

Open Payments System Quick Reference Guide

Bulk File Upload

Introduction

The Open Payments system allows applicable manufacturers and group purchasing organizations (GPOs), hereafter collectively referred to as “reporting entities,” to submit records of payment, other transfers of value, and ownership or investment interests via bulk file upload or manual data entry. This quick reference guide provides a high-level overview of how to submit data via bulk file upload.

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 is registered in the Open Payments system.
- Reporting entity has recertified in the Open Payments system, if necessary.
- User who performs bulk file upload holds the submitter user role for the reporting entity.

Types of Payments and File Formats

Bulk upload files for Open Payments data must be character-separated value (CSV) files and built upon reporting templates provided by Open Payments. A bulk file upload can contain records of only one payment type (General, Research, or Ownership and Investment Interest) and must be built using the template for the specific payment type. The reporting templates for all three payment types are available on the “Resources” tab within the Open Payments system. Sample files can be accessed from the “Resources” page of the Open Payments website (<https://www.cms.gov/OpenPayments/Resources>).

There are different templates depending on the program year(s):

- **General Payments:** Payments or other transfers of value that are **not** in connection with a research agreement or research protocol.
 - Relevant reporting templates are:
 - i. “PY 2018-2020 CSV Template File: General Payments”,
 - ii. “PY 2021-2022 CSV Template File: General Payments”, and
 - iii. “PY 2023 and Onwards CSV Template File: General Payments”
- **Research Payments:** Payments or other transfers of value that are in connection with a research agreement or research protocol.
 - The relevant reporting templates are:
 - i. “PY 2018-2020 CSV Template File: Research Payments” “
 - ii. PY 2021-2022 CSV Template File: Research Payments”, and

Last modified: January 2024



iii. "PY 2023 and Onwards CSV Template File: Research Payments"

- **Ownership/Investment Interests:** Information about physicians or their immediate family members who have an ownership or investment interests in a reporting entity.
 - The relevant template file is "PY 2018 and onwards CSV Template File: Physician Owner/Investor" located within the Open Payments system.

For details on creating CSV templates, refer to the Submission Data Mapping documents located on the Resources page of the Open Payments website (<https://www.cms.gov/OpenPayments/Resources>).to prepare and submit records for Program Years 2018 to 2020 refer to "PY 2018-2020 Submission Data Mapping Document".

To prepare and submit records for Program Year 2021-2022 refer to "PY 2021-2022 Submission Data Mapping Document".

To prepare and submit records for Program Year 2023 and onwards refer to "PY 2023-Onwards Submission Data Mapping Document".

Program years that are older than seven years from the current program year are no longer eligible for submissions and are considered closed program year(s). Reporting entities can only view previously submitted records for closed program years.

Resubmission File Indicator

Users can perform four different actions to records submitted via bulk file upload. Which action the user takes is defined by the value given in the "Resubmission File Indicator" field.

Bulk file submissions can be used to submit new records to the Open Payments system, update information in records previously submitted to the system, update previously submitted records' delay in publication indicator, or delete previously submitted records.

The Resubmission File Indicator values for those actions are as follows:

- "N" - New Submission
- "Y" - Resubmission
- "R" - Renew Delay in Publication
- "D" - Delete

Only one type of action is allowed per file. All records in a file must have the same Resubmission File Indicator value.

Records with "R" or "D" for the "Resubmission File Indicator" field have a smaller number of fields that are required for file submission. Refer to the Submission Data Mapping documents for details.

Data supplied in fields identified as optional for these file types will not be validated or saved in the Open Payments system.

Last modified: January 2024



Refer to the quick reference guide “Requesting or Updating a Delay in Publication” for detailed steps on how to update a delay in publication value via bulk file upload and the quick reference guide “Record Deletion” for detailed steps on how to delete records via bulk file upload.

Delay Limit Reached

Per the Final Rule, records can only be delayed from publication up to 4 years from the year of payment (i.e., the record’s program year); records attributed to Program Years 2014 through 2018 are no longer eligible for a delay in publication in 2022.

Records that have reached the delay-in-publication limit will have one of the following two “Delay in Publication” statuses in the Open Payments system:

- No Delay - R & D on New Product - Limit Reached
- No Delay - C.I. (Clinical Investigation) on New Product - Limit Reached

For program years that have reached the delay limit, users will be prevented from requesting a delay in publication on new or updated records.

