



BENCHMARKING WHITE PAPER

## A Call to Adopt Information Governance Practices

This white paper describes findings from the first major survey of information governance practices at healthcare organizations. This landmark study, prepared by Cohasset Associates in conjunction with the American Health Information Management Association (AHIMA), evaluates and quantifies the state of information governance (IG) maturity and effectiveness, while explicitly addressing the information challenges facing the healthcare industry.

Establishing a baseline, this white paper delivers authoritative, up-to-date benchmarking metrics on information lifecycle practices in healthcare. You will find:

- Incisive and comprehensive measures of the maturity of information governance adoption.
- Details on successes, obstacles and opportunities for more effective information lifecycle management.
- Actions to respond to today's information governance challenges.
- Comparisons made to IG practices survey results for other information-intensive organizations.

The impetus for the survey and this white paper is the recognition that information governance underscores the value of information as an asset essential for advancing the goals and priorities of healthcare organizations. Information is necessary for safe and effective patient care and operational excellence. Information management and control is an undeniable healthcare imperative.

Survey results provide evidence that:

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

## SURVEY OVERVIEW

Cohasset Associates and AHIMA are pleased to announce this foundational healthcare industry survey white paper.

Recognized as a healthcare imperative, information governance (IG) establishes the policy-level rules, investment priorities and accountabilities for managing the lifecycle of information.

Effective IG reinforces the value of information as a critical asset for healthcare transformation. It improves organizational performance through proactive compliance, the effective use of information and by controlling costs. IG advances trusted information, essential for patient engagement and for public and community health.

The survey and this white paper address today's information governance-related healthcare challenges:

- Strategic drivers including changes in care delivery, payment and technology
- Information imperatives such as accuracy, timeliness, accessibility, and integrity
- Rigorous requirements for information confidentiality, privacy, security and compliance

This white paper and its associated survey results will become a go-to source for comprehensive IG adoption measures, benchmarks, IG roadmaps and peer results.

## COMPARE AND CONTRAST

With more than 12,000 total responses since their inception in 1999, the Cohasset Associates | ARMA International | AIIM surveys are recognized as the definitive source on the state of information lifecycle management. The associated biennial white papers document the discipline in its evolution from managing the lifecycle of paper records to expanding those lifecycle principles to address electronically stored information and the expanded compliance requirements for comprehensive information governance (IG). For fifteen years, the biennial surveys and their white papers have been inclusive of All Organizations, including healthcare, contributing to a wealth of data that supports authoritative benchmarking metrics on information lifecycle practices.

In concert with AHIMA and beginning with this 2014 survey and white paper, the maturity of information governance practices in the healthcare industry are separately measured.

Sections of this white paper will have an identified Compare and Contrast heading, comparing these survey results with other IG-related surveys.

## RESEARCH METHODOLOGY

The research was conducted using a web-based survey tool. Over 1,000 survey responses were received during March and April 2014. The invitees included:

- Healthcare and industry professionals such as clinical and non-clinical leaders, officers, directors and managers in both provider and non-provider settings
- AHIMA members

## ACKNOWLEDGEMENTS

Cohasset Associates and AHIMA wish to express their appreciation to the more than 1,000 participants in this survey.

Special recognition and gratitude is extended to Iron Mountain for their support.

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## INTRODUCTION

Today, healthcare is increasingly impacted by technological change. The emergence of the electronic health record (EHR), the increased use of business intelligence and data analytics, an increasing emphasis on quality reporting, and the evolution of mobile and hand-held technology all contribute to an increase in information - in multiple formats - in multiple places - with multiple uses.

The American Health Information Management Association (AHIMA) recognizes that proliferating information must be properly managed and understood. In short, information governance (IG) is required throughout healthcare organizations and the healthcare eco-system. In 2013, AHIMA published a [strategic plan](#) identifying IG as a strategic imperative for the healthcare industry. The Plan says: *Effective enterprise information management in healthcare requires governance of both data and information to improve healthcare.* The need for this governance in healthcare is being driven by the rapid rate of adoption of health information technology, demand for health information to measure quality and performance outcomes in healthcare delivery, and the need for use of clinical and financial data.

To achieve the full benefits of IG, AHIMA believes the following must be addressed:

- An accountability framework and decision rights to ensure the effective use of information, enterprise-wide
- The defined processes, skills, and tools to manage information, throughout its entire lifecycle, as a critical business asset
- The essential standards, rules, and guidelines for functioning in an increasingly electronic environment

Cohasset has conducted biennial surveys on the state of information governance practices in other industries since 1999. To achieve a baseline understanding of the state of IG in healthcare—and map where it needs to go from here—AHIMA has partnered with Cohasset Associates to conduct the first comprehensive survey of IG in healthcare.

And, the survey results are undeniable. Information governance is a strategic imperative: *Quality and safety, cost control, payment reform, care delivery redesign and complying with regulatory changes are top goals for healthcare organizations and all are highly dependent on trustworthy information.* These organizational goals are advanced through the adoption of information governance practices; the absence of IG will impede their achievement.

The survey results and this white paper compel the healthcare industry to take action and "connect the dots" to make effective information governance a reality.

## SURVEY HIGHLIGHTS

These Survey Highlights summarize the key findings, while providing recommended actions for expanding and maturing information governance at healthcare organizations.

The four survey highlights and recommended actions are detailed in this section, along with key benchmarking data from the survey. Use this section to formulate internal action plans and to develop communications highlighting your program's strengths and opportunities.

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1

**Overall, IG programs are less prevalent and less mature in healthcare organizations than is warranted, given the importance of information.**

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2

**Most organizations have not yet established a comprehensive strategy for information governance.**

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3

**The information governance framework and its foundational components call for strengthening and expansion.**

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4

**Information lifecycle management practices related to core functions require improvement.**

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# 1 Overall, information governance programs are less prevalent and less mature in healthcare organizations than is warranted, given the importance of information.

## Survey results uphold:

- Healthcare organizations face compelling drivers for improving information governance practices. Survey participants affirm that high-value information is required to:
  - » Improve the quality and safety of patient care, confirmed as a key driver by 95% of survey respondents.
  - » Manage and contain costs, cited by 93% as a key driver.
  - » Respond to a changing payment environment and the need to analyze clinical, quality and business performance, as affirmed by 92% of survey participants.
- Nearly two-thirds (65%) of respondents from participating healthcare organizations recognize the need to formalize information governance (IG) practices to align how information is managed across functional areas.
  - » Of these, only 43% have actually initiated an IG program and report: substantial benefits (11%), some benefits (19%) or no benefits to date (13%).
  - » Further, even while recognizing the need, 22% of participating organizations have not initiated a formal IG program.

# Recommended Actions

- Build awareness on the importance of IG and the direct impact of IG on the advancement of organizational goals
- Educate stakeholders on the importance of establishing an overarching IG program to expand the benefits of interdisciplinary collaboration
- Illustrate how information governance supports top goals for healthcare organizations
- Designate senior sponsorship for an overarching IG program
- Identify a champion to enthusiastically lead the change management effort for effective IG



## 2 Most organizations have not yet established a comprehensive strategy for information governance.

### Survey results uphold:

- Just over one-third (35%) of healthcare survey respondents report having a comprehensive strategy to guide information governance.
  - » An effective IG program strategy must emphasize achieving high priority organizational goals and mitigating the most significant risks.
- The cross-functional IG structure is identified as mature only 11% of the time. This structure provides multi-disciplinary direction and oversight; sponsorship for resources and funding; and leadership to engender organizational solidarity.
- Significant improvements in information governance practices have been achieved in the past three years; further improvements are expected in the near future.
  - » Eighty-four percent (84%) of survey respondents report that significant improvements have been realized over the past three years.
  - » Ninety-one percent (91%) anticipate significant improvements over the next three years.

# Recommended Actions

- Engage executives in establishing priorities for the IG implementation strategy
- Define an overarching IG strategy that aligns implementation outcomes to the organization's goals and priorities, including patient care, organizational performance and risk mitigation
- Charter a cross-functional IG steering committee or re-purpose an existing committee to strengthen integration across all IG disciplines, resulting in a comprehensive IG program
- Model an IG Steering Committee charter on those used by other important committees
- Include IG topics, when feasible, on the agendas of other governance committees

# 3 The information governance framework and its foundational components call for strengthening and expansion.

## Survey results uphold:

- Information governance policy and practices are assigned a maturity ranking of only 17%, with an improvement underway ranking of 36%.
- Training programs, vital to achieving effective information lifecycle practices, receive a maturity ranking of just 15%.
- Compliance assessments and internal audits are reported as mature by a mere 16% of healthcare respondent's.
- Metrics to guide IG assessment and improvement are reported as mature by just 10% of respondents participating in this survey.

# Recommended Actions

- ☑ Prepare a comprehensive and candid current state assessment of the maturity of foundational IG program components and create a plan to implement the IG strategy
- ☑ Establish or refresh an integrated policy infrastructure that encompasses all IG components and addresses all health and business information in electronic and paper formats
- ☑ Communicate IG goals and achievements and highlight trends
- ☑ Regularly train all employees on IG components with a strong emphasis on the benefits of IG to the organization
- ☑ Collect meaningful metrics on direct actions (e.g., number of users trained; improving rates of EHR or patient portal errors detected and corrected, the volume of information retained, preserved for legal holds and deleted) and derived measures (e.g., cost savings and other benefits, such as increased awareness) to monitor, report and improve IG practices
- ☑ Adopt a long range change management program to continuously build IG support and improve compliance

# 4 Information lifecycle management practices related to core functions require improvement.

## Survey results uphold:

- As would be expected in the healthcare industry, privacy policy and practices receive the highest maturity ranking of 50%. This is followed closely by information security policy and practices at 44%. The maturity results fade quickly for other IG practices, with information preservation at 30% and information deletion and destruction at 26%.
- Nearing 50% for paper records stored on-site, and at 42% for those stored off-site, non-automated (manual) processes represent the primary means by which paper records are deleted when eligible.
- No information type - paper or electronic - business or health - receives a positive result higher than 37% regarding a healthcare organization's ability to preserve only relevant information in response to a legal hold.

