

Attachment A

EXECUTIVE ORDER 2014-14

Efficiency in Licensing Task Force

Oklahoma Medical Board of Licensure and Supervision (450)

The OMB issues Thirty-Four (34) different license types to qualified Applicants. Each license is part of the mission of OMB: TO PROTECT THE PUBLIC.

August 20, 2024 E.O. 2014-14



Sandra Harrison Interim Executive Director The Oklahoma Medical Board of Licensure and Supervision mission is to promote the health, safety and well-being of the citizens (patients) of Oklahoma by requiring a high level of qualifications, standards and continuing education for licenses regulated by OMB. To protect the on-going health, safety and well-being of the citizens (patients) of Oklahoma by investigating complaints, conducting public hearings, effectuating and monitoring disciplinary actions against any of the licensed professionals, while providing the licensee with proper due process and all rights afforded under the law. To provide any member of society upon request, a copy of the specific public records and information on any of the licensed professionals.

The Oklahoma Medical Board Staff

Executive Department: 5 Legal Department: 3ⁱ Licensing Department: 10 Investigation Department: 6 Support Services: 7 Total Staff: 29

Executive Order Report Staff

Sandra Harrison, Interim Executive Director Lisa Cullen, Director of Licensing Valeska Barr, Assistant Director of Licensing Dela Kwetey, Director of Finance and Support Services Chris Maloney, Data Base Administrator (Contract) Alexis Garner, Legal Intern (Contract)

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ⁱThe OMB has a contract with the Oklahoma Attorney General's Office for staffing of the Legal Department. Staffing provided through the contract are not considered full time employees of the Oklahom a medical Board.



Oklahoma State Medical Board of Licensure and Supervision

August 20th, 2024

Members of the Task Force

The Honorable Kevin Stitt, Governor

Transmitted herewith is a report of the Oklahoma Medical Board of Licensure and Supervision, prepared in response to the Executive Order issued by Governor J. Kevin Stitt on June 17, 2024. This report outlines the types of licenses issued by the OMB and provides detailed information as mandated by the Executive Order. In accordance with the governor's directive to streamline the licensing process, eliminate barriers to professional opportunities, and lower associated costs. This audit is part of our commitment to breaking the red tape that hinders job creation and professional growth in Oklahoma.

My staff and I will be pleased to discuss or clarify items in the report.

Sincerely,

Sandra B. Harrison

Interim Executive Director

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Introduction

Objective

This report outlines the types of licenses issued by the Oklahoma Medical Board of Licensure and Supervision (OMB or Board) and provides detailed information as mandated by the Executive Order. In accordance with the governor's directive to streamline the licensing process, eliminate barriers to professional opportunities, and lower associated costs. This audit is part of our commitment to breaking the red tape that hinders job creation and professional growth in Oklahoma.

Vision, Values and Behaviors

The OMB was established in 1923, and its mission is to protect the public by setting educational and training standards for licensure to ensure that licensee's conduct meets the standards of the profession, as defined in law. The Board's responsibilities include:

- Licensing—The OMB issues licenses that must be renewed at various time periods.
- Renewals- The OMB renews licenses after the submitted application, fee and continuing education (if required) has been received.

Licensees:

The OMB licenses thirty-four (34) different types of licensees. Processing of an application begins once an application is complete.

- Investigating and resolving complaints—The OMB investigates complaints against licensees and can take statutorily authorized non disciplinary or disciplinary action, as needed, such as issuing a letter of concern or placing a licensee on probation (see Complaint resolution).
- Providing information to the public—The OMB provides information about licensees with active, revoked, and retired licenses, including disciplinary history, on its web site. In addition, the Board publishes public meeting agendas and minutes on its web site. OMB staff also respond to requests for public information, including requests made by phone, regarding the license status and disciplinary history.

Licensing

The OMB issues licenses to qualified applicants within the overall time frames specified in board rules.

OMB issues licenses to qualified applicants

The OMB is responsible for the licensing and regulation of various healthcare professionals within the state. This narrative provides a overview of each type of license issued by the board, highlighting the roles, responsibilities, and qualifications required for each position.

