Physician Payments Sunshine Act (Open Payments)

What is it?
- Section 6002 of the Affordable Care Act requires the establishment of a transparency program, now known as Open Payments.
- The program increases public awareness of financial relationships between drug and device manufacturers and certain health care providers through annual reporting on a public website.

How does it work?
- Applicable manufacturers of covered drugs, devices, biologicals, and medical supplies must report annually to the Centers for Medicare and Medicaid Services (CMS) any payments or other transfers of value made to physicians and teaching hospitals.
- Applicable manufacturers and applicable group purchasing organizations (GPOs) must report ownership or investment interests held by physicians or their immediate family members.
- Applicable GPOs must report payments or other transfers of value made to physician owners or investors if they held ownership or an investment interest at any point during the reporting year.
- This data will be published June 30th each year on a public website and will include payments from the previous calendar year.
- Physicians will have 45 days to review and dispute incorrect data and an additional 15 days to resolve the dispute before publication of the data.

What is reported?
- Payments or other transfers of value made to physicians and teaching hospitals as well as ownership and investment interests of physicians and their immediate family members.
- Reporting includes the amount of payment, date of payment, nature of payment, form of payment, related products, physician information (name, specialty, NPI, State professional license number/s, primary business address), and for ownership and investment interests, the dollar amount, value and terms of the ownership or investment interest.

What should physicians do?
- Operate within University policies, including full disclosure of activities and adherence to allowable and prohibited activities.
- Keep track of payments and transfers of value made to you.
  - A mobile app is available for real time tracking - OPEN PAYMENTS Mobile for Physicians.
- Be mindful of ownership and investment interests held by you and immediate family members.
- Ask companies to let you review reportable transfers before they report them.
- Verify that your information in the NPI enumerator database is current and update it as needed.
- Register with CMS in order to receive notifications and information.
- Review your information for accuracy.

Resources
- [http://go.cms.gov/openpayments](http://go.cms.gov/openpayments)
- [ama-assn.org/go/sunshine](http://ama-assn.org/go/sunshine)
- [www.musc.edu/coi](http://www.musc.edu/coi)
- COI Office:
  - Mary Evelyn Armstrong, Conflict of Interest Officer
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