# Recommended Actions

- Strengthen the IG practices of managing information throughout its lifecycle, from creation or receipt through final disposition

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- Establish interdepartmental teams to develop and apply reasonable, workable IG practices to newer technologies and information types

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- Formalize IG practices to enhance the integrity, quality and trustworthiness of information

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- Leverage the mature aspects of privacy and information security to enhance other components of information governance

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- Employ automated tools to identify and delete information that is eligible for destruction

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- Define effective practices to identify and preserve information needed for a legal hold, reinstating business-as-usual practices upon conclusion of the legal matter

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- Establish routine and comprehensive assessments to identify areas of vulnerability and opportunities to refine IG program components

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## SURVEY RESULTS

### 1. INFORMATION GOVERNANCE STATUS AND DRIVERS

#### 1.1 What is the status of the information governance within your organization?

Cohasset defines information governance (IG) as a comprehensive platform for the effective and efficient management of the information lifecycle. Information governance:

- Establishes policy-level rules
- Defines investment priorities
- Institutes accountabilities
- Aligns implementation outcomes to business priorities
- Measures results

Nearly two-thirds (65%) of respondents from participating healthcare organizations recognize the need to formalize information governance practices to align how information is managed across functional areas. Of these, 43% have actually initiated an IG program, reporting the achievement of the following:

- Substantial benefits (11%)
- Some benefits (19%)
- No benefits to date (13%)

The survey did not include questions regarding the length of experience with IG; accordingly, no conclusions can be drawn as to whether the range of reported benefits relates to length of experience.

Even while recognizing a need, 22% of participating organizations have not initiated a formal IG program.

In contrast, 11% have not begun a IG program because they recognize no need.

Finally, 24% of respondents report not knowing whether their organizations have initiated an IG program.

	2014
No recognized need; have not started a formal program or initiative	11%
Recognized need; have not started a formal program or initiative	22%
Program initiated; benefits have not yet been realized	13%
Program initiated; some benefits are being realized	19%
Program initiated; substantial benefits are being realized	11%
Don't know	24%

Given the breadth of information governance as defined, it is unrealistic to quickly achieve a mature and effective program. In addition to taking time, it takes organizational commitment in the form of cross-disciplinary participation and engagement.

A mature and effective program is one that adopts robust principles, policies and practices developed through strong interdisciplinary cooperation. Affiliations with and commitments from the following organizational areas are essential:

- Privacy and Information Security
- Legal, Compliance and Risk Management
- Information Management, Informatics and Information Technology

Sponsorship and participation from both clinical leadership and administration are also critical for IG program success. Ongoing relationships create an environment conducive to the development and implementation of sustainable IG program strategies.

## 1.2 Does your organization have a comprehensive strategy to guide future information governance direction?

In this era of limited resources and a growing demand for trusted information, information governance requires a comprehensive strategy that aligns with the healthcare organization's priorities and goals.

Just over one-third of respondents (35%) report a comprehensive strategy guiding information governance. This may relate to the recent introduction of IG as a comprehensive control standard. It may also signal governance of certain functions such as privacy and security, but not organization-wide IG programs.

2014	
Yes	35%
No	31%
Don't know	34%

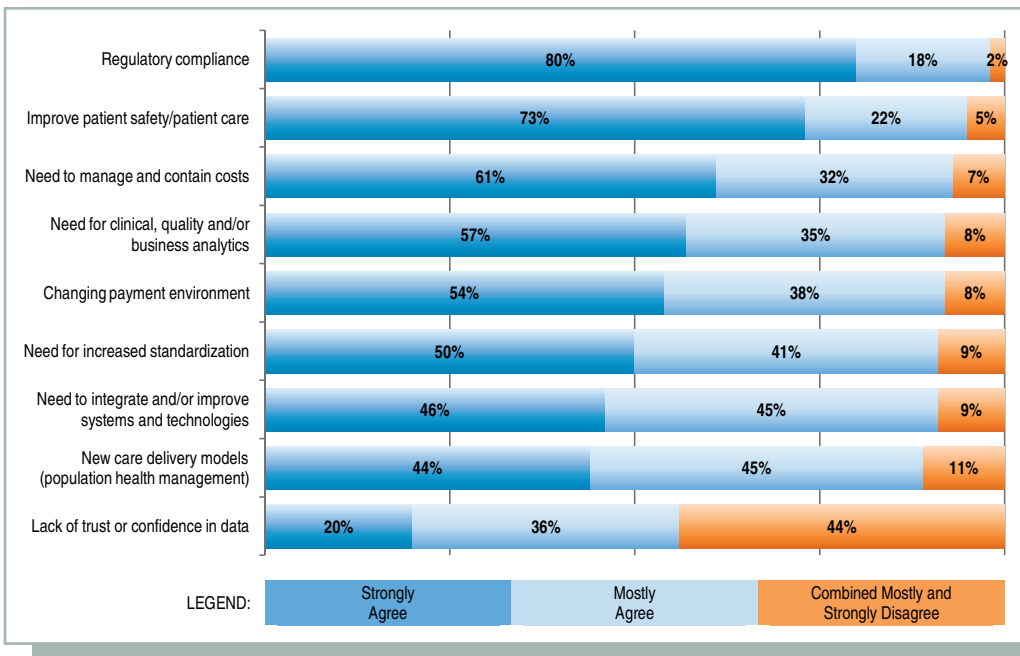
As noted in question 1.1, a significant number of respondents are not aware of the status of IG in their organizations.

An IG program strategy must emphasize achieving high-priority organizational goals and mitigating the most significant risks. Further, essential to a comprehensive IG program strategy are metrics, which:

- Substantiate alignment with clinical and business priorities
- Provide concrete proof of the benefits and value
- Document progress toward strategic goals
- Signal when a strategy is not achieving the desired outcome

### 1.3 What drivers are important to information governance in your organization?

Healthcare faces a range of complex and interrelated environmental, operational, and performance challenges that drive the improvement of information governance. Each driver contemplates both access to and the use of trusted information.



Survey participants affirm the importance of each of these drivers to information governance. In point of fact, for seven of the nine attributes, the combined strongly and mostly agree responses, each totaling over 90%, identify these drivers as both relevant and essential.

- Overwhelmingly, respondents affirm regulatory compliance as the most compelling driver of information governance at 98%. Eighty percent (80%) of those respondents strongly agree.
- Ninety-five percent (95%) of respondents strongly (73%) and mostly agree (22%) that improving patient safety and care is a driver of information governance.
- Cost management was cited by 93% as a key driver, followed closely by the changing payment environment at 92%.
- The need for information for the analysis of clinical, quality and business performance was cited as a driver for information governance at 92%.

The driver with the lowest ranking, lack of trust or confidence in data, will benefit from introspective analyses by the survey participants:

- Fifty-six percent (56%) of survey participants strongly and mostly agree that a lack of trust in data is a driver for information governance in their organizations.

#### Compare and Contrast

Here, and in other sections of this white paper, identified by a Compare and Contrast heading, excerpted results from the 2013 | 2014 Information Governance Benchmarking Survey conducted by Cohasset Associates | ARMA International | AllIM will be provided for your consideration, study and analysis.

- For All Organizations responding to the Cohasset Associates | ARMA International | AllIM survey:

» Only 17% report a mature comprehensive strategy; 36% indicate that improvement is underway.

- » The strong 44% disagreement may suggest that external drivers are the most compelling catalysts for IG and/or trust and confidence in data are embedded concerns in each of the other more highly ranked drivers.

As identified in question 1.2, there is significant opportunity for improvement in aligning information governance strategies to organizational priorities. This survey question reveals strong agreement about compelling drivers for comprehensive IG.

- Quality and safety, cost control, payment reform, care delivery redesign and responding to regulatory changes are top goals for organizations and all are highly dependent on trustworthy information.
- It seems clear that there is an important opportunity to advance these organizational goals through effective IG and that the absence of IG may impede achieving those goals.

### 1.4 Rank your agreement that the following are actively engaged in information governance in your organization.

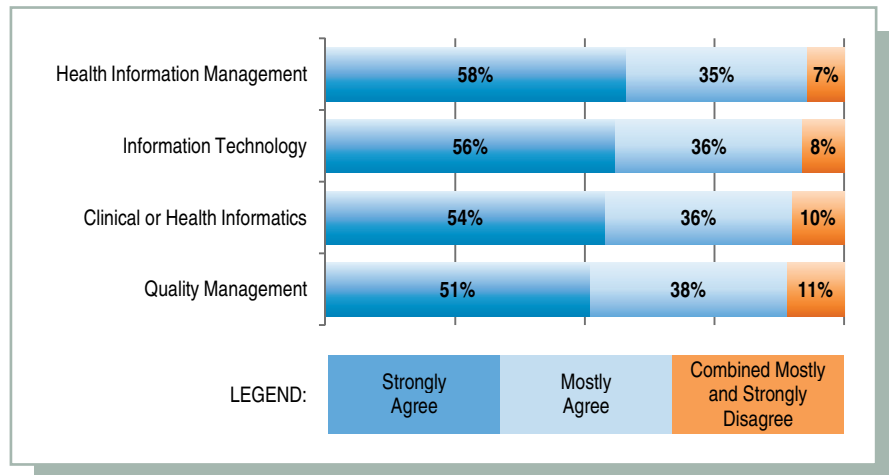
Information governance is an interdisciplinary program that requires broad organizational engagement. Senior level support is critical to the adoption of effective and mature information governance practices. This engagement is also a key indicator of the overall success and impact that the IG program can experience.

#### Information Stewards

Combined strongly and mostly agree responses affirm very active engagement by stewards of health information, including: HIM (93%), information technology (92%), clinical or health informatics (90%) and quality management professionals (89%).

