



# **Advancing Privacy & Security Practices Through an Organization Wide Information Governance Program**

**April 5, 2017  
2 pm – 3 pm ET**

# Agenda

- Welcome and Introductions
  - Claudia Ellison, Program Director, eHealth Initiative
- Discussion & Comments
  - **Katherine Downing**, MA, RHIA, CHPS, PMP, Senior Director, IGAdvisors<sup>®</sup>, at the American Health Information Management Association (AHIMA)
  - **Barb Beckett**, RHIT, CHPS, Systems Privacy Officer, St. Luke's Health System
  - **Judi Hofman**, Northwest Regional Privacy Officer, Catholic Health Initiative
- Questions & Answers from Audience



# Housekeeping Issues

- All participants are muted
  - To ask a question or make a comment, please submit via the chat feature and we will address as many as possible after the presentations.
- Technical difficulties:
  - Use the chat box and we will respond as soon as possible
- Questions & Answers
  - Use the Q&A
- Today's slides will be available for download on the eHI Resource page at:  
**<https://www.ehidc.org/resources/eventsummaries>**

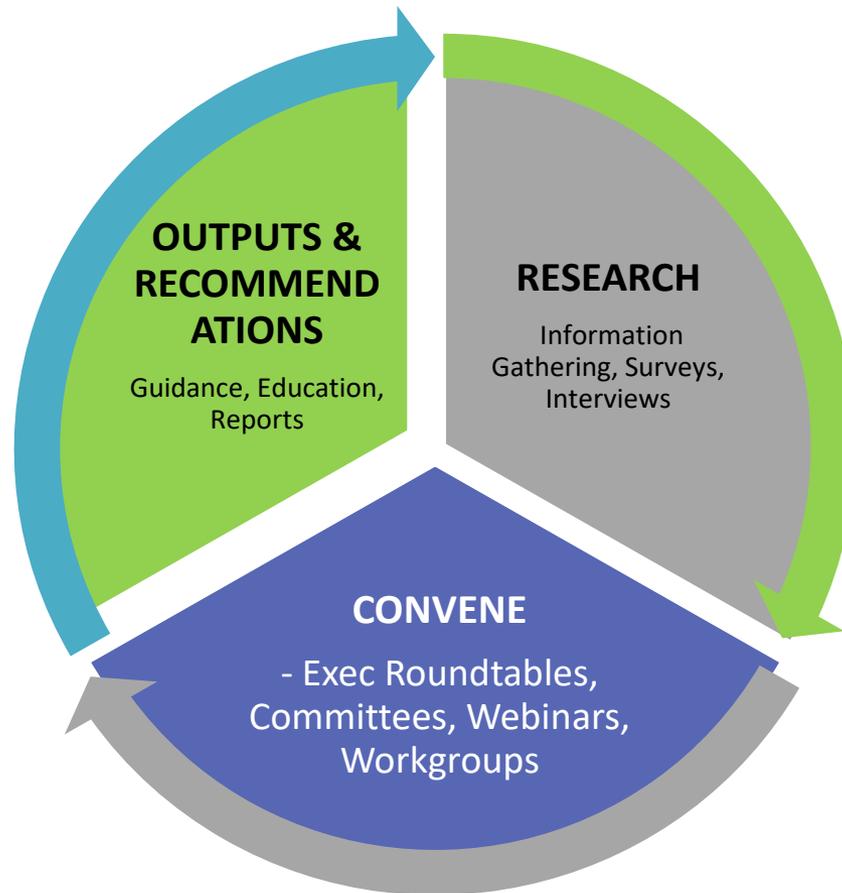


# Overview of eHealth Initiative

- Since 2001, eHealth Initiative (c6) and the Foundation for eHealth Initiative (c3) have conducted research, education and advocacy to demonstrate the value of technology and innovation in health.
- Serve as the industry leader convening executives from multi-stakeholder groups to identify best practices to transform care through use of health IT
- The missions of the two organizations are the same: to drive improvement in the quality, safety, and efficiency of healthcare through information and technology.
- Our work is centered around the *2020 Roadmap*. The primary objective of the *2020 Roadmap* is to craft a multi-stakeholder solution to enable coordinated efforts by public and private sector organizations to transform care delivery through data exchange and health IT.



