



National Practitioner Data Bank Healthcare Integrity and Protection Data Bank



FACT SHEET: AN OVERVIEW OF THE PROACTIVE DISCLOSURE SERVICE PROTOTYPE (PDS)

The PDS Purpose

The PDS was developed in response to a growing interest in on-going monitoring of health care practitioners. Entities that subscribe to the PDS receive notification within one business day of the Data Banks' receipt of a report on their enrolled practitioners without having to perform a traditional query on the subjects.

Federal Querying Requirements and Accreditation Standards

- Using the PDS with the National Practitioner Data Bank (NPDB) is essentially querying 24 hours a day, 365 days a year. Therefore, enrollment in the PDS meets the mandatory hospital querying requirements of the *Health Care Quality Improvement Act of 1986*, as amended.
- The **Joint Commission** supports the PDS "as an acceptable alternative to directly querying the NPDB."
- The **National Committee for Quality Assurance (NCQA)** has indicated PDS may be used to review malpractice settlements or judgments paid on behalf of a practitioner at initial credentialing (CR3) and recredentialing (CR7); verify sanctions and limitations on licensure and Medicare/Medicaid sanctions at initial credentialing (CR5) and recredentialing (CR7); and conduct on-going monitoring of sanctions and limitations on licensure and Medicare/Medicaid sanctions (CR9).
- The **Centers for Medicare & Medicaid Services (CMS)** views the use of the PDS as consistent with CMS hospital requirements for quality assessment and medical staff privileging.
- The **Commission on Accreditation of Rehabilitation Facilities (CARF)** recognizes PDS as one source of data that may be used by medical rehabilitation service providers as part of a professional privileging system.

How the PDS Works

Entities that subscribe to the PDS receive notice via e-mail or through PDS correspondence [via the *Options* screen in the Integrated Querying and Reporting Service (IQRS)] of new information on their enrolled practitioners within one business day of the Data Banks receipt of the information. In contrast to submitting a query, all entities need to do is log in to the IQRS or use the Interface Control Document (ICD) Transfer Program (ITP) to retrieve reports.

This service is offered as an alternative to the current traditional Data Bank querying service. You may continue to query on your practitioners, enroll all practitioners in the PDS, or enroll some practitioners in PDS while continuing to use the traditional query method on others. The format and the information contained in the Data Bank report, as well as the information required to be reported to each Data Bank, will remain the same.

How to Enroll Your Entity in the PDS

All eligible queriers are invited to participate in the PDS. To participate, your Entity Data Bank Administrator must click **Activate Proactive Disclosure Service (PDS)** on the *Administrator Options* screen and follow the on-screen instructions. Enrollment for each Data Bank is determined by the entity's registration which is based on its statutory authority to query. Enrollment confirmation may be used to demonstrate compliance with accrediting standards including on-going monitoring. For more information on PDS details, see www.npdb-hipdb.hrsa.gov/pds.html.

Canceling a PDS Subject Enrollment

You must cancel any PDS enrollment immediately upon receiving notice that the subject has left your organization. Failure to cancel enrollment of a subject that is no longer part of your organization could result in a violation of the confidentiality provisions of the *Health Care Quality Improvement Act of 1986*, as amended, and may result in a civil money penalty. The *Privacy Act* also contains penalties for confidentiality breaches of Data Bank information.

Subscription Fee

The annual subscription fee covers the cost of an initial query and the enrollment of one practitioner in one Data Bank for one year. For billing purposes, each practitioner enrolled in a particular month will have an enrollment that expires on the last day of the same month of the following year (i.e., all practitioners enrolled in August 2008 regardless of the exact date of enrollment, have an expiration date of August 31, 2009). Enrollments should be renewed each year to maintain service. The annual PDS subscription fee for each Data Bank will be \$3.25, as announced in the *Federal Register*. The subscription fee is payable at the time of enrollment and enrollment renewal.

Enrolling Your Practitioners in the PDS

Practitioners may be enrolled in the PDS through either the IQRS or the ITP. For information on how to enroll subjects in PDS using ITP, access the ICD that specifies the PDS file format for use with the ITP. Go to www.npdb-hipdb.hrsa.gov/itp.html. Enrolling practitioners through the IQRS enables users to enroll a single subject, a stored subject, or a subject from the subject database.

Each practitioner enrollment may be renewed on a yearly basis. Confirmations will be available upon demand for enrolled and previously enrolled subjects (whose enrollments have been canceled within the last four years). An enrollment must be canceled by the entity immediately if the practitioner no longer has a relationship with the entity.

Assigning Your Agent(s) PDS Privileges

Entities that wish to use an agent for the PDS must verify that the authorized agent plans to use the PDS on the entity's behalf. During the PDS activation process, the Entity Data Bank Administrator may assign PDS privileges to your agent(s). In addition, if you already have agents currently querying on behalf of the entity, they will be pre-selected to receive the PDS ability. The Entity Data Bank Administrator may update these agent preferences at this time. To update agent preferences after the initial activation, click **Maintain Agent Information** from the *Administrator Options* screen.

Notification of a Report Disclosure

Entities with PDS-enrolled practitioners receive notification of all new or updated Data Bank reports within one business day of Data Bank receipt of the report. Notice will be provided via e-mail and PDS notification via the *Options* screen in the IQRS.

Entities that initially enrolled practitioners using the IQRS must access report disclosures through the IQRS. Entities that initially enrolled practitioners through the ITP must access disclosures through the ITP.

Using the PDS with Third-Party Software

If your entity wishes to use the PDS with your third-party software package, you will need to verify with the vendor that the package supports PDS.

Additional Information on the PDS

For more information on the PDS, see the PDS Web site page, available at www.npdb-hipdb.hrsa.gov/pds.html. Also see the PDS Frequently Asked Questions, located at www.npdb-hipdb.hrsa.gov/faq-PDS.html.

NPDB-HIPDB Assistance

For additional Data Bank information, visit the NPDB-HIPDB Web site at www.npdb-hipdb.hrsa.gov. If you need assistance, contact the NPDB-HIPDB Customer Service Center by e-mail at help@npdb-hipdb.hrsa.gov or by phone at 1-800-767-6732 (TDD 703-802-9395). Information Specialists are available to speak with you weekdays from 8:30 a.m. to 6:00 p.m. (5:30 p.m. on Fridays) Eastern Time. The NPDB-HIPDB Customer Service Center is closed on all Federal holidays.