Weill Cornell Medicine
Office of Conflict of Interest

OPEN PAYMENTS REVIEW & DISCLOSURE FAQ

Q 1. What is Open Payments?

The Open Payments Program is a federal transparency initiative requiring manufacturers of drugs, biologicals, medical devices, and medical supplies to report payments and transfers of value made to physicians, teaching hospitals, and certain non-physician practitioners.

Q 2. Who is considered a Covered Recipient?

"**Physicians**" include persons who are legally authorized to practice Medicine, Osteopathy, Dentistry, Dental Surgery, Podiatry, Optometry, and Chiropractic Medicine (note that medical residents are specifically excluded from this definition). "**Non-Physician Practitioner Covered Recipients**" include physician assistants, nurse practitioners, clinical nurse specialists, certified registered nurse anesthetists, anesthesiologist assistants and certified nurse midwives.

Q 3. What should WCM Covered Recipients know?

- "Payments" is defined very liberally, e.g. meals or other items of value greater than $10 will be reported. Please see the Natures of Payment page for more information.
- The reporting of payments is being done by industry, not by WCM. Reporting entities are applicable manufacturers or applicable Group Purchasing Organizations.
- WCM does not have access to the information industry is reporting about you and cannot review this information for you.
- The information will be published in a public database available to all, including the press, patients, and others.
- It is very important that what is reported about you is accurate and consistent with what you have reported on your WCM Conflicts Survey.

Q 4. What actions should WCM Covered Recipients take?

1. If you have not already registered through the CMS portal: Register through the CMS Identity Management System. Note that you may already have an EIDM account if you use the Health Insurance Oversight System (HIOS), the Medicaid and CHIP Program System (MACPro), or other CMS systems.
2. Once you have created an account, you will need to request access to the Open Payments system, which will allow you to create an Open Payments profile and review your reported data. Review additional registration instructions here.
3. Ensure that your Conflicts Survey is up to date (refer to **Question 5** for instructions on accessing and updating your Conflicts Survey).

Q 5. How do I access and update my Conflicts Survey?

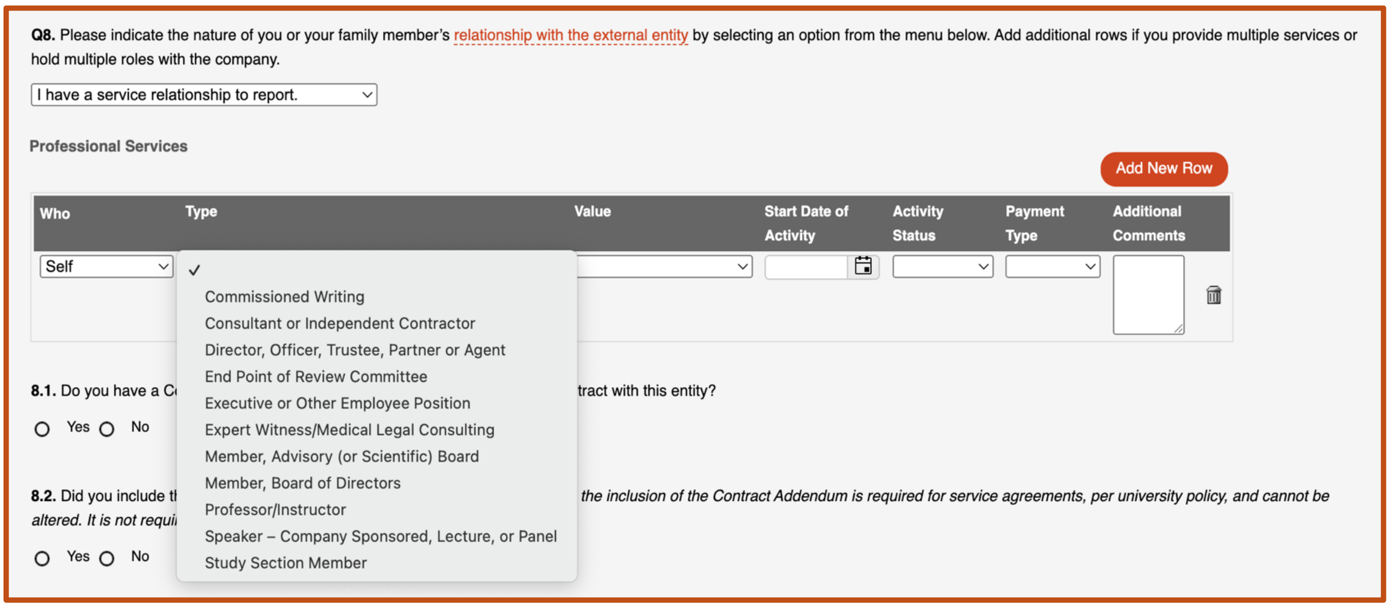
1. Log on to the **Weill Research Gateway** (WRG).
2. Select your institution from the list provided.
3. Enter your **CWID and Password.**
4. Navigate to the left-hand side of your screen to the **Conflict of Interest** tab.
5. Select the **Access Conflicts Survey** button.
6. From the next screen, click on create/edit your current Conflicts Survey.
7. Complete the form by answering all relevant questions. Be sure the Primary Questions and any supplemental financial interest questions related to disclosed entities have been answered accordingly.
8. Click the checkbox at the bottom of the page to the left of **"I certify..."** to attest to your disclosures.
9. After the page refreshes, click the **Submit** button at the very bottom of the page.
10. Once successfully submitted, you should receive a confirmation email. If you do not receive confirmation or you encounter technical issues (i.e., trouble logging in, problems within the survey, or error messages) please contact wrg-support@med.cornell.edu.

