



# Open Payments...A New Era of Transparency

USC Office of Compliance

# Today's Agenda

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- 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

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- 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

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## **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. Puliafito, M.D., M.B.A. Dean, Keck School of Medicine of USC *Carmen Puliafito*  
Avishai Sadan, D.M.D., Dean, Ostrow School of Dentistry of USC *Avishai Sadan*  
R. Pete Vandersteen, Ph.D., R.Ph., Dean, USC School of Pharmacy *R. Pete Vandersteen*

**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 providers in meeting disclosure 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 as efficient and simple as possible. 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 video

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](#)[Home](#)

## 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:

Password:

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

&lt;&lt; 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.



### 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				

&lt;&lt; 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
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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

USC salary scale

AAMC or other published salary scale

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

The arrangement has the potential to enhance the health of the public

The arrangement serves USC's academic mission

The arrangement supports academic standards of medical professionalism

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

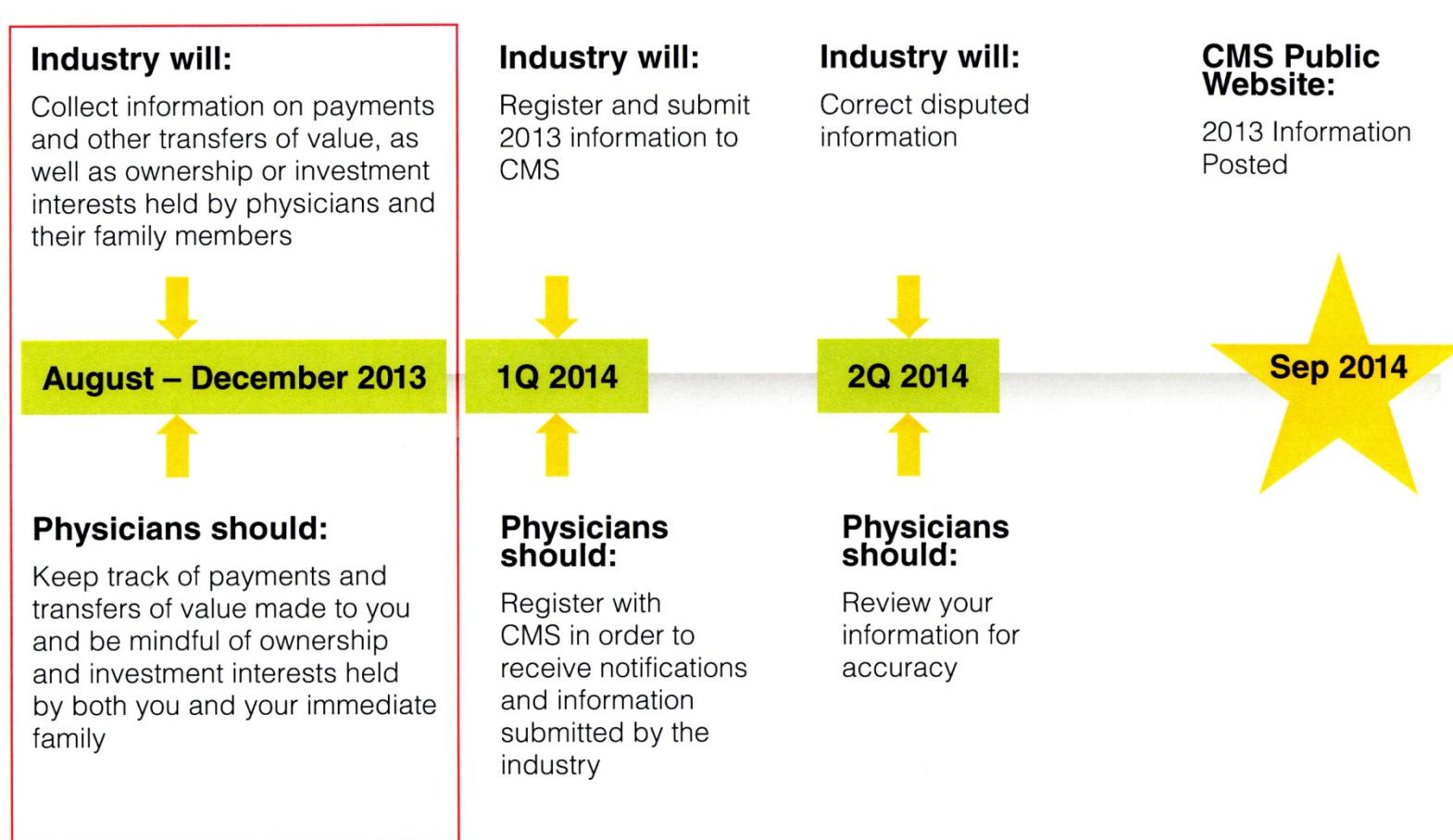
[« Back](#)

