



The Comptroller General  
of the United States

Washington, D.C. 20548

# Decision

Matter of: Navy-Advance Payment for Publication Verifying  
Medical Specialty Board Credentials  
File:  
Date: B-231673  
August 8, 1988

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## DIGEST

Advance payment authority for subscriptions to publications contained in 31 U.S.C. § 3324(d)(2) extends to verification reports of physicians' board certifications.

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## DECISION

By letter of June 7, 1988, the Commander of the Navy Accounting and Finance Center requests our decision concerning whether the Navy may properly make an advance payment to a medical specialty board for the verification of a physician's board certification. We conclude that it may for the reasons stated below.

## BACKGROUND

Under Department of Navy policy, many prospective health care providers are evaluated for employment under a prescribed credentials review process. A crucial part of this process is verification of documented credentials information. There is at least one medical specialty board which will not provide the necessary verification without a prepayment of its fee. Our decision is requested as to whether advance payment to the medical specialty board is proper under the authority contained in 31 U.S.C. § 3324 (1982).

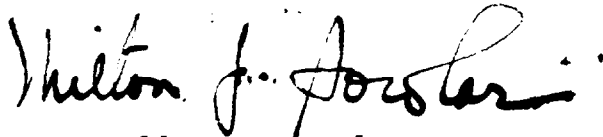
Section 3324(d)(2) of Title 31 permits agencies to pay in advance for printed or recorded publications which are for the auditory or visual use of the agency. For the purposes of this submission, it is necessary to determine whether the verification of board certification constitutes a "publication" within the meaning of the act.

This Office has held that items which are read, such as books, pamphlets, newspapers, periodicals, microcards and

other prints, constitute publications. See, e.g., 41 Comp. Gen. 211 (1961). We have been informed that the verifications in the present case are available in written form to the public on a subscription basis for the purpose of verifying medical providers' credentials.

We find these verification reports analogous to the laboratory evaluation reports considered in B-210719, Dec. 23, 1983. In that case, we noted that Army hospitals could properly pay in advance for laboratory evaluation reports which were used by subscribing hospital laboratories to meet hospital accreditation requirements and to satisfy quality control standards.

The verification reports in the present case are a necessary step in the process of evaluating the professional qualifications of a health care provider. Although the verification of a particular physician's credentials may be circulated to only a small group of subscribers, such factor does not preclude its inclusion within the term "publication." We conclude that the verifications constitute "publications" under 31 U.S.C. § 3324(d)(2). Accordingly, subscriptions to these reports may be paid for in advance.

*for*   
Comptroller General  
of the United States