Types of Licensures issued by the OMB

Maintaining a variety of licensure types is necessary for fostering a robust healthcare system, ensuring that professionals at all stages of their careers can contribute effectively to patient care. Full licensure allows healthcare professionals to practice independently within their scope of practice, providing a broad range of services. Compact licensure enables professionals to practice in multiple member states without obtaining additional licenses, promoting mobility and access to care. Assistant licensure permits individuals to work under the supervision of fully licensed professionals, providing support and gaining experience. Trainee/apprentice/provisional licensure allows individuals in training to practice under supervision, ensuring they acquire the necessary skills and experience for full licensure.

Having a variety of licenses ensures a comprehensive healthcare system that supports the full spectrum of professional development. Full licensure provides independence and expertise, compact licensure enhances mobility and access to care, assistant licensure fosters support and skill development, and trainee/apprentice/provisional licensure ensures a pipeline of well-trained future professionals. This diversity in licensure types helps maintain high standards of patient care, flexibility in service delivery, and a robust healthcare workforce.

The licensees are as follows:

Anesthesiologist Assistant

Anesthesiologist Assistants are graduates of an approved program who is licensed to perform medical services delegated and directly supervised by a supervising Anesthesiologist. Authority for licensure is found in 59 O.S. §3206.

Apprentice Athletic Trainer

Apprentice Athletic Trainers are in the process of completing their required training and education under the direct supervision of licensed athletic trainers. They assist in the duties usually performed by an athletic trainer. Authority for licensure is found in 59 O.S. §530.

Athletic Trainer

Athletic Trainers are healthcare professionals with the qualifications required and whose major responsibility is the rendering of professional services for the prevention, emergency care, first aid and treatment of injuries incurred by an athlete under the supervision of a physician to effect care and rehabilitation. Authority for licensure is found in 59 O.S. §530.

Licensed Dietician

Licensed Dieticians provide apply and integrate scientific principles of nutrition pursuant to different health, social, cultural, physical, psychological and economic conditions to the proper nourishment, care, and education for individuals throughout life. Authority for licensure is found in 59 O.S. §1730.

Provisional Licensed Dietician

Provisional Licensed Dieticians are those who have met the educational requirements and are in the process of completing the practical experience required for full licensure under the supervision of a licensed dietician. Authority for licensure is found in 59 O.S. §1734.

Registered Electrologist

Registered Electrologists use an electrosurgical apparatus to accomplish permanent hair removal by inserting electric current into the hair follicle thereby destroying living tissue and germinative hair cells. Authority for licensure is found in 59 O.S. § 536.7.

Music Therapist

Music Therapists use music interventions to achieve specific goals within a therapeutic relationship. They work with individuals of all ages to address physical, emotional, cognitive, and social needs. Authority for licensure is found in 59 O.S. §889.6.

Occupational Therapist

Occupational Therapists provide assessment, treatment and consultation through the use of purposeful activity with individuals who are limited by or at risk of physical illness or injury, psycho-social dysfunction, developmental difference or the aging process, in order to maximize independence, prevent disability, and maintain health. Authority for licensure is found in 59 O.S. §888.6.

Occupational Therapy Assistant

Occupational Therapy Assistants work under the direction of occupational therapists to provide rehabilitative services to patients. They help clients develop, recover, and improve skills needed for daily living and working. Authority for licensure is found in 59 O.S. §888.6.

Licensed Orthotist

Licensed Orthotists evaluates, measure, assembles, fits, adjusts or services orthosis as prescribed by a licensed physician for the support or correction of physical disabilities caused by neuro-musculoskeletal disease, injuries or deformities. These devices help patients regain mobility and function. Authority for licensure is found in 59 O.S. §3006.

Licensed Orthotist Prosthetist

Licensed Orthotist Prosthetists are trained to provide both orthotic and prosthetic care. They design and fit devices that support or replace a limb or other body part. Authority for licensure is found in 59 O.S. §3006.

Licensed Prosthetist

Licensed Prosthetists evaluates, measures, designs, fabricates, fits or services artificial limbs (prostheses) as prescribed by a licensed physician for replacement of external parts of the human body lost due to amputation or congenital conditions or absences. Authority for licensure is found in 59 O.S. §3006.

Registered Orthotist Assistant

Registered Orthotist Assistants assist licensed orthotists under direct supervision with patient care service for the fabrication of orthoses. Authority for licensure is found in 59 O.S. §3006.

