

CMS Open Payments & Healthcare Transparency

Open Payments is a federal program that collects and makes information public about financial relationships between the health care industry and physicians and teaching hospitals. The Centers for Medicare & Medicaid Services (CMS) collects information from manufacturers of drugs and devices about payments and other transfers of value they make to physicians and teaching hospitals. These payments and other transfers of value can be for many purposes, like research, consulting, travel, and gifts. CMS makes this data publicly available and searchable on www.cms.gov/openpayments each year.

Program Timeline for Program Year 2019



- CMS publishes this data twice annually: Initial Publication (June 30 of each year) and Refresh Publication (early part of the calendar year after submission).
- Physicians have 45 days starting April to review and dispute.
- Physicians can still review and dispute at any time after June 30, but the data will be published on the CMS website.
- All physicians are affected even if you do not treat Medicare or Medicaid patients.

Physicians – You Role in Healthcare Transparency

- Physicians are encouraged to review and dispute the 2019 data reported about you during the Review & Dispute period from April 1st to May 15th, 2020.

- After registration in the Open Payments System, physicians can review the data reported about you and ensure that the information is accurate. If you find errors in records submitted by a reporting entity, you can initiate a dispute on those records.
- The CMS Open Payments dataset for program year 2019 will be published on June 30, 2020. The Office of Institutional Compliance will also conduct a review of the industry payments received by TTUHSC physicians, and make sure physicians meet TTUHSC's conflict of interest and commitment disclosure requirements.

Open Payments Review & Dispute COVID-19 Announcement

CMS is aware that the COVID-19 pandemic is greatly impacting the healthcare community as a whole. However, CMS does not have the authority to postpone the Open Payments data publication deadline of June 30. Therefore, the Review and Dispute period will remain April 1, 2020 – May 15, 2020. Please note that your review and dispute actions are voluntary and are not required under the statute.

Program Changes Coming in 2021

On November 15, 2019, CMS finalized several changes to the Open Payments Program as part of the [CY 2020 Physician Fee Schedule Final Rule](#). One of the significant changes is to expand the definition of “covered recipient” to include:

- Physician Assistants
- Nurse Practitioners
- Clinical Nurse Specialists
- Certified Registered Nurse Anesthetists
- Certified Nurse-midwives

The expanded Open Payments program applies to information required to be submitted on or after January 1, 2022. Therefore, the expanded program will be effective for data collected beginning in calendar year 2021 as this is the data that will be reported to CMS in 2022.

For detailed information about how the Open Payments program works and how to review your reported data, please visit this website: <https://www.cms.gov/openpayments> If you have any questions, please feel free to contact the Office of Institutional Compliance at compliance@ttuhsc.edu.