[Save](#) | [Exit](#) | [Hide/Show Errors](#) | [Print...](#) | [Jump To:](#) - Relationship With Industry (RWM) ▾

# 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
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.	<b>Information about the two physicians</b> <ul style="list-style-type: none"><li>• Name, address, NPI, license number, specialty (\$5,000 will be attributed to each physician that receives the award)</li></ul> <b>Payment information</b> <ul style="list-style-type: none"><li>• Form of payment, date of payment, and nature of payment</li></ul>
<ul style="list-style-type: none"><li>• GSK contracts with an advertisement agency to create an newsletter valued at \$35, regarding cutting edge treatments.</li><li>• GSK provides reprints of journal articles.</li></ul>	<ul style="list-style-type: none"><li>• Name, address, NPI, license number, specialty</li><li>• \$35 will be attributed to medical doctors receiving the newsletter</li></ul> <b>Payment information</b> <ul style="list-style-type: none"><li>• Form of payment, date of payment, and nature of payment</li></ul>

# 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
GSK provides <b>Dr. Henry Jones</b> 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 <b>charity</b> .	<p><b>Dr. Henry Jones information</b></p> <ul style="list-style-type: none"><li>•Name, address, NPI, license number, specialty (\$500 will be attributed Dr. Henry Jones)</li></ul> <p><b>Payment information</b></p> <ul style="list-style-type: none"><li>•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</li></ul> <p><b>Drug information</b></p> <ul style="list-style-type: none"><li>•The marketed name of the covered drugs</li></ul>

# 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

Sep 2014



# 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

➤ Go to  
<https://portal.cms.gov>

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

<https://portal.cms.gov>

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.

[New User Registration](#)

[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 Immune Care](#)

Click  
I accept to the  
Terms



**CMS.gov Enterprise Portal**  
Centers for Medicare & Medicaid Services

Health Care Quality Improvement System | Provider Resources

CMS Portal > Registration

Screen reader mode Off | Accessibility Settings

### 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 by writing to 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**

