



Summary for Healthcare Professionals of The Physician Payment Sunshine Act

The federal Physician Payment Sunshine Act of 2010 requires pharmaceutical, biologic, and medical device manufacturers to annually disclose to the Centers for Medicare & Medicaid Services (CMS) in the Department of Health and Human Services (DHHS) payments and other transfers of value furnished to physicians and teaching hospitals.

Manufacturers must begin collecting the required data on August 1, 2013. They are required to be submitted to CMS by March 31, 2014. Beginning September 30, 2014, CMS will make the information gathered through these reports publicly available through a searchable Web site. The format CMS will use is unknown at this point.

What Does This Mean for Physicians?

- Consistent with the Sunshine Act, manufacturers will collect and report to the government all transfers of value to physicians and teaching hospitals from all Noven sources.
- According to the statute, physicians and teaching hospitals are to have an opportunity to review the manufacturer-submitted information and submit corrections for at least 45 days before the information becomes publicly available on the government Web site. The mechanism to access this information is not yet available. Access instructions will be communicated at a later date.

A Few Examples of Reportable Transfers of Value

- In-service meals (e.g., accompanied by an educational presentation by a sales representative in a physician's office)
- Meals provided at a speaker program or product theater
- Travel costs
- Fee for service arrangements such as consultant, speaker, advisory board member, or clinical trial investigator
- Grants
- Certain educational materials and items provided to physicians and teaching hospitals for professional use

Some Examples of Items That Need NOT Be Reported

- Indirect payments made through a third party where the manufacturer does not know the identity of the recipient, e.g., CME or blinded market research participants.
- Anything less than \$10 in value, unless the total value of all of the payments or transfers of value during the calendar year to that particular covered recipient is more than \$100 in value.
- Any transfer of value, even one valued at less than \$10, will be collected by Noven. If the aggregate amount is \$100 or less, Noven will not report it.
- Educational materials that directly benefit patients or are intended for patient use.
- Drugs and biologics provided to covered recipients for distribution to patients as samples or placebos.

If You Have Questions...

- For general questions related to this reporting requirement, we encourage you to contact your professional association.
- For questions specific to Noven's approach to the Sunshine Act, please send an e-mail to aggspend@noven.com. Please consult with your accountant or tax advisor should you have questions about any tax implications related to this reporting requirement.

Noven's Commitment

- Noven will strive to keep you informed of our plans to comply with this law.
- Noven will maintain trust with our customers – both healthcare professionals and patients.
- While focused on transparency, Noven will continue its dedication to developing and offering products and technologies that meaningfully benefit patients and striving to improve overall health and well-being.