Q 6. How do I add a new entity into WRG?

If the entity you need to report is not found in the dropdown list, you must submit a request to add the entity via the [WRG Add Entity Request Form](#).

Q 7. How do I properly report an external activity for a professional service on my Conflicts Survey?

To report payments received for consulting, speaking, advising, or otherwise, you must select "**I have a service relationship to report**" to **Question 8** on your Conflicts Survey (referenced below). Another set of questions will appear for you to properly categorize the activity. You can **"Add New Row"** for each **type** of professional service (e.g., serving as a consultant and an advisory board member for a single entity.)



Note: If you have a written agreement with the company and the relationship is ongoing, you will need to incorporate [WCM's non-negotiable contract addendum](#). It is strongly encouraged that you upload the signed addendum to WRG along with your updated survey. Otherwise, you may certify that the addendum has been included under Question 8.1.1.

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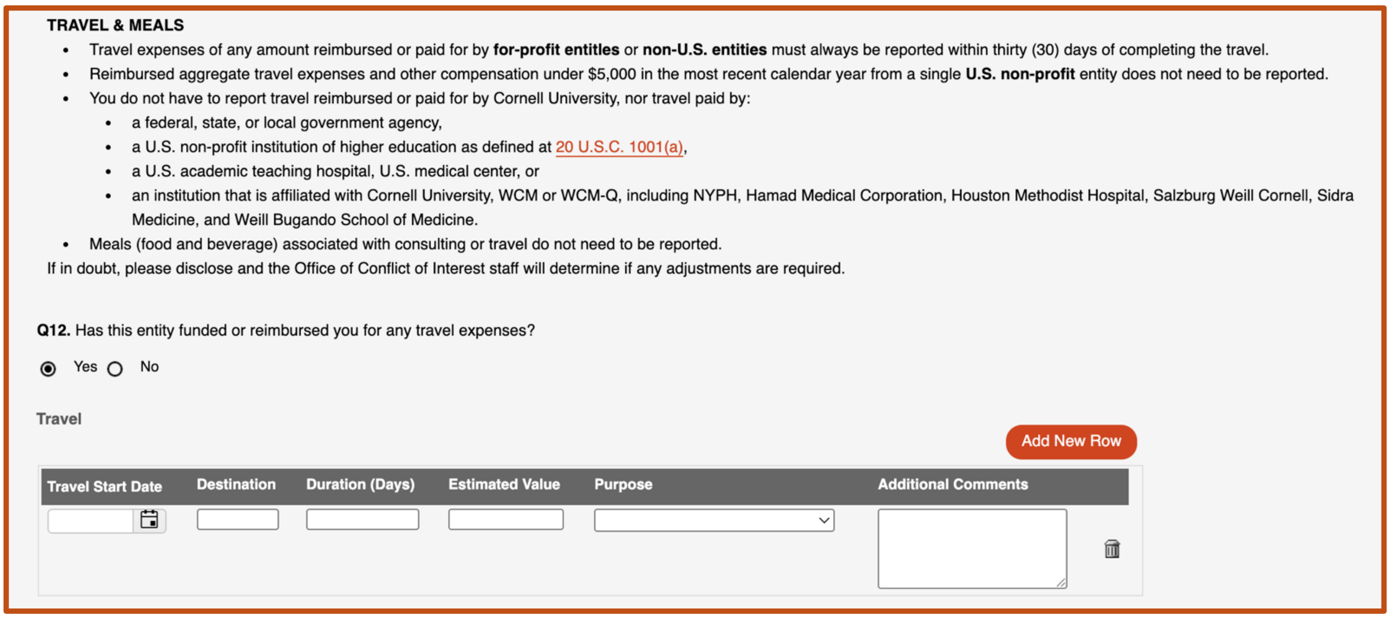
Q 8. How do I report travel paid for or reimbursed by an External Entity?