# Enter your personal Information

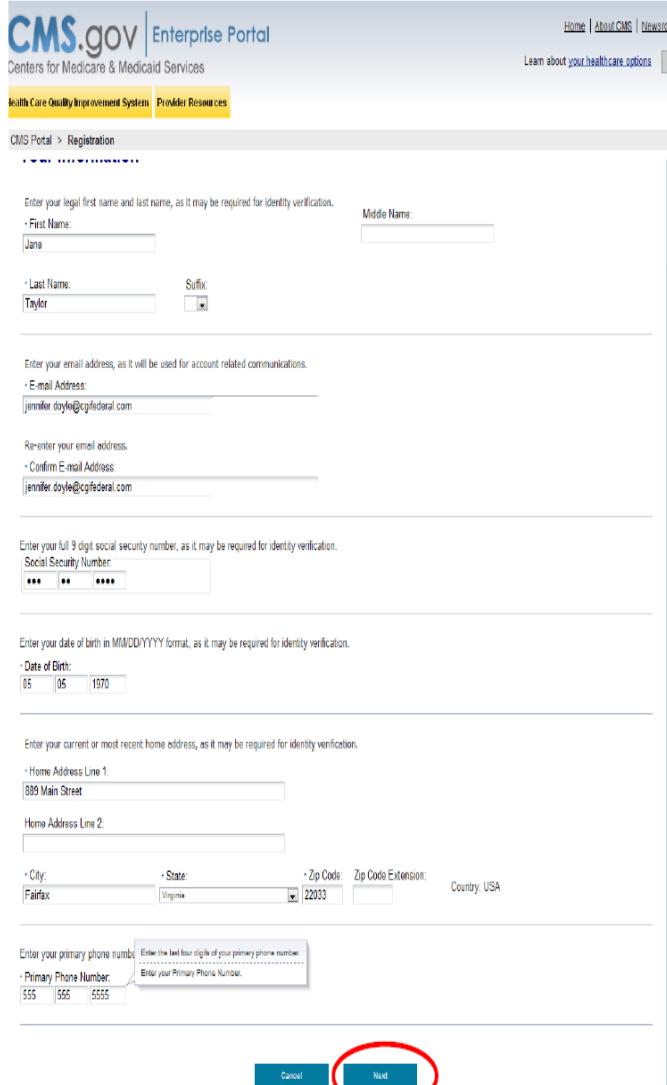
**-Name**

**-Email**

**- SS**

**-DOB**

**Address**  
**Phone #**



The screenshot shows the CMS.gov Enterprise Portal registration page. The page header includes the CMS logo and navigation links for Home, About CMS, Newsroom, and Learn about your healthcare options. The main content area is titled 'Registration' and contains the following fields:

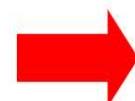
- Name:** Fields for First Name (Jane), Middle Name (empty), Last Name (Taylor), and Suffix (empty).
- Email:** Fields for E-mail Address (jennifer.doyle@cfederal.com) and Confirm E-mail Address (jennifer.doyle@cfederal.com).
- Social Security Number:** A field with masked input (\*\*\* \* \* \* \*).
- Date of Birth:** A field with input (05 05 1970).