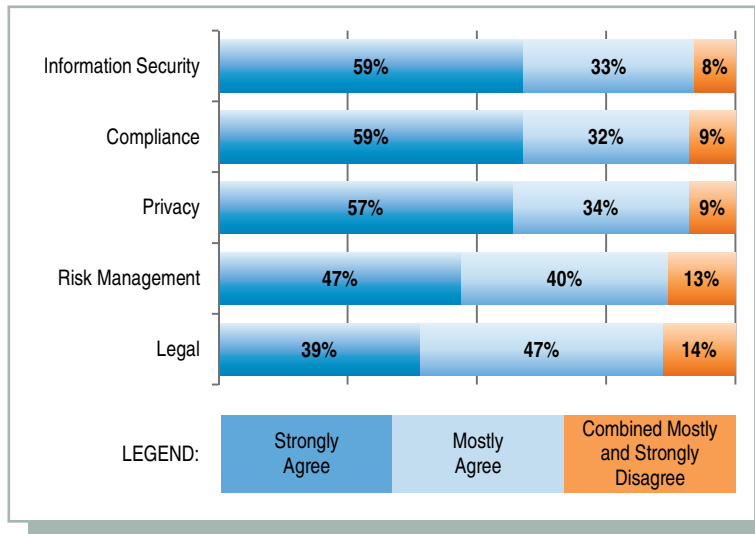
Collaborations support a strong and unified information governance program:

- Effective collaboration between IT, informatics and HIM is necessary when managing information throughout its lifecycle. Without this emphasis, new content will be created and managed without information lifecycle controls, increasing the mass of unattended information in the future.
- Quality management, clinical analytics and other key users of information represent important alliances.
- An active engagement with IT translates to the opportunity for information governance to have a “voice at the IT planning table.” This connection is important to sound information design and capture and other decisions that impact life cycle management.



### Compliance and Risk Operations

Nearing the levels of engagement attributed to the information stewards, healthcare information security, compliance and privacy leaders are actively engaged in information governance activities, with combined strongly and mostly agree responses of just over 90%.

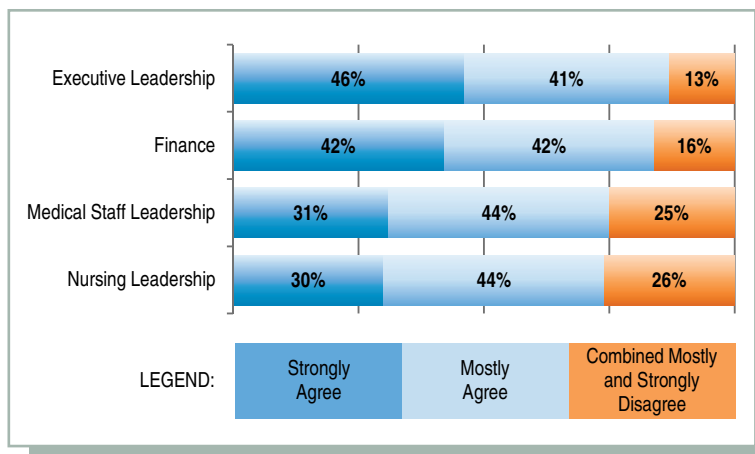


With positive results exceeding 86%, survey participants also affirm active engagement and support in their organizations from risk management and legal services.

### Leadership and Administration

Leadership engagement is a critical IG program success factor.

Over 80% of respondents strongly and mostly agree that executive leadership, including finance is actively engaged. It is notable that the level of active support from the medical staff (75%) and nursing leadership (74%) trails other executive leaders.



The responses from the survey participants provide evidence that strong interdisciplinary engagement is essential for sustainable IG. Aligning this finding with the reported levels of IG initiation by healthcare organizations may indicate that organizations are considering the formalization of governance mechanisms and in the meantime or instead, are using existing mechanisms such as standing committees and informal working relationships to move forward.

Introducing IG into an environment with pre-existing collaborative relationships is an advantage that helps organizations realize early benefits.

### Compare and Contrast

The following results are reported in the 2013 | 2014 Information Governance Benchmarking Survey conducted by Cohasset Associates | ARMA International | AHIMA.

- For All Organizations, the combined strongly and mostly agree responses are:
  - » Compliance and governance areas provide the greatest degree of support for information governance programs. Rankings exceed 80% for areas such as Legal, Privacy and Data Protection and Compliance and Regulatory Affairs.
  - » Information Technology is well-aligned with a ranking of 68%.
  - » The engagement and support by executive and other management is reported at just over 60%.
  - » The employee workforce demonstrates the lowest degree of engagement at just 51%.

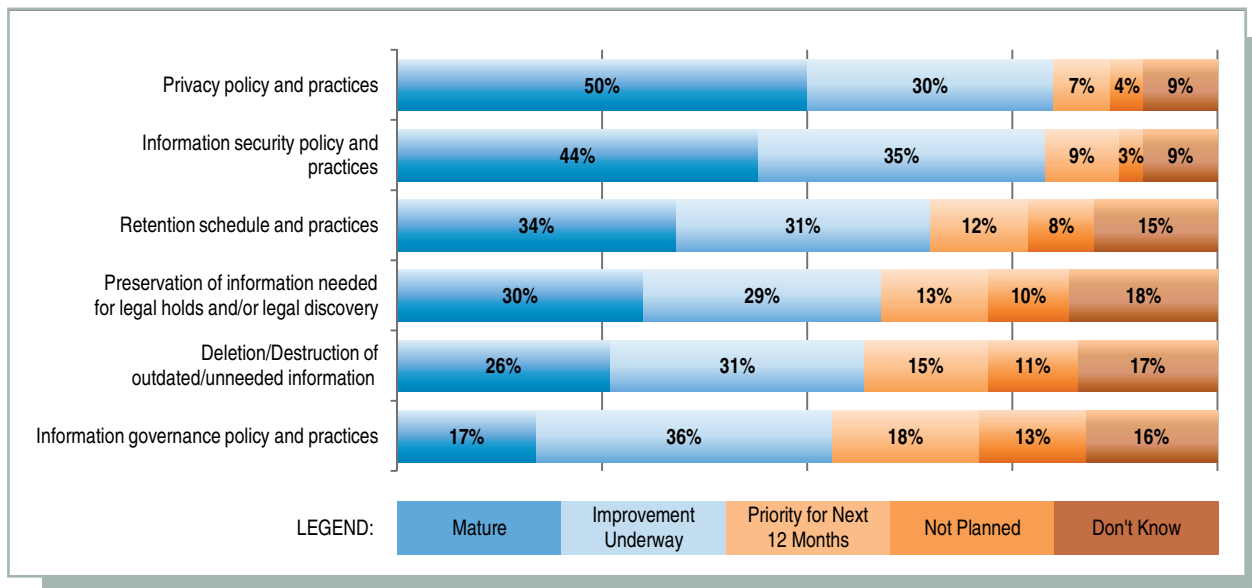


### 1.5 How mature are the following information governance components in your organization?

The maturity of a range of functional components for healthcare IG was assessed. To facilitate comparison, these are grouped into three clusters reflecting critical organizational capabilities:

- Policy and Practice - IG functions that require sound policy development and execution practices
- Measures and Metrics - IG functions that require robust measurement capability
- Guidance - Essential IG structure and capabilities

#### Policy and Practice



As would be expected in the healthcare industry, privacy policy and practices receive the highest mature ranking of 50%, followed closely by information security policy and practices (44%); however, maturity results fade quickly:

- Retention schedule and practices: 34%
- Preservation of information needed for legal holds and/or legal discovery: 30%
- Deletion/Destruction of outdated/unneeded information: 26%

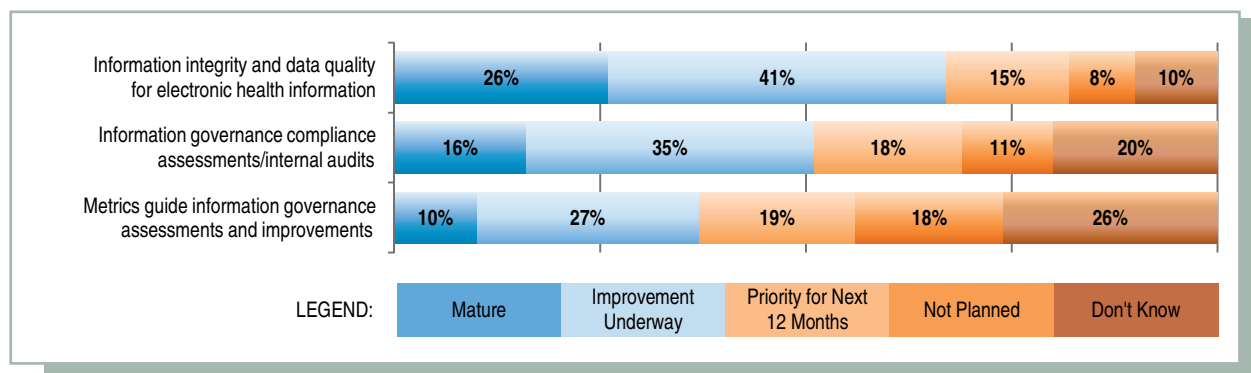
It is notable that information governance policy and practices has the lowest mature ranking of just 17%, accompanied by the highest improvement underway ranking of 36%. This may suggest that organizations are busy building the policy infrastructure essential for effective information governance.

## Measures and Metrics

Measures and metrics are key to successful information governance. Practices and results are audited for compliance and for adherence to goals and targets. Measures and metrics raise awareness of the current state of information asset lifecycle control, risks, and vulnerabilities. Measures and metrics demonstrate the effectiveness of governance initiatives such as:

- The number of users trained
- Patient portal errors corrected
- Master person index accuracy rate
- Volumes of information retained, preserved for legal holds and deleted

Derived benefits such as cost savings or increased awareness should also be measured. Measures and metrics help build a business case and garner support for the IG program.