# Roadmap to Transforming Care



# eHealth - Convening Executives to Research & Identify Best Practices

- Data Analytics
- Data Access and Privacy
- Interoperability
- Patient and Provider Technology Adoption

This webinar was made possible through the  
generosity and support of AHIMA!



# Meet the Speakers



Kathy Downing  
Katherine Downing, MA, RHIA,  
CHPS, PMP, Senior Director,  
IGAdvisors®, American Health  
Information Management  
Association (AHIMA)



Judi Hofman  
Northwest Regional Privacy  
Officer, Catholic Health Initiative



Barb Beckett, RHIT, CHPS  
Systems Privacy Officer, St.  
Luke's Health System

AHIMA Information Governance

# Advancing Privacy & Security Practices Through an Organization Wide Information Governance Program



*Kathy Downing, MA, RHIA, CHPS, PMP  
Sr. Director Information Governance  
AHIMA IGAdvisors™  
[www.IGIQ.com](http://www.IGIQ.com)  
Twitter: HIPAAqueen  
#IGNOW*

# Objectives

- Define information governance and discuss how it is used across industries
- Outline how the IG Principles of Compliance and Information Protection lay a framework for enterprise wide information governance
- Define how security and privacy officers extend their view and outlook to advance P/S efforts and information governance

# Information Governance – Not just HealthCare

- P&G
- MasterCard
- Motorola
- AutoTrader
- McKesson
- UBS

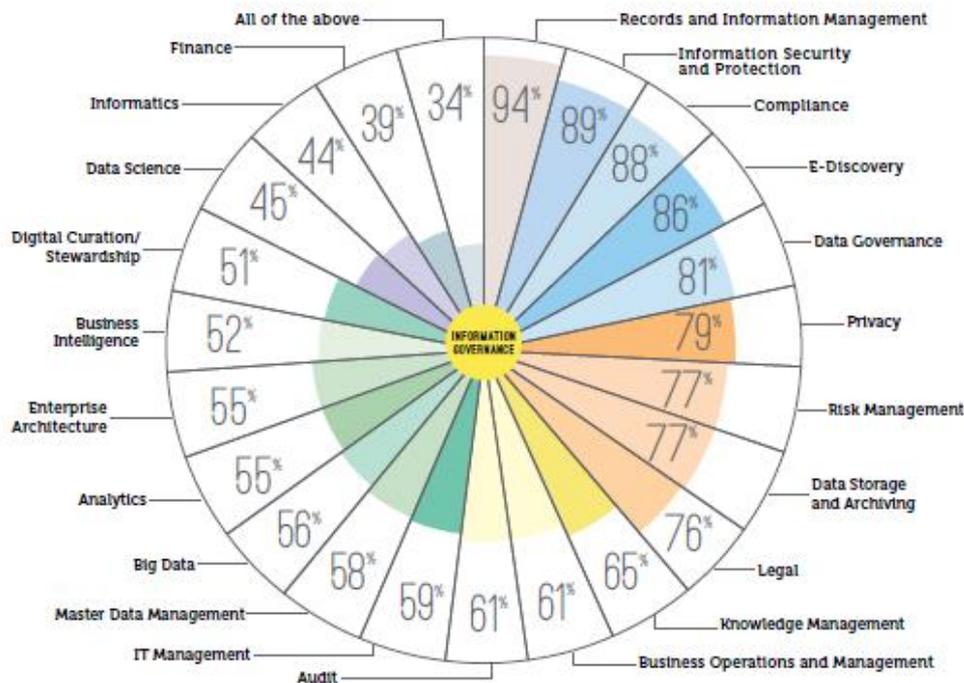


# 2015 IGI Annual Report



## THE FACETS OF IG

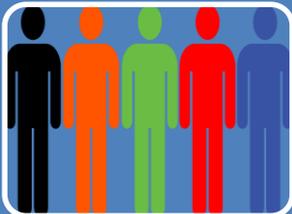
### THE FACETS OF IG: IG SERVES A COORDINATING FUNCTION



IGI Annual Report 2015 is available at: [www.lginitiative.com](http://www.lginitiative.com)