- Address:** Fields for Home Address Line 1 (899 Main Street), Home Address Line 2 (empty), City (Fairfax), State (Virginia), Zip Code (22333), Zip Code Extension (empty), and Country (USA).
- Phone Number:** A field for Primary Phone Number with input (555 555 5555) and a tooltip asking to enter the last four digits of the phone number.

At the bottom right of the form, there are 'Cancel' and 'Next' buttons, with the 'Next' button being highlighted by a red circle.

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



**CMS.gov Enterprise Portal**  
Centers for Medicare & Medicaid Services

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: outuser21

- Password:  (redacted)

- Confirm Password:  (redacted)

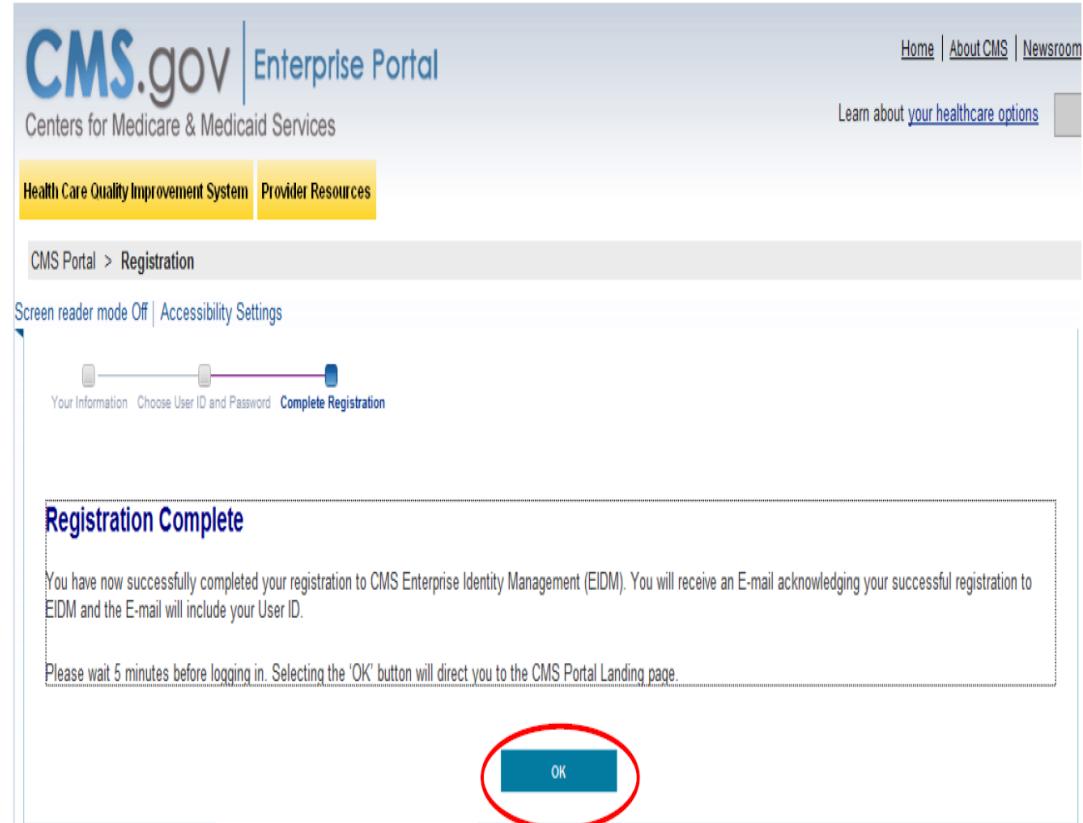
**Select your Challenge Questions and Answers:**

