Comment on Draft Strategy to Reduce Documentation Burden

I applaud the HealthIT.gov work on reducing documentation burden. The document is an excellent review and summary of many of the challenges facing clinicians and informaticists.

Recommendations:

* Outdated practices should be removed from regulatory compliance.
  + Nursing Care Plans are no longer relevant in the EHR or in health care. The focus is the patient, with a team approach. Many hours are wasted on maintaining a nursing care plan for the sole objective of regulatory compliance. Care plans are useful in nursing school to learn critical thinking about a disease/problem process. In the real world of health care and the EHR, better tools exist to manage the care of the patient. There should be no requirement by CMS or TJC related to nursing care plans.
* Information should be accepted from appropriate licensed clinicians, not just from physicians.
  + Much of the burden on physicians is the need to include specific data elements in their documentation because it does not ‘count’ unless it is documented by a physician.
  + Information provided by RNs, APRNs, PAs, and other appropriately licensed professional clinicians should be allowed to ‘count’ for quality, billing, and compliance measures.

Respectfully submitted,

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