As with information governance policy and practices, foundational work in measures and metrics is immature:

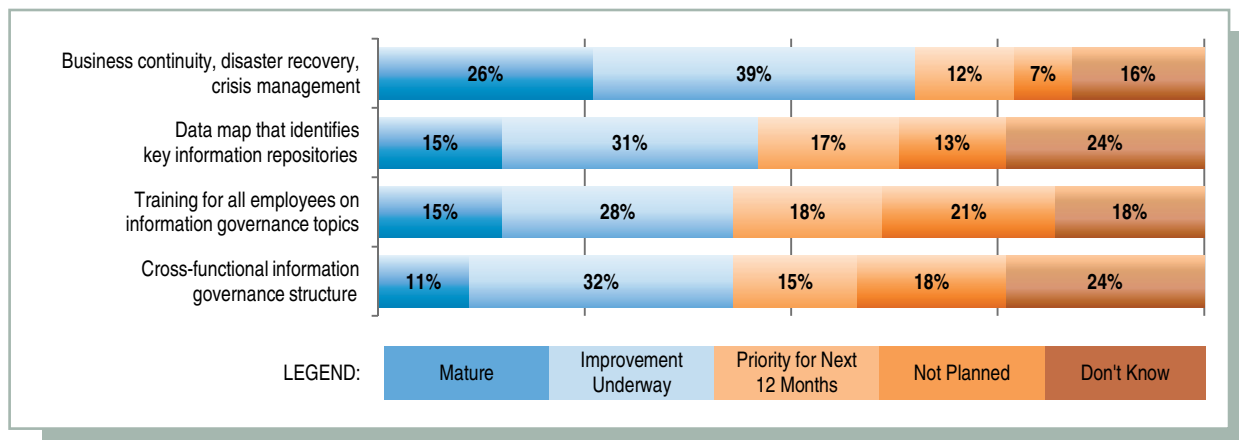
- Compliance assessments and internal audits are reported mature in just 16% of respondent organizations.
  - » A greater percent of respondents report that compliance assessment and internal audits are under improvement (35%) or targeted for improvement (18%) in the near term.
- Metrics to guide IG assessment and improvement are reported as mature by just 10% of respondents participating in this survey.
  - » Twenty-seven percent (27%) of survey participants report that improved metrics are being developed or will be developed in the next twelve months (19%).

Information integrity and data quality measurement relating to electronic health records (EHR) appears to be the strongest of the measures and metrics attributes:

- Twenty-six percent (26%) report mature measurement systems for EHR data integrity.
  - » Forty-one percent (41%) report that EHR data integrity work is underway.

## Guidance

Guidance attributes represent essential information governance program components.



Among this cluster of essential IG program components, business continuity, disaster management and crisis management is cited as the most mature function with substantial improvement underway (39%) or expected in the coming twelve months (12%).

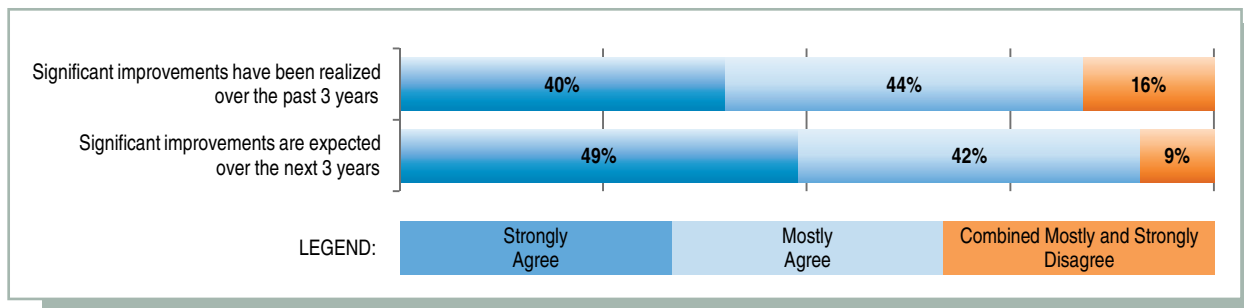
For most healthcare organizations, however, the following IG guidance capabilities are not mature and represent areas for fruitful developmental focus:

- Data mapping supports the quality, interoperability and usability of health information. Currently this function is mature by only 15% of respondents.
- Generally, training is in place for privacy and security topics because of regulatory requirements.
  - » Regarding other aspects of IG training, employees cannot make good information lifecycle management decisions unless they understand what to do and why it is important.
  - » A mature ranking of only 15% represents an area for improvement. Twenty-eight percent (28%) of respondents indicate that such improvement is underway.

In addition to membership from information technology and from HIM and clinical or health informatics, a cross-functional IG structure generally includes executive leadership and representation from governance areas (legal, compliance, risk management and privacy).

- The cross-functional IG structure is identified as mature only 11% of the time.
- The purpose of the cross-functional IG structure is to provide multi-disciplinary direction and oversight; sponsorship for resources and funding; and leadership to engender organizational solidarity.

### 1.6 Are information governance practices in your organization improving?



Despite the relative immaturity of certain critical functions and the range of improvement opportunities identified throughout this survey, respondents report significant improvements over the past three years and expect further improvements in the near future:

- Eighty-four percent (84%) of survey respondents strongly (40%) or mostly agree (44%) that significant improvements have been realized over the past three years.
- Ninety-one percent (91%) of survey respondents strongly (49%) or mostly agree (42%) that significant improvements are anticipated over the next three years.

As detailed in Question 1.2, developing an IG program strategy is essential to achieving the planned improvements:

- The IG program strategy should emphasize high impact actions, such as those recommended earlier, to achieve the greatest value and mitigate the most significant risks.
- In addition, essential to a comprehensive IG program strategy are audits and metrics to track program success and point to the course corrections necessary to attain desired outcomes.
- Finally, an IG program strategy must include the deployment of a multi-disciplinary governance structure.

## 2. INFORMATION LIFECYCLE MANAGEMENT

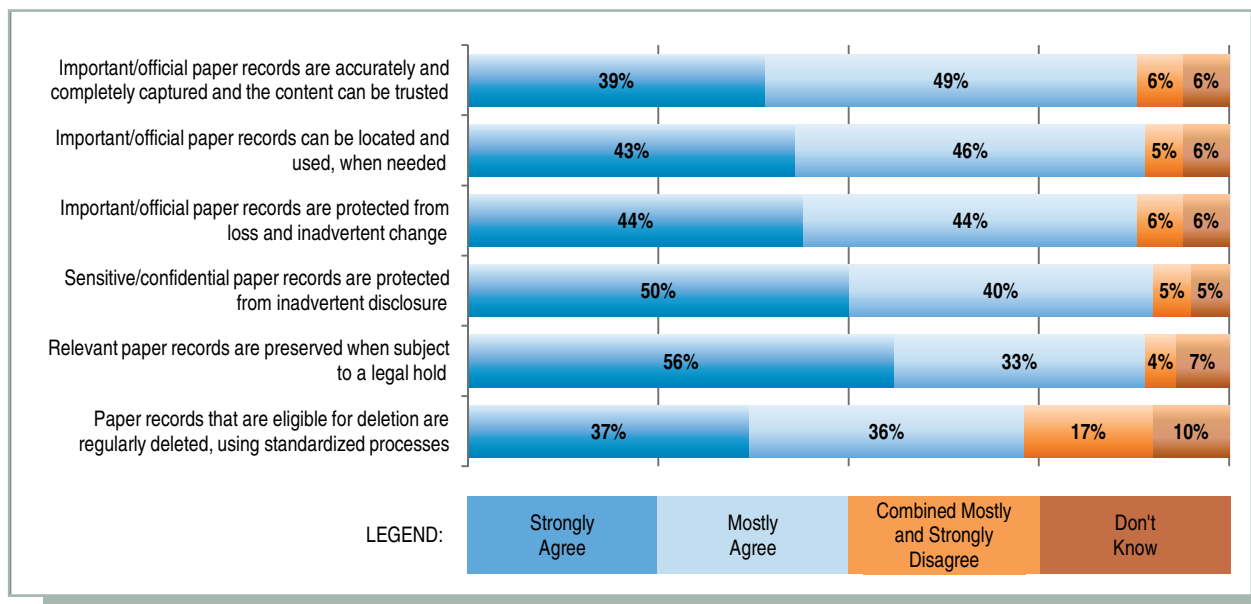
Recordkeeping standards and policies detail the approved methods for managing paper records and electronic information throughout their lifecycle, from creation through destruction.

- Information creation transpires at or near the time of an occurrence and by people or processes that have knowledge of circumstances of the transaction or activity being recorded.
- The protection of information includes coordination with other information governance programs, such as business continuity, privacy and data security.
- Legal Hold processes stop destruction and preserve information needed for reasonably anticipated, threatened, or pending litigation, government investigation or external audit.
- Systematically developed retention schedules specify how long information is to be kept to fully address an organization's legal, fiscal, regulatory, and administrative requirements.
- Procedures define the timely and secure disposition of records and information, including deletion or destruction when the prescribed retention period elapses, unless suspended due to a legal hold.
- Electronically stored information with long-term retention requirements is preserved using the appropriate medium and storage conditions to minimize media deterioration and technical obsolescence.

The development of these controls in healthcare organizations and the measured adherence to them constitute a mature and effective information governance program. Accordingly, this survey measures the efficiency and effectiveness of information lifecycle management for both paper records and for electronically stored information.

## 2.1 Is your organization's information lifecycle management of *paper* records efficient and effective?

Recordkeeping standards and policies detail the approved methods for managing paper records.

