

Contact Attorneys Regarding
This Matter:

H. Carol Saul
404.873.8694 - direct
carol.saul@agg.com

Jennifer D. Bugar
404.873.8194 - direct
jennifer.bugar@agg.com

Lanchi N. Bombalier
404.873.8520 - direct
lanchi.bombalier@agg.com

Arnall Golden Gregory LLP
Attorneys at Law

171 17th Street NW
Suite 2100
Atlanta, GA 30363-1031

Two South Biscayne Boulevard
One Biscayne Tower 2690
Miami, FL 33131

1775 Pennsylvania Avenue NW
Suite 1000
Washington DC 20006

www.agg.com

Sunshine Series – Installment Three – CMS Publishes FAQs regarding Registration for the National Physician Payment Transparency Program

As noted in **Installment Two** of our Sunshine Series on April 22, 2013, CMS recently published a number of FAQ responses as part of the agency's educational outreach on the National Physician Payment Transparency Program, commonly known as the Sunshine Law. Two of the FAQs address the CMS registration process for applicable manufacturers, group purchasing organizations ("GPOs"), covered recipients (i.e., physicians and teaching hospitals), and physician owners and investors.

In one FAQ, CMS confirms that, in order to submit data to CMS, applicable manufacturers and GPOs will be required to register with CMS. The FAQ notes that the data required upon registration will include the name of the primary and secondary points of contact for the applicable manufacturer/GPO and the name of the individual attesting to the accuracy of the data being submitted. CMS also states that additional guidance regarding the registration process will be provided in the near future.

In light of the FAQ, companies should determine who will serve as CMS' points of contact and who will be charged with certifying for accuracy. The FAQ can be found by clicking [here](#).

In another FAQ, CMS reiterates its strong recommendation that all parties interested in the annual reports, including covered recipients and physician owners and investors, register with the agency. As required by statute, covered recipients and physician owners and investors will be given an opportunity to review and request the correction of any data submitted by applicable manufacturers and GPOs for a period of at least 45 days prior to the data being published on the CMS website.

CMS notes that only the parties that register with the agency will receive individual notification of the annual review and correction period and thus will likely be the only parties that will have the full 45 day period available to review. Otherwise, public notification will be available about the review and correction period through a general online posting on the **CMS** website

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and CMS' email list serves; if a person does not register and elects instead to monitor those sources, review time may be lost. The FAQ can be found by clicking [here](#).

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