Records submitted via bulk file that have a Resubmission File Indicator value of “N” or “Y” (i.e., new records or resubmitted records, respectively) and request a delay in publication but are not eligible for a delay based on their program year will fail record validation.

When attempting to submit a bulk file, if a user selects the “Renew Delay in Publication” option from the “Resubmission File Indicator” drop-down on the “Upload Payments” page (i.e., indicating all records in the file have a Resubmission File Indicator value of “R”), the system will display an on-screen error message and prevent the file from being uploaded.

Actions

Step 1: Confirm Demographic Information in Records

1. Prior to submitting a data file, check the demographic information for each physician, non-physician practitioner (NPP), teaching hospital, or principal investigator included in the records to ensure that it is current. To assist you in creating accurate records, CMS has made profile information available through the Validated Physicians List (VPL), Validated Non-Physician Practitioner List (VNPPL), and the CMS Teaching Hospital List located in the Open Payments system.
 - The VPL ZIP file consists of two CSV files: one for Physicians with a National Provider Identifier (NPI) and the other for Physicians without an NPI. The VPL ZIP file also includes a supplement file for each reportable program year with inactive licenses for each physician for the corresponding program year.
 - The VPL is **not** an exhaustive list of all physicians who should be included in Open Payments reporting.

Last modified: January 2024



- Physicians who do not appear on the VPL may still be successfully matched. The VPL is merely a tool to help prepare records. Check with the National Plan and Provider Enumeration System (NPPES) for information on physicians that cannot be found on the VPL.
- The VPL is only accessible within the Open Payments system on the Submissions page.
- The VNPPL is a reference data file in CSV format, which includes information about Physician Assistants (PAs), Nurse Practitioners (NPs), Clinical Nurse Specialists (CNSs), Certified Registered Nurse Anesthetists or Anesthesiologist Assistants (CRNAs/AAs), and Certified Nurse-Midwives (CNMs).
- The VNPPL is not an exhaustive list of all NPPs who should be included in Open Payments reporting.
 - NPPs who do not appear on the NPPL may still be successfully matched. The NPPL is merely a tool to help prepare records. Check with the National Plan and Provider Enumeration System (NPPES) for information on NPPs that cannot be found on the NPPL.
 - The NPPL can only be accessed within the Open Payments system, on the “Submissions” tab.
- The Teaching Hospital Lists (listed by reporting cycle) includes all teaching hospitals that must be included in Open Payments reporting. The Teaching Hospital List can be accessed via the Resources for Reporting Entities page on the Open Payments website (<https://www.cms.gov/OpenPayments/Resources/Reporting-Entities>).
 - For “Doing Business As” use the hospital’s name in the submitted record. The “Doing Business As” name is found in the Teaching Hospital List under the heading of “Hospital Name.”
 - For the address of the hospital in the submitted record, use the NPPES Business Address in the Teaching Hospital List.

Step 2: Prepare Files

Bulk file uploads in the Open Payments system must be in CSV format with the field delimiter set to pipe (|). Instructions on how to set the field delimiter can be found in the Open Payments User Guide for Reporting Entities.

The maximum file size for a submitted file is 250 MB. Larger files should be divided into multiple files that fall under 250 MB. CSV data files can be submitted as ZIP files if all files contained within the ZIP file are of the same payment category type. Submitted ZIP files must be under 250 MB after compression. There is no limit to how many files you can upload into the system.

Step 3: Upload Bulk Data File

To submit data via bulk file upload, follow these steps below:

Last modified: January 2024



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” page, select “Bulk File Upload” under the “Submit Payment Data” header.
3. On the “Upload Payments” page, select the Payment Category, Reporting Entity, Program Year, and Resubmission File Indicator values for the bulk file. The “Resubmission File Indicator” field drop-down field identifies the type of file you are submitting and must correspond to the “Resubmission File Indicator” field within the file (see “Resubmission File Indicator” section above, for an explanation of these actions):
 - New Submission
 - Resubmission
 - Renew Delay in Publication
 - Delete

General Payments and Ownership or Investment Interests records are not eligible for delays in publication. If you select “Ownership or Investment Interest” for the field “Payment Category”, the option “Renew Delay in Publication” will not appear in the “Resubmission File Indicator” field.

4. Select the appropriate file to upload. Each file will be treated as a separate upload. The file extension must be **.CSV** for CSV files and **.ZIP** for ZIP files.
5. Select “Submit File to Open Payments.”

Repeat the steps above for each file that needs to be uploaded.

Upon upload, the file will go through several validations.

