDIP, CCS, CCS-P
Susan Clark, RHIT, CHTS-PW, CHTS-IM
Karen Collins-Gibson, MSA, RHIA, FAHIMA
Donna Coomes, MBA, CHPS, CCS, CPHQ
Melanie Comeaux, MBA/HCM, RHIA
Katherine Downing, MA, RHIA, CHPS, PMP
Christine Edwards, RHIA, CHP
Merry Holiday-Hanson
Charlotte McCuen, MHA, RHIA
Ralph H. Morrison, RHIA, CPC
Mari Pirie-St. Pierre, RHIA
Vicki Reynolds, RHIT
Angela Rose, MHA, RHIA, CHPS, FAHIMA
Donna Rugg, RHIT, CCS
Diane I. Skelton, RHIT, CTR
Jenny Utz, RHIA
FOREWORD
This toolkit provides a variety of resources and tools for healthcare professionals who are developing an Information governance (IG) initiative whether they are reviewing and trending healthcare data for a healthcare entity, reporting on quality measures in a physician office, managing an enterprise master patient index, or working with other operational, health, or financial information. Notably, this toolkit is intended to provide guidance for the governance of all types of information, not just clinical. The toolkit begins by discussing current healthcare initiatives and programs that are increasing the demand for IG. From there, the resources focus on the development of an IG charter, committee structure, job descriptions, and policies and procedures. The toolkit concludes with an appendix, which includes sample documents and suggestions for additional reading for guidance in obtaining buy-in and managing a project, as well as a bibliography of additional helpful IG resources.

INTRODUCTION
As electronic health record (EHR) adoption advances, the available data elements and information within healthcare continues to expand. Various government programs, such as the transition to the International Classification of Diseases 10th Revision Clinical Modification/Procedure Coding System (ICD-10-CM/PCS) and the passing of the American Recovery and Reinvestment Act and the Patient Protection and Affordable Care Act, further enhance the necessity for organizations to analyze information to make informed business decisions. Of note, while IG may be used as a tool to assist in governing health information, IG applies to all information in the healthcare enterprise and not just health information (e.g., HR, Finance, Operations).

IG is a strategic initiative to be applied across all types of organizations and healthcare entities. The goal of this toolkit is to provide a resource that facilitates and supports IG initiatives at a foundational level. Best practice guidance provided in this toolkit was developed for use across all organizations. However, this toolkit is not a mature tool and is not designed to be a one-size-fits-all “how to” guide to IG; rather, it is a starting point for healthcare organizations looking to develop or expand an enterprise IG initiative.

PRINCIPLES
The principles of IG for healthcare, known as the IG Principles for Healthcare (IGPHC)™, are broad and comprehensive. They are intended to be used as practical guidance to assist in developing an IG initiative. They are not prescriptive. Their application within any organization will be dependent upon the type, size, role, mission, sophistication, legal environment, and resources of the individual organization. The IGPHC™ are based on practical experience, information theories, and legal requirements within healthcare and are also informed by other established practices from multiple disciplines within healthcare, such as quality improvement, safety, risk management, compliance, data governance, information technology governance, privacy, and security. They embrace the values embedded in healthcare—accuracy, timeliness, accessibility, and integrity. These values serve the best interests of the healthcare information consumer, from providers to non-providers, researchers, public health officials, health information exchanges, claim administrators, payers, and patients.

RESOURCES FOR OBTAINING BUY-IN FOR INFORMATION GOVERNANCE
This toolkit contains an annotated bibliography that provides citations to readings on the development of IG, including 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 addressed include but are not limited to: definitions and principles 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 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.

The complete bibliography of articles for visioning and obtaining organizational buy-in for IG, information standards, and information architecture including data modeling and metadata can be found in Appendix A. A bibliography of resources on IG published in the AHIMA Body of Knowledge is also available in Appendix A.

CHECKLIST OF STAKEHOLDERS AND WHO TO INCLUDE

When discussing IG in the healthcare ecosystem, one size does not fit all when it comes to identifying who the stakeholders should be and the level of their involvement. Therefore, the information in this section is not meant to be prescriptive; rather, it is meant to provide business guidance to assist healthcare leaders as their organizations place growing importance on the value of information and data management across the enterprise.

Spanning the continuum of healthcare, IG exists in an ever-changing landscape to support an organization’s enterprise data and analytics as the foundation for confident decision making and improved patient outcomes while keeping costs down.

Data and information are increasingly being used beyond the four walls of the healthcare organization. We need IG to expand to others with whom we share information, as capabilities expand connections to the consumer outside the physical walls of traditional healthcare institutions in order to reach local, regional, and global consumer markets.

As we consider the checklist of stakeholders to engage in IG, we must remain aware of this fluid landscape. For example, at times a stakeholder may need to be added on an ad hoc basis, depending on the geographical location, nature of the issue, or situation under review and consideration.

Every day, industry stakeholders see signs and symptoms signaling the need to strengthen health information management (HIM) and governance. However, over time, as healthcare, technologies, laws, compliance, and regulations continue to evolve, so too must we understand enterprise IG as fluid, not static. This also holds true for the list of stakeholders.
In the past, records managers owned records management, perhaps within a compliance department at an enterprise. To address the broader issues surrounding records management, several other key stakeholders must be involved. Legal, information technology, health information management, informatics, and compliance tend to be the departments that touch IG the most, though certainly other departments might seek representation. Many enterprises create IG committees led by an IG officer or other executive to ensure that all necessary constituents are represented and that all relevant issues are addressed.

With all of these additional considerations beyond traditional records management, IG emerged as a platform for organizations to define policies at the enterprise level, across multiple jurisdictions. IG then also provides for the enforcement of these policies for those who work with various repositories of information, data, and records:

- CEOs and other executive leadership in determining how to protect their organizations in the use of information assets
- Records management professionals in designing comprehensive and effective records management programs covering the lifespan of information
- Information technology professionals to design and maintain information systems that meet the organization’s needs

This section sets out some best practice advice and tips when planning a checklist of stakeholders for an IG program.

**ENGAGE AN EXECUTIVE SPONSOR**

IG will set the drivers, policies, strategies, and core processes that information owners need to manage information within the organization. To ensure success, it is critical to have the right people at the table. The program requires an executive-level sponsor. Many organizations form an IG committee, overseen by a chief IG officer (CIGO) or other C-suite executive who makes key decisions on the program. Key to success is carefully choosing the members of the committee to ensure commitment and decision-making power. The Chief Information Officer (CIO), Chief Financial Officer (CFO), Chief Technical Officer (CTO), or general counsel will add authority as policies and procedures are rolled out.

**ESTABLISH A MULTIDISCIPLINARY COUNCIL**

An IG program will affect every part of the organization, so broad and deep support from executives and managers is required. A multidisciplinary committee — often called a council — should be established to drive planning and execution. The best way to approach IG is to roll out the program through a series of smaller manageable projects. As a result, your committee may change over time to include those leaders that are directly involved with the current projects.

**INVOLVE IT AND BUSINESS UNITS FROM THE START**

IG is often driven by the legal department, but there are two groups (IT and business units) that should also be involved. 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.

**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 organization; these may be consumers, businesses, societal partnerships, governments, research institutions, and non-government organizations.2
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.3

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 CIGO, 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 without consideration of a wider application.

When there is an overall plan in place, ensure it keeps pace with the business, with information assets being considered in project prioritization and governance planned into project requirements.

Technology implementations are well understood by most IT and business groups. The user acceptance goal is paramount in these projects and should be taken into account during planning. Key user groups should be involved during the requirements, planning, testing, and early implementation to maximize adoption. Training is also a key component as these systems roll out and one that is often overlooked. Even when systems are very intuitive, training around policy, governance, and systems can go a long way to increasing adoption and compliance to policy.

**CHECKLIST OF KEY STAKEHOLDERS AND AD HOC BUSINESS UNIT REPRESENTATIVES**

Enterprise IG efforts are most successful when sufficient collaboration among key and ad hoc stakeholders occurs. The following checklist will provide additional granularity and perspective on key and ad hoc stakeholder considerations:

- C-suite execs, including the enterprise (IG) officer, IT, IS, and privacy and security
- HIM departments who oversee mechanics of information 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
- Business office and business unit users who need information to operate the organization
- Finance
- Quality improvement leadership
- Clinicians
- Patient safety
- Nursing
- Human resources

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 affected 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.

WHERE TO START AND THE INFORMATION GOVERNANCE PROCESS
One way many healthcare organizations get started with IG is by identifying a pain point, a problem that their organization is struggling with that relates to the organizational strategy. One question to ask before getting started is “what is the biggest problem with information that people are having difficulty resolving in our organization?” Most organizations start by pulling together a group of stakeholders, and those stakeholders then work collaboratively to solve the identified challenge. The stakeholder group can then use the success with this initial initiative as a model for expansion and development of future IG initiatives. The process map below provides an illustration of the process for developing and sustaining IG.

CONSIDERATIONS FOR DEVELOPING CHARTERS
The IG charter document is a practical method of clarifying to team members and other interested parties what the exact purpose, authority, and boundaries are for the team. Team members should 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 outline the expected length of the team’s service and 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. Responsibility levels for each team member should be spelled out including their expected contribution to major milestones. Include details about the team’s budget and detail any requirements concerning how the company will approve necessary funding.
Distribute a copy of the charter to each member as well as any other key individuals. The charter should be updated whenever new members are added or leave the team. A sample IG charter can be found in Appendix B.

**PROJECT PLANNING**

Successful projects don’t just happen on their own; they happen through effective management and project planning. The first step to be taken when starting any kind of project, including any projects associated with the IG strategy, 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. No two projects are identical. 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 in Appendix B.
PROJECT MANAGEMENT GUIDANCE
As mentioned above, successful projects happen through effective management and project planning. Many changes happen between the start and the completion of a project that can positively or negatively affect the outcome. While education and training can provide some of the tools and skills needed to advance IG in a healthcare organization, researching some important project management guidance in advance can assist in developing readiness for an IG initiative. It is important to note that IG is not a project, but organizations can use project management to move the initiative along. IG is an overarching initiative, while project management is a tool that you use to advance the IG program and help move it along.

It should be noted that while project management tools can be helpful to kickstart an IG program, IG is not a project. The IG program may start as a group of projects that are related and are managed as one big task. However, a project is defined as temporary in nature and is undertaken to get specified results in 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.

A number of articles providing guidance on formal project management have been included in the bibliography in Appendix A.

DEVELOPING JOB AND ROLE DESCRIPTIONS
Job descriptions are necessary to ensure that information is being addressed as a part of the IG strategy. It should be noted that not every organization will have the same roles or requirements within their respective organizations. Some organizations may choose to have additional roles while others may have fewer roles or combine IG responsibilities within existing roles in the organization. The most important consideration is to evaluate the needs of the organization and then staff the IG roles appropriately based on the desired outcomes and the availability of new or existing resources. You will need as much information about various IG roles and responsibilities as possible to assist in developing job or role descriptions. One way to get started developing the various role descriptions is to define the job responsibilities of existing employees. This should include a breakdown of current work duties, tasks, and responsibilities being accomplished by each employee. Once you have completed the review, the next step is to evaluate the most important outcomes or contributions needed.

Following that, develop a list of the responsibilities for each IG role, including both general areas of responsibility and specific IG duties. Once the roles are defined, job descriptions can be created or modified to include the roles and responsibilities that are created as a result of the IG initiative. Some suggested roles and their descriptions are noted below.

**Information Governance Executive:**
Responsible for implementing an IG program to make coordinated decisions about information for the benefit of the overall organization that addresses information related requirements and manages risk while optimizing value. Ensures that decisions are made for the benefit of the overall organization and not any particular department or division. Responsible for developing a comprehensive assessment of information related practices, requirements, risks, and opportunities. Establishes an IG program that has structure, direction, resources, and accountability with assurance that the program objectives will be achieved. Ensures effective, timely, and appropriate disposition of information. Ensures that all information and data is protected and secure. Provides assurance that the organization maintains the integrity and availability of long-term information assets throughout their intended useful life. Leverages the power of technologies in its IG program.
Information Governance Program Director:
Implement the IG strategy and program to comply with privacy, confidentiality, and information security-related laws and regulations and company policies and objectives. Proactively anticipates and directs program changes to support continued compliance with the evolving information management and data protection landscape and furtherance of company objectives. Responds to data security incidents and enhances the organization's data security incident response plan. Establishes an information management and protection framework for an effective enterprise-wide IG program and directs day-to-day activities, including program objectives, policies, procedures, training, and communication. Develops methods for demonstrating success through metrics, key performance indicators, and audits or external reviews. 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.

Business Analytics Professional:
Analytics professionals create new insights from predictive statistical activities that target and deliver value to the organization. Assists in defining and implementing the business intelligence (BI) strategy across the landscape including BI strategy analysis and definition; BI governance approach definition and implementation; BI rationalization; BI sourcing/delivery approach and implementation and BI transformation.

Data Architect:
Revises enterprise models (conceptual, logical, and physical); creates data models that conform to existing standards and conventions; provides leadership and guidance with enterprise data strategies; revises data dictionary definitions, governance practices, and standards; and partners with security architects to ensure compliance with data security and privacy mandates. Responsible for end-to-end lifecycle 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.

