

CMS Open Payments Registry Review Checklist

General	Yes	No
Does the organization have a Conflict of Interest (COI) policy and procedure? Is there a code of conduct which outlines permitted/not permitted activities?		
Is the COI policy applicable to all employees and physicians, including medical staff? Does the COI policy address relationships with vendors, including consulting arrangements, honorarium, travel, meals, and entertainment?		
Does the organization have a procedure for reviewing the CMS Open Payments Registry and does it include the following? <ul style="list-style-type: none"> - Frequency of review (upon hire, upon contract initiation, upon credentialing, etc.) - Dollar threshold for review (e.g., \$5,000, \$10,000, etc.) - Research and resolution of any reportable events - Analysis of potential conflicts, such as serving in a decision-making capacity related to the drug or device manufacturer - Monitoring of OIG/DOJ enforcement activities related to drug or device manufacturers and relationships with current employees/contractors/medical staff - Reporting of analysis to management and governance 		
Is there a person/department responsible for auditing COIs?		
Is there a vendor relationship policy for physician practices, and has this policy been communicated to such vendors?		

CMS Open Payments Registry	Yes	No
Have the COI forms been reviewed and compared to the CMS Open Payments Registry?		
Are there reportable events under the policy?		
Are any physicians in a decision-making capacity, whereby they may influence purchasing decisions for pharmaceuticals or medical devices? This includes medical directors, product selection committee, drug formulary committee, etc.		
Is there a person/department responsible for auditing COIs?		
Is the proportion of time spent speaking, traveling, etc., appropriate?		
Full-time employees?		
Part-time employees?		
Are these activities provided for in existing employment agreements?		
Should any of the consulting fees/honoraria have been paid to the health system?		
Is there a written contractual agreement between the physician and the vendor?		
Is this agreement kept on file?		
Are the fees reasonable?		
Has an inventory of physician relationships with vendors (per the Open Payments Registry) been compared with the vendor listing to determine if any physicians, either on medical staff or employed, have existing arrangements with vendors utilized by the health system?		

Speaker Programs	Yes	No
Is the information available through other means that do not involve remuneration (e.g. various online resources, medical journals)?		
Is the event held in a location that is not conducive to learning (e.g. entertainment or sports venue)?		
Has there been little to no new developments related to the pharmaceutical or medical device?		
Is the provider a repeat speaker program attendee for the same product or device?		
How was the provider selected to attend the speaker program (e.g. high prescriber, ordering physician for device)?		
Has the organization assessed whether the remuneration is above Fair Market Value?		
Is the information relevant to the selected audience?		

