



Open Payments...A New Era of Transparency

USC Office of Compliance

Today's Agenda

- USC Relationship with Industry Policy
- diSClose
- Open Payment Rule
- In the News...Financial Interests and University Faculty

USC
Relationship with Industry (RWI)
Policy Review

September 2009

What drove a need for USC to create a RWI Policy

- AAMC Task Force Report
- Continuing government enforcement
- Impact of industry disclosures and proposed Senate Bill 2029

Principles for Assessing Interactions

- The **interactions should involve knowledgeable parties** on both sides of the interactions.
- Interactions should be in **appropriate settings...** and assure evidence based exchange which is **free of bias** to the maximum extent possible.
- Interactions must **serve the academic mission** as well as legitimate missions of industry.
- **Compensation** and arrangements should be structured to **support the above principles.**

Fundamental USC Position

- USC supports meaningful interactions with Industry.
- USC recognizes that these collaborations have led to the discovery of new knowledge which has directly benefited patients/public health.
- USC seeks to maintain a culture of ethics in its business relations and to minimize conflicts of interest or even the appearance of conflicts of interest.

MEMORANDUM

TO: All Faculty of the Keck School of Medicine of USC, USC School of Dentistry and USC School of Pharmacy

FROM: Carmen A. Puliafito, M.D., M.B.A.
Avishai Sadan, D.D.S
R. Pete Vanderveen, Ph.D.

DATE: November 2, 2009

SUBJECT: Relationships with Industry

The Keck School of Medicine of USC, the USC School of Pharmacy and the USC School of Dentistry support meaningful interactions and collaborations with Industry. These partnerships through the years have led to the discovery of new knowledge and the development of innovative therapies, which have directly benefited the patients we serve.

However, under no circumstances can we allow these collaborations to have or appear to have improper influence over our core missions of education, research and patient care. As such, we have supported the development of expanded university policy to guide faculty and staff in their interactions with industry. The Relationships with Industry Policy first adopted in January 2008 has now been updated and takes into consideration recommendations from the Association of American Colleges and the American Medical Student's Association. We want to thank the Academic Senate and the USC Healthcare Compliance Committee for their diligent efforts in assisting us with the updating of this policy.

We have attached a copy of the updated policy for your review. Please pay particular attention to new guidance in the following areas:

- **Disclosure of Consulting Arrangements:** Beginning January 1, 2010 these arrangements must now be disclosed, reviewed and approved prior to initiating service to ensure that they do not present a conflict of commitment or conflict of interest. In addition, they must be disclosed to students, residents and fellows when relevant.
- **Industry Sponsored Speaker's Bureaus:** These arrangements are strongly discouraged as they are defined by federal regulations as part

of Industry's marketing activities. In all industry sponsored speaking arrangements, faculty must remain in control of the content presented and ensure that the information is based on the best scientific evidence available.

- **Gifts and Free Meals:** Gifts from Industry may not be accepted. Food delivered by or paid for by Industry marketing representatives is defined as a gift and may not be accepted.
- **Industry Donations of Equipment/Devices/Supplies:** These donations must be managed by the School and will require approval from the Office of Compliance.

Our faculty's academic pursuits – your academic pursuits – are the heartbeat of our university. Collaboration with faculty colleagues and with industry is vitally important to the scholarly work that you do. Just as important is your thoughtful cultivation of such relationships to ensure that all such activity is in compliance with the new university policy.

We will be sharing additional communication on this topic around campus in the weeks ahead and will be offering education on the specifics of this policy. Please relay any questions to the Office of Compliance at 213-821-5420.

Thank you for your prompt attention to the important issues surrounding our relationships with industry.

Attachment

Policy Basics

Scope

- Students, residents and fellows are included within the scope of this policy.
- Policy is applicable whether on or off campus.

Industry Sponsored Frequent Speaking Engagements for Non-CE Events

- **Strongly discouraged** as they are defined by federal regulations as part of Industry's marketing activities.
- Requires that faculty remain in control of the content presented and ensure that the presentation is based on the best scientific evidence available.

Disclosure of Consulting Arrangements

- Required disclosure and approval by the chair/or designee, of contracts for consulting and other types of service arrangements with Industry **prior** to the initiation of the consulting.
- Disclosure of consulting/service arrangements when participating in activities relating to purchasing (ex Pharmacy and Therapeutics Committee) and disclosure to students, residents and fellows when relevant.

Policy Basics

Gifts, *Food*, Free Services and Cash Payments from Industry

- Food is now defined as a gift and may not be accepted directly from Industry.

Education Grants and Trainee Scholarships

- Requires deposit of donated industry funds into USC restricted accounts.
- New procedures are in development to guide personnel on the proper mechanism by which to apply for industry sponsored educational grants.

Relationship with Industry Policy

Education Grants and Trainee Scholarships

- Education grants received from Industry must be clearly documented and signed by authorized signer for USC.
- Education events must comply with ACCME Standards for Commercial Support.
Key Question: Budget? , Educational Objectives? , Target audience?
- Fellowship funding must not exceed the direct cost of fellowship.
- Education funding should not originate from company's sales/marketing.
- Industry can not influence educational event / content.

Consulting Criteria for Chair Approval

- Is there a detailed Scope of Work?
- Fair Market Value review
- Is there a “quid pro quo”
- When are services provided?
- Conflict of Interest and Commitment Review
- Is the faculty member involved in research with the company requesting services?
- Paid Promotional Speaking Review

Use of diSClose for RWI Disclosures

A “one-stop” system to meet all disclosure requirements

diSClose Update



MEMORANDUM

TO: Faculty, Keck School of Medicine of USC, Ostrow School of Dentistry of USC, USC School of Pharmacy

FROM: Carmen A. Pulliafito, M.D., M.B.A, Dean, Keck School of Medicine of USC *Carmen Pulliafito*
Avishai Sadan, D.M.D., Dean, Ostrow School of Dentistry of USC *Avishai Sadan*
R. Pete Vanderveen, Ph.D., R.Ph., Dean, USC School of Pharmacy *R. Pete Vanderveen*

DATE: April 22, 2013

SUBJECT: Use of "diSClose" to make disclosures under USC's Relationships with Industry policy

The Keck School of Medicine of USC, Ostrow School of Dentistry of USC, and USC School of Pharmacy support meaningful interactions and collaborations with pharmaceutical companies, biotechnology companies, device and medical equipment manufacturers and other healthcare suppliers ("Industry").