Travel disclosures are captured under **Question 12** (referenced below) and should be reported within 30 days of completing the trip. If you have multiple travel expenses to report, click "**Add New Row.**"

- Travel expenses of any amount reimbursed by **for-profit entities**, domestic or international, must be reported.
- Reimbursed aggregate travel expenses and other compensation under $5,000 in the most recent calendar year from a single **U.S. non-profit** entity do not need to be reported. Travel of any amount by a **non-U.S. non-profit** should be reported.


TRAVEL & MEALS

- Travel expenses of any amount reimbursed or paid for by **for-profit entitles** or **non-U.S. entities** must always be reported within thirty (30) days of completing the travel.
- Reimbursed aggregate travel expenses and other compensation under $5,000 in the most recent calendar year from a single **U.S. non-profit** entity does not need to be reported.
- You do not have to report travel reimbursed or paid for by Cornell University, nor travel paid by:
  - a federal, state, or local government agency,
  - a U.S. non-profit institution of higher education as defined at 20 U.S.C. 1001(a),
  - a U.S. academic teaching hospital, U.S. medical center, or
  - an institution that is affiliated with Cornell University, WCM or WCM-Q, including NYPH, Hamad Medical Corporation, Houston Methodist Hospital, Salzburg Weill Cornell, Sidra Medicine, and Weill Bugando School of Medicine.
- Meals (food and beverage) associated with consulting or travel do not need to be reported.

If in doubt, please disclose and the Office of Conflict of Interest staff will determine if any adjustments are required.

Q12. Has this entity funded or reimbursed you for any travel expenses?

Yes No

Travel

Add New Row

Travel Start Date	Destination	Duration (Days)	Estimated Value	Purpose	Additional Comments

Q 9. How do I report food and beverage?

Industry sponsored meals are not permitted on WCM premises or at non-WCM events. Accepting such meals in an academic setting raises ethical concerns surrounding conflicts of interest. WCM Workforce Members are prohibited from accepting gifts, of any variety or value, from external entities whose interests may represent an actual or perceived conflict of interest to the individual or institution.

Reasonable meals associated with travel are permissible with consulting relationships and training activities. This can be reported with your travel disclosure under Question 12 (see above).

Q 10. How do I dispute a payment with CMS?

To initiate a dispute, you must be registered in the CMS Identity Management System (IDM) and gain access to the Open Payments System to participate in the review and dispute process.

You may review and dispute newly submitted data within the Open Payments System, during the calendar year in which it was submitted, beginning with the pre-publication review and dispute period through December 31.

Q 11. Where can I learn more about CMS Open Payments reporting?

For more information, refer to the Open Payments Covered Recipient Review, Dispute and Correction guidance document and additional resources for Covered Recipients.

Need Additional Assistance?

Open Payments Disputes	Conflict of Interest Questions	WRG Technical Issues
Email: openpayments@cms.hhs.gov	Email: conflicts@med.cornell.edu	Email: wrg-support@med.cornell.ed
Phone: 1-855-326-8366		