Data Steward:
Has overall accountability for data and reporting by responsibly managing data assets, data lineage, and data access, supporting sound data analysis and rationalizing information strategy. This role requires focus on data strategy, execution, and support for projects, programs, application enhancements, and production. Overall responsibility for data quality, data accuracy, data analysis, data profiling, data modeling, data queries, and data mapping capabilities. Defines standards and best practices for data analysis, modeling, and queries. Works collaboratively with business owners in assisting them in the accurate, timely, and complete documentation and data collection.

Data Governance Analyst:
Data governance analyst assists the data governance team in the formation and execution of data governance framework, policy, and standards. Assists in the implementation of an enterprise data governance program. Develops control structures to ensure accuracy and quality of data through all upstream and downstream data channels; ensures controls are in place over applications to ensure that data integrity by performing data integrity gap analysis; coordinates the resolution of data integrity gaps by working with business owners and information technology; and works with business partners to gather and understand functional requirements, develop complex queries and provide reports. Monitors and analyzes master data, key data, and master relationship data within the organization. Ensures master data integrity in key systems. Identifies area for data quality improvements. 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 master data management, metadata management, and data governance operations.

**Master Data Management (MDM) Analyst:**
Responsible for successful delivery of technical business analytics and strategy solutions. The MDM analyst should have a basic knowledge of enterprise master data technology initiatives in support of business, operations and technology team. MDM analysts assist with master data schema development, access business rules, and master data design and migration processes. They must follow standards, guidelines, processes, and expertise to consistently address recurring strategic enterprise master data issues. They are responsible for data convergence, data standards, and data synchronization duties.

**Business Owner:**
Has overall responsibility for the data collected in their respective departments, divisions, or services, ensuring 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 that govern documentation standards that impact coding, billing, and overall collections for the organization. The business owner works collaboratively with the data steward in improving the overall data accuracy.

**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.”

**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.”

Sample job descriptions can be found in Appendix C.

**ORGANIZATIONAL CHARTS/COMMITTEE STRUCTURES**
For the IG committee to function efficiently, there must be a clear chain of command. For example, if the committee chair misses a meeting, another leader should be appointed to lead the meeting. A subcommittee of members may meet between the regular full committee meetings to set the agenda for the next committee meeting and discuss any outstanding issues. Additional subcommittees may be formed based on area of expertise or on tasks to be completed. These subcommittees can be broken out to carry out assigned duties. Subcommittees can help keep the committee members engaged by allowing them to utilize their abilities to carry out their duties within the committee.

The IG committee structure will vary depending on the needs and resources of each healthcare organization. The most important aspect of the committee structure is ensuring that appropriate stakeholders are involved and the intended functions of the IG initiative can be carried out.
Sample organizational charts and committee structures can be found in Appendix D.

**ORGANIZATIONAL CULTURE AND CHANGE MANAGEMENT**

Organizational change management is necessary to manage 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, organizational change management addresses the “people side” of dealing with organizational change.

A vision and strategy are necessary before organization change can occur. The vision and the strategy have to be communicated, and explain the need for IG.

A communications plan is essential to change management.

A variety of articles on change management are included in the bibliography in Appendix A.

**ORGANIZATIONAL COMMUNICATION PLANNING**

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 IG COMMUNICATION PLAN**

Purpose of communication plan:
A living communications 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
- Communicate compliance with 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 communication aspects:
**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.

Sample communication plans can be found in Appendix E.

**ORGANIZATIONAL TRAINING PLANNING**

IG training should focus not only on requirements for information handling and management, but also needs to address any future needs as well. Using a strategic approach to 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 to get all staff trained on the role they will play in IG.

A sample organizational training plan can be found in Appendix F.

**DEVELOPING INFORMATION GOVERNANCE-DRIVEN RFP/RFI REQUIREMENTS FOR IT ACQUISITIONS**

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 are 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 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 in Appendix H.

System requirements should address version control, auto delete based on a schedule, functionality that would help manage legal holds, and other functional and technical requirements built into systems. A sample guideline for developing system requirements can be found here: [http://epf.eclipse.org/wikis/openup/practice.tech.use_case_driven_dev.base/guidances/guidelines/system_wide_requirements_8ED0BB6B.html](http://epf.eclipse.org/wikis/openup/practice.tech.use_case_driven_dev.base/guidances/guidelines/system_wide_requirements_8ED0BB6B.html)

**CONSIDERATIONS DURING MERGERS/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 challenges lie ahead. As mergers and acquisitions have grown more common in healthcare, many organizations have faced an atmosphere of uncertainty. However, mergers and acquisitions have become more and more common in healthcare.

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:

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 if there is an existing process for routine deletion or destruction of documents.

4. Develop a map of where all electronic information resides and on what types of systems.

5. 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.

6. 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.

7. 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.

8. 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.

INVENTORY OF ENTERPRISE INFORMATION MANAGEMENT POLICIES

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 organization’s 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 management policies can be found in Appendix G.

INFORMATION GOVERNANCE CASE STUDIES

To assist in understanding the challenges associated with developing an IG initiative in healthcare, AHIMA initiated four case studies based on the experiences of different types of healthcare organizations who had 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, as well as help uncover some of the overarching goals of IG in healthcare.

CASE STUDY—ACADEMIC MEDICAL CENTER SYSTEM

This case study was previously published in the AHIMA Body of Knowledge as “State of Health Information Governance in Healthcare: Case Study—Academic Medical Center System” at http://library.ahima.org/xpedio/groups/public/documents/ahima/bok1_050604.hcsp?dDocName=bok1_050604
Organizational Description
This facility is an academic medical center with two hospitals, behavioral health services, and multiple outpatient clinics. The system has:

- More than 20,000 admissions annually
- 300,000 outpatient visits
- 4,000 staff
- More than 600 beds

IG Program Description
Executive IG Program Sponsor:
CEO
Program Manager
Associate Administrator

This organization has had an IG program in place for three years. The goal of their program is to ensure the organization is analytics driven to ensure better performance and outcomes.

The IG program was launched by the company’s CEO. It was his desire to be an analytics-driven organization in both performance and outcomes that led to the development of the program.

The individuals interviewed during the case study stated that communication has been the key to the success of their program. HIM leaders play a significant role in the IG program. The leaders that were interviewed felt that there were significant emerging roles for HIM professionals in IG.

Changing the corporate culture to embrace IG initiatives was key. One of the benefits to this system’s IG program has been the ability to identify existing reports and find data when it is needed.

Balanced scorecards are shared with staff and all scorecards are driven up to the executive level of the organization for review. The senior leadership has used the data derived from the scorecards to drive change in the organization. People in the organization have said they continue to want more data. They have been using their EHR for more than three years and being able to respond to the requests for information has become paramount to the success of the IG program.

No new staff members were hired for the IG program. Existing staff were promoted within the organization to higher levels of responsibility. It was noted that the organization recognized the value of having HIM professionals in quality and integrity roles.

Report request forms were developed, and all report requests must align to an organizational priority or strategy to be considered for development. A lot of data requests are sent for executive approval to ensure that key stakeholders are aware of what data is being developed and distributed and to ensure that only those with proper authority have access to the information.

Prior State Analysis
Before the adoption of the IG program, the organization developed reports in silos. They already had built multiple reports, but staff did not know they existed. Time was spent recreating reports. The company uses a balanced scorecard approach for reporting and measuring outcomes. As a result, the organization developed more than 20 recommendations for inclusion in its data/IG model. The organization brought in a consultant to assist in developing the program.
IG Drivers
The organization recognized a number of information management issues that brought the IG initiative forward, including inaccurate data for decision-making, quality issues, data integrity issues, reimbursement issues, inadequate data storage and retention, and the impact on processes from recently expanding into health information exchange (HIE).

The organization is driven by the desire to use information to improve population health and outcomes and is looking at future enhancements that will utilize predictive analysis in an attempt to prevent hospital readmissions.

Highlights of the IG program include:
- Senior-level executive support (CEO project champion)
- Organizational design that supports quality and integrity of information
- IG program built around strategy
- Improved privacy of reports. Reports now require executive approval prior to build
- Initial policies are in place, but there are still gaps in metadata management and data dictionaries
- Centralized management of reports. Reduced redundancy in report requests and enhanced delivery
- Enterprise report management enables rerun of reports versus rebuild
- Reports archived for future needs

IG Program Structure
Components addressed with the enterprise information management governance structure include access, security, and confidentiality; information integrity and quality; information design and capture; content and records management; and information analysis, use, and exchange—including participation in an HIE.

There are clear decision makers related to “sun setting” existing IT systems as well as acquiring new systems, though few systems have been sunset to date. The organization is in the process of getting more systems at this time and vetting new applications is dependent upon the scope of the application. Any application requiring more than 160 hours of IT time or $50,000 needs be approved by the executive committee. Smaller-dollar projects that meet certain thresholds are vetted at different levels.

All privacy breaches come through HIM, and the HIM staff works in collaboration with the privacy officer, legal, and IT staff to ensure breaches are addressed appropriately.

A 12-to-18 month roadmap has been developed to assist in building more core structure, increased focus on building functional areas, and ongoing policy development and governance work.

The organization is moving to a predictive analytics model in an attempt to identify what can be done to prevent readmissions to the hospitals. There is an organizational goal in place to ultimately use the tools to improve population health in the communities served.

Organizational Impact
The organization has a fair number of challenges and recognizes there is still work to do before they complete their IG model. Developing policies and procedures, as well as defining the roles and responsibilities of stewards and owners, has proven to be challenging. There is a recognized need to improve standards around metadata and establish enterprise-level metadata management structures. The organization also needs more definition around architecture and standards. The organization is following AHIMA’s guidance on metadata management.
IG Benefits Realized
Benefits to the program have included a cost/benefit realization of several million dollars, the development of a better way to track quality outcomes, and lowered transcription costs. In addition, the program has been seen as a priority for the organization, and a significant amount of resources have been allocated to make it successful. One of the immediate tangible benefits noted was the ability to quickly turn around reports.

Summary
This healthcare organization is taking a lead in the development of IG. Driven by the desire to use information to improve population health and outcomes, the organization is also looking at future enhancements to include predictive analysis in an attempt to prevent hospital readmissions. The organization values the input of HIM professionals in IG and has promoted three individuals to key roles within the governance program. As the value of data becomes more apparent to the organization, the desire for quicker and more reliable data has increased such that demand has outgrown capacity. Despite having the program in place for more than 18 months, there is another 18–24 months planned for additional improvements to the program, including the implementation of master data management, metadata analysis, and predictive analytics.

CASE STUDY—INTERSTATE INTEGRATED DELIVERY SYSTEM
This case study was previously published in the AHIMA Body of Knowledge as “State of Health IG in Healthcare: Case Study—Interstate Integrated Delivery System” at http://library.ahima.org/xpedio/groups/public/documents/ahima/bok1_050606.hcsp?dDocName=bok1_050606.

Organizational Description
This facility is an interstate integrated care delivery system with a wide range of inpatient and outpatient services. It is one of the largest integrated healthcare systems in the United States.

The organization has:
- More than 100 hospitals
- 1,400 outpatient clinics
- 50,000 providers
- 8 million visits

Program Description
This organization has had an IG program in place for over 10 years. The goal of their program was to ensure that patients’ records could be accessed and retrieved at any of their system locations, creating a single source of truth for seamless coordination of care. The organization also formed a data council that aids in tying together all of the data from each separate facility at the enterprise level.

Prior State Analysis
As mentioned, this organization has had an IG program in place for more than a decade. Prior to that time, there was a decentralized model for data collection and analysis. However, the decentralized model made care experiences inconsistent for their patients and coordination of care was not always efficient. The desire to ensure seamless transitions of care throughout the network of providers, regardless of geographic location or setting, prompted the organization to developing a consortium at the enterprise level. The goal was to make certain that information was available when and where needed for patient care. There was also a desire to analyze patient data for improved outcomes that could not be effectively accomplished with the prior model. In addition, there was a desire to benchmark physician productivity, which was difficult to accomplish.
IG Drivers
The organization wanted consistent data across all of its facilities that would enable them to analyze the data for trends. Data was inaccurate for decision making, and third-party billing was difficult, which created reimbursement issues. There was also a desire to monitor physician productivity and enable more functionality for downstream data use.

Highlights of the IG program include:
- An enterprise-wide consortium to capture and disseminate information across the entire care delivery system
- Executive staff working together to achieve a common platform
- A charter establishing a data governance council
- Data governance council used as a central governing body for IG efforts

IG Program Structure
This organization uses a hybrid approach to their management of information. They have created a centralized authority (consortium) with a decentralized model allowing individual organizations to have some control and decision-making authority for information obtained at the local level. The enterprise data council is led by the director of data quality. Within the consortium are representatives from all areas of the business, including HIM, finance, the business office, clinical and patient care leadership, information systems, privacy/security, and nursing.

Components addressed with the enterprise information management governance structure include information access, security, and confidentiality; information integrity and quality; information design and capture; data warehouse maintenance; content and records management, and information analysis, use, and exchange.

A road map has been developed to assist in building more infrastructure, with an increased focus on metadata, ensuring that information is interoperable and can be exchanged with any health system. There are plans for greater use of analytics to improve outcomes and developing improved methodology for data capture and use. Work groups have also been established to evaluate data management and data architecture.

Organizational Impact
This organization has clear processes in place around sun setting of IT systems and centralized authority over the acquisitions of new systems or upgrades to existing technology. They have the ability to quickly address any data quality issues that might arise, as well as have practices in place to quickly address any type of privacy breach.

The organization has future activities planned to better analyze and improve their data quality.