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

- Question:1 What is your favorite radio station?	- Answer:1 FM
- Question:2 What is the name of the manager at your first job?	- Answer:2 Mary
- Question:3 What is your favorite cuisine?	- Answer:3 Italian

[Cancel](#) [Next](#)

# Click “OK” to complete Part 1 of Registration



The screenshot shows the CMS Enterprise Portal registration page. At the top, the CMS.gov logo and "Enterprise Portal" are displayed, along with links for "Home", "About CMS", and "Newsroom". A banner at the top right says "Learn about your healthcare options". Below the logo, there are two yellow buttons: "Health Care Quality Improvement System" and "Provider Resources". The main content area shows the "CMS Portal > Registration" path. It includes links for "Screen reader mode Off" and "Accessibility Settings". A progress bar at the top indicates steps: "Your Information" (blue), "Choose User ID and Password" (gray), and "Complete Registration" (blue). The main message box says "Registration Complete" and states: "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." Below this, a note says: "Please wait 5 minutes before logging in. Selecting the 'OK' button will direct you to the CMS Portal Landing page." A blue "OK" button is at the bottom of this message box, and it is circled in red.

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

From: donotreply@cms.gov  
To:  
Cc:  
Subject: Enterprise Identity Management System (EIDM) Account Registration  
Sent: Mon 5/5/2014 2:13 PM

Dear Jane Taylor

Thank you for registering. The User ID that you have chosen is OUTUSER21. You can log in to the CMS Portal using the following link with your User ID and Password.

Please keep this E-mail for your records.

<https://portalval.cms.gov>

Thank you,  
CMS Enterprise Identity Management System

Please do not reply to this system generated E-mail.

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

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

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

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 Implement Care

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.

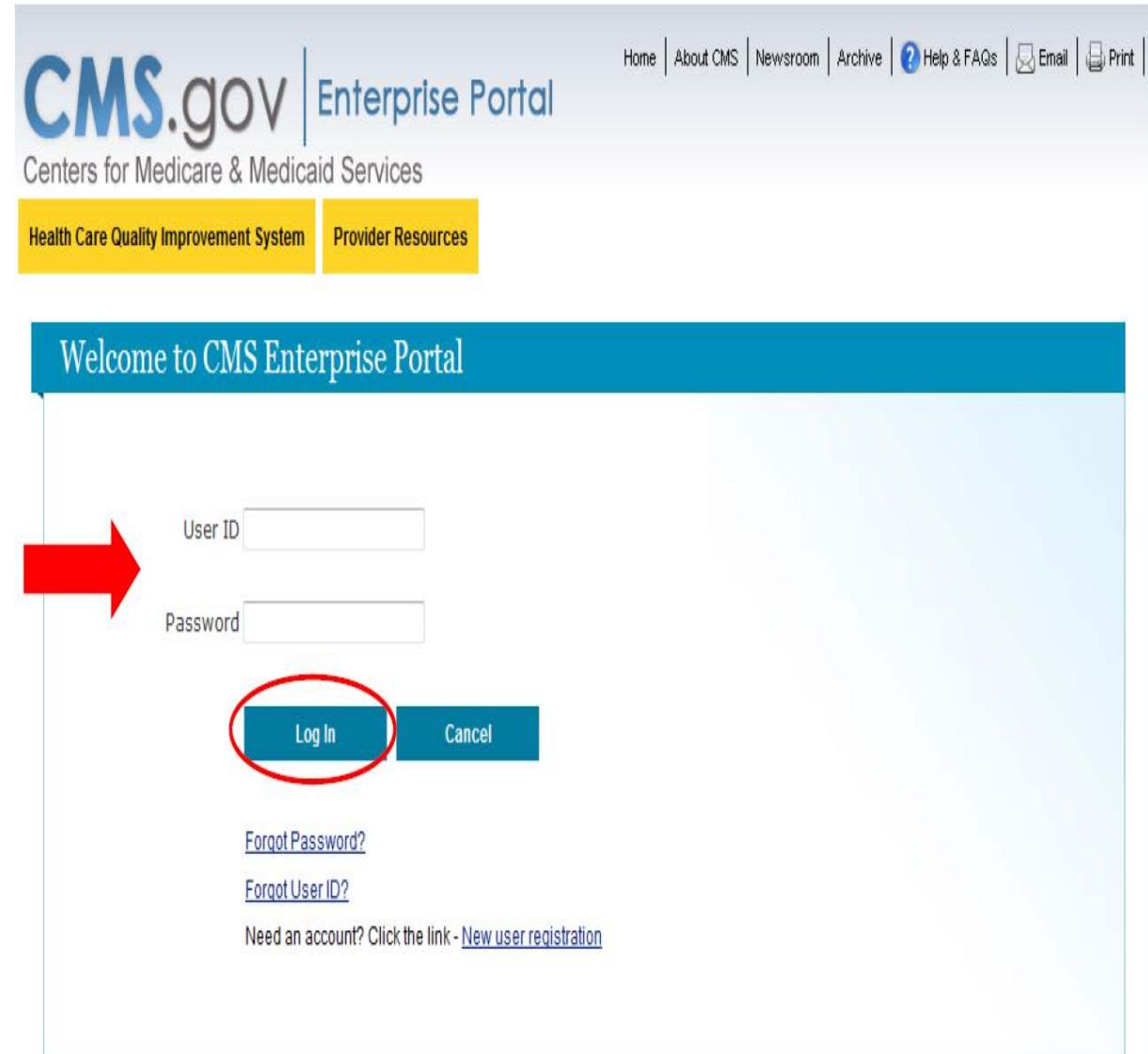
At any time, and for any lawful Government purpose, the government may monitor, intercept, and search and seize any communication or data transiting or stored on this information system.

