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0836

Subject:*Open Payments Data / Outside Professional Activities (System-wide)
Report No. 2021-15*

The final report for Open Payments Data / Outside Professional Activities (System-wide), Report No. 2021-15, is attached. We would like to thank all members of the Office of Compliance and Privacy for their cooperation and assistance during the review.

Because we were able to reach agreement regarding management action plans in response to the audit recommendations, a formal response to the report is not requested. The findings included in this report will be added to our follow-up system. We will contact you at the appropriate time to evaluate the status of the management action plans.

UC wide policy requires that all draft reports be destroyed after the final report is issued. We also request that draft reports not be photocopied or otherwise redistributed.

Christa Perkins
Director
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Attachment

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UC San Diego

AUDIT & MANAGEMENT ADVISORY SERVICES

Open Payments Data / Outside Professional Activities (System-wide)
Report No. 2021-15
September 2021

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I. EXECUTIVE SUMMARY

Audit & Management Advisory Services (AMAS) has completed a review of Open Payments Data / Outside Professional Activities as part of a systemwide review included on the approved audit plan for fiscal year (FY) 2020-21. The objective of our review was to assess controls related to management processes for evaluation of faculty conflict of commitment disclosures with respect to information reported through Centers for Medicare & Medicaid Services (CMS) Open Payments (CMS Open Payments) and other public sources. Although this was a systemwide review, each University of California (UC) campus may have differing procedures for addressing this topic. Therefore, each campus was requested by the UC Office of the President (UCOP) to conduct a review to evaluate local practices.

We concluded the controls related to management processes for evaluation of faculty conflict of commitment disclosures with respect to information reported through CMS Open Payments and other public sources could be improved to provide reasonable assurance that outside activities are being reported in accordance with UC policies and procedures and any noted discrepancies are fully resolved. The UCSF Health Sciences Office of Compliance and Privacy (OCP) completed the initial review and discovered many challenges with comparing UC disclosures to CMS Open Payments data, including getting the complete and accurate internal list of faculty physician data and comparing that information to CMS Open Payments, given the many inherent discrepancies between the two data sets. OCP worked diligently to complete the comparative review, while realizing the process was not efficient, and future cycles may not be repeated in the same manner. OCP will be re-evaluating this process for the next cycle to improve efficiency and effectiveness of the comparative analysis.

We noted an opportunity for improvement in retaining documentation and conducting follow-up when discrepancies were discovered. There were instances where documentation was incomplete as to the explanation of the final resolution of the original variance identified by OCP, or adjustments made to University of California (UC) Outside Activity Tracking System (UC OATS) disclosures resulted in income earned over the threshold allowed by policy which have not been fully resolved by the faculty and department.

OCP indicated that the focus of its review was intended to evaluate CMS Open Payments data from a healthcare compliance perspective to evaluate risk of fraud, waste, and abuse, and was not intended to evaluate compliance with Academic Personnel Manual (APM) 671. Compliance with APM 671 is the responsibility of the academic departments to manage. However the discovery of the reporting discrepancies through the OCP review, and apparent APM 671 violations, would appear to warrant additional follow up with Health Sciences executive leadership.

We also noted a lack of overall understanding of the CMS Open Payments process by both faculty physicians and some Health Sciences department personnel, including the corresponding timeline and what information the physicians should be reviewing. Management Actions Plans to address our findings are summarized below:

A. Unresolved Physician Faculty UC OATS and CMS Adjustments

1. OCP will continue to work with management and Information Technology Services to evaluate potential options for integration of CMS Open Payments data to facilitate improved conflict of interest and commitment reporting by faculty.
2. OCP will follow up with Department Management or other appropriate parties to confirm the resolution for the 10 open / unresolved individual discrepancies from the OCP review; including but not limited to unreported compensation and the remittance of any amounts due to the Health Sciences Compensation Plan (HSCP).

B. Communication and Education

OCP management has provided education in the FY 21 annual compliance training, “UCSDH 2021 Annual Compliance, Fraud, Waste, & Abuse Training (HIPAA)”, and will continue to develop an ongoing training and communication plan for faculty and departments personnel on the CMS Open Payments data, as it relates to requirements of outside activity reporting and UC policy. OCP has partnered with Health Sciences Academic Affairs as it delivers training and education on conflict of commitment policies.

Observations and related management action plans are described in greater detail in section V. of this report.