- First are file-level validations. If the file-level validation fails, the Open Payments system will reject the entire file. If this occurs, you will receive an email notifying you of the file validation failure, the reason for the failure, and if applicable, the line number of the file where the failure occurred.
- If the file passes the initial file validations, each record will be subject to a series of record-level validations. Record level validations are broken into two phases:
 - The first phase of record validations determines if the record can be loaded into the system. Records that fail this phase are not loaded into the system. They will **not be viewable in the Open Payments system and no error log will be produced**. Instead, you will receive an email that identifies the rejected records and the reasons for their rejection.
 - The email will identify a set number of records for each rejection reason. If more records are rejected for a reason than can be displayed, contact the Open Payments Help Desk for the complete list of records rejected for that reason. The email will identify whether the number of records rejected exceeds the visible amount.
 - The second phase of record validations are applied after the records are loaded into the system. If your file contains records that fail this level of validation, you will receive an email

Last modified: January 2024



notifying you of the failure. The failed records **will be viewable in the Open Payments system and the errors will be listed in a downloadable error log.**

- New or resubmitted records that pass the record level validations will be subject to matching validations, in which the Open Payments system attempts to match the covered recipient (e.g., Physician or NPP First Name, Teaching Hospital Address, etc.) information in the record with a valid covered recipient using existing CMS resources and information. If the information in the record cannot be matched, the record will fail matching validation. Users will receive a notification email if any records in the file fail matching validation. The failed records **will be viewable in the Open Payments system and the errors will be listed in a downloadable error log.**
- A record will receive an error if the Drug or Biological Name entered by the user is not valid against the CMS approved dataset **OR** if the National Drug Code (NDC) is provided, but the Drug or Biological Name and NDC combination is not valid against the CMS approved dataset.
 - To address the error, please refer to the Drug Name and NDC dataset reference file on the CMS Resources Page to identify the correct NDC and Drug or Biological Name combination for submissions.
- A record will receive an error if the Medical Device or Medical Supply Name and Primary Device Identifier combination is not valid as per the CMS-approved source - Global Unique Device Identification Database (GUDID) dataset combination of brand name and Primary Device Identifier if Primary Device Identifier is entered.
 - To address the error, please refer to the Medical Device and Medical Supply Name and Primary Device Identifier dataset reference file on the CMS Resources Page to identify the correct PDI and Device Name combination to use for submissions.
- In certain scenarios a warning message will be listed in the downloadable Warning log. Examples of this include if a physician's license expired during the program year, or if the record is considered to be a late submission.
- Licenses that expired during the program year will display an expired license warning message(s) on the individual record's "Record ID" page. In addition, these records will be flagged with a warning icon on the "Payment Category" page.
 - License Warnings will only be displayed for the payment records that were successfully matched. Submitters should review the license information on records that triggered warnings. If the information is valid, no action is required, and the record can continue through final submission without further updates. If the information is not valid, users should correct or delete the records.

Records with validation and/or matching errors must be corrected before they can undergo final submission.

Last modified: January 2024



Note: To clarify errors in fields that can contain multiple values, such as physician or NPP license, the error log file column (“Data Element Value”) displays the specific value in the field that produced the error. The onscreen error messages for multiple value fields will also identify the specific value that produced the error.

Refer to the quick reference guides “Identifying Validation and Matching Errors” and “Correcting Validation and Matching Errors” or the “Open Payments User Guide for Reporting Entities” for instructions on how to identify and correct errors.

The matching process is not applied to records with Resubmission File Indicator values of “R” or “D” for “Renew Delay in Publication” or “Delete”, respectively.

Record Upload Statuses

If the file passed file level validations, the user may check the status of their upload at any time via the “Review Records” page. Below is a summary of the processing statuses related to data submission:

- **System Processing** - Records that the Open Payments system is still processing and validating.
- **Failed Validation** - Records that did not pass field validation checks.
- **Failed Matching** - Records that were not successfully matched to a valid covered recipient.
- **Ready for Submission** - Records that are successfully validated and matched and are ready for final submission.

Records with errors that failed validations prior to being loaded into the system are not saved in the Open Payments system and will not appear on the “Review Records” page.

Step 4: Review Submitted Files:

Submitters may review the status of their submitted files via the “Review File Status” page or by accessing the file details associated with the record(s) on the “Payment Category” page.

The “Review Files Status” page provides a listing of submitted files, including the processing status, the date the file was submitted, and the user that uploaded the file. It also identifies any files that were deleted and the user that initiated the deletion. Follow the steps below to access the “Review File Status” page.

