

Linking Data and Records Retention Schedule at UTHealth Houston (SB 475)

Diarra Boye and Danette Spencer



Session Goals

In this presentation, we will outline our efforts to achieve compliance with Senate Bill 475 and enhance data governance practices at UTHealth Houston.

We'll discuss our approach to link data and records retention schedules and transition to a paperless office.





Introduction to UT Health Houston

The University of Texas Health Science Center at Houston (UTHealth) is a prominent academic institution dedicated to advancing healthcare education, research, and patient care

- UTHealth is located in the Texas Medical
- UTHealth is a component of The University of Texas System and is recognized for its excellence in health science education.
- UTHealth is a hub for cutting-edge biomedical and healthcare research
- UTHealth has strong affiliations with multiple healthcare institutions.
- UTHealth is committed to serving the local and global communities through its research, education, and outreach programs
- The institution collaborates with a wide range of organizations, both within and outside the Texas Medical Center, fostering interdisciplinary cooperation and knowledge exchange

Understanding UTHealth

UTHealth Organization Data			
	1 Academic	2 Research	3 Clinical/Care
McGovern Medical School	✓	✓	✓
Graduate School of Biomedical Sciences	✓	✓	
Cizik School of Nursing	✓	✓	✓
School of Dentistry	✓	✓	✓
School of Public Health	✓	✓	
School of Biomedical Informatics	✓	✓	
<div style="text-align: center;"> 4 UTHealth Internal Operations & Admin </div>			

	Data Category	Icon	Data Examples
1	Academic / Education		<ul style="list-style-type: none"> • Student Information (applications, profiles, etc.), • Education programs (E.g., courses), • Grade Information (E.g., grades, GPAs)
2	Clinical / Patient Care		<ul style="list-style-type: none"> • Clinic and outpatient data, • Medical and dental records, • Practice plans, etc.
3	Research		<ul style="list-style-type: none"> • Research spend, • Intellectual property, • Contracts, • Grants,
4	Operations / Administrative		<ul style="list-style-type: none"> • Employees and salary information, etc. • Finance and accounting, • Philanthropy information, • Physical facilities, utilities, equipment, etc.