As you are aware, however, under no circumstances can we allow these collaborations to have or appear to have improper influence over our core missions of education, research and patient care. Since 2009, USC has required all healthcare professionals who have influence directly or indirectly over the prescribing, dispensing or purchasing of Industry products or services to disclose all consulting activity with Industry for university review and approval. It is therefore critical that all our healthcare professionals strictly adhere to USC's Relationships with Industry policy and promptly disclose all outside relationships with Industry before undertaking the activity so that the university can ensure that the relationship complies with the requirements of the policy.

In addition, On February 1, 2013, the Centers for Medicare & Medicaid Services published a final rule commonly known as the Physician Payment Sunshine Act. The Sunshine Act requires Industry to begin gathering records of payments to healthcare professionals effective August 1, 2013. CMS will make the information gathered available to the public on September 30, 2014.

University of Southern California
1234 Trousdale Parkway, Los Angeles, California 90089-1234 • Tel: 213 740 1234 • Fax: 213 740 1234



In light of the Sunshine Act, and to assist USC professionals in meeting their obligations under the Relationships with Industry policy, all new disclosures of consulting activity on behalf of Industry must be made using "diSClose" (<https://disclose.usc.edu>), an on-line system USC has developed to assist in the making and review of disclosures of outside activity. diSClose has been developed to make the disclosure process efficient and simple to use. diSClose is also the tool to be utilized if you are a researcher and have any research-related conflicts of interest. For guidance on how to use the system, please visit <http://ooc.usc.edu/diSClose-training-videos> to review a series of training videos.

Thank you for your cooperation in this important effort.

“...all new disclosures of consulting activity on behalf of Industry must be made using “diSClose” (<https://disclose.usc.edu>), an on-line system USC has developed to assist in the making and review of disclosures of outside activity.”

Home

Welcome to diSClose. This is a “one-stop” system for USC faculty and staff to disclose outside financial interests and activities. Please log-in to begin your disclosure.

USCnet Login

USC NetID:	<input type="text"/>
Password:	<input type="password"/>
<input type="button" value="Login"/>	<input type="checkbox"/> Remember me

After signing into this site, you are bound by the terms and conditions set forth when you received your account.

[Forgot your login ID?](#)

Disclosure Selection

Please check all that apply:

Research

- I am making/updating an annual financial disclosure - HHS (NIH, CDC, HRSA) researchers only
- I am making/updating a disclosure of a potential conflict of interest related to research

Relationship with Industry ("RWI")

- I am a Healthcare Professional and have a relationship with a pharmaceutical or medical device company to disclose/update

Business/Personal Conflict

- I have a potential conflict of commitment to disclose/update
- I have a potential personal conflict to disclose/update
- I have a potential business conflict to disclose/update

<< Back

Save | Exit | Hide/Show Errors | Print... | Jump To: Disclosure Details ▾

Financial Disclosure for Discloser Five : Entity Details

Click "Add Relationship" below to disclose a financial interest with an external company or organization. When you have disclosed all of your financial interests, click 'Continue' at the bottom of the screen.

 New Disclosure

1. Relationships Under Review:

View/Edit	Organization	Relationship Types	Last Updated
There are no items to display			

2. Previously Reviewed Relationships (click 'Modify' to enable editing):

Modify	View	Organization	Disclosure Types	Last Updated
There are no items to display				

<< Back

Save | Exit | Hide/Show Errors | Print... | Jump To: Disclosure Details ▾

Disclosure for Discloser One in Baxter International: Relationships With Industry (RWI)

Please provide details about your Consulting, Advisory Board, Management Roles and Promotional Speaking with the above Entity:

1.0 * What is the total time commitment anticipated under this consulting arrangement?

2.0 * What is the start date of the agreement?



3.0 * Is the term of the agreement limited to one year?

Yes No [Clear](#)

4.0 * Is the consulting agreement in writing?

Yes No [Clear](#)

4.1 Please upload a copy of the consulting agreement:

Name	Description
------	-------------

There are no items to display

5.0 * Is your compensation under the agreement based on an hourly rate for actual services performed?

Yes No [Clear](#)

6.0 ***What is the hourly rate proposed for the services you intend to perform over the remaining term of the contract?**

6.1 *** To demonstrate that your rate of salary is fair market value, please check the salary scale that you used and attach documentation:**

ID
<input type="checkbox"/> USC salary scale
<input type="checkbox"/> AAMC or other published salary scale
<input type="checkbox"/> Other (requires explanation)

6.1.1 **Please explain other salary rate:**

6.2 **Please upload any supporting documents for fair market value:**

Add	
Name	Description
There are no items to display	

7.0 *** Will you be providing these services at the same time that you are engaging in University activity?**

Yes No [Clear](#)

7.1 **Please select all that apply:**

Reasons
<input type="checkbox"/> The arrangement has the potential to enhance the health of the public
<input type="checkbox"/> The arrangement serves USC's academic mission
<input type="checkbox"/> The arrangement supports academic standards of medical professionalism
<input type="checkbox"/> Other (please explain below)

7.1.1 You selected 'Other,' please explain why this is an appropriate activity to engage in:

8.0 *** Is the paid promotional speaking at an industry-sponsored event, i.e. speaker's bureau?**

Yes No [Clear](#)

9.0 *** Are you responsible for the content of the presentation?**

Yes No [Clear](#)