IG Benefits Realized
The organization reports that they have seen many positives from the IG program. They have achieved a network-wide health information exchange across their entire care system. Coded information is used to tie patient conditions with clinical reminders. There is easier access to information for decision making, and the organization has an increased confidence in the accuracy of its data.

Summary
This organization had an enterprise consortium for more than 10 years; it is composed of council representatives from all the various business units and led by the director of data quality. The organization recognized a desire to use data downstream, which led to
a requirement for consistent data to analyze for trends. Third-party billing was difficult under the previous model, as was analyzing physician productivity.

No individual leader was responsible for getting buy-in for the IG program. Instead, it was driven by a desire to improve coordination of care and improve patient outcomes across the organization since many patients seek care at multiple geographic locations. HIM staff are responsible for looking at data for peer review at the enterprise level and evaluate data for the establishment of patterns. HIM staff also provide training to clinicians on CPT and ICD coding, and they educate staff and coders on proper code assignments.

The formation of the consortium has brought executives together from across the system to achieve a common goal, and this has resulted in an improved culture of care for the populations the system serves.

**CASE STUDY—LARGE REGIONAL INTEGRATED DELIVERY SYSTEM**

*This case study was previously published in the AHIMA Body of Knowledge as “State of Health IG in Healthcare: Case Study—Large Regional Integrated Delivery System” at [http://library.ahima.org/xpedio/groups/public/documents/ahima/bok1_050605_hcsp?dDocName=bok1_050605](http://library.ahima.org/xpedio/groups/public/documents/ahima/bok1_050605_hcsp?dDocName=bok1_050605)*

**Organizational Description**

A large regional medical system with more than 20 hospitals and more than 30 outpatient clinics, outpatient surgery centers, and urgent care clinics. The system has:

- 200,000 admissions annually
- 10 million outpatient visits
- 35,000 annual births
- 5,000 physicians
- 40,000 staff
- 5,000 beds

**IG Program Description**

Executive IG Program Sponsors:

- Vice President of Information Systems
- Program Manager
- Director of Data Governance

This organization’s IG program started several years ago when HIM staff needed an enterprise master patient index (EMPI) to consolidate patient records for the more than 20 hospitals in the system. The hospitals were duplicating patient records, making coordination of care difficult. The data team was able to successfully implement a single shared EMPI to eliminate duplicate patient records.

Prior to the start of the IG program, the organization was transforming from a decentralized care model to a shared service organization model. The vision for the organization was clinical integration. Staff members were requesting data but did not have the appropriate access to obtain it. Data that they did have access to receive was taking too long to obtain. It was recognized that there needed to be an IG program in place to better enable coordination of care throughout the entire shared services organization and also to maintain a competitive advantage in the various service regions.
Prior State Analysis
The organization had recently implemented an EHR and access was being managed by giving only a limited group of employees access to perform job duties. There was a process set up to manage access to data, but it was inefficient in some areas. Depending on one’s role, an employee may or may not have been able to see or share data, and there was no formal structure in place for managing processes. Regional hospitals were assigning duplicate medical record numbers to patients, making it difficult to coordinate care across the organization.

IG Drivers
Senior leadership recognized that the organization required an IG model. Trying to manage information at the local level was not allowing the organization to capitalize effectively on the economy of scale that could be realized through a centralized governance process.

Initial IG program drivers included:
- A need to manage costs around supplies, in particular devices and prosthetics
- Desire for a standardized approach to understand data and share this information within their community hospital affiliate network
- An enterprise master patient index was needed to ensure smooth care coordination throughout the regional organizations
- Need for a centralized IG process to allow the organization to capitalize on economy of scale

Program Highlights
Highlights of the information/data governance program at this large regional integrated delivery system include:
- Organizational design designed to address the need for access to data and reports
- Executive level support through vice president-level sponsorship
- Use of a physician champion for the project
- Centralized management of access and reports

IG Program Structure
Components addressed with the enterprise information management governance structure include:
- Data quality and classification
- Retention/storage/disposal of data
- Access, security, and confidentiality

Future State
The organization has had their information/data governance program in place for more than two years, and they are still developing additional infrastructure. Although they do have business unit stewards in place, there are not consistent processes across all business units. Business unit stewards are in place in the clinical, financial, and supply areas. The desired future state includes a roadmap for a standardized approach to data governance for all the community hospital affiliates. Policies have been created and are in the process of being updated and implemented.

Organizational Impact
It is recognized that the cultural shift in the organization toward IG is challenging, and communication at all levels is a key to program success. Change management and accountability are being addressed as a significant component to the overall IG program.
IG Benefits Realized

Benefits of the program for this system have included:

- Reduced costs around supply management in the areas of devices and prosthetics
- A unified EMPI, with regional hospitals no longer duplicating patient records
- Improved coordination of care across the system

Summary

The IG program at this organization began with the realization of the need for an EMPI to enable successful implementation of an enterprise EHR. Prior to the implementation of the IG program, each patient was given a new medical record number at each individual facility, therefore making coordination of care difficult. A project was initiated to pull together all the separate medical records into a unified master patient index from the more than 20 hospitals that had previously operated independently.

Over several years before the implementation of the IG initiative, the organization began to realize that they needed an approach to IG. The organization was transitioning to a shared services model. Members of the shared services organization were requesting data, but they did not have appropriate access to obtain it, and what they were able to obtain was taking too long to get. A physician champion created a vision of an IG program wherein clinical information could be integrated throughout the organization. The physician lead approached the vice president of information systems with a proposed governance model. Executive leadership agreed that the approach was appropriate and necessary to ensure that information and data could be obtained, understood, and analyzed.

The organization felt there was an immediate need for IG, as they were not nimble and could not respond quickly enough to requests for information. A charter was drafted and a director of enterprise data governance was hired. Business intelligence staff acted as project managers on the program, and activities were undertaken to finalize processes.

The biggest hurdle to overcome has been the culture shift that needed to occur with 40,000 employees. Therefore, a change in management and accountability structure has been implemented to ensure success of the IG program.

The organization currently addresses data quality and classification; retention, storage, and disposal of data; and access, security, and confidentiality issues. There are business unit stewards in place for mapping and in other functional areas, including clinical, financial, and central supplies. The vice president of information systems has oversight of the program from a clinical perspective and the business intelligence team project manages all of the IG program activities.

At this time, HIM staff is not involved in the IG program. The majority of the program is designed around information systems infrastructure, with an online data warehouse and data vault serving as a key function of the program.

The organization recognizes that they are at the beginning of a long journey to accomplish their goals and have a future state analysis under way to continue to map out the future state of their program.
CASE STUDY—FOUR-HOSPITAL INTEGRATED DELIVERY SYSTEM
This case study was previously published in the AHIMA Body of Knowledge as “State of Health IG in Healthcare: Case Study—Four-Hospital Integrated Delivery System” at http://library.ahima.org/xpedio/groups/public/documents/ahima/bok1_050607.hcsp?dDocName=bok1_050607.

Organizational Description
This organization is an integrated healthcare system and the region’s largest healthcare provider. They provide services to patients throughout their region through four hospitals, more than 48 outpatient clinics, and more than 1,500 affiliated physicians.

The organization is a recognized leader in the adoption of electronic health records (EHRs), with a system-wide implementation that allows its hospitals and physicians to offer integrated, coordinated care throughout the region.

IG Program Description
Executive IG Program Sponsor:
- President/CEO
- Program Managers
- CIO and Chief Quality Officer

This organization started its IG program to tie together information from the EHR at four hospitals that fall under the umbrella of the corporation. Each hospital is a separate legal entity, and these hospitals did not share common data prior to the implementation of their EHR. In order to ensure that information was reliable for patient care, as well as to ensure patient safety, an EHR workgroup was established. This group led to the further establishment of the clinical governance program.

Prior State Analysis
Prior to the initiation of the IG program, each of the hospitals in the system operated independently as a separate legal entity. This led to problems getting data and being able to respond quickly to requests for release of information, quality reporting, core measures, and meeting contracted, quality required for pay-for-performance.

HIM staff had participated in the implementation of the EHR, but they did not have a voice in how the EHR-generated data was being used. HIM leadership recognized that a framework was needed.

Physicians were complaining of there being too much clutter in the EHR. Also there were complaints of too much “garbage” in the record, and physicians were saying they could not get to the heart of the patient’s complaints. They wanted to have a mechanism to understand the patient’s story. Some physicians wanted to use “progress notes” for everything without entering any discrete data. There was a dependence on scanned documentation, both clinical notes as well as business documents. Scanned documents could not be found in the “notes activity” within the EHR, meaning physicians had to search multiple tabs to find information while providing patient care.

IG Drivers
The IG program was started to meet reporting requirements for core measures and quality initiatives. The data that was being pulled was felt by staff to be inaccurate or incomplete, and the lack of data integrity was leading to patient safety concerns.

Physicians could not tell the patient’s story with the amount of clutter in the EHR. Filters were not usable and problem lists were not being maintained. Eight to nine years after the EHR’s implementation, HIM staff was being bombarded with scanned documents,
both clinical documents as well as business documents, all of which needed to be maintained. But the record volume was making it difficult to find what was needed to manage patient care. Another driver was related to legal cases that emerged when release of information requests were sent with incomplete information.

The quality team was challenged because they had no real guidance available to them on what was appropriate data that should be pulled for core measures. HIM staff was asked to provide guidance and develop policies on documentation, problem list use, and appropriate use of templates with structured data to ensure that data could be pulled effectively for quality reporting.

The organization is a part of the regional health information exchange (HIE) and the CIO and the privacy officer represent the organization on the exchange.

**Program Highlights**

The system’s president/CEO was instrumental in getting the IG program initiated. The hospital CEO for each individual organization was asked to champion the project locally. The enterprise CIO and chief quality officer were given authority to manage the umbrella program, and the chief nursing officer was enlisted to provide guidance from a patient safety perspective. Physicians were supportive because they were program drivers with the desire to achieve pay-for-performance measures as well as wanting the development of more patient-centered care. Nurses were identified from within the system to work with the chief nursing officers to take on a leadership role in the program.

HIM professionals have a governing voice, and the legal department also participates to ensure they are guiding decision making. They developed a program charter and used existing staff in the governance program. A fundamental element for success has been empowering staff to bring forward suggestions for improvement.

Prior to implementation, there were multiple distinct organizations that all had individual identities. There were three different models in place for physician staffing: employed physicians, community physicians, and one facility was physician owned. The system also utilized medical students and residents.

Executive leadership focused on making the program physician driven to harmonize the various physician groups and put guidelines in place that applied to all physicians in the organization.

A physician workgroup was pulled together as a part of the IG program. The goal was for the workgroup to evaluate all existing templates and standardize them for patient care, core measure and quality reporting, and to ensure patient safety.

By making physicians the drivers of the change, the organization was able to show the importance of IG and gain physician buy-in. Physicians are now happy with the ownership they have over the information in the record, and they are now taking responsibility to ensure that the policies and IG structure is enforced.

**IG Program Structure**

This organization has a centralized approach to IG within the organization. There is a centralized authority led by the CIO and chief privacy officer with a secondary group of leaders from across the organization that provides control and decision-making authority for information obtained at the enterprise level. There are subgroups with responsibilities for data within their respective business areas, and additional staff can be brought into the program to design workflows, documentation flow sheets, order sets, and other items as needed.
Components addressed with the IG structure include access, security, and confidentiality; information integrity and quality; information design and capture; content and records management; and information required for participation in the regional health information exchange.

**Future State**
The organization recognizes that everything in healthcare is changing, and they are preparing to react to this change. It is this organization’s stance that if they have to measure something, then they need to know how to get the necessary information out of their systems.

The organization is working on making sure they are able to keep up with requirements for the Centers for Medicare and Medicaid Services’ “meaningful use” EHR Incentive Program, core measures, pay-for-performance, hospital-acquired conditions reporting, ambulatory care requirements, and preventive screening notifications.

They are currently working on IG policies and procedures, and while some fundamental policies are in place, most is still a work in progress.

**Organizational Impact**
Impact of the IG program on the organization has included:
- Centralization of decision making for information use and dissemination
- Executive leadership has driven the organization to be aligned with its strategic initiatives
- All employees are expected to think about data in terms of how it affects the patient

**Benefits Realized**
As part of the initiative, filters were set for scanned images to make it easy to filter out business documents from patient care documents. Physician leadership was able to get buy-in from primary care physicians for them to “own” the problem list. Other filters were built to make it easier to find what was needed for patient care and to reduce concerns over patient safety when necessary information could not be found.

One of the intangible benefits realized from the initiative is the ability to get all levels of the organization to participate in the program while it is still being developed. Leadership has recognized that they can still be aggressive in moving the program forward while they continue to think it through in terms of development.

There has been a need to go back at times and work through challenges, but that has been seen as a positive for the organization because it has helped staff uncover their talents and become a more aggressive and progressive organization. In addition, flexibility has been key since it is recognized that the program outcomes are not always as expected. But by approaching the governance program with the best intention and by thinking about how it affects the patient, there will be knowledge and wisdom gained along the way, organization staff feel.

**Summary**
This organization recognized the need to bring together information from all of their affiliated hospitals which, prior to the organization of their IG model, had operated independently from one another.
The key drivers for formalized IG in this organization included:

- The need for accurate data for core measure reporting
- A desire for better integrity of information in the EHR
- A concern for patient safety
- Identified gaps in their release of information and documentation processes

The CIO and chief privacy officer were essential to getting buy-in for the IG program. HIM staff have a governing voice in the IG program, including holding responsibility for developing and monitoring compliance with IG policies. Physicians also have a voice in the governance program, and this has helped with buy-in from physicians across the organization.