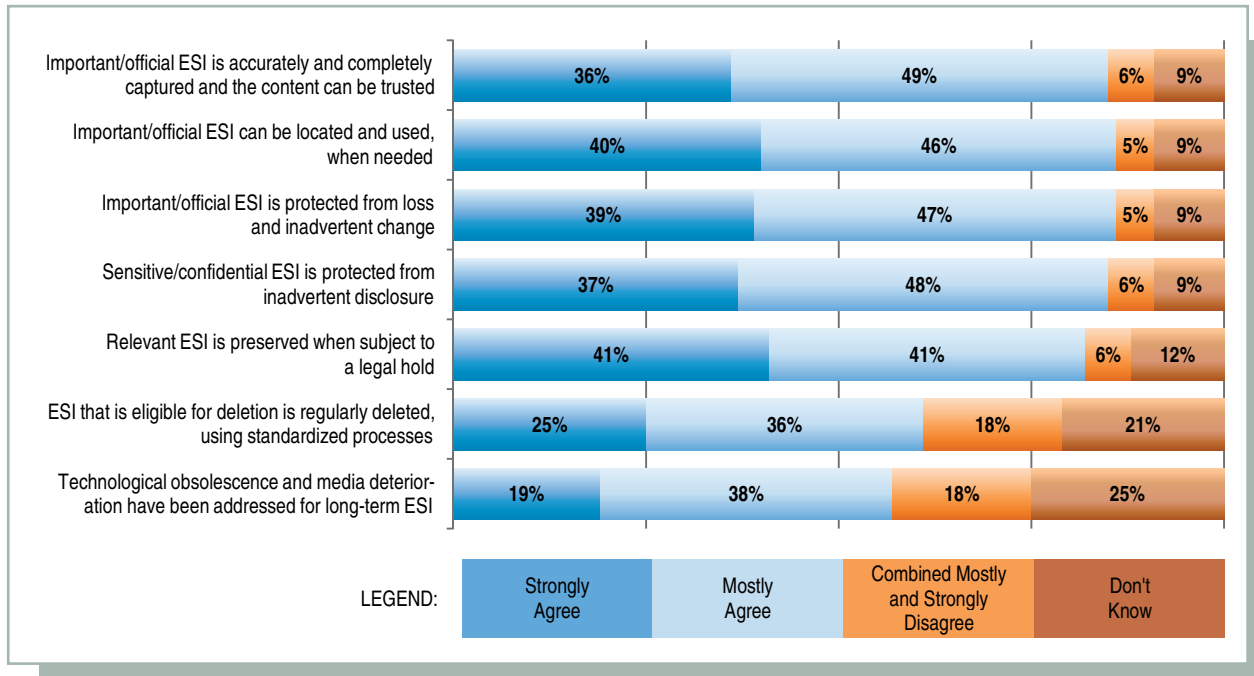


Respondents overwhelmingly affirm that paper records are managed effectively and efficiently from creation through preservation. Five of the six lifecycle elements received nearly 90% combined strongly and mostly agree ratings.

This includes inactive medical records and other business records that are maintained in paper form.

- Notable, however, is the result regarding paper record deletion.
- With a combined result of just 73%, which trails the responses for the other five lifecycle elements by fifteen or more points, survey participants indicate that the processes directing the regular deletion of paper records require improvement.

## 2.2 Is your organization's information lifecycle management of *electronically stored information (ESI)* efficient and effective?



Generally, these survey results affirm that participating healthcare organizations have implemented media-neutral IG governance practices.

Supported by their combined strongly and mostly agree responses of 80% or greater for five of the seven lifecycle elements, survey participants affirm that ESI is managed effectively and efficiently from creation through preservation.

- However, similar to paper records, survey participants indicate with a combined strongly and mostly agree response of just 61%, that the processes directing the regular deletion of ESI also require improvement.

The long-term retention of unstructured content presents challenges, including both media fragility and technical obsolescence. Based on these survey results, healthcare organizations face considerable work ahead to adopt an effective approach to long-term digital preservation.

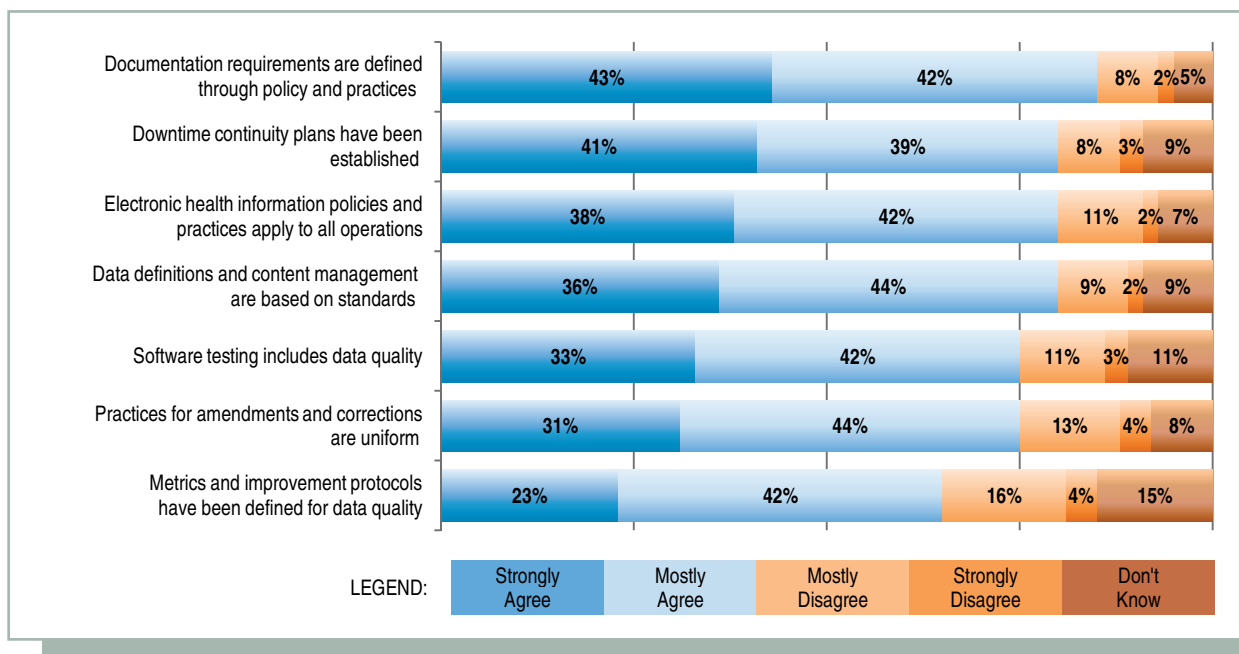
- The efficient and effective retention of long-term ESI is represented by a combined strongly and mostly agree response of just 57%.

### 3. INFORMATION CONTROL AND QUALITY

#### 3.1 Are your organization’s electronic health information controls effective?

Information governance ensures that controls in the form of policies, procedures and other mechanisms are in place, being followed and kept up-to-date.

- The survey assessed selected areas of control for electronic information that healthcare organizations are most likely addressing first for EHRs, the most pervasive enterprise information system.
- The relatively high mostly agree response suggests that while basic controls are in place, more remains to be done.



The most advanced controls are:

- Policy and practices for health information documentation, where 85% of respondents strongly (43%) or mostly (42%) agree that current controls are effective.
- Downtime continuity plans are reported to be effective by 41% of respondents.

The results for the remaining controls assessed in this survey showed weaker levels of strong agreement and a predominance of mostly agree findings.

The weakest area of control appears to be metrics and improvement protocols for data quality. Just 23% strongly agree that controls are effective.

The important IG area of information integrity and quality is assessed further in Section 3.2.

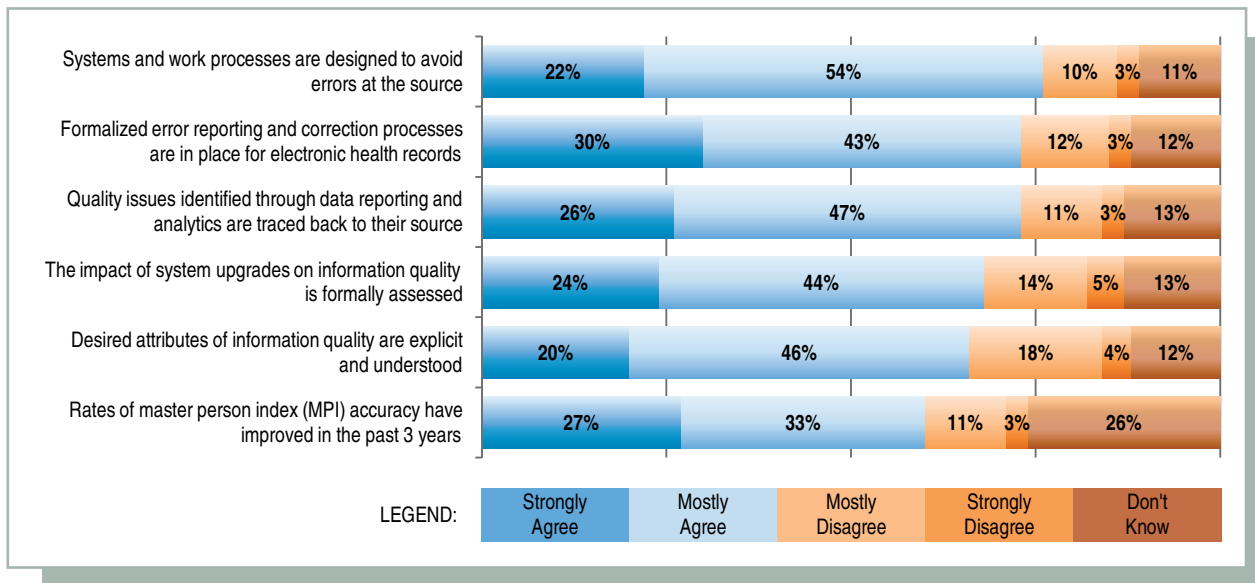


### 3.2 Are your organization’s information quality improvement programs effective?

Information quality control is foundational to information lifecycle management. It is key to fully realizing the benefits of IG and the value of information assets.

Quality control mechanisms assessed in the survey range from designing-in quality to correcting identified errors.

- Overall, two-thirds to three-quarters of respondents strongly or mostly agree that their quality control programs are effective. However, as with electronic health information controls, the mostly agree response is selected far more often than strongly agree, identifying that opportunities for improvement exist.



