



August 10, 2009

Nicole Greene
Chief, Policy and Analysis Branch
DHHS/HRSA/BPHr
Division of Practitioner Data Banks

Dear Ms. Greene:

NCQA has reviewed information on the Proactive Disclosure Service (PDS) provided by the National Practitioner Data Bank (NPDB) and has concluded that organizations may use the PDS to meet the following credentialing and recredentialing requirements.

- **CR 3, Element B, factor 4 and CR 7, Element B, factor 3:** Verification of a history of professional liability claims that resulted in settlement or judgment paid on behalf of the practitioner
- **CR 5, Element A and CR 7, Element D:** Verification of state sanctions, restrictions on licensure or limitations on scope of practice and verification of Medicare and Medicaid sanctions
- **CR 9, Element A, factors 1 and 2:** Ongoing monitoring of sanctions and limitations on licensure

The organization must maintain appropriate documentation within the credentialing file that show:

- Initial and continued enrollment, as applicable, in the PDS (enrollment confirmations)
- Date of report and verification and staff person's signature, initials or unique identifier
- Presentation of required verification to the Credentialing Committee within the verification time limits.

According to the NPDB, within 24 hours of enrolling a practitioner in the PDS, an organization receives an initial report that covers all referenced requirements of CR 3, CR 5, CR 7 and CR 9. The organization can log on to PDS to retrieve a report about subsequent actions against the practitioner. If there are no actions, the organization must provide evidence in the credentialing file that it looked for actions within the verification time limit.

NCQA lists the NPDB as one of several options for verification of the referenced CR 3, CR 5, CR 7 and CR 9 information but do not require its use.

Regards,

Gerald Stewart, MHA
Policy Director