II. BACKGROUND

Audit & Management Advisory Services (AMAS) has completed a review of Open Payments Data / Outside Professional Activities as part of a systemwide review included on the approved audit plan for fiscal year (FY) 2020-21. This report summarizes the results of our review.

UC Policies on Conflict of Commitment and Outside Activities

Outside professional activities are those activities that are within a faculty member's area of professional academic expertise, and that advance or communicate that expertise through interaction within the industry or community or with the public. The University of California (UC) policy on conflict of commitment and outside activities for Health Sciences faculty is found at Academic Personnel Manual (APM) 671: Conflict of Commitment and Outside Activities of Health Sciences Compensation Plan (HSCP) Participants. The policy provides guidance for the identification and management of outside professional activities in order to avoid conflicts of commitment, while assuring that HSCP participants may engage in a wide array of outside activities without unnecessary limitations. This policy is specific to faculty members who are participants in the HSCP. Faculty members who are not participants in the HSCP are subject to the provisions of APM 025. Per UC conflict of commitment policies, outside professional activities are distinct from non-professional activities, such as activities that are part of the faculty member's private life, and are not expressly governed by UC regulations, or by the guidelines on outside professional activities.

Professional activities are separated into three categories in this policy. Categories I and II include activities that must be reported. Category III activities are those that are within the course and scope of UC employment and need not be approved or reported. These categories are defined as follows:

- **Category I activities:** outside professional activities that are most likely to create a conflict of commitment because: 1) they are activities related to the training and expertise which is the individual's qualification for UC appointment, but performed for a third party, and/or 2) they require significant professional commitment.
- **Category II activities:** typically shorter term outside professional activities that are outside the course and scope of UC employment. Category II activities have a lesser potential for a conflict of commitment than do Category I activities.
- **Category III activities:** within the course and scope of UC employment. As such, they are unlikely to raise conflict of commitment issues.

Policy APM 671 requires faculty Plan participants to obtain prior approval from the Chancellor for activities that result in exceeding either annual time or earnings thresholds. Additionally, the policy states, "income earned above the approval threshold, with the exception of income earned from Category III activities, must be deposited to the Plan." Local Implementing procedures further clarify that prior approval is required by the Chancellor to exceed the earnings approval threshold or to directly retain earnings that exceed the threshold.

Faculty members are responsible for self-reporting outside activity compensation internally via the University of California (UC) Outside Activity Tracking System (UC OATS). UC OATS is a web-based application used across the UC system to provide faculty, deans, and faculty administrators a new and efficient way to track, manage and annually certify outside professional activities and income in

conformity with the UC conflict of commitment. UC OATS replaced paper-based processes to simplify compliance with the UC conflict of commitment policies, including APM 025 and APM 671. UC OATS was already in use at multiple campuses across UC but was deployed at UCSD on September 3, 2019, for reporting activities, starting with those for FY 2018-19.

CMS Open Payments

Centers for Medicare & Medicaid Services (CMS) Open Payments (CMS Open Payments) is a national disclosure program that promotes a more transparent and accountable health care system. CMS Open Payments data is publicly accessible information about payments and transfers of value that reporting entities make to covered recipients. Reporting entities, including drug and medical device companies, are responsible for tracking these financial transactions and must submit this data to CMS on an annual basis. Covered Recipients are responsible for reviewing and verifying the accuracy of this data within the allowed time to make revisions to amounts reported if needed.

Per CMS, “Covered recipients (Covered Recipients) are any physicians (excluding medical residents) who are not employees of the applicable manufacturer that is reporting the payment; or teaching hospitals that receive payment for Medicare direct graduate medical education (GME), inpatient prospective payment system (IPPS) indirect medical education (IME), or psychiatric hospital IME programs during the last calendar year for which such information is available.” Effective January 2021¹, CMS Open Payments will include five new provider types: physician assistants, nurse practitioners, clinical nurse specialists², certified registered nurse anesthetists & anesthesiologist assistants, and certified nurse-midwives.

Every year CMS Open Payments data is collected, submitted, reviewed, and published by CMS. CMS publishes full datasets for the previous calendar year annually on or before June 30 and refreshes the data in January of each year. Data is reported by pharmaceutical, medical device, and group purchasing companies. CMS does not comment on any relationships or amounts, rather it just collects and publishes the data. It is up to the individual provider and the reporting companies to reconcile any discrepancies. Therefore at UCSD, it is the individual faculty physician’s responsibility, not the University’s, to ensure CMS Open Payments data is accurate. Data is reported across three payment categories:

1. **General Payments:** Payments or transfers of value that are not in connection with a research agreement or research protocol.
2. **Research Payments:** Payments or transfers of value made in connection with a formal research agreement or research protocol.
3. **Ownership and Investment Interests:** Information about the ownership or investment interests that physicians or their immediate family members have with the reporting entities.