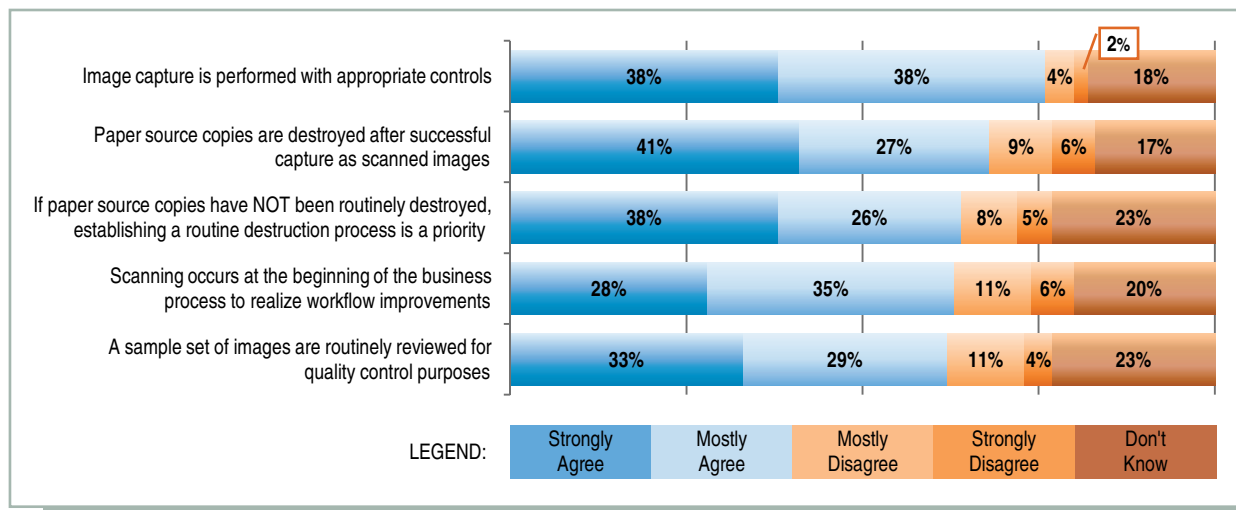
Combined rates of strongly agree and mostly agree responses range from a high of 76% to a low of 60% for the six aspects of information quality control included in this survey.

- Highest overall agreement was reported for the practice of designing systems and work processes to avoid errors at their source, with the majority of responses for mostly agree (54%).
- Formalized error reporting and correction processes are in place at 73% of healthcare organizations. Forty-three percent (43%) provide the less definitive response of mostly agree, suggesting that further improvement is needed.
  - » Responses for improving information capture when errors are detected in data reporting are similarly aligned with a strongly agree rate of 26% and a mostly agree rate of 47%.
- Nearly 20% of respondents mostly (14%) or strongly disagree (5%) that processes for assessing the impact of system upgrades on information quality are adequate.
  - » Similarly, 22% mostly and strongly disagree that the desired attributes of information quality are explicit.
- Improving rates of master person index (MPI) accuracy, a key master data management variable that has been a quality control focus for some time, is rated lowest.
- This finding is also of note in that 26% of respondents do not know whether the accuracy of this measure has improved in the past three years.

### 3.3 Are your organization’s imaging operations efficient and effective?

Since the early 1990s, organizations have deployed document imaging systems to capture, store and reprint digital replicas of documents.

In healthcare, imaging is also an important transitional tool in moving from paper to electronic health records (EHRs) and it continues to be a key means of capturing unstructured information. In addition, imaging has used throughout healthcare organizations in a number of applications.



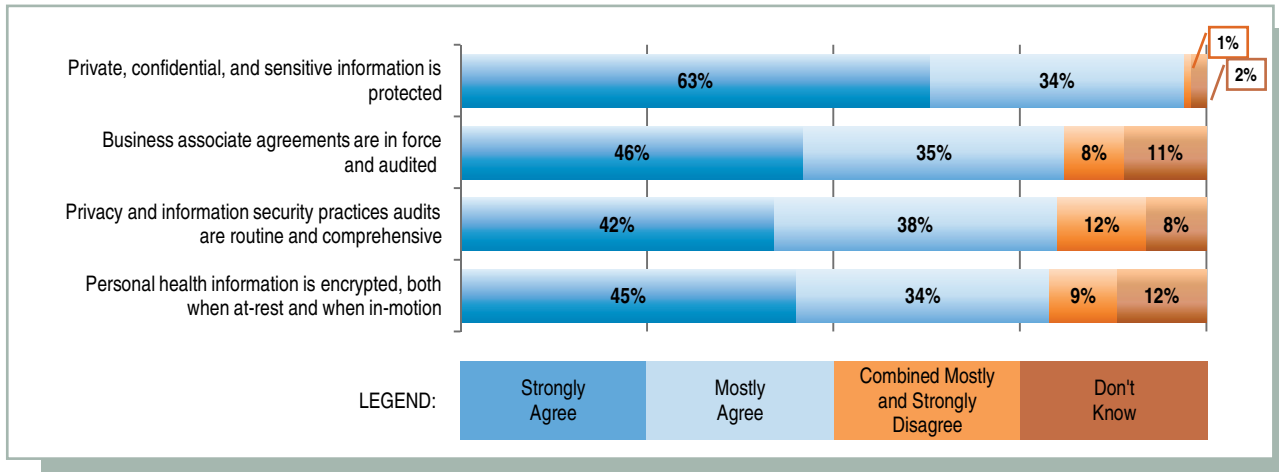
- The use of appropriate image capture controls receives the highest combined result of 76%.
- Sixty-eight percent (68%) of respondents strongly and mostly agree that paper source copies are destroyed after a successful image capture.
- If paper source copies are NOT destroyed after a successful image capture, establishing a source copy destruction process is identified as a priority for 64% of survey participants.
- Quality control is also important as indicated by the 62% combined result regarding the routine review of sample images.

## 4. INFORMATION SECURITY AND PRIVACY

### 4.1. Are your organization's privacy and information security programs effective?

Healthcare privacy and security are subject to regulation under the Health Insurance Portability and Accountability Act (HIPAA) and are generally the most advanced of the information governance components in both policy and practice.

#### Policy



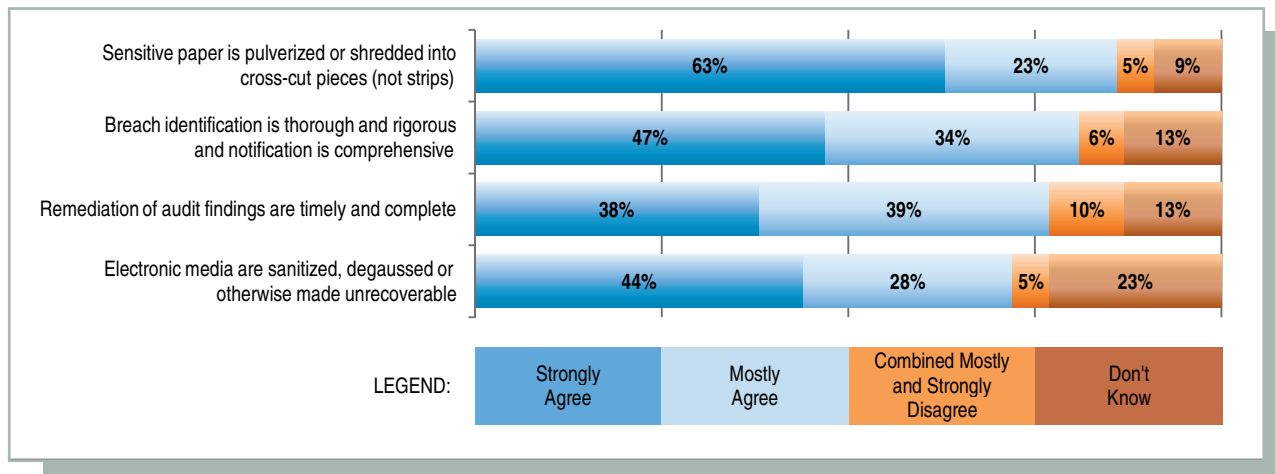
Nearly all survey participants (97%) affirm that essential policies for maintaining private and secure protected personal health information (PHI) are in place in their organizations.

By comparison:

- Only 81% report that business associate agreements are in force and routinely audited.
- Just 80% indicate that auditing for compliance with privacy and information security practices is also routine and comprehensive.
- Seventy-nine percent (79%) of survey participants strongly or mostly agree that encryption is used both when PHI is at rest and in motion.

### Practice

There are a number of critical practices for privacy and security management. The survey associated with this white paper addressed indicator practices relating to the destruction of sensitive information in paper and electronic form and breach identification.



The secure destruction of information involves taking precautions and completing processes to ensure the content is not recoverable:

- For paper records, the process involves pulverizing or cross-cutting the media.
- For digital media, the process involves sanitizing the media to prevent it from being read. Sanitizing removes information from media to render the information unrecoverable by technical means.

More than 70% of responses related to all media types strongly or mostly agree that their organizations' deletion/destruction practices render sensitive information unrecoverable.

- There is greater certainty regarding the secure destruction of paper.
- With regard to the handling of electronic media, a higher percentage of respondents (23%) report that they do not know what procedures are being used.

Breach identification and notification practices have been strengthened in response to recently enacted regulatory requirements.

- Eighty-one percent (81%) of survey participants affirm the existence of rigorous breach identification and notification processes.
  - » Weaker practices or no knowledge of current practices are reported by 19% of respondents.
- As noted in the preceding section, auditing for compliance with privacy and information security practices will benefit from improvement. The remediation of those findings is now affirmed to face similar challenges.

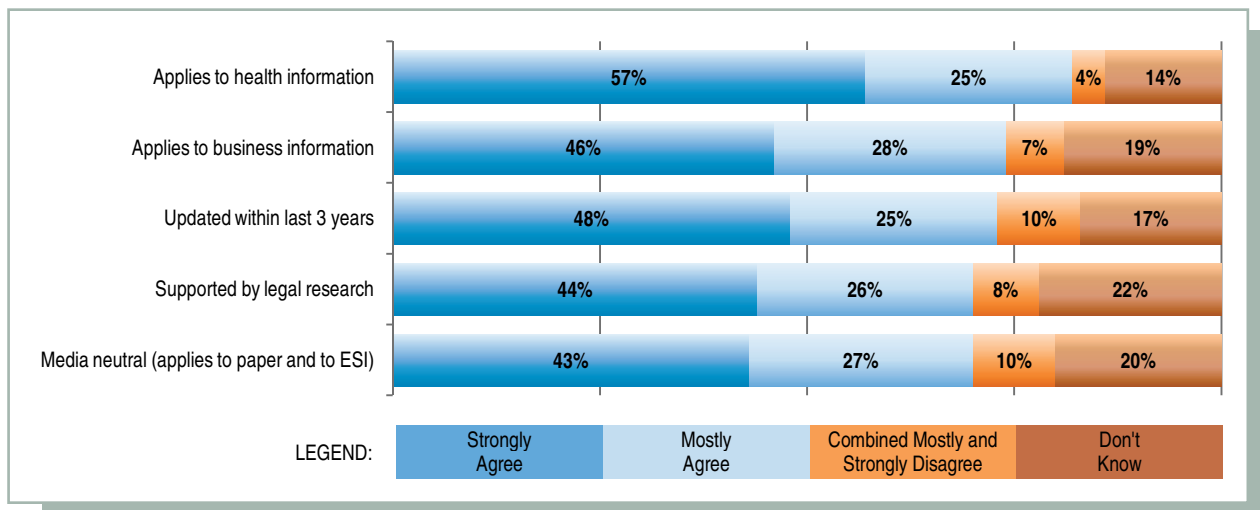
## 5. RETENTION AND DISPOSITION

### 5.1 Is your organization’s retention schedule effective?

An effective retention schedule that applies to information – in all locations and formats – is the cornerstone of mature information governance. It is essential to retaining and subsequently deleting or destroying unneeded information, following consistent and systematic practices.

