

## Sunshine Key Differences

	2008	2009
Physician Information		Medicare Billing Number
		Specialty
Items		Perspective Ownership (stock options)
		Compensation for serving as faculty or speaker for a continuing medical education program
		Grant
Reporting		Applies reporting to product spend
Exception	\$25 exception	No payment too small
Aggregate Reporting	\$500/year	\$100/year
Unknowingly Failure to Report Penalty per event	\$1,000 - \$5,000	\$1,000 – 10,000
Limit	\$50,000	\$100,000
Knowing Failure to Report Penalty per event	\$5,000 – \$50,000	\$10,000 - \$100,000
Limit	\$250,000	\$1,000,000
Corrections	Accepted	No Changes Accepted Once Submitted
States	No State Reports	Submitted State Reports
Pre-emption	Pre-empted state laws	No Pre-emption for stricter state laws, if you want to add DTC, or lower limits....