# Why Information Governance is Important



## People

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



## Process

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



## Technology

- Managing Data
- Improving Information Security
- Trusted data exchange

# Healthcare Organizations are Succeeding On the Road to Information Governance



## WHAT IS INFORMATION GOVERNANCE (IG)?

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



Establishes  
policy



Determines  
accountabilities  
for managing  
information



Promotes objectivity  
through robust,  
repeatable  
processes



Protects  
information with  
appropriate  
controls



Prioritizes  
investments

## INFORMATION GOVERNANCE IS AN EMERGING SUPER DISCIPLINE

It is a subset of corporate governance and includes key concepts of:



Robert F. Smallwood  
[Information Governance](#)  
[Concepts, Strategies, and Best Practices](#)

### IG Competencies For Healthcare:

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

2013

- Research
- Awareness
- Education
- Advocacy
- Planning

2014

- Convening
- Collaboration
- Survey
- Stakeholder Support
- Development
- Thought Leadership
- Recognition

2015

- Collaboration
- Refinement
- Validation
- Development
- Piloting-Learning
- Stakeholder Support
- Growing BOK
- Survey
- Thought Leadership

2016

- Collaboration
- Refinement
- Validation
- Development-Product Releases
- Product Enhancement
- Piloting-Learning, Best Practices
- Growing BOK
- Thought Leadership
- Recognition as IG Leaders and Knowledge Source
- Professional Readiness-IG Workforce



# Information Governance



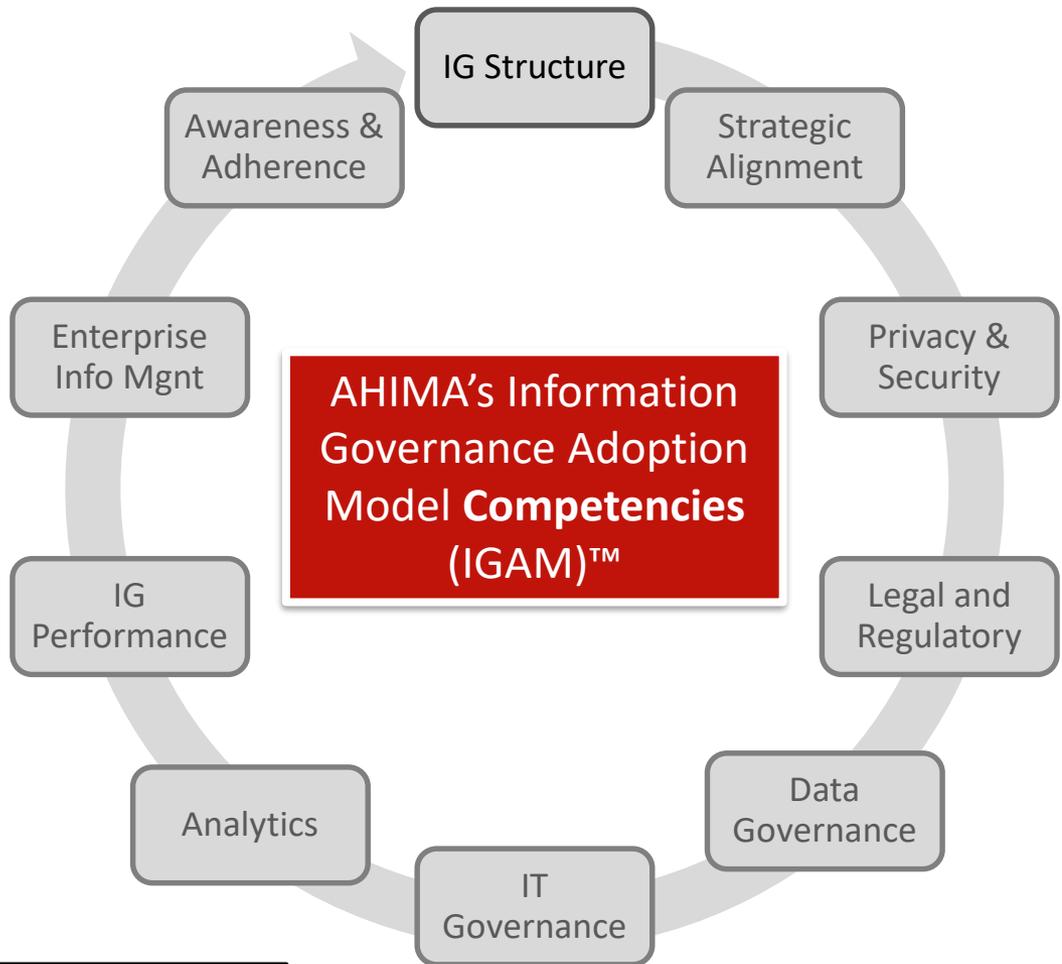
# What is Information Governance?