In the healthcare industry, the retention schedule must take into consideration health information, as well as business information.

- Survey participants affirm the effective application of their retention schedule to health information, with a combined strongly and mostly agree response of 82%.
- That same attribute, applicable to business information in the healthcare industry, is nine points lower at just 74%.



The high percentages (70% or greater) reflected by the combined strongly agree and mostly agree responses for all attributes reveal that retention schedules in healthcare organizations are viewed by the survey respondents as mostly effective, though practices regarding business records may not be as well planned and executed.

In addition to the above attributes, an effective retention schedule should be:

- Clear and easy to interpret
- Uniform across all business operations
- Applicable to all of the organization’s locations
- Regularly maintained to ensure it remains effective and appropriate

Also, to be most useful a retention schedule should:

- Include fewer categories that can be applied to broader sets of information (in Cohasset's experience, highly-regulated organizations can function effectively using a functional retention schedule format of between 75 and 150 categories).
- Use a minimal number of event-based or conditional categories to make it easier for users to consistently interpret retention time periods and calculate destruction eligibility dates.
- Use sufficiently-detailed retention specifications that direct users to a category for specific information (e.g., a form, document, database table, etc.).

### Compare and Contrast

The following results are reported in the 2013 | 2014 IG Benchmarking Survey conducted by Cohasset Associates | ARMA International | AHIMA.

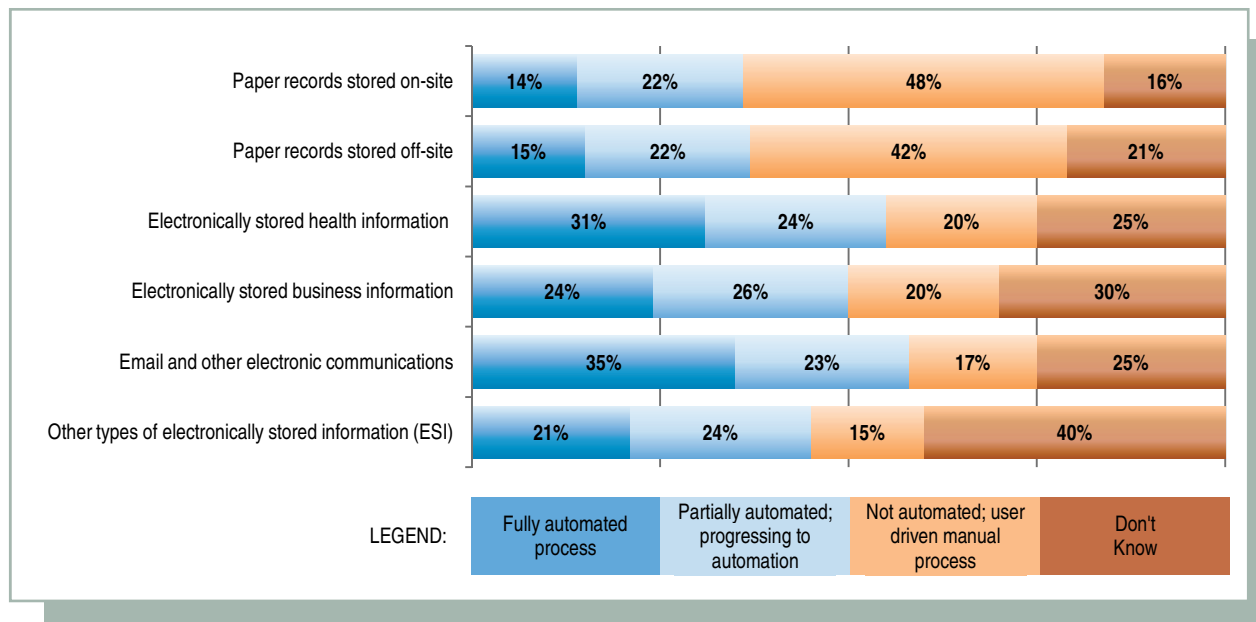
- For All Organizations:
  - » Ninety-two percent (92%) of respondents agree that a retention schedule is in place in their organization.
  - » More than 60% of survey participants strongly and mostly agree that their organizations' retention schedules will benefit from (1) uniformity across business operations (2) fewer categories and (3) retention time periods based upon legal-research.
  - Only 12% of respondents from all organizations contend (strongly agree) that their retention schedule will not benefit from improvement.

## 5.2 Does your organization use automated processes to identify and delete information that is eligible for destruction?

Mature and effective information governance programs utilize automated or partially automated methods to delete eligible electronic information and identify physical records eligible for destruction when the retention period expires, provided the information is not relevant to a legal hold.

### Automated Deletion Defined

- Fully automated processes are found in organizations that systematically perform consistent and repeatable deletion.
- Organizations with partially automated deletion processes and those progressing to automation have made some progress in establishing automated and system-controlled deletion.



### Paper Records

Automating the deletion/destruction process is essential to attaining consistent and systematic end of lifecycle processes. Manual processes are reliant on individual actions, which can result in inconsistent and haphazard deletion/destruction outcomes.

- Given the maturity of systems designed and available to assign and manage the retention of paper records stored off-site, it is surprising that 42% of respondents selected not automated (manual).
  - » This result identifies a clear opportunity to adopt foundational information governance components.

Effectively automating the disposition process requires an organizational commitment, appropriate resources and a willingness of the organization to embrace change. While the information governance representatives may drive the effort, involvement from information technology and senior leadership is a prerequisite for attaining desired levels of automation.

## Electronically Stored Information (ESI)

Today, most information is born in diverse electronic forms, in volumes that exceed manual processing capabilities.

- It is commendable that approximately 50% of healthcare industry survey participants indicate the effective use of either full or partially automated processes to delete eligible electronic health or business information.
  - » Caution: Given the explosive growth of ESI, the tendency is for employees to abandon ESI that is no longer useful.
- Fifty-eight percent (58%) of respondents affirm the automated deletion of email and other electronic communication.
  - » Caution: (1) the implementation of digital voice mail systems having a larger storage capacity, and (2) unified voice mail systems, wherein voice mail messages are embedded in email messages sent to the recipient, could create hurdles for this automated deletion process.

Content analytics tools have matured and are now accepted as a defensible and practical method for applying lifecycle controls to large volumes of eligible information. These tools enable healthcare organizations to:

- Classify information
- Separate high-value information
- Delete unneeded information
- Mitigate the cost and risk associated with over-retention

## Compare and Contrast

The following results are reported in the *2013 | 2014 IG Benchmarking Survey* conducted by Cohasset Associates | ARMA International | AHIMA.

- Biennial survey results indicate that most organizations struggle with deleting ESI that is past the required retention and not needed for a legal hold.
  - » For both e-mail and voice mail, the deletion processes are identified as manual (no automation) by 40% of respondents.
  - » The fully automated deletion of e-mail is affirmed by just 15% of respondents, with partially automated deletion confirmed by 30% of survey participants.
  - » Respondents attest to fully automated voice mail deletion at 16%; partial automation is 15%.



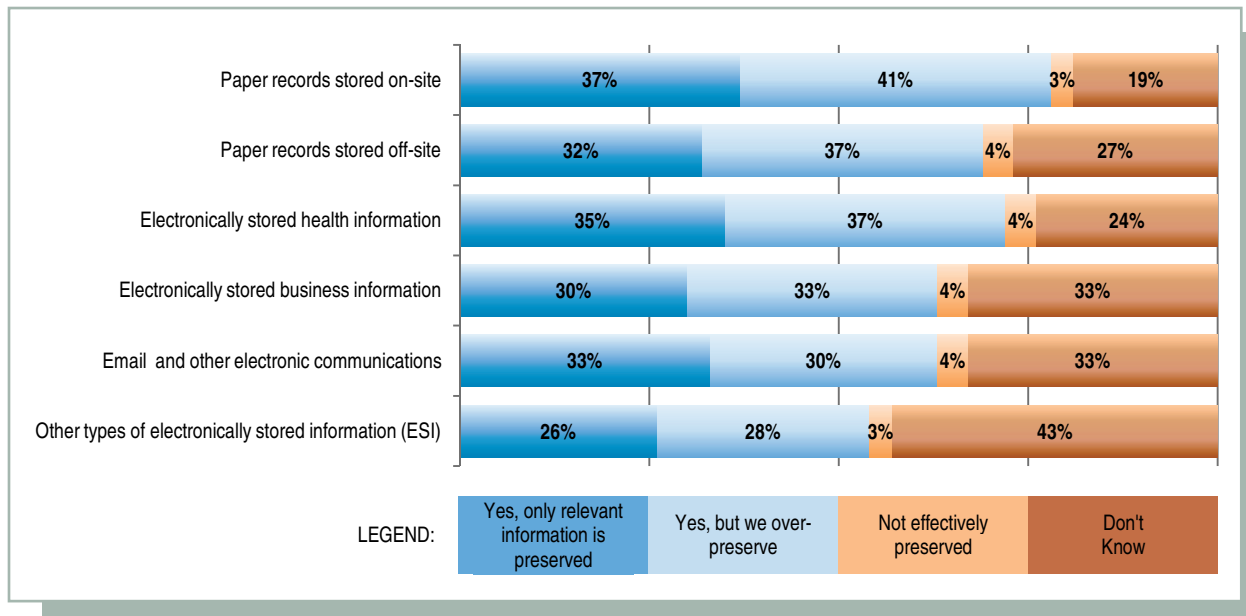
## 6. LEGAL HOLDS

### 6.1 When a legal hold is issued, does your organization effectively preserve (stop destruction of) relevant information?

