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Dr. Susan G. Queen, PhD  
HRSA Reports Clearance Officer  
Room 10-33, Parklawn Building  
5600 Fishers Lane  
Rockville, MD 20857

Dear Dr. Queen,

On behalf of the National Association Medical Staff Services (NAMSS), I would like to respond to the March 12, 2007 Federal Register request for comments on the proposed Healthcare Integrity and Protection Data Bank (HIPDB) on Health Care Providers, Suppliers, and Practitioners. NAMSS strongly advocates for the use of electronic databases to verify provider information; however, we also encourage HRSA to consider collecting and reporting more hospital-level data to prevent fraudulent abuses within the health care system.

NAMSS is recognized as the expert on the delivery of quality health care through the work of medical staff and healthcare provider specialists. NAMSS also advocates for the development of modern technology such as the HIPDB and NPDB to create more efficient provider verification and credentialing systems. However, while these technologies are important, NAMSS also believes that they should be made as secure and effective as possible.

The HIPDB currently requires healthcare entities to provide information on providers such as prior facility affiliations. NAMSS supports the inclusion of this information; however, we believe that it can be strengthened. One of the critical elements for an effective credentials verification process is to obtain a complete work history of a healthcare provider. There is still wide-spread concern in our industry that physicians and independent healthcare practitioners are able to move from one community to another to avoid investigation or disciplinary action.

By failing to divulge all prior hospital affiliations in an application for privileges, a physician who relocates may attempt to hide prior disciplinary actions and investigations that may have occurred at a previous facility but would have not merited a HIPDB/NPDB report. If a healthcare entity does not have a provider's complete employer history, it hinders its ability to submit a complete report of affiliations to the data banks. In order to

get the most complete assessment of a provider's performance, health care organizations must be able to verify a provider's complete hospital affiliation history. NAMSS continues to be a strong proponent of openly sharing this type of information with healthcare organizations who grant clinical privileges as this would have tremendous impact on patient safety.

To solve this problem, NAMSS recommends adding a new section to the HIPDB Query Response Report. In addition to listing prior hospital affiliations, the report should include a section of all healthcare entities, professional societies and licensing boards that have queried the HIPDB for the provider. Credentialing staff can cross-compare the querying entities to the affiliated entities in the report. If there are any discrepancies between the lists, it will act as a red flag to conduct further inquiry into the provider's records and to contact hospitals not listed as affiliates.

Although the current Federal Register announcement only requests comments on the HIPDB, NAMSS urges HRSA to consider applying the same recommendations to the National Practitioner Data Bank (NPDB). Both of these systems are crucial to assuring that patients receive safe healthcare from only qualified providers. If you have any questions regarding these comments, please contact Christine Perez in the NAMSS office at (202) 367-1175.

Sincerely,

A handwritten signature in cursive script that reads "Carole La Pine".

Carole La Pine  
NAMSS President