## INFORMATION GOVERNANCE FOR HEALTHCARE INCLUDES:



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

# AHIMA Information Governance Adoption Model (IGAM™) Competencies



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# IG Principle of Protection

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

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



# Compliance

Information practices and processes must comply with organization policies and all applicable laws, regulations, and standards.

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

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

# INFORMATION GOVERNANCE CORE COMPETENCIES



## AHIMA IG Adoption Model™

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

## AHIMA Levels 1-5

At Risk	Aware	Aspirational	Aligned	Actualized
<p><b>LEVEL 1</b></p> <p>This level indicates an environment where information governance concerns, requirements, and opportunities are not addressed at all, are addressed minimally, or are addressed in an ad hoc manner. Organizations that identify primarily with these descriptions should be concerned that their programs will not meet legal or regulatory scrutiny, may not effectively serve the business needs of the organization, and may impede patient care and service delivery.</p>	<p><b>LEVEL 2</b></p> <p>This level indicates that an organization is in the early stages of information governance. The approach is siloed at the business unit level. Organizations that identify primarily with these descriptions should be concerned that their programs will not meet legal or regulatory scrutiny, may not effectively serve the business needs of the organization, and may impede patient care and service delivery. There is also an increased risk for adverse outcomes and privacy breach.</p> <p>Organizations are encouraged to consider taking an enterprise approach or perhaps developing a roadmap that will help to address vulnerabilities and improve management through information governance.</p>	<p><b>LEVEL 3</b></p> <p>This level indicates a program where the essential requirements that must be addressed to meet the organization's legal, regulatory, and business requirements are present in basic form. This approach is characterized by defined policies and procedures and the implementation of processes specifically intended to improve information governance. Organizations that identify primarily with Level 3 descriptions still may be missing significant opportunities for streamlining business, improving the care experience, and controlling costs, but they have the key basic components of a sound program in place and are likely to be at least minimally compliant with legal, operational, and other responsibilities.</p>	<p><b>LEVEL 4</b></p> <p>This level describes an organization that has established a proactive information governance program throughout its operations. Information governance issues and considerations are routinely integrated into business decisions. The organization is compliant with good practice and easily meets its legal and regulatory requirements. The organization that identifies primarily with these descriptions should begin to pursue the additional business and productivity benefits it could achieve by increasing enterprise-wide information availability, mining its information for a better understanding of patients' and consumers' needs, and otherwise transforming its organization through increased use of their information.</p>	<p><b>LEVEL 5</b></p> <p>This level describes an organization that has integrated information governance into its overall infrastructure and business processes to such an extent that compliance with program requirements and legal, regulatory, and other responsibilities are routine. This organization has recognized that effective information governance plays a critical role in patient outcomes and consumer services and cost containment, competitive advantage, and patient and consumer service, and it has successfully implemented strategies and tools to achieve these gains on a integrated basis. This organization is a leader in building and sustaining a vibrant, secure, and ensuring information is trustworthy and actionable across the medical ecosystem.</p>



