

## Texas Tech University Health Sciences Center El Paso Institutional Compliance Procedure

<b>Procedure:</b> Conflict of Interest - Screening Faculty Against the Open Payment System	<b>Procedure #:</b> HSCEP OP 10.05, PRO B
<b>Effective Date:</b> July 5, 2022	<b>Last Revision Date:</b> January 6, 2025
<b>References:</b> HSCEP OP 10.05, HSCEP OP 73.09, Regents' Rules 3.1	
<b>TTUHSC El Paso Institutional Compliance Website:</b> <a href="http://elpaso.ttuhsc.edu/compliance/">http://elpaso.ttuhsc.edu/compliance/</a>	

### Procedure Statement

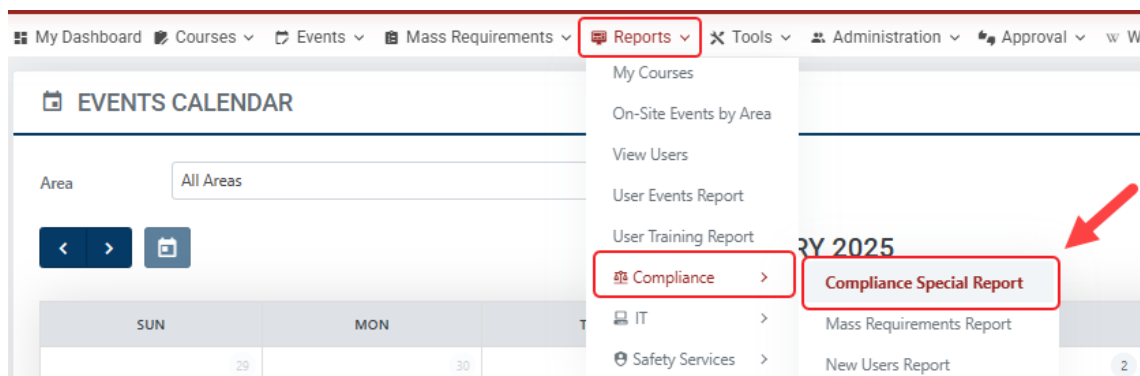
This procedure provides guidance to the Compliance Staff when determining monetary benefit provided to Texas Tech University Health Sciences Center El Paso (TTUHSC EP) physicians, dentists, and mid-level providers as reported by the Centers for Medicare & Medicaid Services (CMS) website: <https://www.cms.gov/openpayments/>. CMS publishes the data annually on or by June 30.

### Scope

Compliance staff will review all TTUHSC EP physician, dentist, and mid-level provider data.

### Procedure

1. The Vice President of the Office of Institutional Compliance or designee will perform the following:
2. Go to the **Tech Training** application: <https://academic.elpaso.ttuhsc.edu/TechTraining/>
3. Log in using your TTUHSC EP credentials.
4. Next, go to the **Reports** dropdown → **Compliance** → **Compliance Special Report**.



5. In the **Compliance Special Report** screen, go to the **Search Criteria** tile and click on the **List of Active Employees** button.

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Compliance Special Report

**Search Criteria**

Eraider

Assigned Date

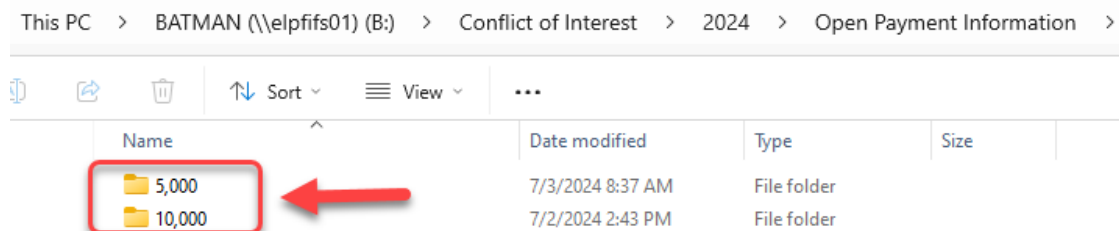
Training

Training Status

☒ All 
 ☐ Completed 
 ☐ Credited 
 ☐ Locked 
 ☐ Due

←

6. Download the **List of Active Employees** report and save it in the following folder:  
**Batman** drive → **Conflict of Interest** folder → **2025** folder (or current year) → **Open Payment Information** folder → save under **Open Payment Search 2024** (or previous year).
7. Once the report has been saved, clean up the report using the following criteria:
  - a. Apply a filter to all columns.
  - b. In the **Role** column, remove all job titles that are not physicians, dentists, or mid-level providers,
  - c. Remove all columns except:
    - i. Full name,
    - ii. E-mail,
    - iii. Department, and
    - iv. Role
  - d. Create three additional columns titled:
    - i. \$5,000 but < \$10,000
    - ii. \$10,000 or Greater
    - iii. Open Payment Amount for 2024 (or previous year)
8. Go to the **Batman** drive → **Conflict of Interest** folder → **2025** folder (or current year) → **Open Payment Information** folder, and create the following folders:



9. Next, go to the **CMS Open Payments** website: <https://www.cms.gov/openpayments>
10. Click on the **Open Payments Data** link to search the database. This will direct you to the search page.