Overall the IG program has brought executive-level staff from within the organization together to achieve the goal of a unified health system that is prepared to meet the upcoming challenges that they expect to see in healthcare.

**CONCLUSION**

IG offers a wealth of opportunities for improving outcomes for healthcare organizations and their patients. Healthcare professionals must be ready to address the existing culture, re-examine and refine policies and procedures, embrace change, and use strong management skills to help shape the future strategy of the organization as it develops and refines its IG platform. Through IG, healthcare organizations can lead the way in achieving the triple aim of improving the healthcare experience for patients, improving population health, and reducing costs.

**NOTES**

1. AHIMA thanks ARMA International for use of the following in adapting and creating materials for healthcare industry use in IG adoption: Generally Accepted Recordkeeping Principles® and the IG Maturity Model. www.arma.org/principles. ARMA International 2013. Find the IGPHC at http://www.ahima.org/~/media/AHIMA/Files/HIM-Trends/IG_Principles.ashx


5. Ibid.

APPENDIX A

BIBLIOGRAPHY OF ARTICLES AND ADDITIONAL READING


Blair, Barclay. “Making the Case for IG.” ViaLumina Ltd., 2011. http://barclaytablair.com/2012/02/24/making-the-case-for-information-governance-ebook-on-slideshare/ This e-book provides definitions, outlines the barriers and challenges, and discusses the business case for IG. A practical approach to developing an IG program is provided. The author points out that lack of IG opens the organization up to legal exposure and litigation. The IG program needs to be able to withstand the scrutiny of the court system. Falling short can lead to fines and other negative consequences. The author believes that an effective IG program provides a level of assurance that information assets are being managed appropriately.

Buckles, Greg, et al. “Importance of IG.” London: eDJGroup, 2012. http://chrisdale.files.wordpress.com/2012/08/edj-information-governance-report-2012.pdf The eDJ Group conducted an updated survey to look at the state of IG in 2012. At that time, one third of companies had an active IG program, one third stated that they were in the planning stages and one third stated that they either had no program or were unsure. The desire to control information across all departments is a common reason for instituting IG. Executive leadership is needed though the title or position of the executive may vary. Establishing a culture of responsibility for use, storage, and sharing of information is critical. Accountability for information management does not necessarily belong to the CIO although several companies in the survey used this position to lead the IG initiative. A team approach is needed in order for the IG program to be successful. The most important factor in the success of the program is ensuring cross-functional communication and cooperation among business units.

“Data, Data Everywhere.” *The Economist*, Feb. 27, 2010. http://www.economist.com/node/15557443 This is a series of articles on the need to manage the proliferation of information that is occurring in all sectors. It discussed the associated business issues and the need for governance. The amount of digital information increases ten-fold every five years. Currently, only 5 percent of it is structured but this is changing rapidly. As information becomes increasingly digitized, aggregating and analyzing data is likely to bring bigger benefits. Information created by machines will largely be used by other machines.

DeAbreu Faria, Fernando, Antonio Carlos Gastaud Macada, and Kuldeep Kumar. “IG in the Banking Industry.” 2013 46th Hawaii International Conference on System Sciences (HICSS), pp. 4436-4445, 2013. This research paper focuses on IG in the banking industry. It involves a study of 13 banks in three countries, all with highly developed financial systems: Brazil, Hong Kong (SAR of China) and the United States. In addition to reporting on the perceived need for IG in today’s banks, the study proposes an IG framework. It offers a set of “factors” (principles) for informing an IG framework for the banking industry—most of which is likely transferable to healthcare.

A visual representation of IG policy/process cycle showing stakeholder perspectives of business, legal/risk management, and IT.

This book chapter discusses steps for developing a data governance framework, including: (1) review best practice and peer organizations to evaluate their methods, (2) devise a strategy and gain support of stakeholders, (3) perform a current state assessment to understand challenges and utilization of data, (4) identify metrics and KPIs, (5) quantify the cost of data governance efforts, since quantifying the benefits of data governance is more difficult, and (6) track the application and usage of data to ensure that it meets the goals of the organization. The importance of change management in developing and using the framework is emphasized as well as the need for corporate leadership to be aware of its role and responsibilities in data governance.

This article highlights an aspect of governance that is unique to healthcare—patient identity management. It discusses the need to address data stewardship as part of data governance. Data governance involves creating a shared understanding of data uses, identifying tools for data analysis, and developing a solid data stewardship structure. Effective governance models involve people, policies, as processes as well as technology.

ARMA’s Generally Accepted Recordkeeping Principles sets out accepted principles for recordkeeping with implications for IG. These principles include accountability, integrity, protection, compliance, availability, retention, and transparency. In addition, the ARMA Maturity Model for IG attempts to paint a more complete picture of what effective IG looks like. It is based on principles as well as a foundation of standards, best practices, and legal/regulatory requirements. The maturity model serves as a foundation for assessing adequacy of recordkeeping programs by identifying five levels of maturity: Level One — Substandard, Level Two – In development, Level Three — Essential, Level Four — Proactive, Level 5 — Transformational. The IG Maturity Model will assist organizations in conducting an evaluation of recordkeeping programs and practices.

“Governance from the Ground Up: Launching Your IG Initiative.” SAP white paper, 2011.
IG encompasses both strategy and execution. It is business driven.
Many organizations have attempted to initiate IG but have failed to get it off the ground. The most common reasons for this include failure to launch (team meets but initiative goes nowhere), hiding behind the team (no one taking the lead), absence of data management (presence of data management in-house but business side of organization is unaware), unwillingness to assign decision rights (no authority to hold people accountable for results), assuming an immediate enterprise focus (inability to make the case for IG). Formalizing the role of data stewards with the authority to fix data problems
solves the issue of having no one to “own the data.” The ideal IG project begins with a small business problem to be solved. Establish new smaller processes and ensure that they are repeatable and can scale to the next project. This proof of concept is what can put IG into practice and set the stage for an information-enabled organization.


This chapter provides an argument for why and how the health workforce should be contributing to health IG, followed by an historical overview of various initiatives undertaken, the results achieved and issues identified during these processes. It concludes with an exploration of strategies that may be adopted to bring about change and achieve improvements. (E-book, fee required.)


Discusses IBM’s history with IG as well as offering a repeatable process and thoughts about automating IG. May be helpful in development of assessments of effectiveness of maturity of organizational IG.


This 2010 report that details the results of an IG survey of legal, records, and IT staff in Global 1000 companies from 10 industries. Challenges and barriers to IG are highlighted in the report. An IG maturity model is included in the report to assist with addressing barriers. The top IG initiatives that were planned in the next one to three years included activities around risk reduction and cost reduction. The report suggests that no single department can be solely responsible for the IG process. Collaboration among stakeholder groups was identified as a key success factor for an IG program.


IG requires a balanced approach through which effective management of risk, compliance, related policies are used to achieve business objectives. Well-defined policies help establish the principles and guidelines to ensure the scope of IG is maintained. The steps to managing policies include the following: (1) Evaluate the scope of existing policies. (2) Assess if each policy is fit for its purpose. (3) Create clear alignment between business objectives and information policy. (4) Define SMART information policy principles. (5) Make information policies active instruments for IG. (6) Use metrics to drive behavioral improvement.


Presents case studies based on experiences of four healthcare organizations with active IG initiatives. Goal of article is to offer better understanding of IG, present issues and address questions associated with implementation in healthcare and encourage HIM professionals to assume leadership roles. (Full text available to AHIMA members.)


Health data stewardship involves responsibility for assuring appropriate use of health data and liability for inappropriate use. The purpose of stewardship is to obtain the greatest benefit from effective and appropriate use of data while minimizing risk.
Health data stewardship has become more urgent with the rise in electronic health data; recognition of the value of electronic data in improving population health; acceleration in the use of information technology; and awareness of the risks associated with inappropriate uses of data. Anyone who collects, views, stores, exchanges, analyzes, or uses electronic health data is responsible for data stewardship. Essential practices include transparency about use; identification of the purpose for data use; participation of individuals; security safeguards and controls; de-identification; data quality, including integrity, accuracy, timeliness, and completeness; limits on use, disclosure, and retention; oversight of data uses; accountability; and enforcement.

Khatri, Vijay, and Carol V. Brown. “Designing Data Governance.” *Communications of the ACM* 53, no. 1 (2010): 148–152. This research-based article draws distinctions between governance and management and provides a framework for data governance. It purposefully does not distinguish between data governance and IG and provides a decision matrix which can be used to design a data governance initiative.

Kloss, Linda. *Implementing Health IG: Lessons from the Field*. Chicago: AHIMA Press, 2015. Succeeding in a value-based health system has changed requirements for trusted information at all levels. Healthcare has transitioned from a paper to a digital infrastructure over the past decade, but the governance and enterprise management mechanisms have not yet caught up. Current practices remain largely isolated and insufficient for the new digital information environment. The growing volume and sources of electronic data and the complexities of information and communication technologies eclipse the governance capacity of most organizations. (Book available for purchase; discounted for AHIMA members.)

Kooper, M.N., R. Maes, and E.E.O. Roos Lindgreen. “On the Governance of Information: Introducing a New Concept of Governance to Support the Management of Information.” *International Journal of Information Management* 31, no. 3 (June 2011): 195–200. This paper from the University of Amsterdam provides a conceptual definition of IG as “the set of activities aimed at establishing a normative foundation to facilitate and stimulate sense making interactions.” It discusses the background of IG as an extension of IT governance principles, but makes the point that there is an important difference between the two.

Laney, Douglas. “The Birth of Infonomics, the New Economics of Information.” Gartner, October 2012. This Gartner report discusses issues associated with the valuation of information as a business asset. Infonomics is an economic theory developed by Gartner that recognizes information as being an asset. Accounting theory can therefore be applied for managing information in the same manner as any other enterprise asset. At its core is a set of seven principles: 1. Information is an actual asset. 2. It has both potential and realized value. 3. Its value can be quantified. 4. It should be accounted for as an asset. 5. Information’s realized value should be maximized. 6. Information’s value should be used to help budget IT and business initiatives. 7. Information should be managed as an asset. By embracing the principles, organizations can achieve benefits in operational and financial performance.


Based on literature review, an organization-wide data quality management and IG framework is presented to support the premise that collection of quality data supports safe and effective patient care. (Full-text available, open source journal)

Logan, Debra. “Hype Cycle for Enterprise Information Management.” Gartner, July 2012. Defines and discusses the components, including organization and roles, associated with enterprise information management (EIM); identifies the maturity of EIM as “adolescent” and predicts that this “transformational” activity will become mature in 5-10 years. Strategies to begin valuation of information will drive and be driven by EIM.

O’Kane, Bill. “Nexus of Forces Boosts IG and MDM.” Gartner, November 2012. The increased visibility of the information component of the nexus of forces (mobile, social, cloud, and information) is boosting the need for IG and leading to the creation of the new executive role of chief data officer (CDO). The new executive role of chief data officer is responsible for ensuring that materially valuable business information is valid, verifiable, managed, true, appropriately private and interoperable. The CDO meets the role’s challenges partly through policies that assign some responsibilities to business data stewards and others (operational responsibilities) to IT data custodians. The role of the CDO is to lead in the management of information as a business asset. Effective use of information across the organization will impact how technology is used to support IG.


Discusses HIM’s evolving role and transition from a focus on paper and low-value task and activities to the more strategic functions and roles associated with IG in healthcare. The white paper looks at current state and best practices that will enable HIM professionals to move to IG.


This article describes the data governance evolution and model used to address data from the EHR at Vanderbilt University Hospitals. The EHR was often inaccurate or incomplete and posed a potential risk to patient safety, confidentiality, and data quality. The article points out that making a solid business case for data governance is crucial for securing buy-in from executive management and organizational stakeholders. It is important to align business and IT strategies to ensure that resources are available for data governance. Data governance should be a priority for healthcare leaders.


Article describes the financial and operational challenges of today’s healthcare environment, argues that data-driven organizations can serve new patient populations, improve quality and efficiency of care. Key pillars (governance, organizational structure, people, process, technology) are outlined as foundational to the developing this strategy. Importance of culture is addressed. (Full-text available to journal service subscribers.)
The article described the data governance start up activities at Sutter Health.
Recommendations for developing an IG program include: (1) Create a vision to drive change by addressing business need such as a breach or reimbursement issue resulting from a management or data integrity issue. (2) Convene a steering committee, assign key roles, and engage executive leadership. (3) Define program's scope. (4) Conduct a current state assessment. (5) Develop a time frame; it could take 12-18 months just to get started. (6) Identify areas to achieve impact through an incremental approach. The goal is to ensure information assets are managed and controlled.

Discusses data governance within the context of access to health information for clinical and health services research. This includes the role of the data steward whose function is to ensure trustworthiness of data, including its acquisition, storage, safeguarding and usage as well as ensuring that patient rights are respected.

This commentary from the Sedona Conference, a legal think tank, explains the need for comprehensive IG from a compliance and risk management standpoint. With a focus on records and information management, privacy and security, and e-discovery, it offers a set of 11 recommendations for organizations to address in IG programs.

IG requires strategic coordination across all business units. A successful IG program should incorporate four lines of function within every organization: (1) organization and culture (addressing structure and change management). (2) Policy and management (3) Effect on business processes, and (4) technology optimization. IG models going forward will likely start with a C-suite position and undergo refinement based on organizational need. The risks and benefits of big data have been a prominent concern for executives. There is a recognized need for the effective organization, retrieval and destruction of information. IG programs must also address data security, including breach prevention and response. Done correctly, IG will not only prevent immediate failure of existing programs, but set up new programs for success.