10.0 *** Does the agreement in any way prevent with your ability to be in control of or ultimately responsible for the content of the presentation:**

Yes No [Clear](#)

11.0 *** Does the speaking present unsolicited off-label uses of FDA-approved drugs or devices?**

Yes No [Clear](#)

* Required

<< Back

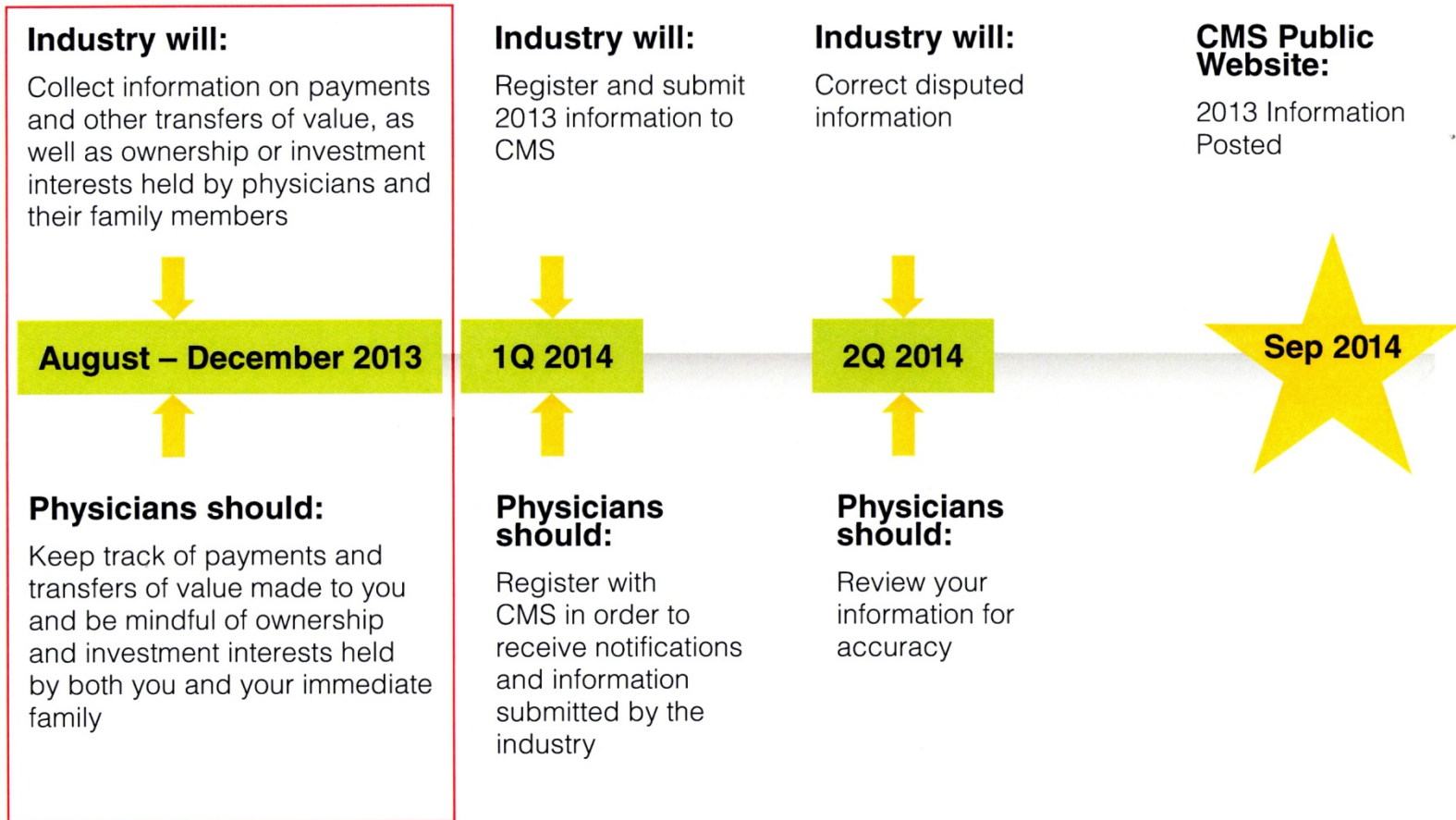
Save | Exit | Hide/Show Errors | Print... | Jump To:

- Relationship With Industry (RWI) ▾

Open Payment Rule

Formerly known as the Sunshine Act

2013 Open Payment Timeline



Reporting Requirements for Industry

- Report annually to CMS
- Report payments or other transfers of value made to physicians and teaching hospitals
- Report ownership or investment interests held by physicians or their immediate family members

Three Types Of Reporting Categories

General Payments

- *Collects and reports payments or other transfers of value not made in connection with a research agreement*

Research Payments

- *Collects and reports payments or other transfers of value made in connection with a research agreement*

Ownership & Investment Interest

- *Collects and reports ownership or investment interests*

Example: Indirect Payments

Payments or other transfer of value made by a manufacturer to a physician or teaching hospital **through an intermediary.**

Scenario	Reported
<p>Pfizer provides \$10,000 to a specialty society on October 12, 2013 requesting the award to be split between the two physicians, chosen by the specialty society physicians.</p>	<p>Information about the two physicians</p> <ul style="list-style-type: none">• Name, address, NPI, license number, specialty (\$5,000 will be attributed to each physician that receives the award) <p>Payment information</p> <ul style="list-style-type: none">• Form of payment, date of payment, and nature of payment
<ul style="list-style-type: none">•GSK contracts with an advertisement agency to create an newsletter valued at \$35, regarding cutting edge treatments.•GSK provides reprints of journal articles.	<ul style="list-style-type: none">• Name, address, NPI, license number, specialty•\$35 will be attributed to medical doctors receiving the newsletter <p>Payment information</p> <ul style="list-style-type: none">• Form of payment, date of payment, and nature of payment

