

THE THREE “RS” OF THE OPEN PAYMENTS LAW: REGISTER, REVIEW, AND RESPOND

It is important for UAB faculty’s external activities with industry to reflect positively on our institution and its mission. These relationships can advance clinical treatments and fuel progress when they are undertaken in a healthy, responsible manner.

The Federal Open Payments Law requires pharmaceutical and medical device/supply companies to report to the Centers for Medicare & Medicaid Services (CMS) payments and/or other transfers of value over \$10 made to physicians. CMS must then publish the data to a public website, beginning September 30, 2014. For more information, see [Quick Facts Sheet](#).

The purpose of the Open Payments Law is to increase public awareness about financial relationships between healthcare providers and drug and device manufacturers. It is important that UAB Medicine physicians adhere to the UAB Enterprise Conflict of Interest and Conflict of Commitment Policy and review the accuracy of the information published about them by CMS.

UAB PROVIDER INSTRUCTIONS – IMMEDIATE ATTENTION REQUIRED!

All UAB Medicine physicians legally authorized by the State of Alabama to practice medicine are strongly encouraged to follow these steps:

1. Complete CMS’s two-phased registration process. See [Open Payments: Phase 1 Step-by-Step CMS Enterprise Portal Registration for Physicians and Teaching Hospitals – June 2014](#).
 - Phase 1: **Register in the CMS’s Enterprise Identity Management (EIDM) System (<https://portal.cms.gov>)** and use your CMS EIDM System registration information to request access to the Open Payments database through the CMS Enterprise Portal. Please note that the system validates your identity by matching confidential information located in your credit file.
 - Phase 2: **Register in the Open Payments system.** See [Open Payments System Quick Reference Guide – Physician Registration](#). During registration, there will be an opportunity for you to identify an “authorized representative” who will have access to view the data reported about you in advance of publication to the CMS public website. One recommendation is for a physician to designate the Executive Administrator for his/her Department as an “authorized representative.”
2. Examine the data reported about you for accuracy.
3. If the data reported about you are not accurate, follow instructions provided by CMS to dispute them with the manufacturers. See [Open Payments System Quick Reference Guide – Physician and Teaching Hospital Record Review and Dispute Functions](#). Disputes made within the first 45 days of the review period (i.e., on or before August 27, 2014) will be either resolved or indicated as disputed when the information is published on the public website.

4. Ensure all External Activity Request Forms and Disclosures of Financial Interest you are required to complete under the [UAB Enterprise Conflict of Interest and Conflict of Commitment Policy](#) are submitted by August 27. If you are required to complete and submit forms:

- Check your UAB Forms dashboard to recall the forms you have on file by going to www.uab.edu/uabforms and reviewing the forms located on the “History” tab.
- If a new form is needed, click on the UAB Electronic Forms tab and the External Activity Request/Financial Interest Disclosure form link on the left to complete and submit the appropriate form.
- If modification of an existing form is needed for any material differences in activity end dates or amounts received, click on that form, and indicate you wish to modify the form and re-submit. A material difference in amounts is one where actual amounts received falls into a different range than the amounts estimated in the original form (see ranges below).

Ranges for form modifications:

- \$0-\$4,999
- \$5,000-\$9,999
- \$10,000-\$19,999
- \$20,000-\$29,999
- \$30,000-\$39,999, etc. to \$99,999
- \$100,000-\$149,999
- \$150,000-\$199,999
- \$200,000-\$249,999, etc.

- If you are UAB researcher, check your financial interests’ case in [IRAP](#) to verify that all your current personal financial interests are reflected there. If you have questions, contact the [CIRB Office](#).

FOLLOW-UP

Your immediate attention to this matter is requested and greatly appreciated. By following the steps outlined above, you are afforded the opportunity to know and to help ensure that both the information made public by CMS and our External Activity database are accurate.

If you have questions, please direct them as follows:

- Open Payments Law – Please contact your UAHSF Compliance Office (205-731-9863).
- External activity request form submission – Please contact your Department’s Executive Administrator.
- Financial interests related to research – Please contact the CIRB (205-975-9691).