Frequently Asked Questions about CMS.gov's Open Payments Database

1. **Do I have to do this?**
   No, but if you don’t, you have less ability to dispute incorrect data. It is also likely that publications such as ProPublica will be scanning the data and writing articles on physicians who have substantial payments attributed to them. Because Stanford has publicly available policies about acceptance of such payments and because we are a high visibility research-oriented institution, it is certainly possible that our faculty would be the subject of such articles.

2. **Is the process difficult?**
   CMS has information on its web site on how to establish identity and how to register but it takes multiple steps. Please download and review the Physician training slides in the links section at the bottom: https://doresearch.stanford.edu/research-scholarship/conflicts-interest/coi-training-and-other-information#cms’s-open-payments-database-(sunshine-act)

3. **Can I have someone handle this for me?**
   Yes, but only after you, the physician, has registered, can you appoint one delegate to monitor your records. You have to “affirm or dispute” each record, your delegate will have “read-only” access.

4. **Are only payments made to me personally reported?**
   No, transfers of value may be meals or travel, and research payments may have only been made to the University but could be attributed to the PI as an indirect payment. Moreover, payments may be mis-reported (e.g. sponsored research or travel support reported under consulting income) or the same payment could be reported more than once.

5. **What is the process for dispute resolution?**
   CMS has made clear that dispute resolution will be between the manufacturer and the physician. CMS will not intervene. How each company will approach this may vary.

6. **What happens if the manufacturer and I don’t agree at the end of the period?**
   You can continue to attempt to resolve it, but the data will be published as submitted by the manufacturer with a notation that shows it was disputed. If it is resolved after the publication date, there is a one-time update at the end of this calendar year which will show the correction at that time and going forward.

7. **Where do I go to register and verify my identity?**
   Go to: http://portal.cms.gov to register, establish your profile, and review your data. In addition, you will find more detailed information, FAQs, and the Helpline number. Stanford resources include the Conflict of Interest website (https://doresearch.stanford.edu/research-scholarship/conflicts-interest/coi-training-and-other-information) and Spectrum (http://spectrum.stanford.edu). The AAMC, AMA, and other organizations also have information posted.

8. **When do I need to complete this by?**
   Physicians have until May 15th each year to review their data for the previous calendar year and can dispute anything inaccurate before the deadline. The data is made public on June 30th each year.

9. **What happens when I dispute a record and it is not resolved by industry?**
   Physicians have a 45-day period to review and initiate any disputes they may have, and Industry has a 15-day period to resolve and submit corrections. Disputed data which is not resolved will be published on the public website on June 30th each year, but it will be marked as disputed. If it is resolved after the publication date, there is a one-time update at the end of this calendar year which will show the correction at that time and going forward.