Open Payments System Quick Reference Guide
Covered Recipient Review and Dispute Process

Introduction

The purpose of this quick reference guide is to provide an overview of the review and dispute process for physicians, non-physician practitioners (NPP) (including principal investigators), and teaching hospitals, collectively referred to as covered recipients. This guide will cover how to review and affirm data submitted by applicable manufacturers and applicable group purchasing organizations (GPOs), hereafter collectively referred to as reporting entities. It also covers how to initiate and withdraw disputes on submitted data.

Prerequisites

- User is registered in the Centers for Medicare & Medicaid Services (CMS) Identity Management system (IDM) and obtained access to the Open Payments system.
- Covered recipient has records eligible for review and dispute in the Open Payments system.
- If a covered recipient does not have a profile, CMS advises to create one and to keep it maintained each year so any reported payments may be reviewed prior to publication.

Actions

Reviewing Submitted Data

Follow the steps below to review data submitted to the Open Payments system:

1. Log in to the Open Payments system via the CMS Enterprise Portal at https://portal.cms.gov/ and select the "Review and Dispute" tab on the menu bar.
2. Select a covered recipient from "Choose a Covered Recipient" drop-down menu whose records are to be reviewed. To see the summary of payment records for the covered recipient chosen, select the "Show Summary" button. This will bring up the Summary of Payment Records. Only records available for review and dispute are included in the Summary of Payment records. All third-party payments are counted in the Summary of Payments for general payment category.
3. Select the "Show Records" button to navigate to the "Review and Dispute" page for the covered recipient. The "Review and Dispute" page displays all available records for review.

   a) Users can use available filters on the page to narrow search results as desired.
   b) There are two tabs that may contain information related to the records attributed to the covered recipient:

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   i. **Available for Review and Dispute:** This tab displays all records that are currently available for review and dispute.

   ii. **Deleted and In Progress Records:** This tab displays all records that were available for review and dispute in the current calendar year but were deleted or are in the process of being edited by the reporting entity. These records are shown as information only and review and dispute actions are not allowed for records on this tab.

> **Note:** When the reporting entity re-attests to the records in a status of "In Progress", the record(s) will become available in the "Available for Review and Dispute" tab**.**

4. View details for an individual record by selecting the hyperlinked number under the "Record ID" heading on the "Available for Review and Dispute" tab. This will open the "Record ID" page for that record, which contains the record's details, general information, and reporting entity contact information.

Affirming Submitted Data

Affirming the data is voluntary and means that the covered recipient agrees with the reported information. Records cannot be affirmed if there is an active dispute for the record. Follow these steps to affirm data records:

1. Log in to the Open Payments system via the CMS Enterprise Portal at https://portal.cms.gov/ and select the "Review and Dispute" tab on the menu bar.
2. Select the covered recipient whose records are to be reviewed from the drop-down menu. To navigate to the Review and Dispute page, select the "Show Records" button.
3. On the "Review and Dispute" page, use the filtering tools to help find the records to be affirmed, then select the "Search" button. All records available for affirmation will be under the "Available for Review and Dispute" tab.
4. Select the "Affirm Record" button to open the "Affirm Record" page.
5. Review the information displayed on the "Affirm Record" page. Select "Affirm Record" button to affirm the record.
6. A confirmation message is displayed that the record has been successfully affirmed.

Once a record has been affirmed, the "Affirm Record" button will no longer be available for selection.

Affirmed records may still be disputed if the covered recipient later identifies errors in the report.

Initiating Disputes

If you find errors in records submitted by a reporting entity, you can initiate a dispute on those record(s). Follow these steps:

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1. Log in to the Open Payments system via the CMS Enterprise Portal at https://portal.cms.gov/ and select the "Review and Dispute" tab on the menu bar.
2. Select the covered recipient whose records are to be reviewed from the drop-down menu. Select the "Show Records" button to navigate to the "Review and Dispute" page.
3. On the "Review and Dispute" page, use the filtering tools to help find the records to be disputed, then select the "Search" button. All records available for dispute will be under the "Available for Review and Dispute" tab.
4. Select the "Dispute Record" button to dispute the record. This opens the "Dispute Record" page.
5. Enter the reason the dispute has been initiated and your contact information in the "Dispute Details and Contact Information" text box. When finished, select "Send Dispute."

    a) The text box can contain up to 4,000 characters, including spaces, and allows all special characters on a standard U.S. keyboard (not including ALT+NUMPAD ASCII Key characters).
    b) It is recommended that you include review and dispute contact information, such as an email address and/or phone number, within the "Dispute Details and Contact Information" text box to assist the reporting entity in resolving the dispute in a timely manner.
    c) When the "Send Dispute" button is selected, the system sends an email to the reporting entity notifying them that a dispute has been initiated. This email will include the contents of the "Dispute Details and Contact Information" text box.

6. The "Dispute Confirmed" page displays a confirmation message that the dispute has been successfully initiated for that record.
7. A notification in the record's header will identify that the record has associated disputes including the number of disputes ever initiated.

Withdrawing a Dispute

A dispute may be withdrawn if the dispute is no longer valid or desired. To withdraw a dispute, follow these steps:

1. Log in to the Open Payments system via the CMS Enterprise Portal at https://portal.cms.gov/ and select the "Review and Dispute" tab on the menu bar.
2. Select the covered recipient whose records are to be reviewed from the drop-down menu. To navigate to the Review and Dispute page, select the "Show Records" button.
3. On the "Review and Dispute" page, use the filtering tools to help find the record(s) to be withdrawn, then select the "Search" button. All disputes available for withdrawing will be under the "Available for Review and Dispute" tab.

    > **Note:** Only disputes in "Initiated" and/or "Acknowledged" statuses on the record are available to withdraw.

4. Select the "Dispute ID" link located at the bottom of the disputed record to view dispute details.

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5. Select the "Withdraw Dispute" button. The "Withdraw Dispute" page is displayed. Review the information and select the "Withdraw Dispute" button.

6. A confirmation message is displayed that the dispute has been successfully withdrawn.

>   Once a dispute has been withdrawn, the "Withdraw Dispute" button will be unavailable for selection.

An email notification will also be sent to the reporting entity informing them that a dispute has been withdrawn.

Next Steps

*   Work with reporting entities to resolve disputes, if necessary.

Additional Resources

All review and dispute process resources for covered recipients are available on the Resources for Covered Recipients page of the Open Payments website at https://www.cms.gov/priorities/key-initiatives/open-payments/resources/covered-recipients.

The "Review and Dispute for Physicians, Non-Physician Practitioners, Teaching Hospitals, and Principal Investigators" section of the Open Payments User Guide for Covered Recipients covers the entire review and dispute process in detail and provides step-by-step instructions for various scenarios.

Quick reference guides relevant to review and dispute activities for physicians, NPPs, and teaching hospitals include:

*   Review and Dispute Timing and Data Publication

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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.
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