

## Pfizer Independent Grants for Learning & Change (IGL&C)

August 12, 2013

To: IGL&C Database

From: Independent Grants for Learning & Change

**Re: Sunshine Act – Implications for our Independent Grants Program (INCLUDING Healthcare Charitable Contributions)**

The Centers for Medicare & Medicaid Services (“CMS”) published the final rule to implement the Federal Physician Payments Sunshine Act (“Sunshine Act”) on February 8, 2013. The Sunshine Act requires certain pharmaceutical and device manufacturers to annually report payments or other transfers of value (both direct and indirect) furnished to US-licensed physicians and US teaching hospitals (“Covered Recipients”, as defined by CMS).

Applicable manufacturers must begin collecting data on the payments or other transfers of value provided to Covered Recipients on or after August 1, 2013, with the first data reporting period covering August 1, 2013 through December 31, 2013.

In our efforts to comply with this CMS requirement, Pfizer IGL&C has adopted several new policies and processes that will impact most grant recipients effective August 1, 2013. These changes are outlined below:

*NOTE: All changes apply to grant recipients who are approved and/or grant funds paid on or after August 1, 2013.*

- Pfizer IGL&C grant funds will no longer support food or beverage in *any* capacity. Grant recipients will be required to certify that no Pfizer funds will be used to support food and/or beverage, in addition to signing a Letter of Agreement that restates this prohibition.
- During the acknowledgment/closeout stage, grant recipients will be required to report back to IGL&C any payments or transfers of value to faculty (planners, speakers, etc.) and participants if they meet the definition of ‘Covered Recipient’. Grant recipients will be notified of these reporting requirements at the time of grant approval.

In the coming weeks, IGL&C will begin to disseminate materials regarding processes, timelines and templates that grant recipients will be required to follow and use in reporting accurate data on payments and other transfers of value provided to covered

recipients using Pfizer IGL&C grant dollars.

Thank you for your understanding and cooperation as we implement these changes.

Pfizer Independent Grants for Learning & Change

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