

# Dictating for Dollars: Is It for You?

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Even with increasingly automated systems, the dictation of discharge summaries in a timely manner is still an issue. Some managers report that physicians are requesting hospitals provide them relief by allowing them to hire nurses, physician assistants, or HIM professionals to dictate the discharge summary. This can be a solution, but pitfalls can arise. Hospitals and medical staff organizations should consider the following concerns when evaluating this practice.

## Who's Responsible?

The hospital and the medical staff organizations must acknowledge the attending physician's responsibility for completing the discharge summary. If an attending physician chooses to delegate this activity, he or she is responsible for the resulting summary and any payment due to the person who dictates. This protects both the hospital and attending physician ethically and from a liability standpoint. The hospital cannot be construed as slanting the documentation toward better reimbursement or better outcomes than actually occurred, and the physician retains control of and responsibility for the content of the summary by amending or correcting it if necessary and signing it.

## It's What You Know

Both the medical staff and hospital should agree on the level of education and credentials of a nonphysician dictator. A healthcare professional familiar with the clinical process is preferable over someone who may not recognize clinically relevant values and results. "Can you take someone who is not a clinician, give them a medical record, and can they extract it into a useful document?" asks Robert Wise, executive vice president, standards, of the Joint Commission on Accreditation of Healthcare Organizations. Wise points out that while the Joint Commission has no standards regarding who might dictate, surveyors might ask how the hospital and physician know the nonphysician dictator is competent.

While the discharge summary should be a summary of the documentation already in the medical record, an untrained eye will not always see all of the information that needs to be in a summary. Some organizations only allow clinical specialists who have knowledge of the patient, such as one of the nurses who provided care either in the hospital or in the physician's office, to dictate the summary. Other organizations allow those with healthcare backgrounds, including HIM professionals, to summarize the chart and dictate the summary. It must be expressly clear who is eligible to perform this function and that it is an extra job not to be performed during normal work hours if the person is a hospital employee.

## Is It Legal?

The facility should verify that state laws and standards do not prohibit nonphysician dictation. Michelle Gower, RHIT, implemented a "dictation specialist" program at her former employer, Harbor Oaks Hospital in New Baltimore, MI. "The Joint Commission surveyors and state surveyors had no problem at all with our program as long as the responsible physician reviewed and signed the document," she says. In fact, "they loved the longer and more detailed reports that were produced by the nonphysician personnel." Wise confirms that the Joint Commission has no standard regarding who dictates but does require physicians to review and sign reports.

## Know Your Formats

Gower also recommends that the discharge summary be dictated in a specified format to ensure that all of the requirements of the medical staff bylaws and Joint Commission standards are met.<sup>1</sup> Prescribing a standard format will not only assist the nonphysician dictator but will also likely raise the standard for the physician dictator and increase the quality of the overall documentation.

## Making the Right Choice

Hospital and medical staff organizations already credential physicians, nurse practitioners, and certified physicians' assistants, and some may choose to use that process to credential a nonphysician dictator. Others may decide that credentialing is a complicated process for dictation without providing care. However, there should be an organized process for authorizing a nonphysician dictator, either through credentialing or another application process. The process should include the exact qualifications of nonphysician dictators (both education and job function), as well as how selection is made, periodic review of their dictation, and input from the physicians who hire them to perform this function.

## Note

1. "Dictation Specialists Slash Delinquency Rates at Michigan Hospital." *Medical Records Briefing*, 2001.

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