Open Payments System Quick Reference Guide
Final Submission and Attestation

Introduction

All data submitted by applicable manufacturers and applicable group purchasing organizations, hereafter collectively referred to as "reporting entities," must complete a final submission and attestation process in the Open Payments system. This quick reference guide provides a high-level overview of how to complete the final submission and attestation process.

Prerequisites

- User is registered in Centers for Medicare & Medicaid Services (CMS) Identity Management system (IDM) and has obtained access to the Open Payments system.
- Reporting entity has a profile in the Open Payments system.
- Reporting entity has recertified in the Open Payments system, if necessary.
- User who submits data holds the submitter user role; user who attests to data holds the role of attester for the reporting entity.

Actions

Final Data Submission

Only users who hold the role of submitter in the Open Payments system can perform final data submission. Before final submission can occur, one or more records within the selected payment type and program year must be in "Ready for Submission" status, and no records should be in "System Processing" status. Final submission can be performed as frequently as required throughout the submission process.

To perform final submission, follow these steps:

1. Log into the Open Payments system via the CMS Enterprise Portal at https://portal.cms.gov/ and select the "Submissions" tab.
2. From the "Submissions" tab, under the "Review Records - Summary" section, use the drop-down lists to select the reporting entity and program year for which you want to perform final submission and select the "Review Summary" button.
3. On the "Review Records - Summary" page, select the "View All" button for one of the three payment types (General, Research, and Ownership or Investment Interest) that has record(s) in "Ready for Submission" status and no record(s) in "System Processing" status.

Note: You will need to repeat the final data submission steps for each of the three payment types.

4. Select the "Final Submission" button on the "Payment Category" page for the selected payment type.

   a) If this button is not available, review the following record statuses:
      i. <u>System Processing</u> - Record(s) in this status are still undergoing processing and validation. If any record(s) are in "System Processing" status, users cannot perform final submission for that payment type.
      ii. <u>Ready for Submission</u> - Record(s) in this status are ready for final submission. Users can only perform final submission for that payment type when there are record(s) in "Ready for Submission" status.

5. On the "Confirm Final Submission" page, review the summary details related to your submission. Select the "Submit as Final Submission" button if this information is correct. If the details are incorrect, select the "Cancel" button to go back and make any necessary corrections to the records.

   a) When you select the "Submit as Final Submission" button, the system will process the records that are submitted for final submission. After the final submission process is complete, an email notification will automatically be sent to the reporting entity's submitters, informing them that the final submission was successfully processed.

Records that successfully complete final submission will be shown as "Ready for Attestation". When all records from all payment categories for the program year are in "Ready for Attestation" and/or "Attested" status, the "Notify Attester" button will be available on the program year's Review Records page for users holding submitter role. Select the button to trigger an email notification to the attester(s), informing them that there are records available for attestation.

Notification that records are available to attest will not be sent to the attesters until the submitter selects the "Notify Attester" button.

Completion of the final submission process can take up to several hours depending on the amount of records and system activity levels. Submitters should take this processing time into consideration when performing submission activities.

Attestation

After the data has undergone final submission, the reporting entity attester will be able to attest that the information they are submitting to the Open Payments system is accurate and complete. Only individuals in the attester role may complete the attestation process.

Records previously attested that were marked for deletion must be re-attested in order for those records to be removed from the Open Payments system. A summary of records that are marked for deletion is provided during the attestation process.

Last modified: January 2024

To complete attestation, follow the steps:

1. Log in to the Open Payments system via the CMS Enterprise Portal at https://portal.cms.gov/ and select the "Submissions" tab.
2. From the "Submissions" tab, under the "Review Records - Summary" section, use the drop-down list to select the reporting entity and program year for which you want to perform attestation, then select the "Review Summary" button.

   a) To review the marked for deletion records that will be deleted by the attestation, select the "View All" button next to the payment category. On the "Payment Category" page, check the box for "Yes" under the heading "Marked for Deletion," then select "Search." This will filter the search results to show only records marked for deletion. Once you have reviewed them and are ready to attest, return to the "Review Records - Summary" page.

3. On the "Review Records - Summary" page, select the "Begin Attestation of All Records" button.

   Note: Attestation is conducted for all records for that program year, across all three payment types.

   a) If the "Begin Attestation of All Records" button is not available, check if records for the program year are in "Ready for Attestation" and/or "Attested" status. If any record is in another status, contact a submitter for the reporting entity and alert him or her that all records need to be advanced to "Ready for Attestation" status (i.e., undergo final submission) before attestation can begin.
   b) The attesters will be able to attest all "Ready for Attestation" and/or "Attested" records.

4. On the "Confirm Payments" page, review the detailed summary of records being attested to for the program year displayed per payment category and select the "Next" button to proceed.
5. On the "Add Assumptions" page, you may provide any assumptions made when preparing and submitting the data. Text within the Assumption Statement is not published with Open Payments data. See Section 4.15 of the Open Payments User Guide for more information about Assumption Statements.

   a) To include an assumptions statement: Select "Yes, include an assumptions statement." Assumptions are entered in a free-form text box with an 8,000-character limit. The assumptions statement can be edited later. After the assumptions have been entered, select the "Next" button.
   b) To proceed without adding assumptions: Select "No, do not include an assumptions statement" and then select the "Next" button. If you choose this option, you can only go back and add assumptions if you make changes to your submission that require re-attestation of that submission.

6. On the "Agree to Attestations" page, review the attestation totals displayed and the statements and select the checkbox next to all the attestation statements which apply to the submission. Note

that checking the first two statements is required to proceed. If you are attesting to the deletion of previously attested records, checking the sixth statement is strongly encouraged.

   a) A summary of all records being attested to and deleted (if applicable) is displayed on this page. When finished, select the "Continue" button.

7. On the "Review and Attest" page, review the information displayed, including the attestation totals, and select the "Attest" button to complete attestation.

Next Steps
- Review and resolve disputes as needed

Additional Resources

All data submission resources can be found on the Resources page of the CMS Open Payments website at https://www.cms.gov/OpenPayments/About/Resources.html.

The "Data Submission and Attestation" chapter of the Open Payments User Guide for Reporting Entities covers the submission and attestation processes in detail and provides step-by-step instructions for various scenarios.

Quick reference guides relevant to final submission and attestation include:

- Identifying Validation and Matching Errors
- Correcting Validation and Matching Errors
- Record Deletion
- Consolidated Reporting
- Acknowledging Disputes and Resolving Disputes with No Changes to Data
- Correcting and Resolving Disputes

Disclosure

- **Disclaimer:** The contents of this document do not have the force and effect of law and are not meant to bind the public in any way, unless specifically incorporated into a contract. This document is intended only to provide clarity to the public regarding existing requirements under the law.
- **Activities/persons addressed by this document:** Guidance on how to complete data final submission and attestation.
- **Date of Issuance:** January 2024
- **Replacement / Revision Status:** Revision to previous versions
- **Agency Identifier:** CPI DASG/CPI DTP/DASG/CPI 3455
- **Summary of Document:** Instructions on how to complete data final submission and attestation.
- **Citation to statutory provision/regulation applicable to this document:**
  - **Statute citation:** Social Security Act SEC. 1128G. [42 U.S.C. 1320a-7h]
  - **Rule citation:** 42 C.F.R. §403.900-14