

Summary Fact Sheet Regarding the Open Payment Rule (Physician Payments Sunshine Act):

What is it & why is it important to you?

- Section 6002 of the Affordable Care Act requires the establishment of a transparency program to increase public awareness of financial relationships between drug and device manufacturers and MDs, DDS, Dos, Optometrists and Chiropractors (excludes medical residents).
- Industry has been collecting information on payments and other transfer of value, as well as ownership or investment interests held by physicians and their family members.
- Industry will register and submit 2013 information to CMS in anticipation that CMS will publish this information in September 2014.

What will be reported?

- All payments in excess of \$10, research payments, and ownership and investment interests.
- Specific physician information reported by Industry to CMS will include:
 - Full legal name (as appears in NPPES)
 - Primary and specialty
 - Primary business address
 - NPI
 - State Professional license number
 - Email address
 - Information about the covered product (name of the related covered drug/device/biological/medical supply)
 - Information about the payment
 - Amount, date, form, and nature of payment
 - Number of payments
 - If designated to a third party, name of individual or entity the MD indicated to receive the payment;

What should you do?

- Physicians should track all interactions they have with industry involving payments or transfer of value to ensure accuracy;
- Physicians should register with CMS in order to receive notifications and information submitted to industry. **Registration began June 1st, 2014.** See below for additional details.

What if there is inaccurate information submitted by Industry about you?

- Physicians may initiate data disputes to correct inaccuracies anytime before the end of the calendar year in which information is publicly available.
- Data from unresolved disputes will still be posted publically but will be marked as “disputed”.

To register and for more information please see (<https://www.cms.gov/Regulations-and-Guidance/Legislation/National-Physician-Payment-Transparency-Program/Downloads/Phys-Teaching-Hosp-Phase-1-EIDM-Registration-Steps-%5bJune-2014%5d.pdf>)