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

# Click “Request Access Now”

Portal Help & FAQs Print Log Out Welcome Jennifer Doyle

**CMS 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 links 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\\_FEPS@cms.hhs.gov](mailto:CMS_FEPS@cms.hhs.gov) or 1-855-CMS-1515

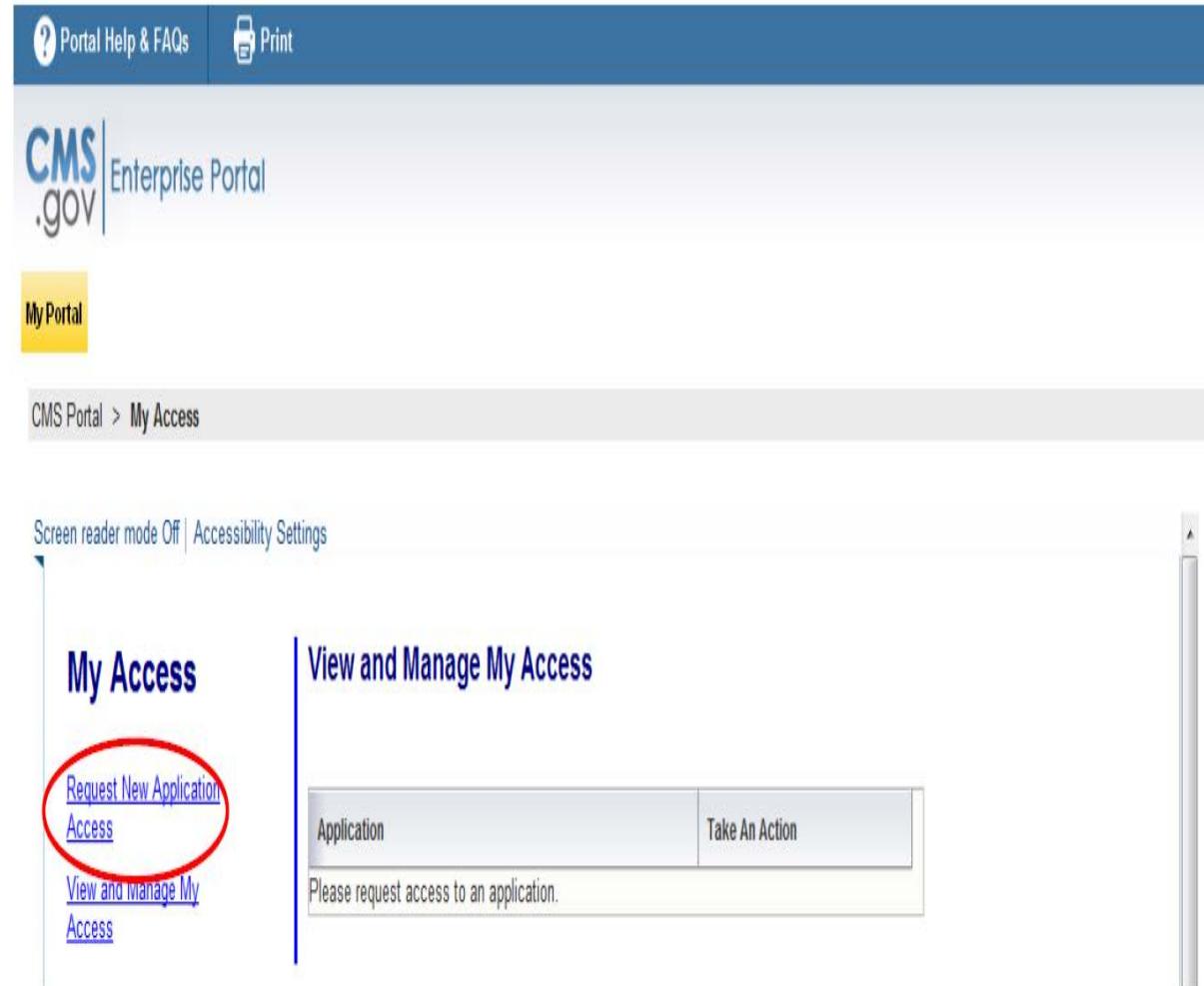
Physician Value / PQRS Help Desk - Contact the PV/PQRS Information Center at 1-800-734-0433.