Registered Prosthetist Assistant

Registered Prosthetist Assistants under direct supervision of licensed prosthetists assists with patient care services for the fabrication of prostheses. Authority for licensure is found in 59 O.S. §3006.

Registered Prosthetist Orthotist Assistant

Registered Prosthetist Orthotist Assistants under direct supervision of a prosthetist and orthotist assist with patient cares services for the fabrication of orthoses or prostheses. Authority for licensure is found in 59 O.S. §3006.

Registered Orthotist Technician

Registered Orthotist Technicians under the direct supervision of a licensed orthotist, assists with the fabrication of orthoses but does not provide direct patient care. Authority for licensure is found in 59 O.S. §3006.

Registered Prosthetist Technician

Registered Prosthetist Technicians under direct supervision of a licensed prosthetist, assist with the fabrication of prostheses but does not provide direct patient care. Authority for licensure is found in 59 O.S. §3006.

Registered Prosthetist Orthotist Technician

Registered Prosthetist Orthotist Technicians under direct supervision of licensed orthotist or prosthetist, assists with the fabrication of orthoses or prostheses but does not provide direct patient care. Authority for licensure is found in 59 O.S. §3006.

Pedorthist

Pedorthists specialize in the practice pursuant to a written prescription from a licensed physician when addressing a medical condition of evaluating planned treatment, measuring, designing, fabricating, assembling, fitting, adjusting, managing of the patient of servicing of a pedorthist device for the prevention of amelioration of painful and/or disabling conditions of the foot and ankle. Authority for licensure is found in 59 O.S. §2306.

Physical Therapist

Physical Therapists help patients reduce pain and improve or restore mobility. They develop treatment plans to promote movement, reduce pain, and prevent disability. Authority for licensure is found in 59 O.S. §887.6.

Physical Therapist Compact

The Physical Therapist Compact allows an individual under a compact privilege the authorization of physical therapists granted privileges by a remote state to allow a physical therapist from another member state to practice in the remote state under its laws and rules. The practice of physical therapy occurs in the member state where the patient/client is located at the time of the patient/client encounter. Authority for licensure is found in 59 O.S. §887.19.

Physical Therapist Assistant

Physical Therapist Assistants subject to the direction and supervision of licensed physical therapists to provide services that improve mobility, relieve pain, and prevent or limit physical disabilities. Authority for licensure is found in 59 O.S. §887.6.

Physical Therapist Assistant Compact

Similar to the Physical Therapist Compact, this allows an individual under a compact privilege the authorization of physical therapist assistants under supervision of a licensed physical therapists granted privileges by a remote state to allow a physical therapist assistant from another member state to practice in the remote state under its laws and rules. The practice of physical therapy occurs in the member state where the patient/client is located at the time of the patient/client encounter. Authority for licensure is found in 59 O.S. §887.19.

Physician Assistant

Physician Assistants (PAs) are licensed to practice medicine under the delegation of a physician. They receive training in the diagnosis, treatment and prevention of disease, including the use and administration of drugs within their scope of practice. Authority for licensure is found in 59 O.S. §519.4.

Physician Assistant Compact

The Physician Assistant Compact allows PAs to have practice privileges in multiple member states, increasing their ability to provide care across state lines.

Radiologist Assistant

Radiologist Assistants are advanced-level certified radiological technologists who work under the direct supervision of radiologists to enhance patient care by assisting the radiologist in the diagnostic imaging environment. A radiologic assistant shall not interpret images, make diagnoses or prescribe medication or therapies or obtain informed consent from patients. Authority for licensure is found in 59 O.S. §541.1.

Respiratory Care Practitioner

Respiratory Care Practitioners evaluate, treat, and care for patients with breathing or other cardiopulmonary disorders. They provide therapies, manage ventilators, and perform diagnostic tests. Authority for licensure is found in 59 O.S. §2033.

Provisional Respiratory Care Practitioner

Provisional Respiratory Care Practitioners are those who have met the educational requirements and are completing their clinical practice hours under direct supervision of a licensed respiratory care practitioner. Authority for licensure is found in 59 O.S. §2034.

Therapeutic Recreation Specialist

Therapeutic Recreation Specialists apply recreation therapy to assist with the treatment and/or maintenance of the health status, functional abilities, recreational and leisure activities. Authority for licensure is found in 59 O.S. §540.6.