Natures of Payment categories³ must be used to describe why a payment or other transfer of value was made, including compensation for non-consulting services, consulting fees, current or prospective ownership or investment interest, education, entertainment, food and beverage, gifts, grants, honoraria, research, royalty or license and travel and lodging.

¹ Per CMS, data collected in 2021 will be submitted to CMS and published in 2022.

² Physician assistants, nurse practitioners, and clinical nurse specialists are classified as Non-Physician Practitioner (NPP) Covered Recipients who are providers who practice either in collaboration with or under the supervision of a physician.

³ Additional guidance on Natures of Payment is available at: <https://www.cms.gov/OpenPayments/Natures-of-Payment>

Data is published on June 30th for the prior calendar year. The time schedule for reporting is as follows:

All Year:	Reporting Entities collect data.
February 1 - March 31:	Reporting Entities submit data collected the previous calendar year.
April 1 – May 15:	Covered Recipients review and dispute data submitted for the previous year.
April 1 – May 30:	Reporting Entities correct data from previous year.
June 30:	CMS publishes data from previous calendar year.
December 31:	All disputes must be submitted for the previous calendar year. Balances will be updated and the refreshed reported amounts will be published in January a year after the submitted data.

UCSD Health Sciences' Office of Compliance and Privacy – FY2018-2019 Review

The UCSD Health Sciences Office of Compliance and Privacy (OCP) recently initiated processes to compare data from CMS Open Payments to UC OATS to evaluate discrepancies as part of efforts to prevent fraud, waste and abuse. In addition, individual physician faculty members should be regularly monitoring their activity as reported on the CMS Open Payments system and correcting any discrepancies between information reported by CMS and information reported by themselves in UC OATS.

In July 2020, the OCP conducted a review comparing external data from CMS Open Payments reported on a calendar year basis for 2018 and 2019 with internal data reported by physician faculty members on a fiscal year basis for FY 2018-19 from UC OATS. This was the first time OCP conducted a review of this nature, there were many challenges and complications in this initial process that were noted.

OCP's process to review CMS Open Payments data included the following steps:

1. **Gather UCSD Faculty Names:** Requested a list of all names of anyone who billed through UCSD from MedStaff and Provider Enrollment and gathered a list of approximately 2,000 individuals.
2. **Gather and Stratify CMS Open Payment Data:** Pulled the CMS Open Payment data for all individuals identified in #1 above for program years 2018 and 2019, and OCP stratified the data for any physicians that had more than \$20K, \$50K and \$100K in total general payments.
3. **Gather Conflict of Commitment Outside Professional Activity Data:** Pulled UC OATS FY 2018-19 data and CMS Open Payments data for all members of the HSCP. Then, using data analytics, OCP matched physicians listed in both data sets and compared the total compensation disclosed on UC OATS with the general payment amount posted on CMS Open Payments. OCP identified 17 physicians with significant discrepancies between their CMS data and UC OATS disclosures.
4. **Contact Physician:** Sent out a total of 17 formal memos to physicians with discrepancies between their internal disclosures and CMS Open Payments profiles. Three of those memos were retracted due to errors in the UC OATS data set that were corrected, and then ultimately showed no real discrepancy. OCP indicated they provided education to the faculty physicians, assessed their responses, and evaluated where further assistance was required with the physician and/or department administrators.
5. **Documentation:** Documented letters, emails, and discussions with physicians. Departments were responsible to maintain documentation as well. OCP stated that the discrepancies and actions would be monitored until there was no longer a discrepancy or until the faculty

member demonstrated the discrepancy was due to an external factor, so that no further follow-up deemed necessary by OCP.

