The Physician Payment Sunshine Act, under the Affordable Healthcare Act, places obligations for public disclosure of payments and financial interests made to physicians by manufacturers of drugs, devices, biologicals, and medical supplies as well as group purchasing organizations (GPOs). The information will be collected by and made publicly available by the Centers for Medicare and Medicaid Services (CMS).

1. **What is required by the University in regards to the Physician Payment Sunshine Act?**

   As a paid academic staff member, your University obligation is to report and seek approval for non-University financial or fiduciary interests using the Report of Non-University Activities (RNUA) form. The RNUA form must be updated at least annually. In addition, your RNUA should be updated prior to engaging in any non-University activities if the activities are not covered under your approved RNUA form for the current academic year. Please update your RNUA form as needed during the year.

   You must also annually disclose your significant financial interests if you are an investigator or key research personnel on an award or pending proposal for the Health and Human Services (HHS), Public Health Services (PHS), the National Institutes for Health (NIH) as well as non-federal agencies (see list of agencies) that have adopted the PHS regulations for financial conflicts of interest. The University is obligated to comply with the Department of Health and Human Services 42 CFR Part 50 and 45 CRF Part 94: Responsibility of Applicants for Promoting Objectivity in Research for which Public Health Services Funding is Sought and Responsible Prospective Contractors (August 2011). The disclosure of significant financial interests (SFI) is captured through the Significant Financial Interest-Disclosure and Management Plan: Part I (SFI-DMP: Part I) form. Your SFI disclosure must be updated within 30 days of discovering or acquiring any changes in your significant financial interests. Please see the guidelines and FAQs for additional information about this process.

   The University is not placing additional obligations on you to comply with the Physician Payments Sunshine Act, however, if you are a physician there is information about the Act that you should be aware of and you are encouraged to cooperate with CMS, manufacturers, and GPOs to ensure accurate reporting of your financial interests and payments that will be publically disclosed on the CMS website.

2. **Can inaccurate information reported to CMS be disputed and corrected?**

   Yes. The University encourages you to review and work with the applicable manufacturer and applicable GPO to correct information submitted by the applicable manufacturer and applicable GPO before CMS makes it public.

3. **Does the Sunshine Act apply to faculty start-up companies?**
In order to avoid giving inaccurate information or advice to a faculty start-up company, the University cannot provide legal advice to faculty start-up companies on the requirements under the Sunshine Act. The Act imposes significant civil monetary penalties on applicable manufacturers and GPOs for failures to report. You are encouraged to seek independent legal advice if your company is engaged in production, preparation, etc. of a drug or a medical or biological device or supply.

4. Where can I find more information about the Physician Payment Sunshine Act?
