The National Practitioner Data Bank:
What Compliance Officers Need to Know

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Presentation Overview

- General Provisions
- What Hospital Compliance Officers Need to Know
  - Hospital Querying
  - Hospital Reporting
  - Potential Sanctions
  - Intersecting Roles of Compliance Officers, Medical Staff Services, and Human Resources
- Hospital Compliance Initiative
- Resources & Contacts
General Provisions

Purpose
Created under three statutes to meet several needs:

• Flagging system for effective credential reviews
• Protection against unfit practitioners
• Deter fraud and abuse in the health care system
General Provisions

Types of Information Collected

- Medical malpractice judgments, settlements
- Adverse licensing, certification actions
- Clinical privileges actions
- Professional society membership actions
- Negative actions/findings from private accreditation organizations and peer review organizations
- Government administrative actions, e.g., exclusions from programs
- Civil, criminal health care-related judgments

Merger Goal: Eliminate duplication between the NPDB and Healthcare Integrity Protection Data Bank

- The 3 statutes—Title IV of Public Law 99-660, Section 1921 of the Social Security Act, and Section 1128E of the Social Security Act—remain in effect
- ONE Data Bank
- ONE set of regulations governing the Data Bank’s operations
General Provisions

Recovering Costs

• By law, the Data Bank must recover the full cost of operations. It does so by collecting fees for each query.

Confidentiality

• Information reported to the Data Bank is confidential, not available to the general public, and may not be disclosed except as provided by law.

What Hospital Compliance Officers Need to Know
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Federal law dictates reporting to and querying from the Data Bank.

The Data Bank reduces risk by providing information to help facilitate good decision-making.

| Health care quality | Patient safety | Deterring fraud and abuse |

Hospital Querying Overview

**Must query on:** Health care practitioners when practitioners apply for staff appointments (courtesy or otherwise) or clinical privileges (including temporary privileges); every two years for practitioners on staff or with clinical privileges.

**May query on:** Health care practitioners with whom the hospital has entered (or maybe entering) employment or affiliation relationships.
Use of NPDB Queries

Centralized Credentialing

Querying Through an Authorized Agent

Delegated Credentialing

Continuous Query

Hospital Reporting Overview

**Must report on:** Physicians and dentists

**Must report:** Adverse clinical privileges actions >30 days related to professional competence or conduct

**May report on:** Other practitioners

**May report:** Adverse clinical privileges actions >30 days related to professional competence or conduct
NPDB Reporting

“While under investigation or in return for not conducting such an investigation”

Denials, reductions, and restrictions of privileges
Withdrawals and Nonrenewals Investigations
Summary suspensions Report forwarding to State Licensing Boards

Potential Sanctions

Failure to Report
Loss of immunity protections provided for professional review activities that occur during the 3-year period

Failure to Query
Plaintiff access to NPDB information on that practitioner for use in litigation against the hospital.
More Than Medical Staff Services

Approximate Number of New Data Bank Reports Submitted (Practitioners Only) From 2010 – 2013 by Profession

- Physicians: 78,000
- Dentists: 15,000
- Physician Assistants: 3,000
- Advanced Practice Nurses: 3,000
- Registered Nurses: 109,000
- Licensed Practical/Vocational Nurses: 70,000
- Respiratory Therapists: 2,000
- Physical/Occupational Therapists Assistants: 5,000
- Physical/Occupational Therapists: 22,000
- Pharmacists/Pharmacy Technicians: 22,000
- Social Workers: 3,000
- Nurse Aides/Nursing Assistants: 39,000
- Other: 54,000

Total: ~403,000 Practitioner Reports

Hospital Compliance Initiative
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- Develop and implement stakeholder outreach/education
- Develop and implement individual hospital outreach/education
- Design and implement hospital attestation

Resources and Contact Information
Resources

Web Site - www.npdb.hrsa.gov
- NPDB Guidebook
- Interactive Training
- FAQs, Brochures, and Fact Sheets
- Statistics
- Annual Reports
- Instructions for Reporting and Querying

Customer Service Center
- (800) 767-6732 or (800) SOS-NPDB
- help@npdb.hrsa.gov

Contact Information

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