There were several discrepancies identified due to the differences of timing and reporting requirements between UC OATS disclosures and CMS Open Payments, including:

1. Different Reporting Periods: CMS data is reported in calendar year periods, compared to fiscal year periods in UC OATS;
2. Different Disclosure Requirements: the disclosure requirements for UCSD Health Sciences faculty per APM 671 differed from the disclosure requirements for medical device and pharmaceutical companies per the Sunshine Act⁴ in some areas:
 - If faculty have a scientific lecture at another university and only receive honorarium, this is considered Category III activity and is not required to be reported annually. Many consulting and paid speaking engagements are classified as Category III and not required to be reported.
 - The CMS general payments include food and beverage, travel and lodging, whereas UC does not require those payments to be disclosed.
3. Different Compliance Requirements: Reporting entities for CMS may have a different compliance requirement than UCSD as far as what is disclosed.
4. Different Populations: UC disclosure reporting is only required for those faculty members participating in the HSCP and is not required for all medical staff or all physicians. However, CMS is now starting to collect data for individuals other than physicians.

III. AUDIT OBJECTIVE, SCOPE, AND PROCEDURES

The objective of our review was to assess controls related to management processes for evaluation of faculty conflict of commitment disclosures with respect to information reported through CMS Open Payments and other public sources. Although this was a systemwide review, each UC campus may have differing procedures for addressing this topic. Therefore, each campus was requested by UCOP to conduct a review to evaluate local practices. In order to achieve our objective, we performed the following procedures:

- Reviewed relevant UC conflict of commitment and outside activities policies;
- Interviewed Health Sciences OCP Management including the Interim Chief Compliance & Privacy Officer, the newly appointed Chief Compliance & Privacy Officer and two Compliance Office analysts;
- Interviewed Department of Medicine Faculty Compensation Senior Business Operations Analyst and the Director of Faculty/Staff Affairs, and;
- Evaluated processes for monitoring and compliance with outside activity reporting and verification of CMS Open Payments reconciliation;
- Reviewed the UCSD Health Sciences Compliance Program Annual Report;
- Reviewed Health Sciences and Health Compliance email notifications and reminders;

⁴ The Sunshine Act requires manufacturers of drugs, medical devices, biological and medical supplies covered by the three federal health care programs (Medicare, Medicaid, and State Children's Health Insurance Program (SCHIP)) to collect and track all financial relationships with physicians and teaching hospitals and to report the data to CMS.

- Reviewed Department of Medicine emails and reconciliation process for faculty physicians with a discrepancy; and,
- Evaluated and verified OCP's reconciliation process for 17 physicians with an initial discrepancy to evaluate follow up procedures.

Research payments as reported in CMS Open Payments are processed by the University Office of Contracts and Grant Administration, and the contractual relationship is between the sponsor and the University (not the faculty member directly). Therefore the focus of Compliance and this review is the General Payments category of CMS Open Payments.

This review was not intended to evaluate compliance with faculty disclosure of Outside Professional Activities, or the completeness of UC OATS reporting. The AMAS audit report *Outside Activity Tracking System (OATS) – Conflict of Commitment and Outside Activities Report, Project 2020-03*, evaluated the management of conflict of commitment and outside activities disclosures in accordance with relevant policies and procedures.

IV. CONCLUSION

Based on our review procedures, we concluded the controls related to management processes for evaluation of faculty conflict of commitment disclosures with respect to information reported through CMS Open Payments and other public sources could be improved to provide reasonable assurance that outside activities are being reported in accordance with UC policies and procedures and any noted discrepancies are fully resolved. OCP completed the initial review and discovered many challenges with comparing UC disclosures to CMS Open Payments data, including getting the complete and accurate internal list of faculty physician data and comparing that information to CMS Open Payments, given the many inherent discrepancies between the two data sets. OCP worked diligently to complete the comparative review, while realizing the process was not efficient, and future cycles may not be repeated in the same manner. OCP will be re-evaluating this process for the next cycle to improve efficiency and effectiveness of the comparative analysis.

We noted an opportunity for improvement in retaining documentation and conducting follow-up when discrepancies were discovered. There were instances where documentation was incomplete as to the explanation of the final resolution of the original variance identified by OCP, or adjustments made to UC OATS disclosures resulted in income earned over the threshold allowed by policy which have not been fully resolved by the faculty and department. OCP indicated that the focus of its review was intended to evaluate CMS Open Payments data from a healthcare compliance perspective to evaluate risk of fraud, waste, and abuse, and was not intended to evaluate compliance with APM 671. Compliance with APM 671 is the responsibility of the academic departments to manage. However the discovery of the reporting discrepancies through the OCP review, and apparent APM 671 violations, would appear to warrant additional follow up with Health Sciences executive leadership.

We also noted a lack of overall understanding of the CMS Open Payments process by both faculty physicians and some Health Sciences department personnel, including the corresponding timeline and what information the physicians should be reviewing.

These observations are discussed in greater detail in the balance of this report.

