

Report on Medicare Compliance Volume 30, Number 14. April 12, 2021 CMS Open Payment Registry Review Checklist

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Here's a checklist to help health care organizations identify conflicts of interest with data provided by CMS's open payments program and the warnings from the HHS Office of Inspector General's special fraud alert on speaker programs.^[1] It was developed by the consulting firm PYA. Shannon Sumner, PYA's chief compliance officer, said PYA has encountered some best practice controls in its audits of open payments for health systems:

1. "The Open Payment analysis is done in conjunction with the annual conflict of interest disclosure process to confirm completeness and existence of physician disclosures;
2. "Using the Open Payment disclosures results in a more proactive approach to collecting and assessing physician conflict disclosures. Rather than chasing the COI disclosures, the organization will send the physician a list of disclosures noted on the Open Payment registry and ask the physician to explain the relationships; and
3. "Several facilities are comparing the organization's purchases from the vendors who have significant relationships with physicians to purchase history."

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