1. Log in to the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov/>.
2. Select the “Submissions” tab on the menu bar. Under the “Review Submitted File(s) Status” section of the page, select the “Review File Status” button.
3. “Review File Status” page is displayed with additional search criteria and a File Table.

4. Users can search by following File Processing Statuses:
 - a) **In Process** - The file is being processed by the system.
 - b) **Rejected** - The file is rejected by the system and user is notified via email. No records were uploaded.
 - c) **Submitted Successfully** - File uploaded successfully. May contain record(s) with "Failed Matching" errors since matching occurs after a file is successfully submitted.
 - d) **Submitted with Errors** - The file is uploaded successfully but one or more records in the file are in "Failed Validation" status.
 - e) **Processed with Warning** - File contains records with late submission and/or expired license warning. No action is required for records with late submission warnings. Submitters should review the records that triggered an expired license warning. If the information is valid, no action is required, and the record can continue through final submission without further updates. If the information is not valid, the user should correct or delete the records.
 - f) **System Failure Occurred** - There is a hardware failure or an infrastructure issue. The file will not be processed and may have to be re-uploaded once the system is recovered.
 - g) **Rejected - File Infected** - The virus scan resulted in an infected file. Re-upload a virus free file.
 - h) **Deleted** - File was deleted successfully from the system by selecting the "Delete File" button.
5. Each "File ID" hyperlink directs the reporting entity submitter to the respective "File ID Details" page. The submitter can take actions (view file details, download error log file, download warning log file, and delete file) as they can on the "File ID" page accessed via the "Payment Category" page.

Step 5: Review Records:

1. Log in to the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov/>.
2. Select the "Submission" tab on the menu bar. Under "Review Submitted Payment Records", select the payment type, reporting entity, and program year you wish to view, then select "Review Detail." This brings you to the selected "Payment Category" page.
3. Select the "Record ID" link for an individual record on the "Payment Category" page to view record details. The "Record ID" page may also display error messages, including matching and expired license related information.
4. Users can also select the "File ID" link for an individual record on the "Payment Category" page to view file details.

Step 6: Perform Final Submission and Attestation

Performing a bulk file upload only uploads the data to the system.

You must complete the final submission and attestation processes for the data to be considered reported. Final submission may take several hours depending upon the size of the submission.

Refer to the quick reference guide "Final Submission and Attestation" or the "Open Payments User Guide for Reporting Entities" for instructions on how to complete the final data submission and attestation processes.

Last modified: January 2024



Next Steps

- Correct file-level validation errors, if necessary.
- Correct record-level data submission errors, if necessary.
- Complete final submission and attestation.

Last modified: January 2024



Additional Resources

Table 1 lists the program years which are not eligible for delay in publication renewal and program years not eligible for submission in a given calendar year.

Table 1: Delay in Publication and Submissions Not Eligible Program Years per Calendar Year

Calendar Year	Program Years- Not Eligible for delay in publication renewal	Program Years- Not Eligible for Submissions
2018	2013	NA
2019	2013 and 2014	2013
2020	2013, 2014 and 2015	2013 and 2014
2021	2013, 2014, 2015 and 2016	2013, 2014 and 2015
2022	2013, 2014, 2015, 2016 and 2017	2013, 2014, 2015 and 2016
2023	2013, 2014, 2015, 2016, 2017 and 2018	2013, 2014, 2015, 2016 and 2017

Data submission resources can be found on the “Resources” page (<https://www.cms.gov/OpenPayments/Resources>) and on the “Reporting Entities” page (<https://www.cms.gov/OpenPayments/Resources/Reporting-Entities>) of the CMS Open Payments website.

The “Open Payments User Guide for Reporting Entities,” covers the entire data submission process in detail and provides step-by-step instructions for various scenarios.

Quick reference guides relevant to bulk file upload and your next steps include:

- Identifying Validation and Matching Errors
- Correcting Validation and Matching Errors
- Record Deletion
- Consolidated Reporting
- Payment Category Page
- Requesting or Updating a Delay in Publication
- Final Submission and Attestation

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 for reporting entities on how to submit records of payments, other transfers of value, and ownership or investment interests via a bulk file upload.
- **Date of document issuance:** January 2024
- **Replacement / Revision Status:** Revision to previous versions
- **Agency Identifier:** CPI DASG/CPI DTP/DASG/CPI 3449
- **Summary of Document:** Instructions for submitting data via a bulk file upload.
- **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