The proliferation of mobile devices brings new challenges associated with less ability to control these new sources of data. Through a semi-structured interview process with records management professionals, this research paper looks at the implications of mobile devices and information security for IG. It found that organization security culture, mobile strategy and security framework were important issues to be considered in IG associated with mobile technology.

This book reviews the business cases and lays out best practices for IG in several different industries and points out what they can learn from each other. Industries covered include financial services; healthcare; manufacturing; retail; transportation; government; energy; and telecommunications. It lays out 14 steps to implement an IG program regardless of industry as well as roles and responsibilities, metrics, software tools, and maturity assessment.


Companies often develop IG programs to mitigate compliance risks or as a means of leveraging unstructured data as a business asset. The article discusses the following basic IG best practices for launching and sustaining an IG program: (1) Set clear governance roles and responsibilities. (2) Create policies and procedures to support the program. (3) Appoint the proper leadership—an executive with the authority to make decisions. (4) Establish clear metrics and communicate the value of good governance. (5) Make IG a continuous process. The biggest barrier to IG success is the lack of rightful program “owner”—one with enough authority and enterprise support to focus a governance initiative and keep stakeholders engaged. To ensure that IG programs don’t fail, executive leadership must hold team members accountable. This means factoring the IG role into job descriptions as well as performance measurements.


“2013 Data Governance Survey Results.” Rand Secure Data White Paper. This recent survey describes the areas where organizations are succeeding with data governance efforts and where they are lacking. Forty-four percent of survey respondents replied that their company does not have a formal data governance policy in place. Organizations in which C-level executives are very involved or extremely involved in data governance, are three times less likely to experience complete data loss or a data audit failure—indicating that there is a relationship between the involvement of C-level executives in implementing data governance solutions and the overall success of a data governance within an organization. Based on the results of this survey, Rand Secure Data recommends that all organizations develop a formal data governance policy or reevaluate your current policy; take a cross-functional approach to data governance; ensure that data governance policy complies with legal and regulatory requirements; consider implementing new technology solutions.

Weber, Kristin, Boris Otto, and Hubert Österle. “One Size Does Not Fit All—A Contingency Approach to Data Governance.” ACM Journal of Data and Information Quality 1, no. 1, (June 2009). This paper offers a flexible approach for designing data governance models for organizations, referred to as a contingency approach, which focuses on the roles and decision rights of each actor in the data governance initiative. This approach is based on strategy adapted from IT governance and organizational theory and demonstrates the influence of performance strategy, diversification, organization structure, process harmonization, market regulation, and decision-making styles. This includes a corporate data strategy which links data management with major business drivers and outlines strategic goals. When applying the model in practice, companies can configure it to their specific needs.

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APPENDIX B

IG SAMPLE CHARTER

PURPOSE:
To provide oversight for the use, management, and integrity of information across its lifecycle with a focus on improving patient care, supporting the organization’s mission and goals, providing value, minimizing risk and complying with applicable regulations, accreditation, professional practice, and legal standards.

MEMBERSHIP:
Business Intelligence
Clinical Informatics (e.g., health informatics, medical informatics, nursing informatics)
Compliance
Decision Support
Finance
Health Information Management
IT Security
Legal
Medical Staff
Nursing
Privacy
Quality
Research
Risk

FUNCTIONS/RESPONSIBILITIES:
1. Provide oversight of the full information lifecycle governance functions by establishing effective lines of accountability, responsibility, and authority through the adoption of the IG Principles for Healthcare (IGPHC)™:
   - Accountability
   - Transparency
   - Integrity
   - Protection
   - Compliance
   - Availability
   - Retention
   - Disposition
2. Review and approval of IG policies
3. Review and approval of IG-related strategies and roadmaps
4. Prioritization of IG-related scope, priorities, and initiatives
5. Establishing IG-related metrics, evaluation, and oversight of results
6. Coordination of information management responsibilities across the organization
7. Monitor progress and impact

SUBCOMMITTEES:
- Health Information Management/Medical Record Committee
- Privacy and Security
- Information Content and Integrity
- IT Informatics Steering
- Data Governance
- Analytics and Business Intelligence
- Research
REPORTING:
Report to the Board on the Committee’s activities to include, but not limited to committee minutes, written reports (to include metrics) and any significant matters under consideration by the________Committee.

QUORUM:
Quorum shall be satisfied when at least xxxx (x) members of the Committee are present.

MEETING FREQUENCY:
Meetings shall be held no less than _________.

SAMPLE PROJECT PLAN FOR AN IG PROJECT
Objectives and Scope: This is a sample project plan scope and objectives statement.
Organization and Resources

Project Sponsor
Suzie Sponsor

Project Manager
Michael Manager

Engineering Team
Ed Engineer (Leader)
Joanne Engineer

Operations Team
Otis Operation (Leadership)
Patty Operations

Customer Team
Cathy Customer (Leader)
Don Customer
Ed Customer
Fran Customer
George Customer

(continued)
### SAMPLE PROJECT PLAN FOR AN INFORMATION GOVERNANCE PROJECT

This sample project plan can be used as a starting point for your facility. Engaging project management to assist you in managing this project can help the project move forward.

<table>
<thead>
<tr>
<th>Task</th>
<th>Start Date</th>
<th>End Date</th>
<th>Responsible</th>
<th>Milestone</th>
<th>Status</th>
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<tbody>
<tr>
<td><strong>Site IG Tasks</strong></td>
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<td><strong>Initiation and Planning</strong></td>
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<td>Create charter for IG program</td>
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<td>Create initial IG project plan</td>
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<td>Create communication plan (include escalation process)</td>
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<td>Determine IG quick wins (cleanup, savings, see note)</td>
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<td>Define executive sponsors</td>
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<td>Define IG team and Stakeholders</td>
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<td>Engage project management team</td>
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<td>Review/create organizational chart for IG</td>
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<td>Regular team meetings for IG team</td>
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<td>Establish budget</td>
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<td>Team training (AHIMA videos)</td>
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<tr>
<td>Define IG roles as needed</td>
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<td>Site IG project kickoff meeting</td>
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<td>Site IG project planning meeting</td>
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<td><strong>Project Execution</strong></td>
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<td>Approve project plan with team</td>
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<td>Assess status of IG within the organization</td>
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<td>Begin communications per plan</td>
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<td>Senior leadership on board</td>
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<td>IG leader identified</td>
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<td>IG overview education begins</td>
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<td>Team communication begins</td>
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<td>Build value proposition</td>
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<td>Inventory information stores and paper repositories</td>
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<td>Categorize information assets</td>
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<td>Create a compelling story (elevator speech)</td>
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<td>Determine initial IG deliverables</td>
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<td>Determine pain point—first deliverable</td>
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The last step in the planning phase is to present the plan to the project steering committee and receive plan approval.

<table>
<thead>
<tr>
<th>Task</th>
<th>Start Date</th>
<th>End Date</th>
<th>Responsible</th>
<th>Milestone</th>
<th>Status</th>
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<tbody>
<tr>
<td>Development of an information classification process for use and valuation of information</td>
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<td>Discuss training needs</td>
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<td>Schedule initial training for core team</td>
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<td>Core team training complete</td>
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<td>Workforce and business partner education begins (IG practices and principles)</td>
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<tr>
<td>Inventory policies and procedures to be included in IG program</td>
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<tr>
<td>Begin P&amp;P review</td>
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<tr>
<td>Schedule P&amp;P updates</td>
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<tr>
<td>Inventory reports</td>
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<tr>
<td>Map data flows/information flows</td>
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</tr>
<tr>
<td>Review current workflows</td>
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<tr>
<td>Develop new workflows as needed</td>
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</tr>
<tr>
<td>Review job descriptions/role descriptions</td>
<td></td>
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<td></td>
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<tr>
<td>Schedule update of job/roles if needed</td>
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<tr>
<td>Establish protocols to correct errors in the EHR, PHR, legacy systems, all information systems</td>
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<tr>
<td>Begin work on IG compliance/monitoring program (to extent possible)</td>
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</tr>
</tbody>
</table>

**Project Monitoring**

- Publish project status report
- Status meetings and notes

**Project Closure**
Initiation Phase
During initiation you will be setting up the framework for the program. Charter, communications plan, defining the team, and the other initiation steps outline the way the program is organized and how it will be run.

Planning Phase
The planning phase is a rigorous period when you will develop the project plan. First you will create a preliminary scope statement, which is important for evaluating and ad hoc work prioritizing requests. Project plans for IG will be iterative. The team will define periods for planning and then adjust as the project moves forward.

Sample Timeline

<table>
<thead>
<tr>
<th>Project Name</th>
<th>Timeline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deliverables</td>
<td>Owner</td>
</tr>
<tr>
<td>Planning phase</td>
<td>Task I</td>
</tr>
<tr>
<td></td>
<td>Task II</td>
</tr>
<tr>
<td></td>
<td>Task III</td>
</tr>
<tr>
<td>Team phase</td>
<td>Task I</td>
</tr>
<tr>
<td></td>
<td>Task II</td>
</tr>
<tr>
<td></td>
<td>Task III</td>
</tr>
<tr>
<td>Prototype phase</td>
<td>Task</td>
</tr>
<tr>
<td>Implementation phase</td>
<td>Task</td>
</tr>
<tr>
<td>Closure phase</td>
<td>Task I</td>
</tr>
<tr>
<td></td>
<td>Task II</td>
</tr>
</tbody>
</table>

The last step in the planning phase is to present the plan to the project steering committee and receive plan approval.

Execution Phase
Execution for IG plans can take many forms. Each hospital must define the deliverables, focus, and quick wins for the facility. The team needs to create a compelling story, build a value proposition, and train the team.

Control Phase
During the control phase the project manager must monitor:

- Schedule progress
- Budget
- Scope
Change management is an important piece of the control phase.

**Change Log Template:**

<table>
<thead>
<tr>
<th>Change No.</th>
<th>Change Type</th>
<th>Description of Change</th>
<th>Requester</th>
<th>Date Submitted</th>
<th>Date Approved</th>
<th>Status</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>This may be a design, scope, schedule or other type of change.</td>
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<tr>
<td></td>
<td></td>
<td>The change request should be described in detail.</td>
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<td></td>
<td></td>
<td>Who initiated the change request?</td>
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<td></td>
<td></td>
<td>When was the request submitted?</td>
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<td></td>
<td></td>
<td>When was the request approved?</td>
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<tr>
<td></td>
<td></td>
<td>Is the change request open, closed or pending? Has it been approved, denied or deferred?</td>
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</tr>
</tbody>
</table>

**Close-out Phase**

Once the project is complete, the project manager must take steps to appropriately close out the project. The close-out phase is important because it confirms acceptance of the final project deliverables and transfers knowledge gained from the project to operational owners.

- Verify acceptance of final project deliverables
- Conduct post-project assessment and lessons learned
- Conduct post-project review and evaluation
- Recognize and celebrate outstanding project work
- Disburse project resources – staff, facilities, and automated systems
- Complete and archive final product records
- Ensure transfer of knowledge

**Summary**

Project management is the application of processes, methods, knowledge, skills, and experience to achieve the project objectives. Regardless of the nature of your IG project, the five phases of project management will guide your project to success.
APPENDIX C

SAMPLE JOB DESCRIPTION: CHIEF IG OFFICER (CIGO)

(Company Name)
Chief IG Officer

Position Description:
The Chief IG Officer (CIGO) will be responsible for leading (company name)'s IG program and projects. Specifically, the CIGO is responsible for developing, implementing, and managing an enterprise-wide, integrated IG program designed to optimize the company’s use of its information assets. To ensure optimal use of information assets, the CIGO will coordinate all facets of IG across the organization.

Essential to success in this role is the ability to work cross functionally and collaboratively across all groups within the enterprise and with all management levels.

The CIGO will work with all (company name)'s business units, executives, and our board to develop an IG program that not only meets the company’s legal, regulatory and ethical obligations and the company’s high standards, but that is also tied to the company’s overall business strategy. To that end the CIGO will develop and implement an IG program that addresses both the risk and value sides of the company’s information assets. The CIGO will continue to build out and improve upon the framework and structure of the company’s existing IG program with a clear, strategic vision for advancing the program over the next several years.

Responsibilities
- Review and provide a comprehensive assessment of the company’s existing IG program.
- In collaboration with other key leaders of various IG facets, including the CTO and CISO, as well as management in major IG functions and business units, the CIGO will be responsible for developing a strategic vision for the organization’s IG program and framework for implementing that vision. Through effective collaboration and relationship building, the CIGO will ensure that the vision is consonant with the company’s culture and can be effectively implemented and integrated across the organization at all levels.
- The CIGO will socialize the adoption of both the strategic vision and framework.
- Upon that framework, the CIGO will progressively build the structure of the company’s IG program, moving the company forward in a timely fashion, toward that strategic vision.

Specific Responsibilities
- Identifying any underdeveloped or missing elements of our current IG program and building our or filling these functions with either internal staff or external hires as appropriate.
- Leading the existing IG steering committee, including ensuring that all organizational concerns are represented.
- Reviewing and revising existing policies and procedures to ensure that they adequately address all (company name)'s information regardless of format and expanding and integrating policies across the organization.
- Partnering with IT to implement technological solutions to enforce IG policies and procedures in a way that minimizes the burden on our workforce.
- Developing and expanding internal IG educational programs.
- Developing a program to audit compliance on critical regulatory or legal requirements and expanding it to audit other information activities.
Continue to expand that organization’s incident readiness. Ensure that all regular or anticipated events (e-discovery, investigations, employee departures, etc.) are built into processes so they are not disrupters of routine.