## AHIMA IG Adoption Model™

- Scalable framework for assessing IG adoption maturity
- Easily understood by multiple stakeholders
- Brings value to the organization regardless of starting assessment level
- Creates a pathway of progressive performance expectations to guide organizations through implementation of IG

SEPTEMBER 2016 | AHIMA IG SCORE 4.4

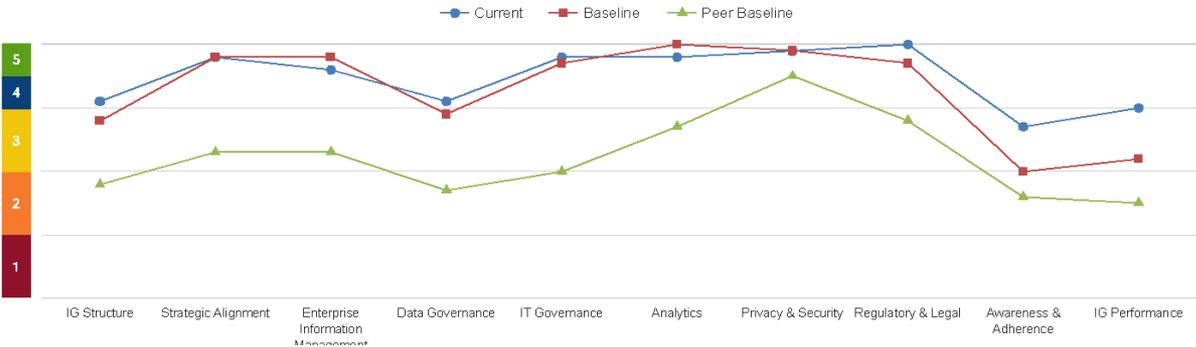
# LEVEL 4

This level describes an organization that has established a proactive information governance program throughout its operations. Information governance issues and considerations are routinely integrated into business decisions. The organization is compliant with good practice and easily meets its legal and regulatory requirements. The organization that identifies primarily with these descriptions should begin to pursue the additional business and productivity benefits it could achieve by increasing enterprise-wide information availability, mining its information for a better understanding of patients' and consumers' needs, and otherwise transforming its organization through increased use of their information.

IG COMPETENCY SUMMARY

IG Structure	Strategic Alignment	Enterprise Information Management	Data Governance	IT Governance
LEVEL 4	LEVEL 5	LEVEL 5	LEVEL 4	LEVEL 5
> MORE DETAILS	> MORE DETAILS	> MORE DETAILS	> MORE DETAILS	> MORE DETAILS
Analytics	Privacy & Security	Regulatory & Legal	Awareness & Adherence	IG Performance
LEVEL 5	LEVEL 5	LEVEL 5	LEVEL 3	LEVEL 4
> MORE DETAILS	> MORE DETAILS	> MORE DETAILS	> MORE DETAILS	> MORE DETAILS

COMPARE YOUR PROGRESS



## Information Governance – How could it help?

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

# Information Governance & the Privacy Officer

- Many areas included in the IGAM relate to the responsibilities of the Privacy Officer
  - Information Asset Inventory
  - Access Controls
  - Breach Management
  - Mobile Device Management
  - Social Media Controls
  - Enterprise wide training and awareness programs
  - Compliance monitoring
  - Business Continuity and Disaster Recovery

# Security Roles and Information Governance

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

# Building a Case for IG - HIPAA Breaches Reach 30M Patients

- **HIPAA data breaches climb 138 percent**
- Information on **4.9 million** Tricare Management Activity beneficiaries was stolen from a Science Applications International Corporation employee's car in 2011.
- This year, Complete Health Systems, reported that a network server was hacked and personal information was stolen, affecting **4.5 million** people around the country.
- Illinois-based Advocate Health and Hospital Corporation reported the theft of company computers, which impacted almost **4.03 million** individuals in 2013.
- Health Net in California had a data breach in 2011 that affected **1.9 million** people. In that case, IBM alerted Health Net that several unencrypted server hard drives were missing from a California-based data center.