Example: Third Party Payments

Payments or other transfer of value provided to a third party **at the request of or designated on behalf of a physician or teaching hospital.**

Scenario	Reported
<p>GSK provides Dr. Henry Jones with a \$500 check for serving as a speaker at a round table discussing Rx on August 5, 2013. Dr. Jones requests that GSK provide the compensation to charity.</p>	<p>Dr. Henry Jones information</p> <ul style="list-style-type: none">•Name, address, NPI, license number, specialty (\$500 will be attributed Dr. Henry Jones) <p>Payment information</p> <ul style="list-style-type: none">•Form of payment, date of payment, and nature of payment, indication that the payment was designated to an entity and that the entity was a charity, as well as, the name of the entity <p>Drug information</p> <ul style="list-style-type: none">•The marketed name of the covered drugs

Continuing Medical Education

Compensation for speaking at a continuing education program is not required to be reported, if all of the following conditions are met:

1. The program meets the accreditation or certification requirements and standards of the ACCME, AOA, AMA, AAFP or ADA CERP.
2. The manufacturer does not directly pay the physician speaker.
3. The manufacturer does not select the physician speaker nor does it provide the third party vendor with a distinct, identifiable set of individuals to be considered as speakers for the accredited or certified continuing education program.

CONTINUING MEDICAL EDUCATION

Physician-Attendees and Physician Faculty/speakers

Indirect payments associated with CME activities:	Physician-Attendees	Physician-Faculty/Speakers	Physician-Attendees	Physician-Faculty/Speakers
	Accredited or certified *		Non-accredited or non-certified	
Meals	✓	X	✓	✓
Travel and Lodging	✓	X	✓	✓
Tuition Fees	X	X	✓	✓
Educational Materials included in CME Tuition Fees	X	X	✓	✓
Educational Materials not included in CME Tuition Fees	✓	X	✓	✓

*Must meet all of the conditions in accordance with § 403.904(g)(1)

2013 Program Cycle: Registration

Industry will:

Collect information on payments and other transfers of value, as well as ownership or investment interests held by physicians and their family members



August – December 2013



Physicians should:

Keep track of payments and transfers of value made to you and be mindful of ownership and investment interests held by both you and your immediate family

Industry will:

Register and submit 2013 information to CMS



1Q 2014



Physicians should:

Register with CMS in order to receive notifications and information submitted by the industry

Industry will:

Correct disputed information



2Q 2014



Physicians should:

Review your information for accuracy

CMS Public Website:

2013 Information Posted



Physicians: Track and Review Your Information

- Physicians should track all interactions they have with industry involving payments or transfers of value to ensure accuracy
- Physicians should register to receive a preview of the data to be made public (discussed later)
- **Specific Physician Information Reported by Industry**
 - Full legal name (as appears in National Plan & Provider Enumeration System - NPPES)
 - Primary and specialty
 - Primary business address
 - NPI (as appears in NPPES)
 - State professional license number(s)
 - Email address
 - Information about the Covered Product
 - Name(s) of the related covered drug, device, biological, or medical supply
 - Information about the Payment
 - Amount, date, form, and nature of payment or other transfer of value
 - Number of payments
 - If designated to a third party, the name of individual or entity the physician indicated to receive the payment

Physicians: Track and Review Your Information

- Consulting fees
- Honoraria
- Gifts
- Entertainment
- Food & beverage
- Travel & lodging
- **Education**
- Research
- Charitable contribution
- Space rental or facility fees
- Royalty or license
- Current or prospective ownership or investment interest
- **Grant**
- Compensation for services other than consulting
- **Direct compensation** for serving as faculty or as a speaker for a medical education program (accredited and **non-accredited**)

Physician/Teaching Hospital Registration

- Physicians and teaching hospitals are not required to register with the program
- However, voluntary registration will allow physicians and teaching hospitals to review their data prior to public release
- Physicians will be able to dispute any data thought to be incorrect for manufacturers and GPOs to review
- Physicians, teaching hospitals and authorized representatives will be able to review and dispute information

Industry registration ended 3/31/14. Physician registration began June 1, 2014.

Physician Registration Begins

- Phase I - Registration to the CMS Portal (6/1/14)
 - Creates account on the CMS Portal
 - Allows user to request Open Payment Application access
- Phase II
 - Will allow user to access the Open Payment Application when online in July (TBD) to review and dispute information submitted by industry regarding physician

Instructions for Phase I

<https://portal.cms.gov>

➤ Go to
<https://portal.cms.gov>

On the Right side of
the screen click on
“New User
Registration”

CMS.gov Enterprise Portal
Centers for Medicare & Medicaid Services

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CMS Portal > Welcome to CMS Portal

Welcome to CMS Enterprise Portal

The CMS Enterprise Portal is a gateway being offered to allow the public to access a number of systems related to Medicare Advantage, Prescription Drug, and other CMS programs.

CMS Enterprise Portal | Medicaid/CHIP | Medicare Shared Savings Program | Physician Value

CMS Secure Portal

To log into the CMS Portal a CMS user account is required.

Login to CMS Secure Portal

Forgot User ID?
Forgot Password?
New User Registration

CMS News

States Moving Forward to Implement Health Reform

Easier electronic funds transfers mean more time with patients and cost savings

Healthcare Professionals Selected as Innovation Adversers will Immune Case

Information for people with Medicare, Medicare open enrollment, and benefits.

Information for children up to the age of 19 in need of health care coverage.

CMS Provides Health Coverage for 100 Million People...

...through Medicare, Medicaid, and the Children's Health Insurance Program. And with health insurance reforms and health care exchanges, we are improving health care and ensuring coverage for all Americans.

Terms and Conditions

Consent To Monitoring

By logging onto this website, you consent to be monitored. Unauthorized attempts to upload information and/or change information on this web site are strictly prohibited and are subject to prosecution under the Computer Fraud and Abuse Act of 1986 and Title 18 U.S.C. Sec. 1001 and 1030. We encourage you to read the [HHS Rules of Behavior](#) for more details.