V. OBSERVATIONS REQUIRING MANAGEMENT ACTION

A.	Unresolved Physician Faculty UC OATS and CMS Adjustments
During our review we noted that ten of the 14 physician faculty members (71%) OCP identified as having discrepancies between data in UC OATS and data in CMS Open Payments were not completely resolved.	
Risk Statement/Effect	
Inaccurate or incomplete reporting of income from outside activities reduces the University's ability to ensure compliance, reduce fraud, waste, and abuse, and mitigate reputational risk for the University.	
Management Action Plans	
A.1	OCP will continue to work with management and Information Technology Services to evaluate potential options for integration of CMS Open Payments data to facilitate improved conflict of interest and commitment reporting by faculty.
A.2	OCP will follow up with Department Management or other appropriate parties to confirm the resolution for the 10 open / unresolved individual discrepancies from the OCP review; including but not limited to unreported compensation and the remittance of any amounts due to the HSCP.

A. Unresolved Physician Faculty UC OATS and CMS Adjustments – Detailed Discussion

AMAS reviewed the data from OCP that identified 14⁵ individuals who were documented with actual discrepancies between their internal UC OATS disclosures and CMS Open Payments profiles that required additional review. We reviewed the memos sent out by OCP, any email correspondence and worksheets from Departments of Medicine and Surgery management to evaluate the reconciliations and their ultimate disposition.

Of those 14 individual discrepancies, we noted four instances where the final resolution of the variance identified by OCP was unclear. OCP memos indicated to the physicians that follow up would occur, however we did not see complete evidence of this in the documentation provided. Those four physicians include one each in the Departments of Surgery, Reproductive Medicine, Pediatrics and Anesthesiology, and are referenced as "Unknown" or "Open/Not Documented" in the Assessment Amounts Owed to HSCP column in the chart further below.

We also noted six instances where adjustments were made to UC OATS disclosures resulting in income earned over the threshold allowed by policy, and the amounts due for HSCP payments remain open and unresolved. Of the 14 individual physicians, ten of them had adjustments to UC OATS for FY 2018-19 in amounts ranging from (\$5,673) to \$491,953, with all but one being an increase in the UC OATS

⁵ Initially there were a total of 17 physicians with identified discrepancies. However, three were not true discrepancies since one was not required to report as they were not part of the HSCP and the other two had errors in the UC OATS calculation. Once those three discrepancies were corrected, those three were considered closed with no findings.

compensation amount, while three had no adjustments (to either CMS Open Payments or UC OATS), and one had an adjustment to their CMS Open Payments data only. Of the ten physicians that had noted UC OATS adjustments, two also had a correction to their CMS Open Payments data. Six of those ten with UC OATS adjustments retained income over the allowed threshold in amounts ranging from \$1,815 to \$137,168 and, based on the department's assessment of taxes, are required to remit tax amounts owed to the HSCP in amounts ranging between \$263 and \$19,908, as this income was retained in excess of the income limitations established by policy. There was no reconciliation provided to OCP for one of the 10 that made an adjustment to UC OATS⁶, so it is uncertain whether this faculty exceeded income limitations and would owe any assessments to the HSCP.

OCP indicated that the focus of its review was intended to evaluate CMS Open Payments data from a healthcare compliance perspective to evaluate risk of fraud, waste, and abuse, and was not intended to evaluate compliance with APM 671. Compliance with APM 671 is the responsibility of the academic departments to manage. OCP sent memos to the faculty, with copy to Department leadership and the Vice Chancellor of the income earned over the threshold. However the discovery of the reporting discrepancies through the OCP review, and apparent APM 671 violations, would appear to warrant additional follow up with Health Sciences executive leadership. See the chart below for a summary of issues.

Department	Number of Discrepancies Identified (Total)	No Adjustment	OATS Adjustment	CMS Adjustment	Assessment Amounts Owed to HSCP	Closed	Open
Medicine	9		9 ⁷		6	3	6
Surgery	2	1	1		1-Unknown	1	1
Reproductive Medicine	1	1			Open/Not Documented		1
Pediatrics	1	1			Open/Not Documented		1
Anesthesiology	1			1	Open/Not Documented		1
Total	14	3	10	1	6-Yes, 1-unknown	4	10

Source: OCP analysis, UC OATS Data, CMS Data, physician feedback and Department of Medicine reconciliations.