Hiring and managing a staff appropriate to support the CIGO’s mandate.

Key Relationships

- Reports to the CEO.
- Collaborates as a peer with the CIO and CISO with each having primary but overlapping areas of influence corresponding to IT infrastructure, information itself, and information security for the CTO, CIGO, and CISO, respectively.
- Collaborates directly with the COO and CFO.
- In addition to collaborating with the COO, consults regularly with management of all business units to ensure effective change management and that the company’s business objectives are considered during all IG efforts.
- Consults regularly with all levels of legal management to ensure that handling of information assets meets the company’s legal, regulatory, and ethical obligations.
- Business intelligence, privacy, records and information management (HIM), and knowledge management teams are direct reports to the CIGO.

Qualifications

- A minimum of 10 years combined professional experience in a core area(s) essential to performing this cross-functional role, including but not limited to IT, information security, legal (privacy or security compliance), records and information management (HIM), business operations, and IG.
- 3-5 years of management experience.
- An ideal candidate will have direct work experience across at least two of the core areas identified above. However, certifications and other demonstrated knowledge to these areas may be sufficient to supplement actual work experience.
- Because of the cross-functional nature of the role, the candidate must have a demonstrated working knowledge and/or ability and willingness to learn the basic operations of each of the core areas identified above.
- Proven ability to negotiate, sell, and work collaboratively in a highly competitive, federated, and regulated environment. This is essential to success in this role.
- Basic technology “know how” is essential.
- Bachelor’s degree is required.

Additional Skills Required for Success

- Excellent communication skills
- Demonstrated leadership capacity and strategic vision
- Superior program and project management skills
- Team building and influencing skills
- Business acumen

Compensation

Compensation is commensurate with experience. (Company name) provides a generous executive benefits and stock plan.

Assumptions underlying this Sample CIGO job description: It is assumed that this is a large enough organization to have other key information functions (like the CTO/CISO) in place, as well as a well-developed C-suite, generally. It is also assumed that there is support for introducing the CIGO position at this level. However, it is acknowledged that in many organizations, it may take time to build support for a new position at this level.
A mid-level IG maturity is also assumed. Some IG functions are in place and there is a foundation for IG into which the new hire would enter. At this level the CIGO would build the framework and structure of the IG program.

Because this is a mid-career role and extensive experience is required, it is assumed that compensation must reflect that. However, compensation, like many of the details, will vary significantly based on the size and nature of the company, location, and so on. However, we would anticipate the floor compensation for this role would be in the mid $100,000s and could easily run into the range of $250,000 to $300,000 or more.¹

Note

SAMPLE JOB DESCRIPTION: CHIEF DATA OFFICER (CDO)
A CDO provides vision and strategy for all data management activities. He or she is a champion for global data management, governance, quality, and vendor relationships across the enterprise. The CDO oversees the enterprise information management (EIM) program, data scientists and data stewards, and data service providers.

1. Establish Policies and Standards
The CDO establishes data policies, standards, organization, and enforcement of EIM concepts. The CDO also oversees and reports on data metrics, and has executive-level responsibility for all enterprise information/data management budgeting and initiatives.

2. Manage Data Governance
Here, the CDO must organize and implement policies, procedures, structures, roles, and responsibilities that outline and enforce rules of engagement, decision rights, and the accountabilities for the effective management of information assets.

3. Study and Maximize Data Quality
The CDO must determine the company’s current data quality and maturity levels – of which there are five. (1) Uncertainty, which typically involves the organization stumbling over data defects as programs crash and employees complain. There’s no proactive improvement process in place. (2) Awakening, during which a few individuals acknowledge the dirty data and try to incorporate quality in their projects before formal enterprise-wide support arrives. (3) Enlightenment is when the organization starts to address the root causes of dirty data through program edits and data quality training. A data quality group usually emerges here. (4) Wisdom arrives as the organization proactively works on preventing future data defects, and data quality incentives arrive. (5) Certainty emerges as the organization shifts to an optimization cycle – continuously monitoring and improving its data defect-prevention process.

4. Establish Standards
A CDO must establish enterprise standards – including a uniform and repeatable system development lifecycle methodology. For instance, there’s a common set of standards for data naming, abbreviations, and acronyms.

5. Master Business Intelligence
This is not about buying a single, most effective business intelligence tool. Rather, business intelligence is about establishing an architecture and a collection of integrated decision-support applications and databases – providing the business community easy access to business data.
6. Explore Data Warehousing
While definitions vary, data warehousing can involve a single massive database or a collection of data marts that are integrated. The data warehouse strategy should provide consistent, clean, and integrated data. Executives, in turn, use the resulting information to make more informed decisions.

7. Master Data Management
Master data is how the CDO and his or her team describe real-world entities – customers, products, employees, suppliers, etc. Master data management (MDM) leverages a range of tools to implement how you capture, integrate, and share that MDM information.

8. Embrace Enterprise Data Modeling (EDM)
EDM often begins as a high-level conceptual data model showing core business objectives (entities) and their data relationships. The EDM model may never be completed, but it still delivers value by allowing CDOs to discover and resolve data discrepancies among different views and implementations of the same data.

9. Explore Metadata Management
An example of metadata is the information embedded in a digital picture – such as the brand and model of the camera, the date and time the picture was taken, etc. In business, you need to capture the right types of metadata – such as business names, definitions and valid domain values; or perhaps ownership (CFO, HR); or security settings (public, company confidential, HR only, senior management only).

10. Navigate Unstructured and Big Data
Unstructured data includes social media, emails, medical records, pictures, videos, and sensor data like RFID. A CDO must take inventory of all that unstructured data – the big data challenge – determining its format, security, ownership, and quality. The result could be new storage needs. A CDO must also determine which unstructured data should – and shouldn’t — be captured.

11. Weigh Data in the Cloud
Moving data off premises to a cloud services provider (CSP) often is an attractive option — especially for startups that don’t want to build their own storage infrastructure. But the CDO must weigh variables like privacy, security, compliance, ownership, and performance questions tied to cloud storage.

12. Establish Business Performance Metrics
The CDO’s team must build business performance dashboards – a business performance management system. It provides timely information and insights that enable employees to improve decisions, optimize processes and plans, and work proactively.

13. Maintain Security and Privacy
Determine and enforce specific security and privacy requirements for each piece of data — especially as it relates to privacy laws, industry regulations, and corporate compliance mandates.

14. Develop Intellectual Capital
Here, the CDO and the team document how the business is run – including policies and procedures that can be shared in training materials; glossaries; name and contact rosters; and even gathering information from employees’ heads to deal with day-to-day problems and more.
15. Establish CDO Credibility
More and more pundits state that the CDO position is not a technical position - and therefore should not report to a CIO or CTO in IT. Rather, CDOs increasingly report to CFOs, COOs, or CEOs - working with the executive team and CIO to align business and technology initiatives.

SAMPLE JOB DESCRIPTION: ANALYTICS BUSINESS INTELLIGENCE - INFORMATION MANAGEMENT

Analytics professionals create new insights from predictive statistical modeling activities that target and deliver value to our clients.

Job Description
Assist clients in defining and implementing the Business Intelligence (BI) strategy across the landscape, including activities such as the following:

- BI strategy analysis and definition
- BI governance approach definition and implementation
- BI rationalization
- BI sourcing / delivery approach implementation (BI centers of excellence, BI as a service, etc.)
- BI transformation, including implementation of BI solutions

Qualifications
1. Three years working knowledge of business intelligence (BI) strategy, solutions design and implementation, methodologies, and business application.
2. One year demonstrated capability on data visualization / data discovery with technologies such as Qlik’s QlikView and Qlik Sense, Tableau, Tibco Spotfire, SAP suite of tools (including Lumira), Oracle suite of tools (including Endeca), D3, SAS Visual Analytics, and SAS Data Visualization.
3. Three years of relevant management consulting experience OR industry experience.
4. Minimum bachelor’s degree in a quantitative discipline, (economics, statistics, operations research, computer science, engineering).
5. Familiarity with data management, big data solutions, and ETLs tools. Proven track record of deploying systemic solutions into a business environment.
6. Custom data visualization experience using JavaScript, CSS, HTML5, and/or d3.js.
7. Exceptional interpersonal and presentation skills.
8. Team oriented and collaborative working style, both with clients and those within the organization.
9. MBA/MS in a quantitative discipline highly preferred.

Professional Skill Requirements
1. Proven success in contributing to a team-oriented environment
2. Proven ability to work creatively and analytically in a problem-solving environment
3. Desire to work in an information systems environment
4. Excellent leadership, communication (written and oral) and interpersonal skills

SAMPLE JOB DESCRIPTION: DATA ARCHITECT

Job Overview
Enterprise architecture serves a critical role in the understanding, documentation, maintenance, control, and planning. The data architect’s role is to serve as a subject matter expert and perform tasks that contribute to the organization’s mission and vision. Daily activities include assisting the lead data architect in revising enterprise conceptual,
logical, and physical data models; creating data models that conform to existing standards and conventions; providing leadership and guidance with enterprise data strategies; revising data dictionary definitions, governance practices, and standards; and partnering with security architects to ensure compliance with data security and privacy mandates. Additional responsibilities include end-to-end data lifecycle 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. This role encompasses all aspects of data management, conceptual, logical, and physical. The role is not tightly focused on the physical implementation.

**Minimum Qualifications**
- 5-7 years of experience with information technology programs and services, with demonstrated expertise in enterprise data management and related technologies.
- 5-7 years of data architect experience.
- Experience with ERwin Data Modeler V7 or a comparable data modeling tool.
- Experience working as a member of distributed data architecture teams.
- Knowledge of Agile development methodology and concepts.
- Understanding of information systems and data life-cycle management best practices and methodologies, formal systems engineering life cycle (SELC), and systems development life cycle (SDLC).
- Experience with Service Oriented Architecture (SOA), web services, enterprise data management, information security, applications development, and cloud-based architectures with federal clients.
- Experience with enterprise data management technologies, including database platforms, ETL tools, and SQL.
- Understanding of National Information Exchange Model (NIEM) standards and interfaces.

**Desired Skills**
- Experience with three or more of the following: Oracle, Microsoft SQL Server, Troux, Rochade, iGrafx, WebSphere, and Cognos
- Thorough knowledge of Microsoft Office Suite products, including Visio and Project
- Good communication skills and customer relationship skills
- Knowledge of configuration management and version control processes

**Education/Certifications:**
- Bachelor’s degree in an appropriate area of specialization; advanced education
- Understanding of two or more industry standard frameworks, including DAMA DMBOK, or Zachman Framework
- FEAF, CMMI, COBIT, ITIL, SCRUM, CDMP, Six Sigma, etc. certifications preferred
SAMPLE JOB DESCRIPTION: DATA STEWARDSHIP AND INFORMATION STRATEGY SERVICES LEAD

Description
This data stewardship and information strategy services (DSISS) position will work closely within the group software engineering and delivery practice. The DSISS lead has overall accountability for group’s overall data and reporting posture by responsibly managing data assets, data lineage and data access, supporting sound data analysis, and rationalizing group’s information strategy. This role requires focus on data strategy, execution and support for projects, programs, application enhancements and production fixes in the group disability and life space. Makes well-thought-out decisions on complex or ambiguous data issues and establishes the data stewardship and information management strategy and direction for group. Effectively communicates to individuals at various levels of the technical and business communities. Participates in hiring, coaching, and evaluation of performance for both direct and matrix staff.

Responsibilities
- Responsible for data quality and data accuracy across all group delivery initiatives.
- Responsible for data analysis, data profiling, data modeling, and data mapping capabilities.
- Responsible for reviewing and governing data queries and DML.
- Accountable for the assessment, delivery, quality, accuracy, and tracking of any production data fixes.
- Accountable for the performance, quality, and alignment to requirements for all data query design and development.
- Accountable for the delivery of any IT developed reports (Hyperion, Cognos, etc.).
- Responsible for defining standards and best practices for data analysis, modeling, and queries.
- Responsible for understanding end-to-end data flows and identifying data dependencies in support of delivery, release, and change management.
- Responsible for the development and maintenance of an enterprise data dictionary that is aligned to data assets and the business glossary for group responsible for the definition and maintenance of group’s data landscape including overlays with the technology landscape, end-to-end data flows/transformations and data lineage.
- Responsible for rationalizing group’s reporting posture through the definition and maintenance of a reporting strategy and roadmap.
- Partners with the data governance team and IT to ensure solutions adhere to the organization’s data principles and guidelines.
- Owns group’s data assets including reports, data warehouse, etc.
- Accountable for defining the performance tuning needs for all group data assets and managing the implementation of those requirements within the context of group initiatives as well as steady-state production.
- Partners with others in test data management and masking strategies and the creation of a reusable test data repository.
- Responsible for group’s relationship with information management and the alignment of group’s reporting roadmap with IM’s roadmap.
- Responsible for governing data access for all group’s data assets.
- Responsible for solving data related issues and communicating resolutions with other solution domains.
Qualifications
- Proven ability to quickly earn the trust of peers and key stakeholders; mobilize and motivate teams; set direction and approach; resolve conflict; deliver tough messages with grace; execute with limited information and ambiguity.
- Ability to navigate matrix organizations effectively.
- Results-oriented, diligent, and works with a sense of urgency. Assertive, responsible for his/her own work (self-directed), have a strong affinity for defining work in deliverables, and be willing to commit to deadlines.
- Possesses knowledge and expertise in data modeling and management techniques and strategies.
- Influential, focused and versatile team player that is comfortable under pressure.
- Ability to communicate at all levels with clarity, poise, maturity and precision both written and verbal.
- Excellent problem-solving and critical-thinking skills; balancing strategic alignment with technology roadmap and emerging industry trends with practical delivery.
- Technical expertise in data architecture principles and design aspects of various DBMS and reporting concepts.
- Solid understanding of PL-SQL, including tuning for performance.
- Solid understanding of key DBMS platforms like SQL Server, Oracle and DB2.
- Experience with data modeling and test data management tools.
- Five + years of experience leading data architecture or engineering function.
- Five + years of hands-on data experience, with demonstrated increase of responsibilities over time.