Medical Doctor

Medical Doctors (MDs) diagnose and treat illnesses, perform surgeries, and provide preventive care. They must complete medical school, residency, and obtain licensure to practice. Authority for licensure is found in 59 O.S. §493.1.

Medical Doctor Compact

The Medical Doctor Compact allows MDs to expedite the licensing process, enhancing mobility and access to medical care. Authority for licensure is found in 59 O.S. §493.7.

Medical Doctor Special Training

Medical Doctors who are beginning their training as first year resident. Upon successful completion of their twelve (12) months of training for an United States trained physician or twenty-four (24) months of training for an international medical graduate, may become eligible to apply for a full unrestricted license to practice medicine. Authority for licensure is found in 59 O.S. §493.4.

Medical Doctor Special License

This license is for MDs who may not meet all standard licensure requirements but have exceptional qualification and warrant special license. If granted a special license, the physician shall not practice outside the scope of the license. Restrictions on the special license will be established by the Board when granted approval at a Board meeting to ensure the physician will practice only under the appropriate circumstances. Authority for licensure is found in 59 O.S. §493.4.

Medical Doctor Volunteer

Medical Doctor Volunteers provide medical care in volunteer settings. Licensure is obtained by mostly retired physicians and is issued for the sole treatment of indigent and financially insecure persons without any expectation of receiving any payment or compensation. Authority for licensure is found in 59 O.S. §493.5.

Qualified Applicant

In order to be a qualified applicant, it means that the licensee has a completed and approved application for licensure. A complete application varies depending on the specific license that is being sought.

OMB statutes and rules outline specific requirements for licensure which vary according to profession. To help ensure the OMB issues only to qualified applicants, application analysts perform a stringent review of the application to ensure the qualifications outlined in statute and rules are met. Additionally, OMB staff maintains a database that generates notices of deficiency that are sent to applicants via email to the address on file with the Board. For the Allied Health professions that are licensed by the OMB each application first goes through an advisory committee recommendation process. The committee assists the Board in conducting examinations and advises the Board on all matters pertaining to licensure. The advisory committee recommendations are electronically sent to the Board for review and vote for approval of applicants.

As authorized by statute, the OMB licenses a wide range of health care professionals to ensure the health, safety, and well-being of Oklahoma citizens and patients. The statutes require high standards, qualifications, and continuing education for those required by statute or rule. The OMB ensures that only those who meet strict prerequisites in education, training, and professional conduct are granted licenses. This rigorous process helps maintain public trust in the medical profession and ensures that patients receive qualified and competent care across various specialties.

Variations in time for licensure

The process of obtaining a medical license begins once an application is complete. An application analyst reviews the submission and sends a letter notifying the applicant of any deficiencies. Applicants can check the status of their application on the OMB website. Weekly, when a physician application is complete, it is forwarded to the Board Secretary for review. If everything is in order, the application is electronically submitted via circularization to all Board members for voting, a process that typically takes about two weeks. If all Board members vote to approve, the license is issued and mailed to the applicant. If any Board member has concerns or questions about the application, they may either request additional information through staff or hold the application for a personal appearance before the Medical Board. The applicant is notified of the Board's request. The average processing time for a medical license is 6-8 weeks if the application has deficiencies required for licensure either awaiting documents from the applicant or primary source documentation such as medical school or post graduate verifications and is deemed incomplete. If a medical license application is complete, it can be processed in as little as 2 weeks.

Expedited processing is available for military service members, spouses, and veterans pursuant to Oklahoma law. To qualify, applicants must complete the application form for portability of Professional Licenses of service members and their spouses. Or eligible licensees must submit additional documentation, including a copy of their military ID, passport, or birth certificate, along with a DD-214 or current original orders. Upon receipt of the required documentation, the licensure department evaluates the application and provides written confirmation and an explanation of the expedited licensure process. For allied health professionals licensed by the Board, applications go through a committee review process, and their processing times are dependent on committee meeting dates.