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”

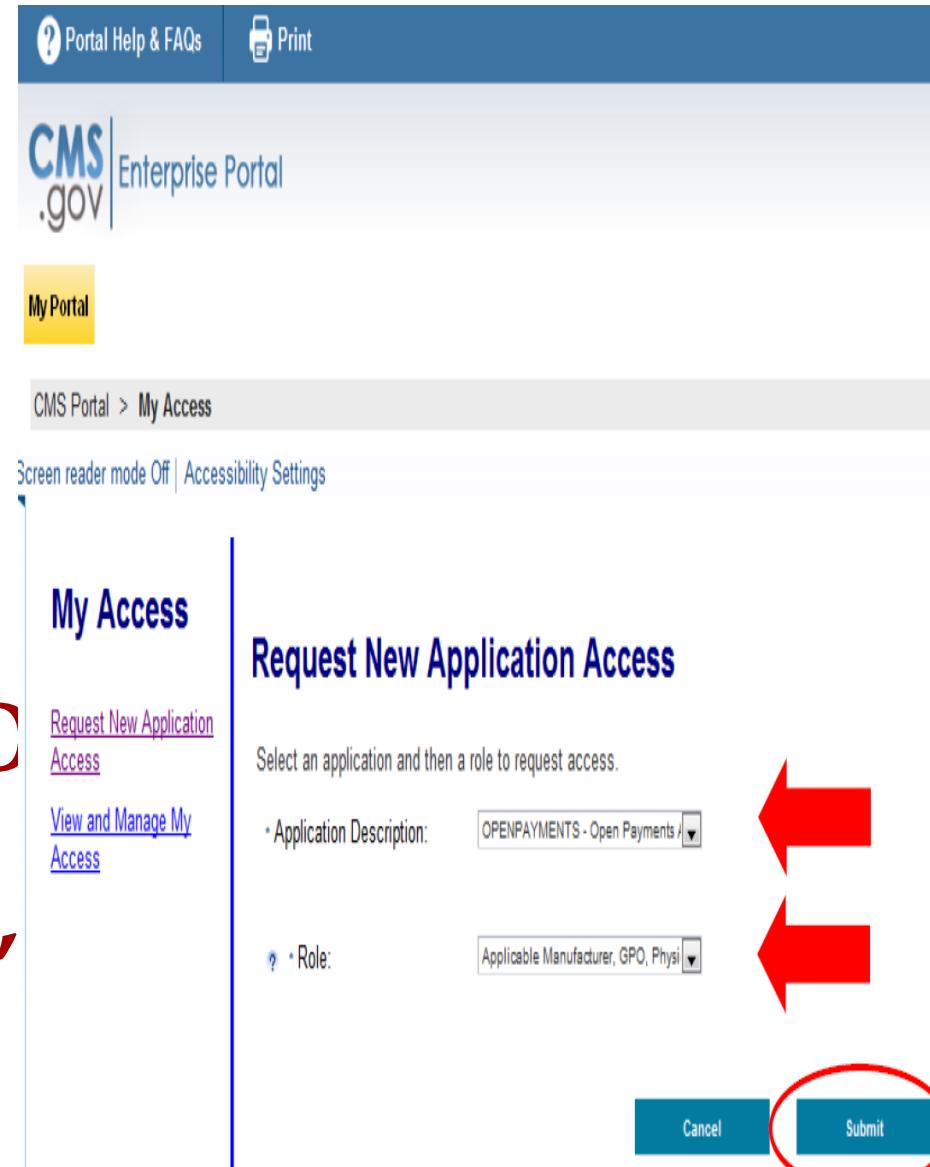


The screenshot shows the CMS Enterprise Portal interface. At the top, there are links for 'Portal Help & FAQs' and 'Print'. The CMS logo and 'Enterprise Portal' text are displayed. A yellow box highlights the 'My Portal' link. Below the header, the breadcrumb navigation shows 'CMS Portal > My Access'. A link to 'Screen reader mode Off | Accessibility Settings' is also present. The main content area is divided into two sections: 'My Access' on the left and 'View and Manage My Access' on the right. The 'My Access' section contains three links: 'Request New Application Access' (which is circled in red), 'View and manage My Access', and 'View and manage My Applications'. The 'View and Manage My Access' section contains a table with columns for 'Application' and 'Take An Action', and a message: '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, GPO, Physi

Cancel Submit

# Review Identity Verification Terms

Click  
Next

The screenshot shows a web page from the CMS Enterprise Portal. At the top, there are links for 'Portal Help & FAQs' and 'Print'. The CMS logo is on the left, and 'Enterprise Portal' is on the right. Below the CMS logo is a yellow button labeled 'My Portal'. The page title is 'CMS Portal > My Access'. Under the title, there are links for 'Screen reader mode Off' and 'Accessibility Settings'. The main content is divided into two sections: 'My Access' on the left and 'Identity Verification' on the right. The 'My Access' section contains links for 'Request New Application Access' and 'View and Manage My Access'. The 'Identity Verification' section contains a message about selecting a role requiring higher security and a list of instructions. At the bottom, there is a message about proceeding with a Terms and Conditions statement, and two buttons: 'Cancel' and 'Next', with 'Next' being circled in red.

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](#)

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.