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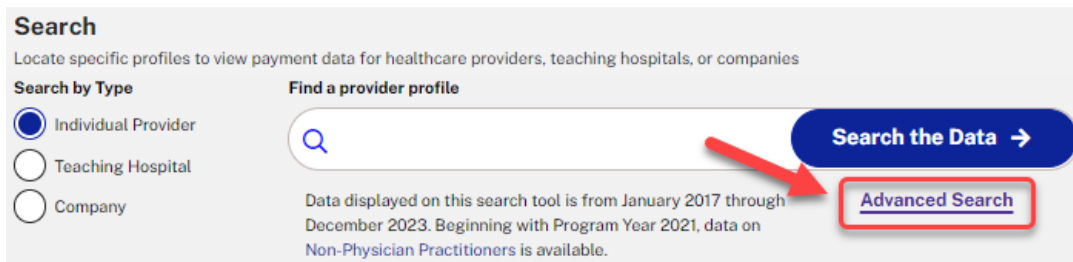
### What is the Open Payments™ Program?

The Open Payments program is a national disclosure program that promotes a more transparent and accountable health care system. Open Payments houses a publicly accessible database of payments that reporting entities, including drug and medical device companies, make to covered recipients like physicians.

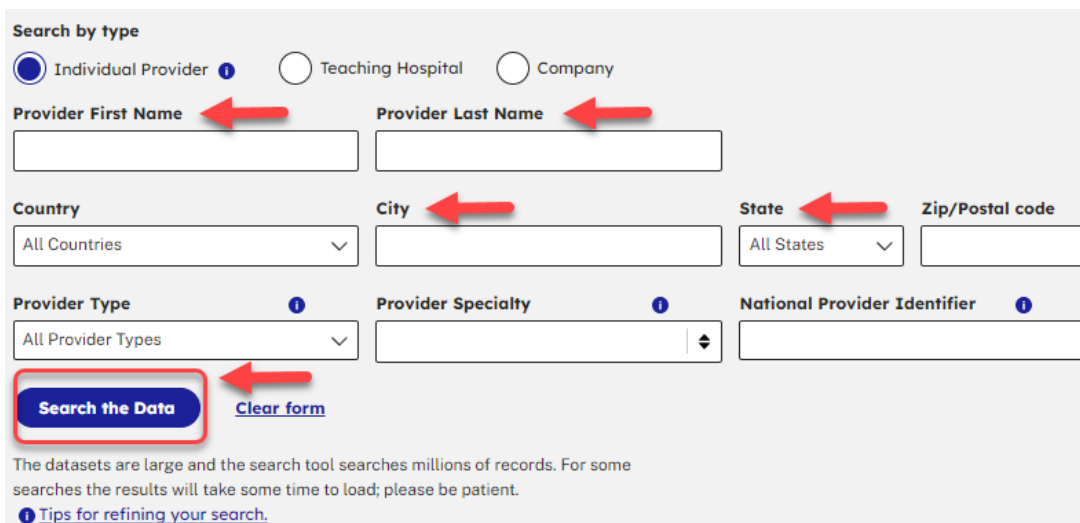
*Please note that CMS does not comment on what relationships may be beneficial or potential conflicts of interest. CMS publishes the data attested to by reporting entities. The data is open to individual interpretation.*

Explore the database at [OpenPaymentsData.cms.gov](https://OpenPaymentsData.cms.gov).

11. In the Open Payments search page, click on the **Advanced Search** link.



12. In the **Advanced Search** screen, enter the physician, dentist, or mid-level provider's **First Name, Last Name, City, and State**, then click on the **Search the Data** button.



13. You will see the following screen:
  - a. If there are results, you will need to select the physician, dentist, or mid-level provider from the list by clicking on the individual's name.

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- b. If the physician, dentist, or mid-level provider did not accept any monies from vendors the database will show no results.

Last Name:

Showing 1-10 of 3,272

Provider name	Provider Type	Specialty	Primary address
<input type="text"/>	Physician	<input type="text"/>	<input type="text"/>
<input type="text"/>	Physician	<input type="text"/>	<input type="text"/>

14. Once you click on the provider's name, ensure the payments received are for the previous year and are listed under General payments.

Non-Physician Practitioner

National Provider Identifier (NPI)

Physician Assistants & Advanced Practice Nursing Providers | Nurse Practitioner

**Filters** [How to use filters](#) [Reset Filters](#)

<b>Year</b> 2023	<b>Payment type</b> General payments	<b>Nature of payment</b> All Natures of Pa...	<b>Company making payment(s)</b> <input type="text"/>
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15. Document the dollar amounts the physician, dentist, or mid-level provider received in the report created in [step #6](#).

\$5,000 but < \$10,000	\$10,000 or Greater	Open Payment Amount for 2023
No	No	\$0.00
No	No	\$0.00
No	No	\$0.00
No	No	\$1,000.00
No	No	\$0.00

16. Repeat steps #12 through step #15 to continue searching for physicians, dentists, or mid-level providers in the report.
17. If the payment amount from any single company exceeds \$5,000 or \$10,000, save a copy of the webpage in PDF format for that individual in one of the corresponding folders from [step #8](#). The naming convention for this file will self-populate.

## **Texas Tech University Health Sciences Center El Paso Institutional Compliance Procedure**

### **Frequency of Review**

The designated Compliance personnel will review this procedure in collaboration with HSCEP OP 10.05, Conflict of Interest and Commitment (July of each year).

**Review Date:** 7/9/2024

**Revision Date:** 1/6/2025