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Sunshine Series – Installment Four – CMS Publishes Teaching Hospital List for the National Physician Payment Transparency Program

Under the federal Sunshine Law, applicable manufacturers must report certain transfers of value made to physicians and “teaching hospitals.” In the final rule, CMS defined the term “teaching hospital” to refer to any institution receiving (directly or indirectly) Medicare graduate medical education funds during the most recent year for which information is available, and also confirmed that CMS would publish a list of teaching hospitals in May of 2013.

On May 2, 2013, CMS published the much-awaited list of teaching hospitals. The list, which spans 21 pages total, can be used by applicable manufacturers when collecting data and reporting payments or other transfers of value pursuant to the Sunshine Law. This list provides the legal business name, tax identification number, and physical address of all teaching hospitals considered to be “covered recipients” under the Sunshine Law by CMS. Unless otherwise directed by CMS, applicable manufacturers may rely on the list for the entirety of the 2013 data collection year.

In light of the upcoming August 1, 2013 collection kick-off, applicable manufacturers should review the CMS list to begin identifying proactively those teaching hospitals with which the manufacturer has reportable financial relationships. To ensure that data collection efforts go smoothly, companies should also consider obtaining the institutional contact information for such entities, as needed. The CMS list of teaching hospitals can be found by clicking [here](#).

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