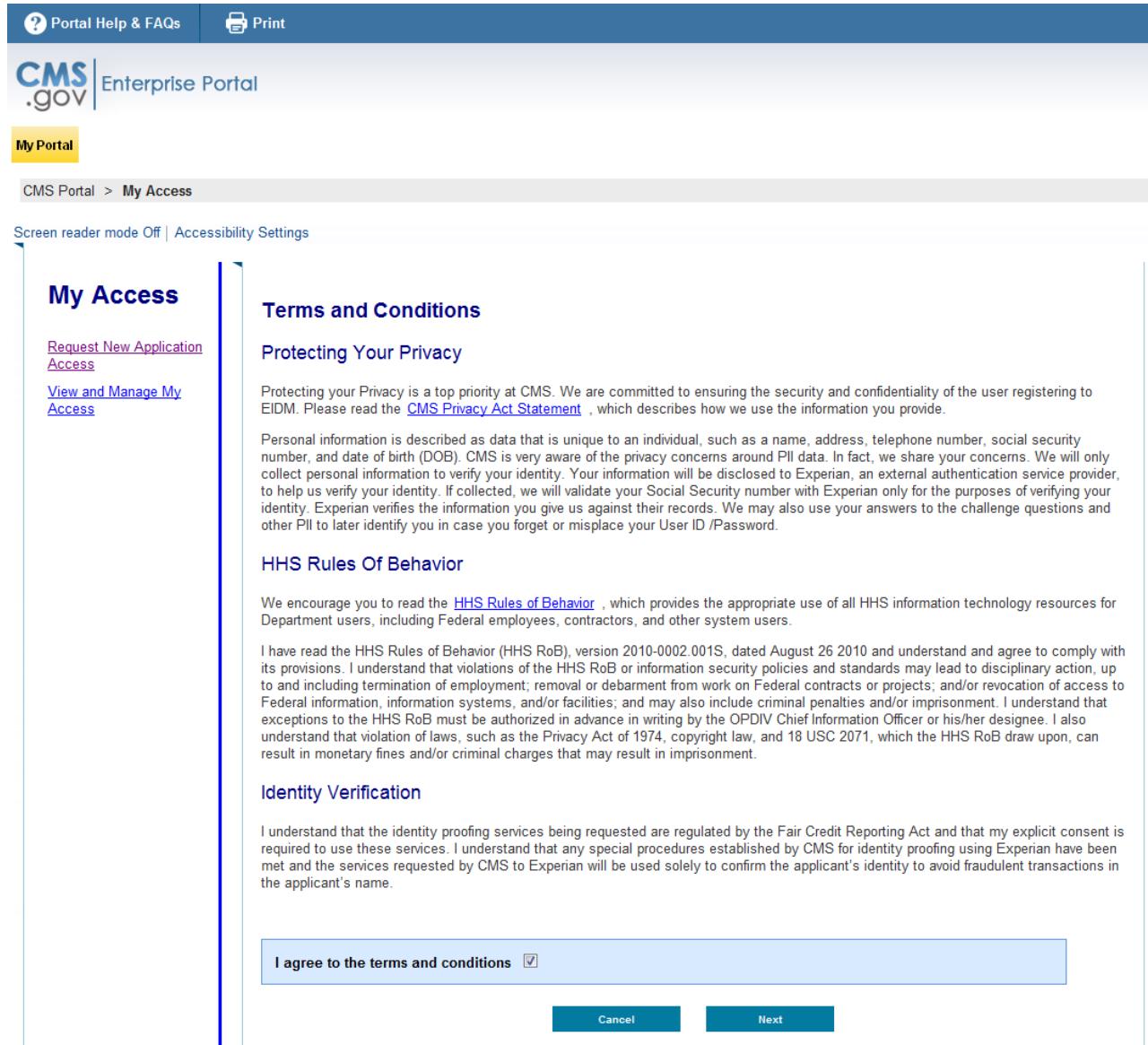
- Ensure that you have entered your legal name, current home address, primary phone number and email address correctly. We will only collect personal information to verify your identity with Experian, an external identity verification provider.
- Identity Verification involves Experian using information 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



Portal Help & FAQs Print

CMS 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](#)

**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

# Confirm Your Information and Edit (if necessary)

Portal Help & FAQs  Print

**CMS**.gov Enterprise Portal

CMS Portal > My Access

Screen reader mode Off | Accessibility Settings

**My Access**

[Request New Application Access](#)  
[View and Manage My Access](#)

**Your Information**

Your Information Verify Your Identity

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:

# Verify Identity

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

# Verifying Identity Successful

Click  
Next

The screenshot shows the CMS Enterprise Portal interface. At the top, there are links for 'Portal Help & FAQs' and 'Print'. The CMS logo and 'Enterprise Portal' text are displayed. A yellow 'My Portal' button is visible. The navigation bar shows 'CMS Portal > My Access'. Below this, there are links for 'Screen reader mode Off' and 'Accessibility Settings'. The main content area is divided into two sections. The left section, titled 'My Access', contains links for 'Request New Application Access' and 'View and Manage My Access'. The right section, titled 'Complete Step Up', displays the message 'You have successfully completed the Remote Identity Proofing process.' and a 'Next' button.

Portal Help & FAQs

Print

CMS 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](#)

Complete Step Up

You have successfully completed the Remote Identity Proofing process.

Next



My Portal

CMS Portal > My Access

[Screen reader mode Off](#) | [Accessibility Settings](#)

## My Access

[Request New Application  
Access](#)

[View and Manage My  
Access](#)

## Request Acknowledgement

Your request has successfully completed. You will need to logout and then log in to access the OPENPAYMENTS Application. Select 'OK' to continue.

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

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- ✓ 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

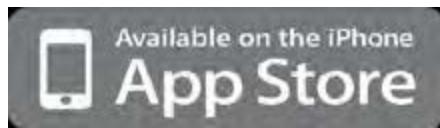


- Two **FREE** mobile applications to aid physicians and industry in tracking data collected for Open Payments
  - Open Payments Mobile for Physicians
  - Open Payments Mobile for Industry
- Applications are available for Apple (iOS) and Android
- Benefits include:
  - Provides a tool to track payments 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...

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**Tammy Capretta, RN, MPH**

Chief Integration and Risk Officer

(323) 442-9761

**Ajay Vyas, Esq.**

Deputy Healthcare Compliance Officer

(323) 442-8588