Protecting Your Privacy

Protecting your Privacy is a top priority at CMS. We are committed to ensuring the security and confidentiality of the user registering to EIDM. Please read the [CMS Privacy Act Statement](#) which describes how we use the information you provide.

Collection Of Personal Identifiable Information (PII)

"Personal" information is described as data that is unique to an individual, such as a name, address, telephone number, social security number and date of birth (DOB).

CMS is very aware of the privacy concerns around PII data. In fact, we share your concerns. We will only collect personal data to uniquely identify the user registering with the system. We may also use your answers to the challenge questions and other PII to later identify you in case you forget or misplace your User ID /Password.

I have read the HHS Rules of Behavior (HHS RoB), version 2010-0002.001S, dated August 26 2010 and understand and agree to comply with its provisions. I understand that violations of the HHS RoB or information security policies and standards may lead to disciplinary action, up to and including termination of employment; removal or debarment from work on Federal contracts or projects; and/or revocation of access to Federal information, information systems, and/or facilities; and may also include criminal penalties and/or imprisonment. I understand that exceptions to the HHS RoB must be authorized in advance in writing by the OPDIV Chief Information Officer or his/her designee. I also understand that violation of laws, such as the Privacy Act of 1974, copyright law, and 18 USC 2071, which the HHS RoB draw upon, can result in monetary fines and/or criminal charges that may result in imprisonment.

I agree to the terms and conditions

Cancel

Next

Click
I accept to the
Terms



Enter your personal Information

-Name

-Email

- SS

-DOB

Address

Phone #

The screenshot shows the 'Registration' page on the CMS.gov Enterprise Portal. The page header includes 'CMS.gov Enterprise Portal' and 'Centers for Medicare & Medicaid Services'. The main content area is titled 'Registration' and contains several sections for data entry:

- Name:** Fields for First Name (Jane), Middle Name, Last Name (Taylor), and Suffix.
- Email:** Fields for E-mail Address (jennifer.doyle@cgfederal.com) and Confirm E-mail Address.
- SSN:** Social Security Number field with masked characters.
- DOB:** Date of Birth field in MM/DD/YYYY format (05/05/1970).
- Address:** Fields for Home Address Line 1 (888 Main Street) and Home Address Line 2.
- Location:** Fields for City (Fairfax), State (Virginia), Zip Code (22033), Zip Code Extension, and Country (USA).
- Phone:** Primary Phone Number field with masked characters.

At the bottom of the form, there are two buttons: 'Cancel' and 'Next'. The 'Next' button is circled in red, indicating the next step in the registration process.

Required fields are marked with an asterisk.

Completing all fields, even those that are not required, will speed-up identity verification.

Select User ID, Password and Challenge Questions



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Centers for Medicare & Medicaid Services

Home | [Learn about your health](#)

Health Care Quality Improvement System | Provider Resources

CMS Portal > Registration

Screen reader mode Off | Accessibility Settings

Choose User ID and Password [Create User](#) Choose User ID and Password

Choose User ID And Password

- User ID

- Password

- Confirm Password

Select your Challenge Questions and Answers:

Your challenge questions and answers will be required for password and account management functions.

- Question:1 <input type="text" value="What is your favorite radio station?"/>	- Answer:1 <input type="text" value="FM"/>
- Question:2 <input type="text" value="What is the name of the manager at your first job?"/>	- Answer:2 <input type="text" value="Mary"/>
- Question:3 <input type="text" value="What is your favorite cuisine?"/>	- Answer:3 <input type="text" value="Italian"/>

Click “OK” to complete Part 1 of Registration

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Centers for Medicare & Medicaid Services

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Health Care Quality Improvement System | Provider Resources

CMS Portal > Registration

Screen reader mode Off | Accessibility Settings

Your Information | Choose User ID and Password | **Complete Registration**

Registration Complete

You have now successfully completed your registration to CMS Enterprise Identity Management (EIDM). You will receive an E-mail acknowledging your successful registration to EIDM and the E-mail will include your User ID.