# Privacy Roles and Information Governance

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



# Privacy and Security

## The Insider Threat



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

# Where Does Information Governance Start?

## Analyze sensitive data:



- Discover and classify sensitive data – and uncover compliance risks – automatically
- Know who is accessing data, spot anomalies, and stop data loss with real-time data, application, and file activity monitoring
- Rapidly analyze data usage patterns to uncover and remediate risks

# Risk Assessment and Information Governance



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

# Information Governance for Mobile Devices

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

# Information Governance Mobile Device Policy

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



# Ensure Minimum Security Requirements



**Use a password or other user authentication**



**Install or enable encryption**



**Install or activate wiping and/or remote disabling**



**Disable and do not install file-sharing applications**



**Install or enable a firewall**



**Install or enable security software**



**Keep security software up-to-date**



**Research mobile applications (apps) before downloading**



**Maintain physical control of your mobile device**



**Use VPNs to send or receive health information over public Wi-Fi networks**



**Delete all stored health information before discarding or reusing the mobile device**

## Breach Investigation Process – not just for PHI

Breach Management for all types of Risks:

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

# Breach Response / Incident Management Team

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



# Information Governance & Social Media

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



# Biggest Risks of Social Media

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



# IG Social Media Guideline Examples



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

# Social Media Will Be Governed According to Policy

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

## Information is an Organizational Asset

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

# Workforce Awareness

- **Formal IG Training**
  - New Employee
  - Annual Training
- **Awareness Program**
- **Monitoring and Accountability**
- **Regulator response**



## Business Continuity and Disaster Recovery – Key Components of Information Governance

- Disaster Recovery Plan and Business Continuity Plans are part of the organizations overall emergency management plan.
- Tested Policies, Procedures, Systems
- Trained Staff

# Compliance Expanded for Information Governance

- Information assets inventory
- Information asset classification
- Total cost of ownership
- Managed inventory of information
- Patient information request response
- Performance measurements for IG Programs

InformationWeek

# DARK Reading

CONNECTING THE INFORMATION  
SECURITY COMMUNITY
[Home](#) [News & Commentary](#) [Authors](#) [Slideshows](#) [Video](#) [Radio](#) [Reports](#) [White Papers](#) [Events](#)
[ANALYTICS](#)[ATTACKS /  
BREACHES](#)[APP SEC](#)[CAREERS &  
PEOPLE](#)[CLOUD](#)[ENDPOINT](#)[IoT](#)[MOBILE](#)[OPERATIONS](#)

## OPERATIONS

3/4/2016  
12:30 PM



Paul Shomo  
Commentary

Connect Directly



0 COMMENTS  
[COMMENT NOW](#)

## Why Marrying Infosec & Info Governance Boosts Security Capabilities

**In today's data centric world, security pros need to know where sensitive data is supposed to be, not just where it actually is now.**

Cybersecurity is an industry of espionage, crime markets, and cyber mercenaries reverse engineering the weapons of warring states. Perhaps these stories are so sensational that we're focusing a too much on the bad guys. That's a bold assertion in an industry driven by threat intelligence, yet our perimeters have already been invaded, and we're occupied. Shouldn't we focus on circling the wagons around our sensitive data?

It used to be that a perimeter breach caused a stir. Today, hacker owngage of endpoints could be another day at the office -- unless our beloved customer

# Wrap Up

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

# IGIQ.com – IG Tools and Resources



## ARE YOU MAXIMIZING THE POWER OF YOUR INFORMATION?

IG *HealthRate*™ is aligned with AHIMA's Information Governance Adoption Model (IGAM)™ and assesses and scores your organization using ten IG organizational competencies. Each competency includes several key markers that identify critical requirements that must be met to achieve AHIMA's IGAM™ Level 5 maturity. Watch this short video to see how you can maximize the power of your information!