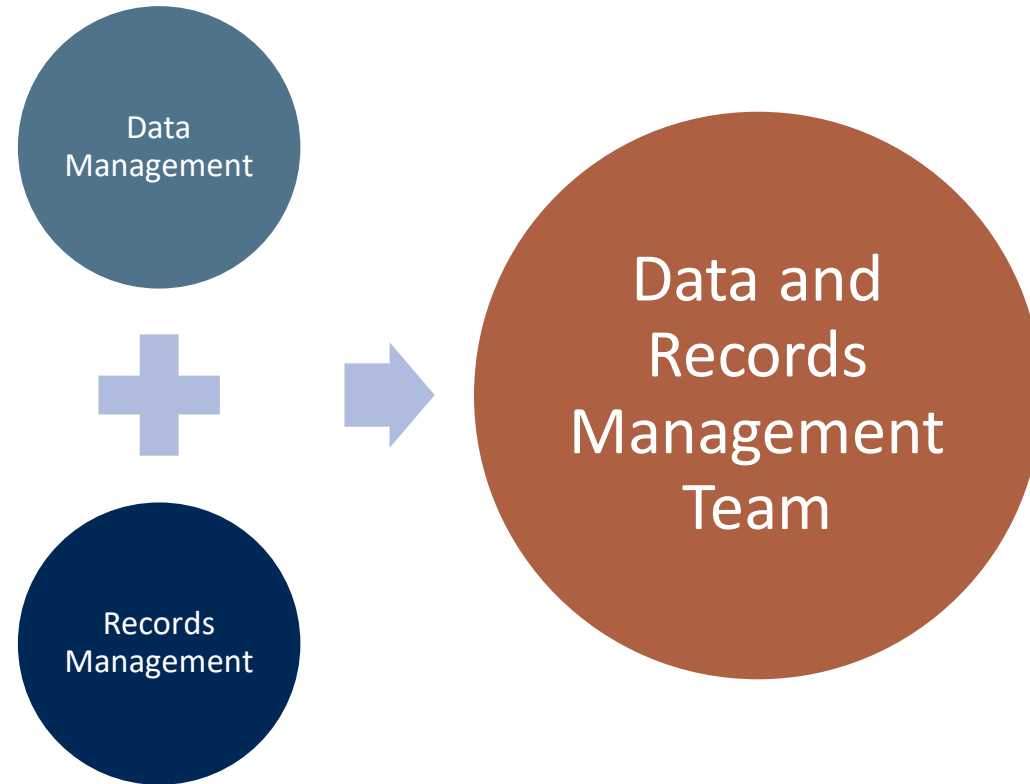
Team Structure

Data Management Team

- Three full time employees

Records Management Team

- Four full time employees
- Four part time employees



Senate Bill 475

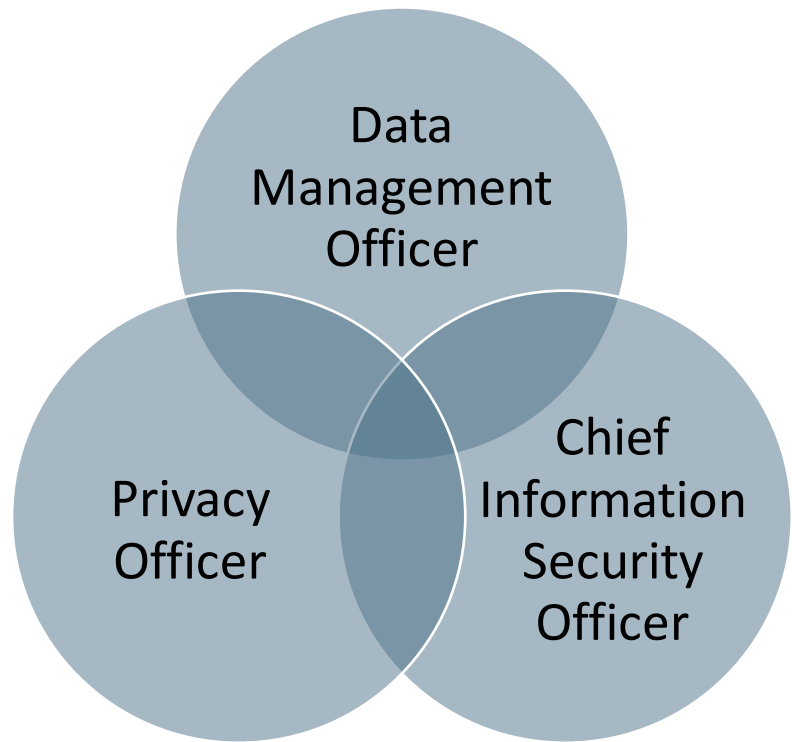
Overall Goal

UTHealth desires to ensure compliance with recently-enacted Texas statutes concerning data governance - specifically 87(R) SB 475.

To achieve compliance and to mature data governance practices, UTHealth must:

- Develop a comprehensive understanding of what “data” means within UTHealth.
- Identify and inventory data assets across the organization and their classifications.
- Perform an assessment of data governance mechanisms currently in place.
- Establish a formal data governance program via an actionable roadmap for implementation, based on identified priorities.

Data Management Officer Role



The Data Manager, CISO, and Privacy Manager work together to align data management with security and privacy practices.

Interaction with Department of Information Resources (DIR)

- Data Management Advisory Council (DMAC)
- Data Literacy Group
- Open Data Portal User Group (ODPUG)
- Texas Enterprise Information Management (TEIM) Group

Project Goals



Link Data & Records Retention Schedule: Our primary goal is to create a comprehensive Data Retention Policy that aligns with our Records Retention Schedule.



Transitioning to a Paperless Office : We aim to digitalize our processes, reducing the need for physical records and improving efficiency.



Data Mapping: We're currently mapping data in Documentum, our document management system, to enhance organization and accessibility.



Managing Data as an Asset: We recognize data as an asset and strive to manage it effectively.

Information Required to Link Schedules

Data Related Information

- Accessing information from similar institutions and state agencies is essential to gather knowledge

Learning from similar institutions and state agencies

- We've looked at best practices from organizations like DIR/TSLAC, UT Systems, and other states, such as Cornell and the University of Washington