SAMPLE JOB DESCRIPTION: DATA GOVERNANCE ANALYST

The main purpose of this position is to assist the data governance team in the formation and execution of data governance framework, policy, standards. This position assists in the implementation of an enterprise data governance program.

Responsibilities
- Develop control structures within a simple environment to ensure the accuracy and quality of data through all upstream and downstream data channels.
- Provide thought leadership and participate with projects that involve any of the upstream or downstream data flows and processes.
- Ensure controls are in place over applications to ensure the data integrity by performing data integrity gap analysis.
- Coordinate the resolution of data integrity gaps by working with the business owners and IT.
- Work with business partners to gather and understand functional requirements, develop complex queries and provide reports.

Knowledge, Skills, and Abilities
- Strong understanding of databases and data structures.
- Strong analytical and time management skills.
- Excellent written and verbal communication skills.
- Intermediate facilitation skills with the ability to drive issues to closure.
- Self-motivated and able to handle tasks with minimal supervision or questions.
- Ability to deliver a high level of customer service.
- Ability to write various documents such as functional requirements.
- Ability to compare technologies and make recommendations to senior members of the team.
Understanding of privacy laws and regulations.
Basic level proficiency in Structured Query Language (SQL).
Intermediate level proficiency with VBA.
Basic level proficiency with Microsoft Word, Excel, Access, Project, and Outlook.
Foster company success through a professional appearance, being courteous to customers with positive attitude.

Education and Experience
- Bachelor’s degree in information technology, business, or related field, or equivalent combination of education and experience required.
- 2+ years data quality or similar level data analysis experience required.
- 1+ years SQL and VBA experience required.
- 1+ years financial services experience required.

SAMPLE JOB DESCRIPTION: MASTER DATA ANALYST
This position will support operations by monitoring and analyzing master data, key data, and master relationship data within the organization.
- Ensures master data integrity in key systems as well as maintaining the processes to support the data quality.
- Identifies areas for data quality improvements and helps to resolve data quality problems through the appropriate choice of error detection and correction, process control and improvement, or process design strategies.
- Ensures quality of master data in key systems, as well as, development and documentation of processes with other functional data owners to support ongoing maintenance and data integrity.
- 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.
- Provides assistance in resolving data quality problems through the appropriate choice of error detection and correction, process control and improvement, or process design strategies collaborating with subject matter experts (SMEs) and data stewards.
- Manages, analyzes, and resolves data initiative issues and manages revisions needed to best meet internal and customer requirements while adhering to published data standards.
- Assists in data management, governance, and data quality of master data requirements with other functional data owners to ensure functional master data integrity across the operation of financial systems is consistent and meets stated business rules and requirements.
- Work closely with the business/IT to ensure alignment of master data rules and the operations of the application meet all requirements.

Essential Job Functions
- Defines, designs, and builds dimensional databases to meet business needs.
- Assists in the application and implementation procedures of data standards and guidelines on data ownership, coding structures, and data replication to ensure access to and integrity of data sets.
- Conducts data cleaning to rid the system of old, unused data, or duplicate data for better management and quicker access.
- Researches, coordinates and installs software releases and database integration
Develops and implements strategies to translate business requirements and models into feasible and acceptable data warehouse designs to ensure that business needs are met.

Provides data consulting in support of business and information technology initiatives to clients to improve client database systems.

**Qualifications**

- Bachelor’s degree or equivalent combination of education and experience.
- Bachelor’s degree in information science, data management, computer science or related field preferred.
- Seven or more years of experience in data analysis or computer programming.
- Experience working in industry standards, regulations, and guidelines in database warehousing and other relevant systems.
- Experience working with company hardware and software products to make sound financial recommendations.
- Experience working with information security practices and available security software packages.
- Experience working with domain structures, user authentication, and digital signatures.
- Experience working with relational databases.

**Other Qualifications**

- Ensure master data integrity in key systems as well as maintaining the processes to the data quality. Identify areas for data quality improvements and help to resolve data quality problems through the appropriate choice of error detection and correction, process control and improvement, or process design strategies.
- Ensures quality of master data in key systems, as well as development and documentation of processes with other functional data owners to support ongoing maintenance and data integrity.
- Good personal computer and business solutions software skills.
- Good communication skills to communicate with customers, team members, external data providers, and management.
- Good skills in data administration, design, and architecture.
- Good analytical and problem-solving skills.
- Ability to work independently and as part of a team.

**SAMPLE JOB DESCRIPTION: RECORDS MANAGEMENT AND INFORMATION GOVERNANCE CONSULTANT**

**Responsibilities**

- Consult with clients to design and implement records management and IG programs and best practices.
- Evaluating existing policies and developing remedies for problems.
- Design, document, and implement records management and IG best practices.
- Be a subject matter expert capable of preparing presentations for trade shows and authoring articles for industry related trade publications.

**Qualifications**

- Knowledge of records management and IG life cycle as well as other statutory and ethics issues.
- 1+ year experience consulting to professional service firms on policy assessment, development, and implementation.
- Experience developing records management policies and retention schedules.
Knowledge of electronic records management and document management systems.
CRM certification preferred.

**SAMPLE JOB DESCRIPTION: IG PROGRAM DIRECTOR**

**Description**
Design, implement, and enhance an IG strategy and program to comply with privacy, confidentiality, and information-security related laws and regulations, and company policies and objectives. Proactively anticipate and direct program changes to support continued compliance with the evolving information management and data protection landscape and furtherance of company objectives. Respond to data security incidents and enhance the company's data security incident response plan. The scope of IG encompasses personal information, company information, systems and infrastructure.

**Essential Responsibilities**
Establish an information management and protection framework for an effective enterprise-wide IG program (“program”) and direct day-to-day activities, including program objectives, policies, procedures, training and communication. Develop methods for demonstrating success through metrics, key performance indicators and third-party assessments.

Identify information management and protection laws and regulations and implement actions to ensure compliance. Effectively represent the organization’s positions and advocate internal and external policy to shape the development of new laws and regulations consistent with company objectives.

Develop and implement a compliance monitoring system. Coordinate a company-wide risk assessment process to identify potential risks and control solutions. Monitor actions to identify emerging risks and to close gaps.

Create internal partnerships with key stakeholders, such as audit services, business services, human resources, legal services and security, to influence and align business-area actions that are needed to achieve program objectives. Serve as a consultant to business-area leaders. Direct actions to ensure external stakeholders, such as suppliers, have policies and practices that are aligned with laws, regulations, and organizational programs.

Provide oversight to an incident response team to investigate and respond to data incidents/breaches in a comprehensive and timely manner that complies fully with applicable federal and state laws and manages the impact to the organization’s brand.

Perform leadership responsibilities, such as determining budget needs. Create and maintain an effective culture. Prepare formal communications.

Perform other duties as assigned.

**Qualifications**
- BA/BS degree in business or related field, or a combination of education and related experience providing equivalent knowledge.
- At least eight years relevant experience in compliance, legal, privacy, information security, or related area.
- Demonstrated experience designing, managing, and executing large-scale, enterprise-wide projects.
- Excellent verbal and written communication skills with the ability to influence the actions of internal stakeholders and manage relationships with external stakeholders.
Preferred
- Broad knowledge of information management and protection laws, regulations, and best practices.
- IG experience, including in the areas of personal information, company information, systems, and infrastructure.
- JD degree

SAMPLE JOB DESCRIPTION: INFORMATION ANALYST

Job Description
Put your reporting and analysis skill set to work by cooperating with data services staff, key business stakeholders, and IT staff to support enterprise data management and service efforts.

As the information analyst, you will communicate and engage with business units to develop a strong understanding of their reporting, data, and product needs. You will work with various teams to define requirements for projects, identify data dependencies and relationships to develop logical and physical data models, create data flow and system activity diagrams, and write specifications for managing enterprise information. You will develop plans and materials to support user adoption, training, and customer service, working through direct and regular contact with users from regions, programs, and service units to provide regular insight and guidance in prioritizing enhancements for the data systems. You will also support technical project managers to ensure that all aspects of the information analysis and requirements gathering process are completed with the highest degree of accuracy and quality, which includes developing and socializing key project artifacts.

Additionally, the information analyst will:
- Serve as a subject matter expert (SME) in master data management, metadata management, and data governance operations.
- Support ad hoc data requests within the existing governance and security policies and best practices.
- Implement rollout plans for data reporting tools, which involves training end users and helping secure the ongoing buy-in and use of the system.
- Develop key documentation, user, guides, and other necessary training materials.
- Support a broad base of users of the data and reporting platforms, ensuring relationships with customers and cross-team members are professional and meet management expectations.
- Coordinate change controls boards for the platform in support of the platform manager.
- Solve complex data-related problems using a variety of technical and analytical skills.

Qualifications
- More than five years of experience managing enterprise-wide data.
- Bachelor’s degree in a related course of study.
- Deep understanding of data modeling and data mapping.
- Strong attention to detail and problem-solving skills.
- Significant knowledge and experience in managing and executing data management initiatives.
- Understanding of business process modeling, data provisioning modeling, entity relationship modeling, and dimensional modeling.
- Experience in project management.
- Demonstrated ability to complete projects on time and on budget.
Experience with education-related data.
Understanding of source-to-target documents, use case and activity diagrams, and use case specifications.
Working knowledge of database management system (DBMS) client software, i.e. MS SQL, Oracle (TOAD), and MySQL.
High proficiency in Microsoft Office programs, i.e. Word, Excel, Access, and Outlook.
Mastery of data management concepts and best practices as well as an ability to become a SME in education data.
Strong ability to explain advanced data concepts to both database developers and architects, non-technical end users, and senior executives.
Ability to understand business needs and translate them into technical specifications.
Expertise understanding and writing SQL.
Experience developing requirements for business intelligence (BI), master data management, and functional data projects.
Strong attention to detail and organizational skills.
Demonstrated high competency in balancing multiple projects.
Strong verbal and written skills.
Experience in process analysis and documentation.

Great Additional Skills:
Master of science or business administration is highly desirable
Experience with Oracle database, Dataflux, ETL, and/or Cognos BI tools preferred.
Experience with IBM Rational Suite tools, i.e. ReqPro, RSM, ClearQuest, and ClearCase is preferred.
Experience with the Rational Unified Process (RUP) is preferred.

SAMPLE JOB DESCRIPTION
CHIEF MEDICAL INFORMATION / INFORMATICS OFFICER
Job Description
The role of the chief medical information / informatics officer is to help facilitate and accelerate the clinical use of IT throughout the healthcare organization and serve as the connector between the clinical staff and IT department. The CMIO directs the efficient use and implementation of IT for physicians, nurses, and other clinical staff.

As part of the senior leadership team, the CMIO will:

Serve as a liaison between medical and IT departments and senior leadership.
Lead studies for designing and integrating IT systems and infrastructure in the clinical departments.
Develop applications that increase efficiency of patient care.
Develop standards in medical terminology and application to increase efficiency in care delivery.
Advise steering committees and assist in policy-making related to health informatics within the organization.

Education and Experience
An MD, DO, PhD, or Pharm D, with a master’s degree in a technical field is preferred. An advanced practice nurse practitioner may be considered for this role. Experience in medical informatics required.

Core Competencies and Skills
Outstanding interpersonal skills including the ability to effectively communicate with staff at all levels throughout the organization, including clinicians.
Excellent communication skills.
Understanding of the process and tools for capturing, organizing, and using information assets.
- Ability to lead and work collaboratively across all levels of the organization.
- Understanding of the legal and regulatory guidelines for health IT.
- Project management skills.
- Ability to influence physicians and clinicians around adoption of technology.
- Familiarity with a wide variety of electronic health records systems.
- Ability to analyze and resolve complex issues.

**Note**
APPENDIX D
SAMPLE ORGANIZATIONAL CHARTS AND COMMITTEE STRUCTURES

Sample Structure 1

Information Governance Council

Performance Analytics Team
Enterprise Technology Team

Analytics Coordination Function Team

Data Quality Standards Committee
Business Intelligence and Performance Management Superusers

Individual Dept Leaders

Sample Structure 2

Director Level Executive Leadership

Enterprise Data Governance Program Office

Data Governance Council

Data process Owners

Data Stewards (clinical, financial, supplies)

Department Leadership
APPENDIX E

SAMPLE INFORMATION GOVERNANCE (IG) 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 (emails, employee portal forums, etc.).
- Identify WHO is responsible for communication threads.
- 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.

