SAMPLE - Reporting to the National Practitioner Data Bank Policy

I. STATEMENT OF PURPOSE:

To ensure compliance with the requirements of the Health Care Quality Improvement Act of 1986 regarding a healthcare entity's reporting of information to the National Practitioner Data Bank (NPDB)

II. STATEMENT OF POLICY:

A. Hospitals and other eligible health care entities must report:

1. Professional review actions that adversely affect a physician’s or dentist’s clinical privileges for a period of more than 30 days
2. Acceptance of a physician’s or dentist’s surrender or restriction of clinical privileges while under investigation for possible professional incompetence or improper professional conduct, or in return for not conducting such an investigation or not taking a professional review action that otherwise would be required to be reported to the NPDB.¹

Actions taken against a physician’s or dentist’s clinical privileges include reducing, restricting, suspending, revoking, or denying privileges, and also include a healthcare entity’s decision not to renew a physician’s or dentist’s privileges if that decision was based on the practitioner’s professional competence or professional conduct. Clinical privileges actions are reportable once they are made final by the health care entity. However, summary suspensions lasting more than 30 days are reportable even if they are not final.²

III. PROCEDURE:

A. In order to report information, entities must first register with the NPDB. Access is limited to those entities that meet the eligibility requirements. Entities that meet querying/reporting requirements may prepare and submit reports via the Integrated Querying and Reporting Service (IQRS).

1. Responsibility for reporting to the NPDB is delegated to the [insert title of appropriate position] who shall be responsible for completing and forwarding appropriate forms and for receiving and securing NPDB reports.
2. When the NPBD receives a report, the information is processed exactly as it is received. Reporting entities are responsible for the accuracy of the information they report. The NPDB is prohibited by law from modifying the information submitted in reports.
3. When the NPBD processes the report, a Report Verification Document is sent to the reporting entity. In addition, a Notification of a Report is sent to the subject.
4. Self-insured entities have the same reporting responsibilities as all other medical malpractice payers. Employers that are self-insured and provide their employees professional liability coverage must report medical malpractice payments they make for the benefit of their employees.
B. Information reported to the NPDB is considered confidential and shall not be disclosed except as specified in the NPDB regulations. The Privacy Act of 1974 protects the contents of records such as those contained in the NPDB from disclosure.

1. Persons, organizations or entities that receive information either directly or indirectly are subject to the confidentiality provisions. Only persons with legitimate interest in the information obtained shall have access to the confidential report. The [insert title of appropriate position] shall be responsible for controlling access to NPDB information. The following persons shall have access to the report:
   - A practitioner viewing his/her own report
   - The chairman of the credentials committee
   - Other persons as authorized by the chief executive officer

2. As directed by policy, the [insert title of appropriate position] shall:
   2.1 Submit reports to the NPDB within 15 days from the date the adverse action was taken or the clinical privileges were voluntarily surrendered.
   2.2 Submit reports via the Integrated Querying and Reporting Service (IQRS) at http://www.npdb-hipdb.com/.
   2.3 Print two copies of the Report Verification Document sent by the NPDB after a report is successfully processed and mail one to the state licensing board and secure the other in the appropriate credentialing file.
   2.4 Report any revisions to previously reported adverse events to the NPDB (e.g. additional restrictions or reinstatements).

Reference:

2. Ibid.

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