

Open Payments System Quick Reference Guide

Record Deletion

Introduction

Applicable manufacturers and applicable group purchasing organizations (GPOs), hereafter collectively referred to as reporting entities, may have to delete records to address issues with the validation, matching, or review and dispute processes.

This quick reference guide provides a high-level overview of how to delete records.

Prerequisites

- User is registered in the Centers for Medicare & Medicaid Services (CMS) Identity Management system (IDM) and 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
- Reporting entity has submitted data to the Open Payments system
- User who deletes records holds the submitter user role for the reporting entity; user who attests to the data holds the role of attester for the reporting entity

Actions

Deleting Files and Records

Deletion can be performed on entire bulk data files as well as on individual records. Records that are in an attested status and marked for deletion must undergo re-attestation to be removed from the system. When marked for deletion by the process described below, the attested record(s) are placed in a status of "Marked for Deletion," and will remain visible to covered recipients and are eligible for publication until re-attestation is complete.

Deleted records will no longer appear in the views of the reporting entity or the associated covered recipient.

Deleting a File

This process will delete all unattested records in the selected data file and mark for deletion all attested records contained in that file. Records within a deleted file cannot be recovered or viewed once deletion has been completed.

1. Log in to the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov/> and select the “Submissions” tab on the toolbar. In the “Review Submitted Payment Records” section, select the payment type (General, Research, or Ownership/Investment), the reporting entity whose records are to be deleted, and the program year for those records, then select the “Review Detail” button.
2. At the bottom of the “Payment Category” page is a data table. Find one record from the file to be deleted. Use the filtering tools on the page to help find a relevant record. Select the hyperlink in that record’s “File ID” column.
3. On the “File ID” page, select the “Delete File” button.
4. Select the “Delete” button from the “Delete File” pop-up window to delete the file.

Note: Record(s) in "Attested" status will not be immediately deleted but will be “Marked for Deletion.” To complete the deletion process, the records for that program year must be attested to again.

Deleting a Record via Bulk File Upload

1. Create a bulk file containing the record(s) to be deleted. Set the “Resubmission File Indicator” for these record(s) to “D” and provide information for all the required fields. Refer to the Submission Data Mapping documents for details, including information on the required fields.
2. Log in to the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov/> and select the “Submissions” tab on the toolbar. Select “Bulk File Upload.”
3. From the drop-down menus, select the appropriate Payment Category (General, Research, or Ownership/ Investment), Reporting Entity, and Program Year. For the Resubmission File
4. Indicator, select “Delete.”

The system will process the necessary records to be deleted within the file. If the file is rejected, the Open Payments system will send a notification email that includes an explanation for the failure.

If an individual record is rejected, it will not be uploaded into the system and the Open Payments system will send a notification email that includes an explanation for the failure.

Deleting a Record Manually

The process below will delete an individual unattested record or mark for deletion an individual attested record.

1. Log in to the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov/> and select the “Submissions” tab or from the R&D page (only for records that are disputed) on the toolbar. In the “Review Submitted Payment Records” section menu, select the payment type (General, Research, or Ownership/Investment), the reporting entity whose record is to be deleted, and the program year for those records, then select “Review Detail.”

2. At the bottom of the “Payment Category” page is a data table. To delete a record, find that record in the data table, select the corresponding checkbox, and select the “Delete Selected” button.

Next Steps

- Attest to deletion of records (if records were previously attested to)

Additional Resources

All data submission resources can be found on the Resources page of the CMS Open Payments website at <https://www.cms.gov/priorities/key-initiatives/open-payments/resources>.

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

Quick reference guides relevant to record deletion and next steps include:

- Identifying Validation and Matching Errors
- Correcting Validation and Matching Errors
- Final Submission and Attestation
- Bulk File Upload
- Manual Data Entry
- Payment Category Page
- Requesting or Updating a Delay in Publication

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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