The FDA’s proposed Physician Payment Sunshine Act is due to come into force later this year. This will be important in the future as it affects sponsors giving any money to doctors working on clinical trials. Under the Act, data must be collected from August 1st 2013, with reports being sent to the CMS by March 31st 2014. You only have until August 1st before you need to start collecting this data and a further eight months to submit it to the CMS. Remember, your company can be fined up to $1,150,000 for failure to comply with the Sunshine Act so it’s vital to get it right.

When in force, the following details will need to be reported:

- Applicable manufacturer or GPO’s name
- Covered Recipient’s
- Amount of payment or other transfer of value
- Date of payment or other transfer of value
- Form of payment or other transfer of value
- Nature of payment
- The name of the related drug, device, biological or supply
- National Drug Code (NDC) of related covered drug/biological, if any
- Eligibility for delayed publication (research payments)
- Name of entity that received the payment or other transfer of value, if not provided to the covered recipient directly (indirect payments)
- Payments or transfers of value to physician owners or investors
- Statement providing additional context for the payment or other transfer of value (optional)