Elements to include
- IG governance structure
- Program/initiative highlights; important high-level tasks and timeframes
- Description of written outputs/deliverables
- Updates on activities
- Initiatives to retain commitment - need ongoing affirmation - what can the recipient do?

KEY COMMUNICATION ASPECTS
- Why: growth in data volumes - essential to ensuring data accuracy and quality decision making. Managing information as a key enterprise asset and 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 explain 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

**IG PROJECT – COMMUNICATION PLAN**
[SAMPLE]
Prepared by:
Position:
Date:
Version #:

**Table of Contents**

**Definitions:**

<table>
<thead>
<tr>
<th>Information Governance</th>
<th>An organization-wide framework for managing information throughout its lifecycle and supporting the organization’s strategy, operations, regulatory, legal, risk, and environmental requirements (AHIMA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Data Governance</td>
<td>The overall management of the availability, usability, integrity, and security of the data employed in an organization or enterprise (AHIMA)</td>
</tr>
<tr>
<td>PM</td>
<td>Project Manager</td>
</tr>
<tr>
<td>PSR</td>
<td>Project Status Report</td>
</tr>
<tr>
<td>PU</td>
<td>Project Update</td>
</tr>
<tr>
<td>SP</td>
<td>SharePoint</td>
</tr>
<tr>
<td>PP</td>
<td>Project Plan</td>
</tr>
</tbody>
</table>
Background (Purpose, Scope)

An organizational structure has been developed to create and execute an IG Program to ensure the organization’s strategic goals are met, facilitate strategic decision making, mitigate organizational risk, manage compliance and improve data quality and integrity, quality of care, effective data sharing, and business intelligence reporting.

This plan outlines the processes required for effectively communicating the purpose and benefits to the IG initiative and its key activities, deliverables, issues, and concerns to appropriate project stakeholders.

Project Organization/Sponsorship/Membership/Key Stakeholders

(Insert Org Chart)

- Executive Oversight/Sponsor
- Data Governance Council
- Project Manager
- Data Stewardship Council
- Sub work teams

Communication Objectives

The purpose of the communications plan is to ensure that consistent, reliable messaging for all IG strategies and activities are received by all stakeholders and members of the organization. Effective communication will contribute to the success of the overall program, its goals and will align resources and priorities across the health system.

The plan will enable staff and stakeholders to understand the basic IG principles and appreciate the tools, processes, and efforts being utilized to improve management of XXXXX’s information.

Communication Purpose and Target Audiences

The targeted audiences are identified below along with the main purpose for communicating with each audience. (Update table below with ideas from message content section.)

<table>
<thead>
<tr>
<th>Audience</th>
<th>Communication Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sponsor</td>
<td>Plans, Progress, Issues</td>
</tr>
<tr>
<td>Oversight Exec Committee</td>
<td>Progress, Issues, Budgetary Concerns</td>
</tr>
<tr>
<td>Project Workgroup Team</td>
<td>Direction, Deliverables</td>
</tr>
<tr>
<td>Management Staff</td>
<td>Plan, Progress, Procedural Changes</td>
</tr>
<tr>
<td>All Staff</td>
<td>Plan, Progress, Impact of Procedural Changes</td>
</tr>
</tbody>
</table>

Message Content

- Purpose of the IG strategic initiative and why it’s important (write 2-4 sentences here)
- Principles of IG governance – each principle with one-sentence description
- Benefits of IG – mitigates risk, promotes safety and quality of care, facilitates compliance, etc.
- Membership of IG oversight committee and workgroup team — why these roles involved
- Retention of information, storage, and destruction – discuss that this will depend on the type of information and the communication will vary depending on the role of the organization’s staff member, the type of information, etc.
- IG related policies
- Project plan: current/future plans, issues/concerns, upcoming deliverables
Communication Messages
The information below outlines the targeted audiences, key communication messages to be disseminated, the method for communication, the frequency of the delivery, the role of the individual who might write the message content and the designated communicator from whom the message will be sent. Consider providing some examples of how they would reach different target audiences for example, what should subject line state for an e-mail going to the medical staff? How does an organization help to ensure the message will be read by the audience?

<table>
<thead>
<tr>
<th>Audience</th>
<th>Tools</th>
<th>Method</th>
<th>Frequency</th>
<th>Message Author</th>
<th>Communicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>IG Workgroup Team</td>
<td>Project Plan</td>
<td>Meeting Posted on SP</td>
<td>Weekly</td>
<td>PM</td>
<td>PM</td>
</tr>
<tr>
<td></td>
<td>PSR</td>
<td></td>
<td>Biweekly</td>
<td>PM</td>
<td>PM</td>
</tr>
<tr>
<td>Oversight IG</td>
<td>Project</td>
<td>E-mail</td>
<td>Weekly</td>
<td>PM</td>
<td>IG Executive</td>
</tr>
<tr>
<td>Executive Committee</td>
<td>Update</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Executive team</td>
<td>IG Executive</td>
<td></td>
<td></td>
<td>CEO</td>
<td></td>
</tr>
<tr>
<td>Medical Staff</td>
<td>IG Executive</td>
<td></td>
<td></td>
<td>Chief of Medical Staff</td>
<td></td>
</tr>
<tr>
<td>Business Owners</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Data Stewards</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data Architects</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data Analysts</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Management Staff</td>
<td>Project Update</td>
<td>E-mail</td>
<td>Monthly</td>
<td>PM</td>
<td>IG Executive</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>All Staff</td>
<td>Project Update</td>
<td>E-mail</td>
<td>Quarterly</td>
<td>IG Executive</td>
<td>IG Executive</td>
</tr>
</tbody>
</table>

Project Documents Repository/References
All project documents will be stored within XXXX’s SharePoint under the folder named “IG.” All communications, notes, PSRs, updates, etc. will be filed under the appropriate sub-folders. List of related enterprise-wide policies is provided in this IG folder but the policy itself will be stored in the applicable department’s folder.

Additional information about IG may be found at xxx.org (list references).
Additional information about IG may be found at XXXXXXXX.org (list references)

**Document Revision History**

<table>
<thead>
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<th>Version</th>
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<th>Author</th>
<th>Description</th>
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<tr>
<td>1.2</td>
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</tr>
</tbody>
</table>

**Sample Communication to IG Team Announcing the Start of AHIMA Pilot:**

We are excited to announce that we have partnered with American Health Information Management Association (AHIMA) to expand our IG program and to enhance our use of the tools AHIMA has developed. This work will occur over the next year starting with a kickoff meeting on____.

The goals include applying the IG principles of accountability, transparency, integrity, protection, compliance, availability, retention, and disposition to our information facility wide. The benefits of IG are ensuring that information is trustworthy and actionable through alignment with organizational strategy. We will engage senior leaders and business unit stakeholders across the enterprise. In an increasingly connected world, this extends outside the proverbial four walls of an organization to make sure that information is available in the right place and the right time to support health and healthcare. This is an organization-wide effort and we look forward to your participation and insights.
APPENDIX F
SAMPLE ORGANIZATIONAL TRAINING PLAN

[Site/System Name] - IG Training Plan

Goal: Provide focus and direction for training [Site/System] workforce on the importance of supporting and adhering to [Site/System’s] IG principles and procedures to promote optimal data integrity and improve current performance.

Training Objectives:
Provide appropriate learning opportunities for [Site/System] workforce to ensure awareness and understanding of the IG initiatives including the following components:

- Executive sponsor
- IG charter - high level components
- Maturity model - current state and where we are headed
- Roles/responsibilities/org chart
- Established teams/ workgroups
- Accountability principle
- Transparency principle
- Integrity principle
- Protection principle
- Compliance principle
- Availability principle
- Retention principle
- Disposition principle
- Inventory of current policies – What we need from you
- Timeframe for training
- Next steps

Preparation Steps:
- Identify specific training needs/goals
- Quantify desired benefits for trainees
- Determine/calculate training costs and identify financing source
- Obtain executive-level support
- Identify training resources
- Select qualified trainers
- Create training topic outline
- Design training content/lessons
- Determine when specific departmental content should be incorporated
- Establish training timeline
- Knowledge transfer to trainers
- Outline trainee groups and training types for each group
- Perform training sessions
- Develop training feedback/assessment form

Training Plan:
A federated model approach will be utilized for training. Certain processes of the training function will be centralized (organization, administration, training plan, core content development) and others decentralized (some departments to add specific content and train staff directly). Training will be conducted within classrooms and virtually via web-based training.
All staff are required to take the “Intro to IG” e-learning module within 30 days of hire date. All staff are required to complete the IG refresher training on an annual basis.

Organization-Wide Training Sessions Offered Initially (dates...)
Targeted Departmental Training: two-hour sessions will be offered for specific departments.

Audiences / Requirements

Organization Wide - Overviews
Management – Overview with more specific details
Targeted Departments – In-depth

Training Resources
Handouts
Websites/ Portals (location/folder)

Training Evaluation
Class Assessments will be completed by trainees to measure effectiveness of training and to facilitate continued improvement of content delivery and understanding.

RESOURCES


## APPENDIX G
### SAMPLE INVENTORY OF IG POLICIES

<table>
<thead>
<tr>
<th>Category</th>
<th>IG Principle</th>
<th>Policy</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administrative</td>
<td>Integrity</td>
<td>Disaster Preparedness and Recovery</td>
<td></td>
</tr>
</tbody>
</table>
### Inventory of IG Policies

<table>
<thead>
<tr>
<th>Category</th>
<th>IG Principle</th>
<th>Policy</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Privacy &amp; Security</td>
<td></td>
<td>Security of Protected Health Information</td>
<td></td>
</tr>
<tr>
<td>Risk Management</td>
<td>Availability</td>
<td>e-Discovery and Metadata</td>
<td></td>
</tr>
<tr>
<td>Health Information Management</td>
<td></td>
<td>Error correction and amendment to the legal health record</td>
<td></td>
</tr>
<tr>
<td>Information Systems</td>
<td></td>
<td>Organizational data sets, values sets, clinical vocabularies and standards</td>
<td></td>
</tr>
</tbody>
</table>
## Inventory of IG Policies

<table>
<thead>
<tr>
<th>Category</th>
<th>IG Principle</th>
<th>Policy</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information Systems</td>
<td>Device and Media Controls</td>
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<td>Information Systems</td>
<td>e-Mail Management</td>
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<td></td>
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<td>Information Systems</td>
<td>Information System Access</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Information Systems</td>
<td>Information System Passcodes</td>
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<td></td>
</tr>
<tr>
<td>Information Systems</td>
<td>Information Systems Downtime</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Information Systems</td>
<td>Mobile Device Management</td>
<td></td>
<td></td>
</tr>
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<td>Information Systems</td>
<td>Remote Access to Information Systems</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Privacy &amp; Security</td>
<td>Breach Investigation, Risk Assessment and Notification</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Privacy &amp; Security</td>
<td>Business Associate Agreement</td>
<td></td>
<td></td>
</tr>
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<td>Privacy &amp; Security</td>
<td>Confidentiality</td>
<td></td>
<td>Ensure that employees, medical staff members, and non-system personnel authorized to access organizational information appropriately safeguard confidential information</td>
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<tr>
<td>Privacy &amp; Security</td>
<td>Disposal of Documents, Materials or Media</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Privacy &amp; Security</td>
<td>Faxing Confidential Information</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Privacy &amp; Security</td>
<td>Notice of Privacy Practices</td>
<td></td>
<td>Standards for the distribution, acknowledgement of receipt, and posting of the Notice of Privacy Practices</td>
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<tr>
<td>Privacy &amp; Security</td>
<td>Patient Request for Accounting of Disclosures</td>
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<tr>
<td>Privacy &amp; Security</td>
<td>Protected Health Information Access Audits</td>
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</tbody>
</table>
APPENDIX H

SAMPLE RFP

A simplified version of a request for proposal (RFP) is outlined below:

- Summary statements
- Executive summary
- Statement of need
- Project description
- Organizational information
- Project schedule
- Conclusion

Company information
- Company name
- Address
- City, state, and ZIP
- Phone
- Project name (be concise)

INTRODUCTION
Include a written introduction to the company, the project team, and a description of the proposed project.

PROJECT GOALS
Use this section to highlight what the company has defined as the goals of the project and anticipated results. Vendors should be instructed to answer how they will meet the project goals.

SCOPE OF WORK
The scope of work (SOW) outlines the details of the project and how the company will work with the vendor to ensure work is completed.

REQUIRED PROPOSAL FORMAT
This section addresses how the information that is being requested should be submitted and outlines the format in which the proposal should be sent back to the company. Vendors should meet or exceed all of the needs that have been outlined for the projects in their RFP response. You should detail in this section what you expect to receive back from the vendors.

ADDITIONAL SERVICES
This section is used to address any additional services that may be requested from the vendor.

OWNERSHIP OF INTELLECTUAL PROPERTY
This section should outline ownership of any physical property being proposed and detail expectations about the ownership of any intellectual property.

COMPANY RESPONSIBILITIES
This section highlights the responsibilities of the company to ensure the vendor has everything needed to stay on track with the project.

ESTIMATED PROJECT TIMELINE
This section shows the anticipated project timeline from the response submission date to the decision date. Remember to allow sufficient time for changes or modifications to the project and the RFP.
SUBMISSION INFORMATION
This section tells the vendor how to submit their bid and what the requirements for submission are.

SELECTION CRITERIA
This section helps the vendor understand the selection criteria. Be certain to include the contact information for the person who should receive the bids and can answer any questions that the vendor has of the company.

MISCELLANEOUS
This section is used to add any additional comments or list any additional services required of the vendor.