OMB ensures compliance with continuing medical education requirements for license renewal

The OMB requires continuing medical education (CME) as do other states to ensure the health, safety, and well-being of the patients of Oklahoma by requiring continuing education for licenses regulated by the OMB. Licensees must meet various requirements to renew their licenses, including attesting that they have met CME requirements, providing a statement regarding history of professional conduct, and submitting the required fee. To help ensure licensees complete the required hours of CME as required by rule prior to renewal, the OMB randomly selects and then audits a percentage of its licensees for compliance with CME requirements. Licensees selected for audit must submit CME documentation to prove that they have completed their requirement of inperson or interactive online courses since they last renewed or were issued their licenses. The OMB provides guidance on these requirements on its web site and in its renewal applications

The OMB's audit process has helped ensure that licensees are in compliance with CME requirements. Licensees selected for audit must submit documentation verifying compliance with the CME requirements to the Board. If staff identify noncompliance with CME requirements, the licensees will be referred to the investigations department for determination of why the licensee was noncompliant.

Complaint resolution

Objective: Investigate and adjudicate complaints against licensees in a timely manner to maintain professional standards which protects the public.

OMB complaint resolution process

The Oklahoma Medical Board of Licensure and Supervision (Board) responsible for is investigating complaints against licensees and may take non-disciplinary and disciplinary action as necessary (see textbox). From January through July 2024, the investigations department has received 430 complaints, opened 79 cases and closed 447 complaints. 376 of those closed complaints were received in 2024. The other 71 were received in previous years. Of the 79 Cases that were opened in 2024, 42 cases have been closed so far.ii

In 2023, the investigations department received 930 complaints, opened 87 cases and closed 837

Examples of Board's non-disciplinary and disciplinary options:

Non-disciplinary options

- Letter of concern
- Order for continuing medical education

Disciplinary options

- Administrative Fine
- Voluntary Submittal to Jurisdiction
- Suspension/Revocation
- Probation

Source: Okla, Admin. Code §435:5-1-4 et seq.

cases. 738 of those closed complaints were received in 2023. The other 99 were received in previous years. Of the 87 Cases that were opened in 2023, 59 cases were closed the same year.

The OMB has well-established controls to guide complaint resolution process—

The OMB has implemented well-established controls to guide its complaint investigation and adjudication processes, including policies and procedures, board member review of investigated complaints, and the use of a database to organize all complaint documents and information and monitor complaint investigation and resolution progress.

Members of the public have the right to file a complaint with the Board regarding professionals under the jurisdiction of the Board, which includes Medical Doctors (MD), Physician Assistants (PA), Physical Therapists (PT), Physical Therapist Assistants (TA), Occupational Therapists (OT), Occupational Therapy Assistants (OA), Anesthesiologist Assistants (ANA), Athletic Trainers (AT), Apprentice Athletic Trainers (AA), Registered Electrologists (RE), Licensed Professional Music Therapists (LPMT), Therapeutic Recreation Specialists (TRS), Respiratory Care Practitioners (RC), Provisional Respiratory Care Practitioners (PR), Licensed Dietitians (LD), Provisionally Licensed Dieticians (PD), Pedorthists (LPED), Licensed Prosthetist/Orthotists (LPO), License Orthotists (LO), Licensed Prosthetists (LPR), Registered Prosthetist/Orthotist Assistants (ROA), Registered Prosthetist/Orthotist Technicians (RPOT), Registered Prothesis Technicians (RPT), Registered Orthotist Technicians (ROT), and Radiologist Assistants (RA). The Board also provides investigative services for Podiatrists (DPM) and Perfusionists (LP) through contractual agreements with those separate Boards.

Complaints can be submitted through various methods, including mail, phone, email, or by using the complaint form available on the Board's website. The complaint form can be accessed electronically or requested in paper form. Upon receiving a complaint, the Board asks for as much detail and supporting documentation as possible to avoid delays in resolution. The facts presented in the complaint will guide the Board's decision on further action. After receiving a complaint, the Board will acknowledge its receipt and review it for potential violations of the Oklahoma Medical Practice Act and the Board's rules and regulations. The complainant will be notified of the review results. If the complaint is assigned to a Board investigator, the complainant will be informed of the investigator's name and contact details for follow-up. If no further action is required, the case is closed, and the complainant is notified by mail. Detailed documentation of every step in the complaint process is maintained. Complaints that have been referred to the Oklahoma Medical Board but are within the jurisdiction of a different board such as the Oklahoma Board of Nursing, Oklahoma Board Pharmacy Board, Oklahoma State Health Department, and Oklahoma Office of the Attorney General's Medicaid Fraud Control Unit are referred to those agencies.

