Open Payments, also known as The Sunshine Act, is a national disclosure program that promotes a more transparent and accountable health care system by making the financial relationships between applicable manufacturers and group purchasing organizations (GPOs) and health care providers (physicians and teaching hospitals) available to the public.

Covered Recipients

Covered recipients are any physicians (excluding residents) who are not employees of the applicable manufacturer that is reporting the payment. For the purposes of Open Payments, a “physician” is any of the following types of professionals that are legally authorized by the state to practice:

- Doctors of Medicine or Osteopathic Medicine
- Doctors of Dental Medicine or Dental Surgery
- Doctors of Podiatric Medicine
- Doctors of Optometry
- Chiropractor

Please Note: This list is expected to be expanded to include physician assistants, nurse practitioners, clinical nurse specialists, certified nurse anesthetists, and certified nurse-midwives, as these providers have prescriptive authority under most states' laws. Manufacturers will be required to start reporting any payments for these new categories of covered recipients after January 1st, 2021 and those payments will be listed on the 2022 Open Payment report.

Important Dates

The Review and dispute period for physicians and teaching hospitals is April 1-May 15, 2020. In order to complete the review and dispute process, covered recipients must register in the Open Payments system.

Covered Recipients have until December 31, 2020 to initiate disputes of data published in 2020. If a new dispute is initiated after the 45-day review and dispute window (April 1-May 15), it will be published as original attested-to data in the initial data publication.

Please Note: CMS noted they have received inquiries about the impact of COVID-19 on the review and dispute period and June 2020 publication deadline. Unfortunately, CMS will be functioning on the current timeline and cannot extend the review and dispute time frame or postpone the publication deadline due to statutory limitations.
Registration is a two step process and both steps must be completed to perform any Open Payments system-related functions such as the pre-publication review and dispute of the data before publication on or by June 30, 2020 (register here).

1. Register in the Enterprise Identity Management System.
   This step confirms your identity and makes sure others can’t get your information.

2. Register in the Open Payments system in the CMS Portal.
   This step lets you see the data reported about you.

If you have previously registered in the Open Payments system, you do not need to re-register. However, if the account has not been accessed within 60 days or more, the account will be locked (to unlock, visit the CMS Enterprise Portal).

If the account has not been accessed in 180 days or more, the account will be deactivated. To reinstate the account, call the Open Payments Help Desk (1-855-326-8366, M-F, 8:30 a.m. to 7:30 p.m. (ET), excluding holidays).