



Sunshine Act Compliance

What is the Sunshine Act and who does it affect?

On August 1, 2013, the “Physician Payments Sunshine Act” portion of the Affordable Care act was put into effect. This requires manufacturers of medical devices and biologicals who participate in U.S. federal health-care programs to report all transfers of value given to physicians and teaching institutions. This includes, but is not limited to, meals, gifts, travel, lodging, educational materials, and consulting fees. The law is designed to prevent potential conflicts of interests.

What does this mean for physicians and teaching institutions relative to IL?

Per the Sunshine Act, IL must document all transfers of value between our company and physicians/teaching institutions when they occur, and report them to CMS on an annual basis. The Sunshine Act allows physicians/teaching hospitals to review and correct the submitted data, to ensure that inaccuracies are not reported.

Specifically, when a “transfer of value” occurs, IL will ask physicians and teaching institutions to provide information such as: National Provider ID, Teaching Hospital Tax ID, Physician License Number, and other publicly available information. This information will be combined with details about the payment amount, nature of the payment (e.g., royalty fees, consulting fees, charitable contribution), and the form of the payment. This will then be submitted to CMS.

Compliance – Our policy and perspective

IL deeply values the vital role of physicians and teaching institutions. We believe healthcare professionals and institutions play an essential role in our research and development process, as well as in the continuous improvement of existing products and services. IL actively solicits support from key opinion leaders to substantiate product claims, drive innovation and develop superior Acute Care and Hemostasis products to enhance diagnostic testing, and ultimately patient care.

The Sunshine Act does not prohibit nor discourage the mutually beneficial exchanges between physicians and the medical device industry; however, it does ensure transparency. Thus, our compliance with the Sunshine Act is essential in protecting these invaluable relationships.

More information on the Sunshine Act can be found at <http://go.cms.gov/openpayments>