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November 13, 2017

HRSA Information Collection Clearance Officer  
14N39  
5600 Fishers Lane  
Rockville, MD 20857

**RE: National Practitioner Data Bank for Adverse Information on Physicians and Other Health Care Practitioners – 45 CFR Part 60 Regulations and Forms, OMB No. 0915-0126—Revision**

To Whom It May Concern:

On September 12, 2017, the Health Resources Service Administration published a notice that it intended to submit an Information Collection Request to the Office of Management and Budget regarding a revision to the OMB approval of information collected by the National Practitioner Data Bank (NPDB). PIAA appreciates this opportunity to share our views on the proposed changes.

***Interest of PIAA***

PIAA is the insurance industry trade association that represents a full range of entities doing business in the medical professional liability and healthcare professional liability (MPL/HPL) arena, including insurance companies, risk retention groups, captives, trusts, and other entities. PIAA members include MPL/HPL enterprises owned and/or operated by physicians, hospitals, health systems, dentists and oral maxillofacial surgeons, podiatrists, chiropractors, and healthcare providers such as nurse practitioners, nurse midwives, CRNAs, and many others, as well as insurance carriers with a substantial commitment to the MPL/HPL line. PIAA members insure more than two-thirds of America's physicians in private practice, as well as dentists, nurses and nurse practitioners, and other healthcare providers, and they insure more than 2,500 hospitals nationwide. This dual role within the healthcare system provides us with the perspective of both of the primary constituencies served by the NPDB.

***Reporting Changes***

Using estimates provided by our members, it appears that up to 16 fields have been added to or changed in the Medical Malpractice Payment Reports, i.e. the reports filed by our membership. In some cases, these alterations will pose little burden to MPL insurers but in others the additional time burden to collect and report the data will not be insignificant. In order to address the rationale for placing this additional burden on reporting entities, we highly encourage the NPDB to release further information on both the necessity of collecting this additional data and the intended use of the data if it is collected. A better understanding of the NPDB's intentions in collecting this additional information will allow stakeholders to more appropriately provide input on the potential benefits of the new requirements as well as alternatives which may be available.

***Conclusion***

The PIAA supports efforts to improve the NPDB reporting process, but believes such changes must be made so as to create the least possible reasonable burden for reporting entities, including MPL/HPL insurers. We encourage NPDB to conduct additional outreach, to the MPL/HPL community in particular, in order to gain

further insights into how such improvements may be made. As part of this process, we strongly recommend that more detail be provided to stakeholders regarding not only what changes may be made, but why the NPDB considers such changes necessary. This will greatly assist all interested parties in providing useful feedback regarding future changes to the reporting system.

We appreciate this opportunity to provide comments and invite you to contact us should you have any questions about the positions taken in this correspondence.

Sincerely,

A handwritten signature in blue ink that reads "B. K. Atchinson". The signature is fluid and cursive, with the first name "B." and last name "Atchinson" clearly legible.

Brian K. Atchinson  
President and CEO