

Open Payments System Quick Reference Guide

Required Information for Registration

Introduction

To register individuals or organizations in the Open Payments system, users must provide all required information. This quick reference guide details what information is required for profile registration.

Collecting required information prior to registration is important, as registration must be completed in one session. In addition, the Open Payments system times out after 30 minutes of inactivity, and all information entered during a session that times out would be lost.

Applicable Manufacturer or Applicable Group Purchasing Organization (GPO): Required Information for Registration

Applicable manufacturers and applicable group purchasing organizations (GPOs), collectively referred to as “reporting entities,” and individuals holding user roles with them must register with the Open Payments system. Individuals designated as primary and backup points of contact for a reporting entity do not have to register within the Open Payments system.

Individuals responding to a nomination email are only required to create a personal profile.

Creating an Entity Profile

Reporting entities can be registered in the Open Payments system by individuals who hold a position within the entity such as Chief Executive Officer, Chief Financial Officer, Chief Compliance Officer, or equivalent.

To create a reporting entity profile the following information is required:

- Entity’s legal name
- Reporting entity type (Applicable Manufacturer or Applicable Group Purchasing Organization)
- Business type
- URL of parent company
- Business address
- Business telephone number
- Type of ownership
- Taxpayer Identification Number (TIN)/Employer Identification Number (EIN)
- Doing Business As (DBA) name
- Is this entity part of a consolidated report (i.e., where an entity is reporting on behalf of another entity)?

Last modified: January 2024



- Information about two points of contact for the entity (name, title, business telephone number, and business email address)
- Contact information for Review and Dispute

The following information is not required for registration, but is helpful to include for vetting purposes:

- Food & Drug Administration (FDA) Establishment Identifier
- Data Universal Numbering System (D-U-N-S® Number)

Creating a Personal Profile

After creating an entity profile, or if the entity profile has already been created, users must create a personal profile. The following information is required:

- First name
- Last name
- Business email address
- Business telephone number
- Job title
- Business address
- User's role(s) in the Open Payment system

Users must review any pre-populated information for accuracy and make edits as necessary. Changing this information in Open Payments will not change the corresponding information in the user's IDM profile.

Nominating Individuals for User Roles

To nominate additional individuals for roles in the Open Payments system, provide the following information for those individuals:

- First and last name of the nominee
- Business email address of the nominee
- Business phone number of nominee
- Role(s) for which the person will be nominated

Physician: Required Information for Registration

Each physician should create a profile for themselves directly in the Open Payments system and should not delegate this task to another individual.

Individuals responding to a nomination email to register as a physician authorized representative will need to create only a personal profile.

Last modified: January 2024



Creating a Personal Profile

The following information is required for creation of a physician profile:

- First name
- Last name
- Business email address
- Business telephone number
- Practice business address (if the physician has multiple practice addresses, the user should enter the primary business address)
- Physician primary type
- Physician taxonomy code
- License number and license state (for at least one state in which the physician holds an active license)

The following information is required if the physician possesses these identifying numbers:

- National Provider Identifier (NPI)
- Drug Enforcement Agency (DEA) Number

Note: If the physician has an NPI, the information supplied during registration in the Open Payments system must match the information (e.g., first and last name) exactly as it is entered within the National Plan & Provider Enumeration System (NPPES) to ensure a successful registration.

Nominating a Physician Authorized Representative

Nominating an authorized representative to assist a physician with Open Payments can be done during registration or later. Nomination requires the following information:

- Name of nominee
- Job title of nominee
- Business email address of the nominee
- Business phone number of nominee
- The business address of the nominee
- Access level(s) to be granted to the nominee

Non-Physician Practitioners (NPPs): Required Information for Registration

For the purpose of the Open Payments program, NPPs include physician assistants, nurse practitioners, clinical nurse specialists, certified registered nurse anesthetists, anesthesiologist assistants and certified nurse midwives. The non-physician practitioner terms are defined in the Final Rule. ([See 42 CFR 403.902](#)) Each NPP should create a profile themselves directly in the Open Payments system and should not delegate this task to another individual.

Last modified: January 2024



Individuals responding to a nomination email to register as an NPP authorized representative will only need to create a personal profile.

Creating a Personal Profile

The following information is required when creating an NPP profile:

- First name
- Last name
- Business email address
- Business telephone number
- Practice business address (if the non-physician practitioner has multiple practice addresses, the user should enter the primary business address)
- Non-physician practitioner primary type
- Non-physician practitioner taxonomy code
- License number and license state (for at least one state in which the non-physician practitioner holds an active license)

The following information is required if the NPP possesses these identifying numbers:

- National Provider Identifier (NPI)
- Drug Enforcement Agency (DEA) Number

If the NPP has an NPI, the information supplied during profile creation in the Open Payments system must match the information (e.g., first and last name) exactly as it is entered within the National Plan & Provider Enumeration System (NPPES) to ensure a successful registration.

Nominating a NPP Authorized Representative

Nominating an authorized representative to assist a NPP with Open Payments can be done during registration or later. Nomination requires the following information:

- Name of nominee
- Job title of nominee
- Business email address of the nominee
- Business phone number of nominee
- Business address of the nominee

Teaching Hospital: Required Information for Registration

Individuals creating a teaching hospital profile must assume a user role of an “Authorized Official” during registration.

Individuals responding to a nomination email to create their profile as an “Authorized Official”, or “Authorized Representative” only need to create a personal profile.

Creating a Teaching Hospital Profile

To search for a teaching hospital, the following information is required:

- State where the teaching hospital is located
- Teaching hospital doing business as (DBA) name
- Taxpayer Identification Number (TIN)
- Teaching hospital business address

Creating a Personal Profile

To create a personal profile, the following information is required:

- First name
- Last name
- Email address
- Business phone number
- Business address
- Job title

Users may review any pre-populated information for accuracy and make edits as necessary. Changing this information in Open Payments will not change the corresponding information in the user’s IDM profile.

Nominating Individuals for User Roles

To nominate additional individuals for user roles in the Open Payments system, the following information is required:

- Name of nominee
- Job title of nominee
- Business email address of the nominee
- Business phone number of nominee
- Business address of the nominee
- User role to be granted to the nominee

Additional Resources

All registration resources are available on the Resources page of the Open Payments website at <https://www.cms.gov/priorities/key-initiatives/open-payments/resources>.

The Open Payments User Guide for Reporting Entities and Open Payments User Guide for Covered Recipients covers all registration processes in detail and provides step-by-step instructions for various scenarios.

Last modified: January 2024



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 of the required information for registering in the Open Payments system.
- **Date of Issuance:** January 2024
- **Replacement/Revision Status:** Revision to previous versions
- **Agency Identifier:** CPI DASG/CPI DTP/DASG/CPI 3627
- **Summary of Document:** An overview of the required information for registering in the Open Payments system.
- **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