



December 14, 2009

Dr. David Blumenthal
Office of the National Coordinator for Health Information Technology
200 Independence Ave, SW
Suite 729D
Washington, DC 20201

Dear Dr. Blumenthal:

On behalf of the medical transcription industry, a sector representing approximately 1,700 employers, 300,000 healthcare documentation professionals, and \$15 billion in annual revenue, we are writing to you concerning how the industry can help accelerate successful electronic health record (EHR) adoption. We support the federal government's multi-billion-dollar investment in EHRs because we believe it has the potential to improve quality of care, increase patient safety, and reduce healthcare costs if all aspects of the health data management industry are included in the process.

The dictation-transcription process remains physicians' preferred method of documenting healthcare encounters because it is easy to use and is time-efficient, allowing physicians to focus on treating their patients and practicing their highly skilled and valuable craft. By making the dictation-transcription process a key component of "meaningful use," physicians will be more likely to embrace the push for greater EHR adoption and to find the experience of using an EHR to be a positive one for them, their healthcare teams, and patients.

We are hopeful moving forward that we can work with your office to find practical applications that will help the overall health data management industry be more efficient and complete. We would like to formally request that the "meaningful use" regulations capitalize on the medical transcription sector's valuable contribution by incorporating the following comments:

1. **Use consistent formatting and coding for all documents entered into the EHR to improve the quality, volume, and flow of information for clinical decision-making;**
2. **Ensure data quality by recognizing the need for skilled and knowledgeable healthcare documentation professionals to review patient health records; and**
3. **Include the ability of EHRs to accept interfaced data from the dictation-transcription process, thereby enabling the use of healthcare documentation professionals, as this is the most common method used by physicians to enter care encounter data into the health record and ensures the accuracy and integrity of patient information.**



Consistent formatting and coding will help improve the flow of information between narrative reports and EHRs, thereby enabling physicians to use the detailed and information-rich data in narrative reports for clinical decision-making. Using the tacit knowledge and expertise of medical transcriptionists in the documentation process will help ensure that patient records are accurate, complete, and consistent. Regardless of the technology used to capture healthcare encounters, the need for an “extra set of eyes” to review patient records remains strong, especially as information exchanged across healthcare enterprises grows exponentially, potentially worsening errors at multiple hand-off points, thereby putting patients at greater risk.

Including the language outlined above will enable the medical transcription sector to *facilitate* the government’s investment in EHR adoption while still ensuring the completeness, accuracy, and consistency of patient records. The medical transcription sector is committed to working with policymakers, regulators, physicians, patients, and healthcare enterprises to achieve this goal by providing a proven, effective, reliable, and highly favored documentation method.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Cindy Adams".

Cindy Adams
President
Voice Systems, LLC

A handwritten signature in black ink that reads "Noel R. Bambrough".

Noel R. Bambrough
President and CEO
Documentation Services Group, Inc.

A handwritten signature in black ink that reads "Lori Adams".

Lori Adams
Owner
QMedET Solutions

A handwritten signature in black ink that reads "Richard Blum".

Richard Blum
President
R&B Sten-Tel

A handwritten signature in black ink that reads "Randy A. Baker".

Randy A. Baker
President & COO
Diskriter, Inc.

A handwritten signature in black ink that reads "Maryan E. Binkley".

Maryan E. Binkley
President
Webchart, Inc.



Connie Brower
Chief Executive Officer
Medical Technology Solutions of America

Darlene W. Duerr
President & CEO
Orion Transcription Services, Inc.

Jay Cannon
President & CEO
Webmedex

Stephen H. Dunkle
Vice President
Strategic Development

Michael Clark
Chief Operating Officer
Medquist, Inc.

Ray W. Dyer
Chief Executive Officer
Acusis

Joanna L. Christensen
Chief Operating Officer
Tri-Script

Eileen M. Dwyer
Corporate Vice President
Corporate Customer Advocacy
MedQuist Inc.

Randy Conklin
President & CEO
eMTS, Electronic Medical Transcription
Services

Kelly J. Fast, CMT
President
Fast Transcription, Inc.



Maria Thomas French
President & CEO
Terra Nova Transcription

John Haugen
Chief Executive Officer
On-Time Transcription

Stephen J. Gaus
President
Opti-Script, Inc.

Gary Hedges
Chief Executive Officer
Bridge Documents

Michael C. Geaney
President
Chase Transcriptions, Inc.

Tony Incardona
SR VP Managing Partner
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Daniel R. Guerrero
President
Total Transcription Solutions, Inc.

Gerry Kelly
President
ALL TYPE
Dictation, Transcription, Editing, &
Document Distribution Solutions

Robert H. Harvey
President & CEO
TRS INSTITUTE, LLC

Sally Kennel
Partner
Valley Transcription Service



Scott Kinne
Director of Business Development
Reporters Transcription Center

Marilyn Reynolds
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Lisa C. Mantila
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Owner
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President
Medical Voice Technology Services, Inc.

Roberta Podzius
President
Interpro Medical

Debra Sofield
Account Manager
Iridium Services, Inc.



A handwritten signature in black ink that reads "Linda Sullivan".

Linda M. Sullivan
President
New England Medical Transcription, Inc.

A handwritten signature in blue ink that reads "Jennifer Tesla".

Jennifer Tesla
Chief Executive Officer
Integrity Transcription Service

A handwritten signature in black ink that reads "Susan Sumner".

Susan Sumner
President & CEO
Zylomed, Inc.

A handwritten signature in black ink that reads "Dara Tribelhorn".

Dara Tribelhorn
Chief Executive Officer
Celerity Solutions Group, LLC

A handwritten signature in black ink that reads "Terheyden".

Nick van Terheyden, MD
Member
Board of Directors, MTIA

A handwritten signature in black ink that reads "John M. Whisenhunt".

John M. Whisenhunt
Chief Executive Officer
StatIQ Solutions

A handwritten signature in black ink that reads "Linda Yaniszewski".

Linda Yaniszewski
President & CEO
ExecuScribe, Inc.