Complaint resolution process time—

Complaint resolution times can vary significantly due to several factors. The process begins with assessing the complaint to determine its validity and scope. Following this initial assessment, the next step involves exploring possible actions to address the complaint. This is followed by a thorough investigation, which includes gathering detailed information, interviewing relevant parties, and obtaining necessary documentation. Delays may arise from efforts to contact the complainant, the licensee involved, or the associated facility, as well as from waiting on hearing dates, expert review of patient charts, and the completion of evaluations or assessments.

Disciplinary Actions —

The Oklahoma Board of Medical Licensure and Supervision (the Board) is authorized to take disciplinary action against licensed or certified individuals under Oklahoma Statue 59 O.S. and the Oklahoma Allopathic Medical and Surgical Licensure and Supervision Act. Disciplinary actions are determined based on several factors, including actual and potential harm to the public, the licensee's acceptance of responsibility, remorse, and efforts to amend wrongful conduct. Penalties vary in severity according to the gravity of the violation. Severe violations result in harsher penalties, while minor violations incur lighter penalties. Administrative fines may be imposed following a formal hearing, with fines up to \$5,000 per day for practicing without a valid license and up to \$5,000 per unprofessional conduct violation.

The Board may issue a letter of concern for minor infractions that do not warrant formal action but serve as a warning of potential future disciplinary measures. Additionally, the Board may accept a Voluntary Submittal to Jurisdiction, allowing the licensee to submit to the Board's authority voluntarily. In cases of felony convictions, the Board may suspend or revoke a license, with reinstatement possible if the conviction is overturned on appeal. Licensees who have been suspended or revoked may petition for reinstatement, provided they comply with all terms and conditions imposed by the Board. Failure to comply with a Board order can lead to further disciplinary action and additional penalties. The Board also stipulates that allied health professionals requiring supervision must not be overseen by physicians on probation. The Board can impose administrative remedies for unprofessional conduct, including fines up to \$1,500 per instance, mandatory continuing education or assessments, with detailed procedures for notice, response, and hearings, ensuring confidentiality and compliance enforcement.

ⁱⁱ Complaints may not be resolved in the same calendar year they are received. In calendar year 2024, the Board resolved several complaints it received in prior years.

iii H.B. 597, 59th Leg., Reg. Sess. (Okla. 2024); H.B. 2120,58th Leg., Reg. Sess. (Okla. 2021); 63 O.S. §63-2556 et seq. (2019);

Public information

The Board provides appropriate, accurate, and timely public information regarding disciplinary history on its web site and through open records request.

OMB provided accurate and appropriate information on its Web site

The Oklahoma Medical Board of Licensure and Supervision (Board) provides accurate and appropriate information on its web site. The Board complies with all requirements of the "Open meetings, Open Records" Act Statutes 25 O.S. §301-314. Requests for public licensure files are typically completed within seven (7) business days. Specifically, the Board's web site includes a search feature that allows the public to look up and review any licensees' profiles for any licensees the Board issues including active, revoked, and retired licensees. The profiles on our website include the licensee's name, date of initial licensure, date of last renewal, education, and any disciplinary actions taken against the licensee's license. Additionally, the profiles provide practice address, contact information, license type, specialty, license status, and details about the primary supervisor.

In addition, the disciplinary histories provided on the licensee's profiles complies with Oklahoma Statutes 25 O.S. §301-314, which prohibits state agencies from providing information on their web sites about dismissed complaints or complaints that resulted in non-disciplinary action. As well as providing redacted records of licensees to those who request it.

The Board offers an optional subscription-based website for hospitals, insurers and other credentialing agencies who require access to additional licensee data not present on the public site. This includes practice history, education and exam information and other primary source verified items. Since this data is hosted by and controlled entirely by the Board, it therefore constitutes a "primary source" verification of licensure status as authentic as a direct inquiry to the Board. Credentials often require information to be primary source verified so they do not have to request the information directly from third parties, such as verification of medical schools or postgraduate training. Another benefit to subscribers is that they may create a list of providers that they are interested in, such as MDs that work at their hospital or whom they insure. This enables subscribers to be notified via e-mail alert if the status of anyone on their list changes due to a disciplinary action or if a listed provider's license is about to expire. The subscription is \$60 per month and includes 300 queries against the database. Additional queries are billed in tiers like cell-phone minutes. Most subscribers do not exceed 300 queries.