**IG Advisors™**

Consulting and Training Solutions

EXPERT IG IMPLEMENTATION



GET YOUR IGHEALTHRATE™



IG *Advisors*™ provides consulting services to help organizations



Find out what AHIMA is doing to move IG forward and how you can get



If you are preparing to tackle IG in your workplace, do it best with AHIMA

## HEADLINES



### CDI: A COG IN THE WHEEL OF INFORMATION GOVERNANCE

HIM Body of Knowledge

Information governance (IG) is an emerging discipline in healthcare that focuses on how an organization ensures information is complete,

### BEGINNING AN INFORMATION GOVERNANCE, EHR OPTIMIZATION PROJECT

EHRIntelligence.com

new problem areas where more – or less – information governance is necessary. As healthcare organizations collect more patient data for

### IT'S OCR AUDIT TIME: HOW TO GET READY

Healthcare Business Tech

regarding security, privacy, operations risk management and information governance. You need documentation of all related activities in

## IGIQ BLOG

Strengthen your IG IQ  
Find the latest IG discussions

TODAY'S BLOG:

**IG is Critical for Our World of Growing Health-Related Data**



# IG Executive Training Video



# IG Executive Video



# IG Executive Training Video



**YOUR MISSION,**  
SHOULD YOU CHOOSE TO ACCEPT IT...

SAVE THE DATE

**AHIMA's 11th Annual  
Privacy and Security Institute**

OCTOBER 7-8 | LOS ANGELES, CA

REGISTRATION OPENS IN MAY!

**AHIMA**  
American Health Information  
Management Association®

Cyber attacks and breaches continue spotlighting the need for the privacy, security, and confidentiality of health information and healthcare organizations require professionals who can advance the management of privacy, security, and confidentiality practices.

PREPARE YOURSELF AT...  
**AHIMA's Privacy and Security  
Training with CHPS® Exam Prep**

MAY 8-9 | CHICAGO, IL

This workshop is a two-day, face-to-face meeting designed to provide you with tools to develop, manage, and administer a privacy and security plan to protect patient information, be able to review individual privacy rights and processes for executing these rights into operation, prepare to sit for the CHPS® exam, and more.



REGISTER NOW AT  
**[ahima.org/events](http://ahima.org/events)**



# IG Products and Services for Excellence in Information Governance



Consulting and Training Solutions



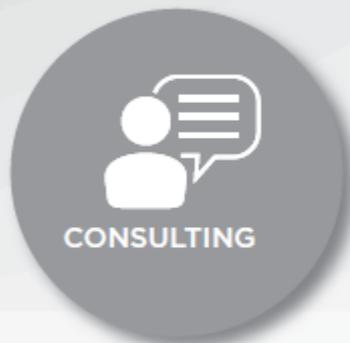
# Resources and Recommended Reading

- AHIMA Information Governance Adoption Model for Healthcare©
- AHIMA [www.IGHealthRate.com](http://www.IGHealthRate.com)
- AHIMA [www.IGAdvisors.com](http://www.IGAdvisors.com)
- *Information Governance Concepts, Strategies, and Best Practices*, 2014. Robert F. Smallwood – available in AHIMA store
- *Implementing Health Information Governance*, 2015. Linda Kloss, MA, RHIA, FAHIMA – available in AHIMA store
- Images from [www.images.google.com](http://www.images.google.com)
- ARMA International. “Generally Accepted Recordkeeping Principles”. ARMA International, 2013. Available at [www.arma.org](http://www.arma.org)

# Resources

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

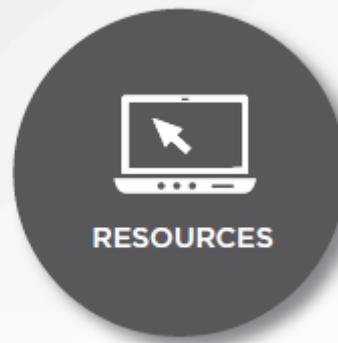
## What's Next? Moving your IG Forward.



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



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



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



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

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

This webinar was made possible through the  
generosity and support of AHIMA!