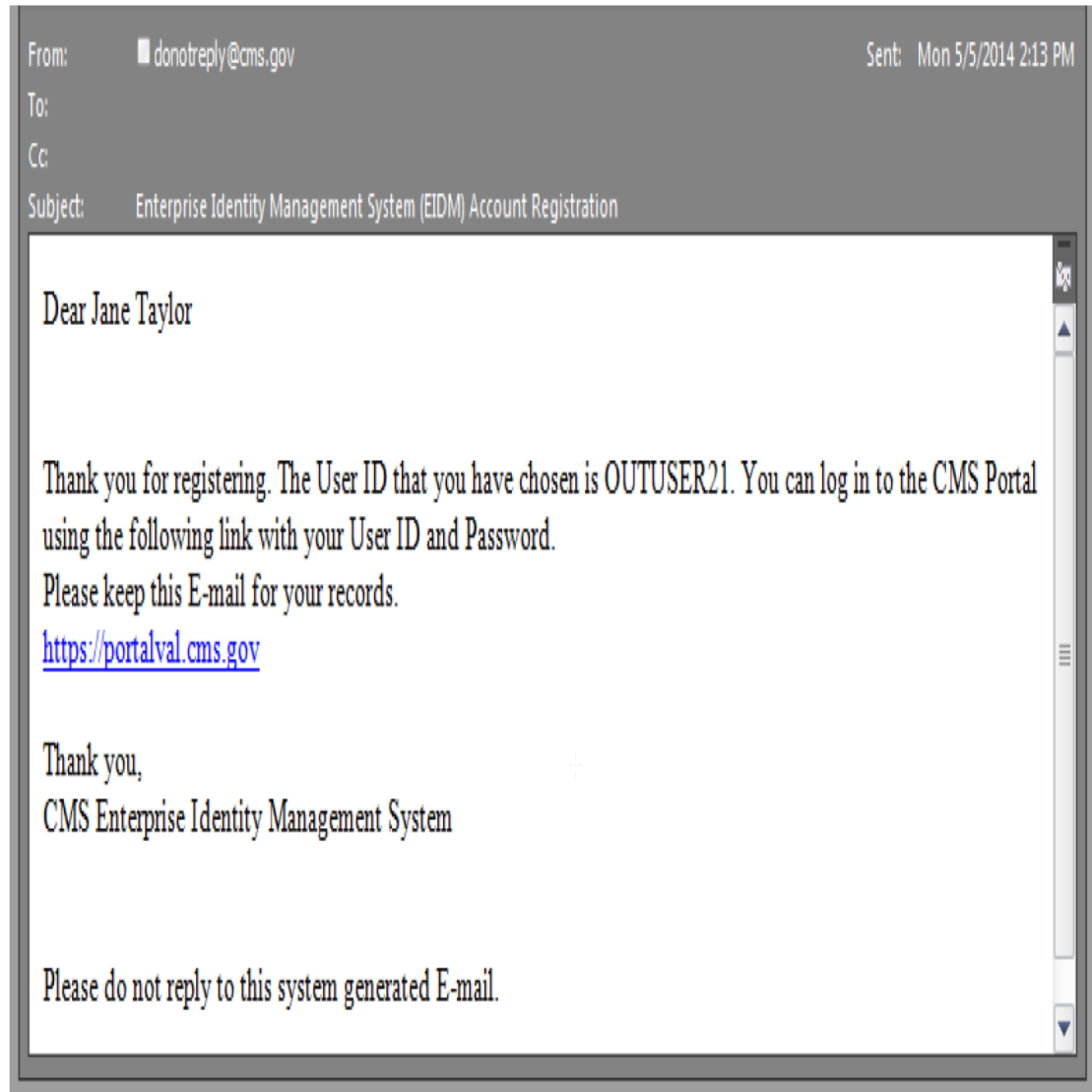
Please wait 5 minutes before logging in. Selecting the 'OK' button will direct you to the CMS Portal Landing page.

OK

Click on “OK” to exit and return to the CMS Enterprise Portal home page.

After clicking on OK, you will receive a confirmation email message that contains your user ID and a link to the CMS Enterprise Portal.

Look for an email providing User ID to continue registration



Go back to
<https://portal.cms.gov>

On the right side
of the screen click
on “Login to the
CMS Secure
Portal”

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CMS Portal > Welcome to CMS Portal

Welcome to CMS Enterprise Portal

The CMS Enterprise Portal is a gateway being offered to allow the public to access a number of systems related to Medicare Advantage, Prescription Drug, and other CMS programs.

[CMS Enterprise Portal](#) | [Medicaid/CHIP](#) | [Medicare Shared Savings Program](#) | [Physician Value](#)

CMS Secure Portal

To log into the CMS Portal a CMS user account is required.

[Login to CMS Secure Portal](#)

[Forgot User ID?](#)
[Forgot Password?](#)
[New User Registration](#)

CMS News

[States Moving Forward to Implement Health Reform](#)

[Easier electronic funds transfers mean more time with patients and cost savings](#)

[Healthcare Professionals Selected as Innovation Advisors will Improve Care](#)

CMS Provides Health Coverage for 100 Million People...

...through Medicare, Medicaid, and the Children's Health Insurance Program. And with health insurance reforms and health care exchanges, we are improving health care and ensuring coverage for all Americans

[Information for people with Medicare: Medicare open enrollment and benefits.](#)

[Information for children up to the age of 19 in need of health care coverage.](#)

Click
I Accept

Terms and Conditions

You are accessing a U.S. Government information system, which includes (1) this computer, (2) this computer network, (3) all computers connected to this network, and (4) all devices and storage media attached to this network or to a computer on this network. This information system is provided for U.S. Government-authorized use only.

Unauthorized or improper use of this system may result in disciplinary action, as well as civil and criminal penalties.

By using this information system, you understand and consent to the following:

You have no reasonable expectation of privacy regarding any communication or data transiting or stored on this information system.

At any time, and for any lawful Government purpose, the government may monitor, intercept, and search and seize any communication or data transiting or stored on this information system.

Any communication or data transiting or stored on this information system may be disclosed or used for any lawful Government purpose.

To continue, you must accept the terms and conditions. If you decline, your login will automatically be cancelled.

I Accept

Decline

Enter User ID and Password

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Welcome to CMS Enterprise Portal

User ID

Password

[Log In](#) [Cancel](#)

[Forgot Password?](#)

[Forgot User ID?](#)

Need an account? Click the link - [New user registration](#)

Click

“Request Access Now”

The screenshot shows the CMS Enterprise Portal interface. At the top, there is a navigation bar with links for 'Portal Help & FAQs', 'Print', 'Log Out', and 'Welcome Jennifer Doyle'. Below this is the CMS.gov logo and 'Enterprise Portal'. A 'My Portal' button is highlighted in yellow. The main content area has a blue header 'Welcome to CMS Enterprise Portal' and a paragraph describing the portal's features. A 'Request Application Access' section on the right contains a blue button labeled 'Request Access Now', which is circled in red. Below this is a 'Contact Help Desk' section with contact information for FFE/HIOS, Physician Value, and ACO help desks. A laptop with a padlock icon is visible in the background of the main content area.

Portal Help & FAQs Print Log Out Welcome Jennifer Doyle

CMS.gov Enterprise Portal

My Portal

CMS Portal > My Portal

Welcome to CMS Enterprise Portal

The Enterprise Portal combines and displays content and forms from multiple applications, supports users with navigation and cross-enterprise search tools, supports simplified sign-on, and uses role-based access and personalization to present each user with only relevant content and applications. The vision of the Enterprise Portal is to provide "one-stop shopping" capabilities to improve customer experience and satisfaction.