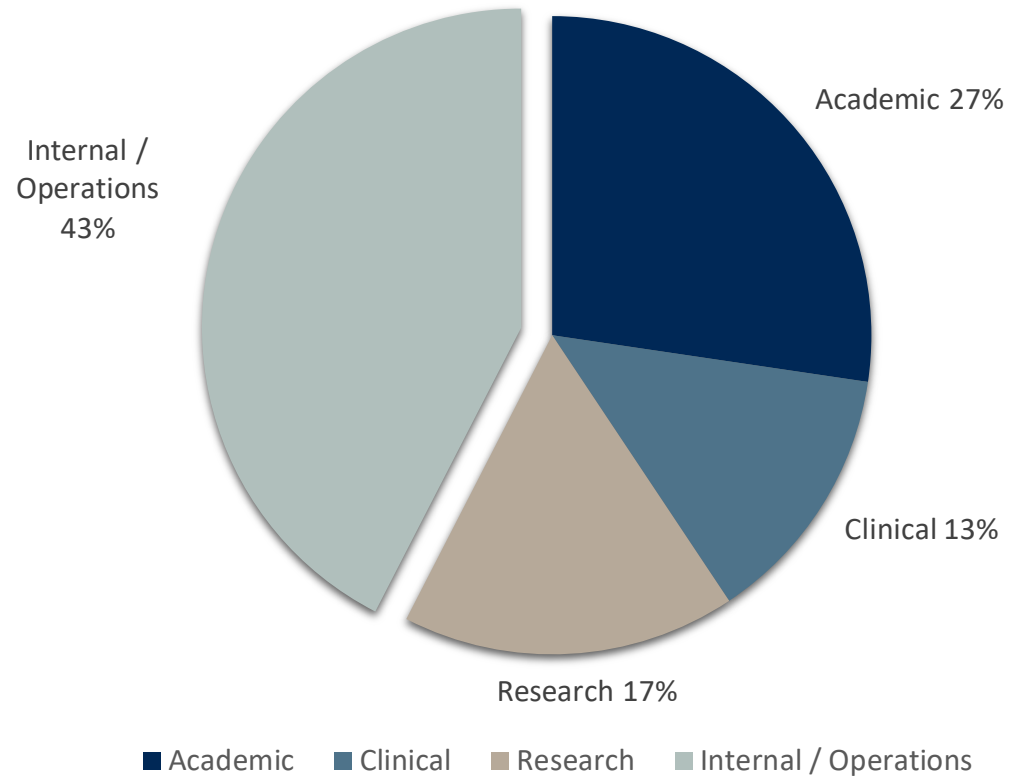
Review current retention schedules

- Complying with state guidelines and TSLAC requirements is fundamental in this process.

Knowledge of data location

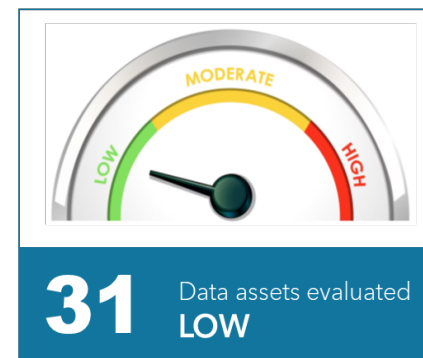
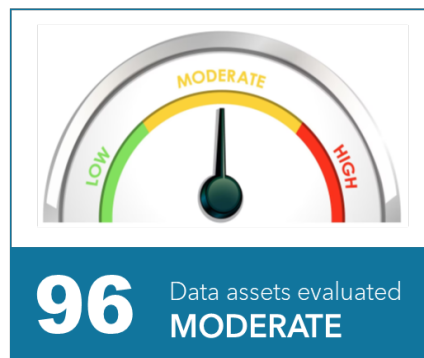
- We conducted an exercise with vendors to identify data assets across our organization, helping us classify and categorize data.

Classifying Data Assets by Category



Data Category	Data Asset Count
Academic	76
Clinical	37
Research	47
Internal / Operations	118
Total	278

UTHealth Houston Data Classification Summary



1. High - Confidential Information (e.g., PII, Family Educational Rights and Privacy Act - FERPA, Health Insurance Portability and Accountability Act - HIPAA, etc.)
2. Moderate - Internal / Official Use
3. Low - Non-confidential / Public Information

Information Required to Link Schedules

Defining records versus data

- Defining what constitutes a record versus data is crucial to ensure consistency

Understanding difference in interpretation

- The meaning of records and data can vary between individuals and departments, making clear definitions and communication vital

Review of Current Policies

- Business Associate Agreements (Epic, Hyland OnBase, etc.)
- Family Educational Rights and Privacy Act (FERPA)
- Health Insurance Portability and Accountability Act (HIPAA)
- National Institutes of Health (NIH) Data Management and Sharing (DMS) policy
- Internal Handbook of Operating Procedures (HOOP) policies

Stakeholders and Partners

Identify Key Stakeholders

- Chief Information Security Officer
- Privacy/Legal Officer
- Chief Data Scientist
- Infrastructure Director
- Risk Management Manager
- Data Governance Committee

Structure Team and Roles

- Structures subgroups based on tasks and roles, ensuring efficient collaboration

Create avenues for feedback

- Microsoft Teams Groups
- Monthly Meetings

Implementation Plan

- Engaging Stakeholders
- Reviewing Records Retention Schedule
- Establish clear policies for data disposal and destruction, enhancing security and efficiency
- Categorizing data and media
- Evaluate various destruction methods to determine appropriate approach for data

Example of Changing Records Policy to Data Policy

Current Records Policy:

- This records series typically includes, but is not limited to: Records which document departmental course offerings and individual course contents: credits; syllabi; course descriptions; course outlines; course summaries; course requests and proposals; curriculum approval lists; lists of classes by term; bibliographies; reading lists; textbook lists; course announcements; handouts; faculty lecture notes, master copy of exams, correspondence and miscellaneous instructional materials.

New Data Policy:

- This data series typically encompasses, but is not restricted to: Data related to departmental course offerings and individual course content, such as credits, syllabi, course descriptions, course outlines, course summaries, course requests and proposals, curriculum approval lists, lists of classes by term, bibliographies, reading lists, textbook lists, course announcements, handouts, faculty lecture notes, master copies of exams, correspondence, and miscellaneous instructional materials

Achieving Results

- Formal Data Retention Policy document
- Incorporating data/record retention training
- Automated deletion schedule
- Collaboration with Internal Audit, Legal, IT Infrastructure
- Setting review schedules (combined with system ownership review)
- Set Communication Strategy

Thank You

Diarra Boye, MS, CPA, CIA, CFE,
Exec. Director, IT Finance &
Business Services
Data Management Officer

Danette Spencer, BBA
Senior Business Systems Analyst
Epic Cogito Certified Analyst

Questions?

