

Here Comes the Sunshine Act

08/18/14

The Centers for Medicare and Medicaid Services (CMS) released a guide for physicians to prepare for the [Dispute Resolution period](#) of the Physician Payments Sunshine Act. The CMS guide is available on the CMS Open Payments website <http://go.cms.gov/openpayments>. CMS announced "mid-July" as the date for when physicians can begin registration in the Open Payments system.

Registration in Open Payments is voluntary for physicians and teaching hospitals, but it is required if you want to access the data to review and dispute what has been reported about you by manufacturers. CMS split registration for physicians and teaching hospitals into two phases for this first reporting year:

Phase 1 (available at any time) includes user registration in CMS' Enterprise Portal. Enterprise Portal registration is a required first step to allow for registration in the Open Payments system when it becomes available in mid-July. Use the Phase 1 Step-by-Step CMS Enterprise Portal Registration for Physicians and Teaching Hospitals presentation for guidance on how to complete this portion of the registration; this resource is also posted on the Physicians and Teaching Hospitals pages of the Open Payments website.

Phase 2 (begins in mid-July) allows physicians and teaching hospitals to:

- Register in the Open Payments system,
- Delegate roles and responsibilities by nominating system users to fill specific user roles, and
- Review and dispute data submitted by applicable manufacturers and applicable GPOs prior to public posting of the data. *Any data that is disputed, if not corrected by industry, will still be made public but will be marked as disputed.*

While there is no official end date to finish the registration steps, if you want to participate in the review and dispute period for 2013 Open Payments data, CMS advises that registration in EIDM and Open Payments is completed by the end of the initial 45-day review/dispute period. CMS is developing a number of educational resources to support physicians and teaching hospitals with this next step of Open Payments system registration. CMS will announce step-bystep guides to registration in the Open Payments system and other supporting resources.

On July 22, 2014, CMS will host a National Provider Call. In the coming weeks, the registration link for the call will be posted to the Event page of the Open Payments website.

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