Provisioning

There are several ways to get access to applications in the CMS Enterprise Portal

1. [EIDM](#) - To get access to applications that are supported by EIDM click [here](#).
2. [EUA](#) - To get access to applications that are supported by EUA click [here](#). Please click the [EUA link](#) for more details.
3. [IACS](#) - To get access to applications that are supported by IACS click [here](#).

Request Application Access

Use the link below to request access to more applications.

[Request Access Now](#)

Contact Help Desk

FFE / HIOS / Agents & Brokers Help Desk - Contact the Exchange Operations Support Center (XOSC) at CMS_FFPS@cms.hhs.gov or 1-855-CMS-1515

Physician Value / PQRS Help Desk - Contact the PV/PQRS Information Center at 1-800-734-6433.

ACO Help Desk - Contact the ACO Information Center at 1-888-734-6433 (select option 2) if you have any questions about using the ACO Portal features. TTY users should call 1-888-734-6563.

Click

“Request New Application Access”

Portal Help & FAQs Print

CMS.gov Enterprise Portal

My Portal

CMS Portal > My Access

Screen reader mode Off | Accessibility Settings

My Access

[Request New Application Access](#)

[View and manage My Access](#)

View and Manage My Access

Application	Take An Action
Please request access to an application.	

Select

“Open Payments”

“Applicable
Manufacturer, GPC
Physician or
Teaching Hospital”

Portal Help & FAQs Print

CMS.gov Enterprise Portal

My Portal

CMS Portal > My Access

Screen reader mode Off | Accessibility Settings

My Access

[Request New Application Access](#)

[View and Manage My Access](#)

Request New Application Access

Select an application and then a role to request access.

* Application Description: OPENPAYMENTS - Open Payments

* Role: Applicable Manufacturer, GPC, Physi

Cancel Submit

Review Identity Verification Terms

Click
Next

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Identity Verification

You have selected a role that requires a higher level of security. You will need to complete Identity Verification successfully, before requesting access to the selected role. Below are a few items to keep in mind.

- Ensure that you have entered your legal name, current home address, primary phone number and email address correctly. We will only collect personal information to verify your identity with Experian, an external identity verification provider.
- Identity Verification involves Experian using information from your credit report to help confirm your identity. As a result, you may see an entry called a "soft inquiry" on your Experian credit report. Soft inquiries do not affect your credit score and you do not incur any charges related to them.
- Confirm that you have your personal and financial information available, as the Experian application will pose questions to you, based on data in their files. You may want to obtain a copy of your credit report, before proceeding with the role request by selecting this link and following the directions provided - <http://www.experian.com>. For additional information, please see the Experian Consumer Assistance link - <http://www.experian.com/help>

If you elect to proceed now, you will be prompted with a Terms and Conditions statement that explains how your Personal Identifiable Information (PII) is used to confirm your identity. Do you want to continue?

Cancel Next

Click
I agree to
the terms

Click
Next

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Terms and Conditions

Protecting Your Privacy

Protecting your Privacy is a top priority at CMS. We are committed to ensuring the security and confidentiality of the user registering to EIDM. Please read the [CMS Privacy Act Statement](#), which describes how we use the information you provide.

Personal information is described as data that is unique to an individual, such as a name, address, telephone number, social security number, and date of birth (DOB). CMS is very aware of the privacy concerns around PII data. In fact, we share your concerns. We will only collect personal information to verify your identity. Your information will be disclosed to Experian, an external authentication service provider, to help us verify your identity. If collected, we will validate your Social Security number with Experian only for the purposes of verifying your identity. Experian verifies the information you give us against their records. We may also use your answers to the challenge questions and other PII to later identify you in case you forget or misplace your User ID /Password.

HHS Rules Of Behavior

We encourage you to read the [HHS Rules of Behavior](#), which provides the appropriate use of all HHS information technology resources for Department users, including Federal employees, contractors, and other system users.

I have read the HHS Rules of Behavior (HHS RoB), version 2010-0002.001S, dated August 26 2010 and understand and agree to comply with its provisions. I understand that violations of the HHS RoB or information security policies and standards may lead to disciplinary action, up to and including termination of employment; removal or debarment from work on Federal contracts or projects; and/or revocation of access to Federal information, information systems, and/or facilities; and may also include criminal penalties and/or imprisonment. I understand that exceptions to the HHS RoB must be authorized in advance in writing by the OPDIV Chief Information Officer or his/her designee. I also understand that violation of laws, such as the Privacy Act of 1974, copyright law, and 18 USC 2071, which the HHS RoB draw upon, can result in monetary fines and/or criminal charges that may result in imprisonment.

Identity Verification

I understand that the identity proofing services being requested are regulated by the Fair Credit Reporting Act and that my explicit consent is required to use these services. I understand that any special procedures established by CMS for identity proofing using Experian have been met and the services requested by CMS to Experian will be used solely to confirm the applicant's identity to avoid fraudulent transactions in the applicant's name.

I agree to the terms and conditions

Cancel Next

Screen reader mode Off | Accessibility Settings

My Access

[Request New Application Access](#)

[View and Manage My Access](#)

Your Information

Enter your legal first name and last name, as it may be required for identity verification.

• First Name:

Middle Name:

• Last Name:

Suffix:

Enter your email address, as it will be used for account related communications.

• E-mail Address:

Re-enter your email address.

• Confirm E-mail Address:

Enter the same E-mail address you entered before.

Enter your full 9 digit social security number, as it may be required for identity verification.

Social Security Number:

Enter your date of birth, as it may be required for identity verification.

