



Missouri Department of Health and Senior Services

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**Jane Drummond**  
Director



**Matt Blunt**  
Governor

March 6, 2007

Sharon Burnett  
Missouri Hospital Association  
4712 Country Club Drive  
P.O. Box 60  
Jefferson City, MO 65102-0060

Dear Sharon:

This is in response to the telephone conference call held on February 23, 2007, to discuss the use of hospital abbreviations. After our discussion and receiving additional feedback from the survey staff, I feel the concerns mentioned are valid and will need some attention both now and in the future.

The surveyors from the Bureau of Health Services Regulation (HSR) will evaluate the compliance of technologically advanced hospital medical records services with 19 CSR 30-20.021(3)(D)4. by considering the intent of the regulation. Hospitals that have converted or are in the process of converting to electronic medical records must demonstrate that the facility's medical records system, specific to the use of abbreviations, is equivalent to and provides the same safeguards as the prescriptive regulatory requirement.

Until the time when a change can be made to the existing regulation, survey staff will be advised to interpret the current regulation as follows: "Each abbreviation or symbol shall have only one (1) meaning, *unless otherwise readily defined in the context of use*, and an explanatory legend shall be available for use by all concerned. There shall be a list of abbreviations and symbols that shall not be used in handwritten communications." The survey team will also be instructed to review all training documentation as evidence that the appropriate staff have been thoroughly trained regarding the facility policy and practice for the use of abbreviations. As we discussed, this interpretive guideline could be met in various ways. For example, if a facility chose to do so, abbreviations could be printed at the bottom of a form. However, that would not be the only way. Another alternative would be to spell out the word or phrase the first time use on a document followed by the abbreviation in parenthesis. Thereafter, on the same form or entry, the abbreviation could be used because the "context" would include its first use in the document or entry. Having said this, I do not mean to limit compliance to these two examples. I do not want to stifle innovation in ways to make abbreviations clear in the context of their use.

[www.dhss.mo.gov](http://www.dhss.mo.gov)

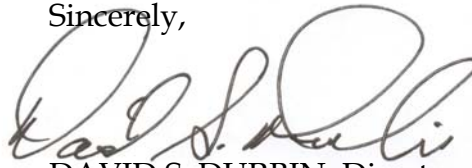
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I believe this slight alteration will address any immediate concerns and allow us to be better educated as we consider further changes to the regulations as they relate to the use of abbreviations. If you have any questions or concerns, please feel free to contact HSR at (573) 751-6303.

Sincerely,

A handwritten signature in black ink, appearing to read "David S. Durbin". The signature is fluid and cursive, with the first name "David" being the most prominent.

DAVID S. DURBIN, Director  
Division of Regulation and Licensure  
573-751-8535/FAX: 573-522-1473

DSD:dl

bcc: Dean Linneman