



HCP Transparency and Compliance Deadlines for 2018

- January 1** Vermont registration and compliance officer form due
- January 31** Reports of HCP Affiliations due to Danish Health and Medicines Authority (Companies without Danish presence may submit by e-mail.)
- Tracking of transfers of value to South Korean HCPs begins (threshold 10,000 Won). Reporting is on rolling basis (see below).
- March 1** French Sunshine (“Loi Bertrand”) reports due via Transparence Santé website
- Israel reports due under Sec. 40A of National Health Insurance Law via Ministry of Health website
- March 31** U.S. Open Payments reports due to CMS via Open Payments Portal
Romanian sponsorship reports due via ANMDN website
- April 1** Vermont transparency reports are due to Vermont Attorney General by e-mail
- May 31** Belgian Transparency reports due using BeTransparent.be platform
- June 1** Nevada Compliance Form due by e-mail to the State Board of Pharmacy
Netherlands reports of 2017 payments due to Dutch Transparency Register
- July 1** Massachusetts and Connecticut reports due by e-mail
- July 31** Romanian HCP sponsorship reports due via ANMDM website.
- September 1** French Sunshine (“Loi Bertrand”) reports due via Transparence Santé website
- August 31** Massachusetts registration renewal and payment due.

IMPORTANT: This information is provided for your convenience and should not be construed as legal advice. The applicability of these requirements to your organization depends on individual circumstances. The information in this list is not exhaustive. Laws and regulations are subject to change.



Rolling Deadlines:

California Health & Safety Code Section 119400-119402 – update company certifications on website annually (typically July 1 of each year, but law does not specify a deadline).

Italy – reporting to local ASL

Report consulting fees paid to HCPs employed by the Italian National Health Service to the applicable local health units (Aziende Sanitarie Locali) within 15 days of payment.

Portugal – Online Reporting of Transfers of Value to HCPs

In 2017, Portugal amended its sunshine law to extend reporting to medical device companies. Companies subject to the reporting obligation must register at <https://placotrans.infarmed.pt/Login.aspx> and report transfers of value to health care professionals and organizations within 30 days of payment.

South Korea – Reports are due 3 months after the end of the Company's fiscal year starting in 2018. For calendar year companies first report is due March 31, 2019. [Korean Reporting Form](#) available here.

Indonesia – Regulation 58 requires companies to report sponsorships of HCPs and HCOs to the Corruption Eradication Commission (*Komisi Pemberantasan Korupsi* or **KPK**) within 30 days of payment.

Industry Code Requirements

Japan: JFMDA (Japan Medical Device trade association) members must publish transparency reports on their company website annually pursuant to the JFMDA Code.

MedTech Europe: MedTech Europe members must report 2017 educational grants using the MedTech Europe platform by June 30, 2018. Companies that are members of MedTech Europe member associations may have similar obligations under the applicable national association code.

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