• Date of Birth:

Confirm Your Information and Edit (if necessary)

Verify Identity

Questions are based on “Out of Wallet” questions taken from your credit report

The screenshot shows the CMS.gov Enterprise Portal interface. At the top, there are links for 'Portal Help & FAQs' and 'Print'. The CMS.gov logo and 'Enterprise Portal' text are visible. Below this is a 'My Portal' section with a breadcrumb trail 'CMS Portal > My Access'. A status bar indicates 'Screen reader mode Off | Accessibility Settings'. The main content area is titled 'My Access' and contains two links: 'Request New Application Access' and 'View and Manage My Access'. The 'Verify Identity' section is active, showing a progress bar and a list of questions. The first question asks for the county of the address, with radio button options and a 'NONE OF THE ABOVE' choice. The second question asks for the city of the street, also with radio button options and a 'NONE OF THE ABOVE' choice. The third question asks for a current or previous employer, with radio button options and a 'NONE OF THE ABOVE' choice. The fourth question asks for a previous phone number, with radio button options and a 'NONE OF THE ABOVE' choice. At the bottom right, there are 'Cancel' and 'Next' buttons.

Verifying Identity Successful

Click Next

The screenshot displays the CMS.gov Enterprise Portal interface. At the top, there is a blue navigation bar with a help icon and the text "Portal Help & FAQs" and a print icon with the text "Print". Below this is the CMS.gov logo and the text "Enterprise Portal". A yellow "My Portal" button is visible. A breadcrumb trail shows "CMS Portal > My Access". Below the breadcrumb, there is a status bar with "Screen reader mode Off | Accessibility Settings". The main content area is divided into two columns. The left column is titled "My Access" and contains two links: "Request New Application Access" and "View and Manage My Access". The right column is titled "Complete Step Up" and contains the message "You have successfully completed the Remote Identity Proofing process." and a blue "Next" button.

Portal Help & FAQs Print

CMS.gov Enterprise Portal

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[View and Manage My Access](#)

Complete Step Up

You have successfully completed the Remote Identity Proofing process.

Next

Select
OK to
continue

The screenshot shows the CMS Enterprise Portal interface. At the top, there is a blue navigation bar with 'Portal Help & FAQs' and a 'Print' icon. Below this is the CMS.gov logo and the text 'Enterprise Portal'. A yellow 'My Portal' button is visible. A breadcrumb trail shows 'CMS Portal > My Access'. A status bar indicates 'Screen reader mode Off | Accessibility Settings'. The main content area is titled 'My Access' and contains three links: 'Request New Application Access', 'View and Manage My Access', and 'Request Acknowledgement'. The 'Request Acknowledgement' section displays a message: 'Your request has successfully completed. You will need to logout and then log in to access the OPENPAYMENTS Application. Select 'OK' to continue.' Below the message is a blue button labeled 'OK'.

Next Step

July 2014

Phase 2 roll out for Physicians and Teaching Hospitals. At that time you will be able to:

- Review,
- Dispute
- Request Corrections

Dispute and Resolution

- Physicians may initiate data disputes to correct inaccurate information anytime before the end of the calendar year in which the information was publically available.
- If the manufacturer is unable to resolve the dispute with the physician or teaching hospital and correct the data in the initial 45-day or subsequent 15-day period, the manufacturer and physician or teaching hospital should continue to seek a resolution.
- Corrections from disputes initiated after 45 days may not be reflected in the initial public data.
- Data from unresolved disputes will still be posted publically but will be marked as “disputed.”
- CMS will monitor the dispute and resolution process and will update the public data at least once annually.

Physician Tools & Resources

Information

- ✓ Webpage dedicated to physicians (<http://www.cms.gov/Regulations-and-Guidance/Legislation/National-Physician-Payment-Transparency-Program/Physicians.html>)
- ✓ Fact Sheets specific to physicians
- ✓ Continuing Medical Education modules (2)
- ✓ Brochure summarizing Open Payments for physicians (<http://www.cms.gov/Regulations-and-Guidance/Legislation/National-Physician-Payment-Transparency-Program/Downloads/Physician-Publication.pdf>)
- ✓ Brochure summarizing Open Payments for patients
- ✓ See Summary Sheet provided as a quick reference

Mobile Applications



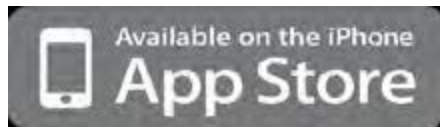
- Two **FREE** mobile applications to aid physicians and industry in tracking data collected for Open Payments
 - Open Payments Mobile for Physicians
 - Open Payments Mobile for Industry
- Applications are available for Apple (iOS) and Android

- Benefits include:
 - Provides a tool to track payments and transfers of value in real-time.
 - Serves as a reference tool during review or information disputes

Accessing the App



Visit the iOS or Google Play Store online or on your phone and follow the steps listed below.



1. Select "Search."
2. Search for Open Payments – both apps will appear for download.
3. Select "Install" for the app you want and the app will download to your device.

In the News...

“More scrutiny for UCLA’s School of Medicine”

LA Times Article 4/25/14 (<http://www.latimes.com/business/la-fi-ucla-outside-money-20140426,0,1223431.story#axzz2zx8MEt4q>)

- UCLA \$10-million settlement between the UC system and the former head of orthopedic surgery at UCLA to address failure to act on complaints about widespread conflicts of interest among medical school faculty and retaliation.
- Article brings more attention around university faculty financial ties to industry and the repercussions on patient care and references the Journal of American Medical Association (JAMA) recent study that raised concerns over university officials having financial interests in industry.
- The study named Eugene Washington who serves as the UCLA Medical School dean and on the board of Johnson & Johnson and Dean Pete Vanderveen of USC School of Pharmacy who serves on the board of Mylan Inc.
- The JAMA Study found that 41 board members at large companies held leadership posts at academic medical centers.

Instances such as these are drawing more and more attention from the government and patient advocates. The article references the Open Payment Rule and that the public disclosure of financial relationships between medical companies and doctors will go into effect in Fall 2014.

We are here to help...

Tammy Capretta, RN, MPH

Chief Integration and Risk Officer

(323) 442-9761

Ajay Vyas, Esq.

Deputy Healthcare Compliance Officer

(323) 442-8588