Effectively preserving information for a legal hold is essential for compliance with legal discovery obligations in the United States. Facing the potential of spoliation charges during litigation, the traditional risk-averse approach to preservation was to keep everything. The danger of this approach is that routine disposal can come to a screeching halt, entrenching a hold-everything mentality. This shutdown can result in increased storage costs, litigation complexity and overall process inefficiency.

To make matters worse, over-retained information can become relevant in multiple legal matters, making it difficult to define the applicable legal and retention requirements necessary to clean up the over-preserved information.

Meeting this challenge, particularly for electronic information, will require the deployment of enabling technologies and a collaboration among legal, IG practitioners and information technology.



This survey measures preservation effectiveness by type of information, including paper and analog records, as well as various types of electronically stored information. Overall the responses indicate a tendency to over-preserve information across all types.

- For paper records stored on-site or off-site, a higher percent of respondents affirm the preservation of more information than might be needed (41% for on-site paper and 37% off-site).
  - » The inefficiency associated with over-preservation may be improved with the use of automated tools.

- No information type receives a positive result higher than 37% for the option: Yes, only relevant information is preserved.
  - » These results suggest that healthcare organizations continue to face challenges defining and executing legal holds in a manner compatible with ongoing retention and deletion or destruction.
  - » The preservation of information is complicated by rapid changes to the nature, location and custody of information – tablets, cloud providers, unified messaging, and mobile devices.

### Compare and Contrast

The following results are reported in the *2013 | 2014 IG Benchmarking Survey* conducted by Cohasset Associates | ARMA International | AIIIM.

For All Organizations:

- Seventy-four percent (74%) of all survey participants report that their organization has a legal hold process; 50% affirm the use of automated tools to facilitate the process.
- The effective termination of a legal hold and the subsequent reinstatement of deletion or destruction processes for that preserved information are affirmed by just 64% of respondents.
- Over-preservation exceeds 50% for paper records, whether stored on-site or off-site.
- One-half of all respondents affirm that email is over-preserved in response to a legal hold.
- For voice mail, 23% of respondent indicate that over-preservation also occurs.

## 7. SUMMARY

As healthcare moves forward in fulfilling the triple aim of advancing patient care, improving population health and reducing costs, information governance must continue to mature. These survey results:

- Identify a growing awareness of the need for IG as an enterprise-wide, cross-functional program.
- Make the case for the adoption of an IG strategy, policy and practices that emphasize achieving high priority organizational goals and mitigating the most significant risks.
- Compel measures and metrics that substantiate IG alignment with clinical and business priorities and provide concrete proof of IG benefit and value.
- Validate the need for an information governance infrastructure that addresses both health and business information, whether in paper or electronic format.

This foundational Cohasset Associates | AHIMA white paper serves as a call to action for the healthcare industry to recognize information as a critical asset for success and to adopt information governance practices. AHIMA is committed to an information governance strategy where IG practices result in better data to make better care decisions and increase knowledge within the healthcare enterprise and across the health eco-system.

Implementing IG requires a collaborative interdisciplinary approach. AHIMA resources will be available to assist cross-functional IG teams:

- Leaders and experts from multiple disciplines and stakeholder groups will convene to develop a framework for IG in healthcare.
- Resource materials, including guidelines, models, practice briefs and tool kits, will be developed to assist organizations in operationalizing the IG framework.
- Educational programs will be provided for HIM and other professionals on the principles and practices of IG in healthcare. Watch [ahima.org](http://ahima.org) for more information on webinars, presentations, resources, and other educational materials.

If you are engaged in information governance activities in your organization, AHIMA would like to hear from you. If you would like to volunteer for an AHIMA IG work group or volunteer panel, send an email to [ig@AHIMA.org](mailto:ig@AHIMA.org).

## 8. DEMOGRAPHICS

The following tables highlight responses to demographic questions, including those used to filter the responses by type and size of organization.

### 8.1 What is your primary work setting?

Acute Care Hospital	37%
Ambulatory Surgery Center	5%
Behavioral / Mental Health	4%
Clinic / Physician Practice	10%
Consulting and Outsourced Services	4%
Educational Institution	2%
Health Information Exchange (HIE) / Health Information Organization (HIO)	2%
Integrated Healthcare Delivery System Corporate Offices	7%
Long Term and Post-Acute Care (LTPAC)	13%
Non-Provider Setting (e.g. government, vendor)	2%
Other	14%

### 8.2 What is your organization's annual revenue (or annual budget, if government or non-profit)?

Less than \$10 Million	36%
\$10 Million to less than \$100 Million	31%
\$100 Million to less than \$500 Million	14%
\$500 Million to less than \$1 Billion	8%
\$1 Billion or more	11%

### 8.3 What best describes your position within your organization?

Executive or C-Level	20%
Director	46%
Manager	15%
Supervisor	3%
Staff	13%
Consultant	3%

### 8.4 Which of the below is your current region of employment?

Northwest Region (AK, ID, MT, ND, NE, OR, SD, WA, WY)	7%
North Central Region (IA, IL, IN, MI, MN, OH, WI)	20%
Northeast Region (DE, MA, ME, NH, NY, PA, RI, VT)	17%
Southwest Region (AZ, CA, CO, HI, NM, NV, UT)	14%
South Central Region (AL, AR, KS, KY, LA, MO, MS, OK, TN, TX)	17%
Southeast Region (DC, FL, GA, MD, NC, PR, SC, VA, WV)	18%
United States - National	5%
Global, including U.S.	1%
Global, excluding U.S.	1%

### 8.5 What are your job responsibilities related to information governance?

Business continuity/disaster recovery	22%
Business intelligence and analytics	25%
Implementation of information management technologies and tools	43%
Information and data quality	58%
Legal holds and/or discovery for legal matters	22%
Management of electronic health information system or other electronic repository	43%
Management of physical health information records or other file room	39%
Privacy, data protection and/or information security	46%
Records and information management	54%
Strategy development	32%
Other	13%

## SPONSORED BY



**Cohasset Associates, Inc. ([www.cohasset.com](http://www.cohasset.com))** is one of the nation's foremost management consulting firms specializing in records management and information governance. Spanning 40 years and serving both domestic and international clients, Cohasset provides award-winning professional services in four areas: management consulting, education, thought-leadership and legal research.

**Management Consulting:** Working with multi-national clients, Cohasset develops information governance (IG) strategies and engages in IG implementation activities to achieve business goals, improve compliance and mitigate risk. Distinguished as the leader of the transition from records management to information governance, Cohasset held its first Managing Electronic Records (MER) conference in 1993. Cohasset's current and former clients include several winners of ARMA's prized Cobalt Award. Cohasset is proud of its reputation for attaining exceptional results.

**Education:** Cohasset Associates is renowned for its longstanding leadership in education on information governance and information lifecycle management.

**Thought-Leadership:** Cohasset regularly publishes thought leadership white papers and surveys to promote continuous improvement in the lifecycle management of information.

**Legal Research:** Cohasset is nationally respected for its direction on records and information management legal issues – from retention schedules to compliance with regulatory requirements associated with the use of electronic or digital storage media.

**For domestic and international clients, Cohasset Associates:**

- Formulates information governance implementation strategies
- Develops policies and standards for records management and information governance
- Creates clear and streamlined retention schedules
- Prepares training and communications for executives, the RIM network and all employees
- Leverages content analytics to improve lifecycle controls for large volumes of eligible information, enabling clients to classify information, separate high-value information and delete unneeded information
- Designs and assists with the implementation of information lifecycle practices that avoid the cost and risk associated with over-retention
- Defines technical and functional requirements and assists with the deployment of enterprise content management and collaboration tools



**The American Health Information Management Association ([ahima.org](http://ahima.org))** was founded to improve the quality of health records, and has been the premier global association and leading authority of health information management (HIM) since 1928. AHIMA's more than 71,000 members worldwide are dedicated to the effective management and use of health information required to deliver quality healthcare to the public.

As HIM and HIT leaders and experts, AHIMA provides education and training, subject matter expertise, and advocacy to support healthcare industry initiatives, the public's right to quality and secure health information, and our members' careers. As a health information thought-leader, the organization actively defines health information policy through advocacy at all levels of government, setting best practices and standards that guide and raise industry awareness.

AHIMA has taken the lead in driving information governance and defining standards for electronic health information, as well as being proponents for, and authorities on, critical healthcare initiatives like ICD-10-CM/PCS and Clinical Documentation Improvement.

Extending their influence across the globe, AHIMA serves as the ANSI-delegated Secretariat to ISO/Technical Committee 215 Health Informatics, and serves as the Administrator of the US Technical Advisory Group (USTAG). AHIMA also participates in the International Federation of Health Information Management Associations (IFHIMA), World Health Organization (WHO), International Health Terminology Standards Development Organization (IHTSDO), HL7, and global committees such as ISO and SNOMED.

## UNDERWRITTEN IN PART BY



**Iron Mountain Incorporated (NYSE: IRM)** is a global provider of storage and information management services. Its solutions for **records management, data management, document management, and secure shredding** help customers to lower storage costs, comply with regulations, recover from disaster, and better leverage their information into a business advantage.

More than 2000 hospitals and 45,000 healthcare accounts trust Iron Mountain for their information protection and storage needs. With a

range of health information management and health IT solutions spanning from Records Storage, Document Conversion Services, Release of Information, Secure Shredding Services, Pathology Storage Management, Backup, Archiving and Data Centers, Iron Mountain can help healthcare organizations transform the way they manage and protect health information. These solutions can help to lower costs, gain control over records and deliver greater operational efficiencies.

## 2014 INFORMATION GOVERNANCE IN HEALTHCARE

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