OCP determined that there were no serious compliance issues as a result of the additional disclosures (beyond apparent APM 671 policy violations), finding that most of the errors were due to not fully understanding the policy and reporting requirements. Some of the discrepancies were due to differences in reporting periods and/or disclosure requirements.

OCP did not produce a final summary report with detailed results for each physician, although the OCP Annual Report indicated physicians with discrepancies required updated disclosures in UC OATS, and those disclosures were addressed with the physicians and corrected. Each physician had an explanation and an analysis, and it has been left up to the departments and/or the individual physicians for reporting any subsequent amounts due to the HSCP. Department management assisted physicians in making the revisions where possible. However, in several cases physicians had not fully completed the

⁶ This individual (in the Department of Surgery) is reported to have retained income over the allowed threshold by \$458,493 and may owe an assessment to the HSCP. No prior approval is noted for this amount over the threshold.

⁷ Two physicians of these nine also had a correction to their CMS Open Payments data.

corrective actions required to comply with University policy. This raises the question of whether the compliance matter should be considered by OCP closed without full resolution, or if additional referral to Health Sciences leadership or follow up is needed.

OCP is still assessing the future state of this review for the 2020 CMS Open Payments data. Additionally, OCP is engaging with Information Technology Services (ITS) to evaluate potential options for integration of CMS Open Payments data to facilitate improved conflict of interest and commitment reporting by faculty. As noted above, in 2021 CMS will start collecting payment data for additional Covered Recipients, including NPPs. As a result, OCP should evaluate the impact of this on their processes since it will be published starting in 2022.

B.	Communication and Education
Training and communications regarding CMS Open Payments could be improved to promote increased understanding by physicians of CMS Open Payments disclosure requirements, and the potential relationship to UC conflict of commitment disclosures.	
Risk Statement/Effect	
Faculty who do not have a full understanding of reporting requirements may not fully disclose outside professional activity accurately or completely. This limits the University’s ability to ensure compliance, reduce fraud, waste, and abuse, and mitigate reputational risk for the University.	
Management Action Plan	
B.1	OCP management has provided education in the FY 21 annual compliance training, “UCSDH 2021 Annual Compliance, Fraud, Waste, & Abuse Training (HIPAA)”, and will continue to develop an ongoing training and communication plan for faculty and departments personnel on the CMS Open Payments data, as it relates to requirements of outside activity reporting and UC policy. OCP has partnered with Health Sciences Academic Affairs as it delivers training and education on conflict of commitment policies.

B. Communication and Education – Detailed Discussion

Based on the communications and documentation we reviewed, we noted that physicians and Health Sciences management had a variety of questions regarding the CMS Open Payments reporting. These questions included how compensation should be classified and reported, how to register and review CMS Open Payments, and the timeline for review and dispute.

OCP includes education on CMS Open Payments in the annual compliance training. However, in addition to ensuring faculty are aware of policy requirements and their responsibilities, additional training may be beneficial for Department reviewers who interact with faculty on their APM 671 disclosures. These personnel can be a valuable resource in identifying faculty questions regarding CMS Open Payments, and a partner in monitoring issues related to the annual report reviews.

OCP also assists with reminders when faculty members are submitting their annual certifications on UC OATS. On September 30, 2020, we noted there was a UC OATS system generated email reminder to all

HSCP members, on behalf of the Vice Chancellor, UCSD Health Sciences and Interim Dean, UCSD School of Medicine, regarding submitting annual disclosures and making sure to monitor and reconcile activity on the CMS Open Payments system. OCP coordinated the addition of new language in that message to remind HSCP members to dispute a payment if the CMS Open Payments profile is inaccurate, so that data is consistent with UCSD disclosures.

In addition, we noted there was a reminder to review CMS Open Payments in the December 2020 UCSD Physicians and Advanced Practice Providers (APP) Update, and to dispute discrepancies as needed. However, this reminder was made in late December 2020 just nine days before the cutoff date to make final corrections for the prior year (2019). The time schedule outlined in the report background provides for several periods of time over the 12 months following each calendar year to review and correct any discrepancies before being published by CMS (by June 30) and between July 1 and December 31. Revisions to CMS Open Payments data would be most effective prior to being published by June 30. Communications should be more timely, with education, training and reminders aligned with those timeframes throughout each calendar year.

The OCP is in coordination with UCSD administration to provide education on CMS Open Payments when faculty members are submitting their annual certifications on UC OATS. OCP plans to continue to work on notification reminders and training for appropriate disclosures that are in compliance with UC and UCSD policies and procedures.