

OPEN PAYMENTS

Creating public transparency into health care industry
& health care provider financial relationships

Program Year 2021 Data Submission &
System Enhancements

February 16, 2022
CMS Open Payments Team



About Open Payments

- Open Payments is a national disclosure program that promotes a transparent and accountable health care system by making the financial relationships between drug and medical device companies (reporting entities) and health care providers (covered recipients) available to the public. Through the Open Payments data, health care consumers have insight into the provider-industry relationships.
- Each year reporting entities collect data regarding payments or transfers of value they have made to covered recipients. In the following calendar year, reporting entities submit this information to CMS for publication.

Key Terms

- Reporting Entities

- Refers to pharmaceutical and medical device manufacturers and their distributors who are required to report payments and other transfers of value to Open Payments.
- Also referred to as applicable manufacturers and group purchasing organizations (GPOs).

- Covered recipients

- Refers to health care providers receiving payments or other transfers of value from the reporting entities and includes: Physicians, Physician Assistants, Nurse Practitioners, Clinical Nurse Specialists, Certified Registered Nurse Anesthetists, Certified Nurse Midwives, and Teaching Hospitals.
 - The additional provider types that were added beginning with Program Year 2021 are collectively referred to within the program as Non-Physician Practitioner covered recipients or NPPs

Program Year 2020 Recap

Program Year 2020 Data Refresh

- On January 21, 2022 the Open Payments Data was refreshed to reflect changes that were made after the initial data publication.



Total U.S. Dollar Value

\$9.03 Billion



Total Records Published

6.36 Million



General Payments
\$2.03 Billion



Research Payments
\$5.88 Billion



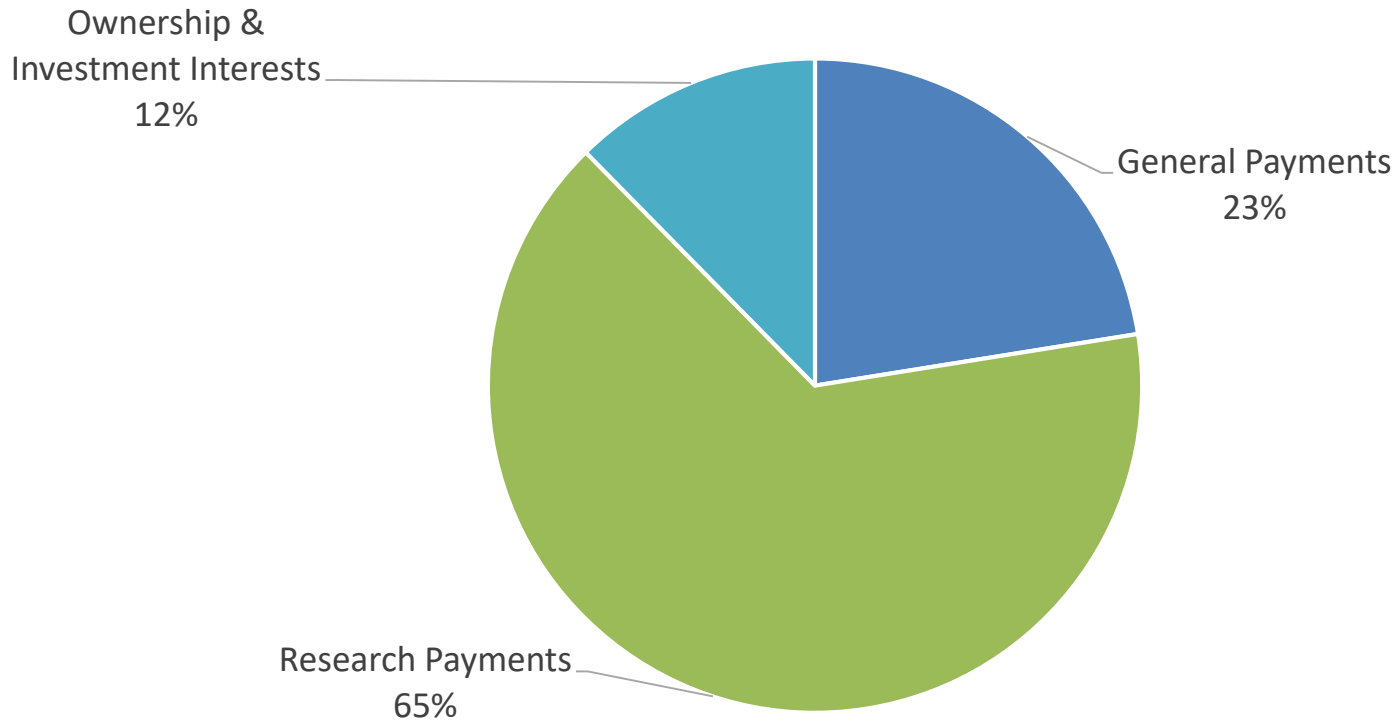
Ownership & Investment
\$1.12 Billion

Refresh Reminders

- What's Included:
 - **Record Updates:** changes to non-disputed records that were made on or before November 15, 2021
 - **Dispute Resolutions:** dispute indicators removed for previously disputed records for those resolved on or before December 31, 2021
 - **Record Deletions:** records deleted on or before December 31, 2021 were removed from the Open Payments database
- What's Not Included:
 - records submitted for the first time after the close of the Program Year 2020 submission window (March 31, 2021)
 - Any records that were disputed and for which dispute resolution resulted in a change to the covered recipient.

Program Year 2020 At a Glance

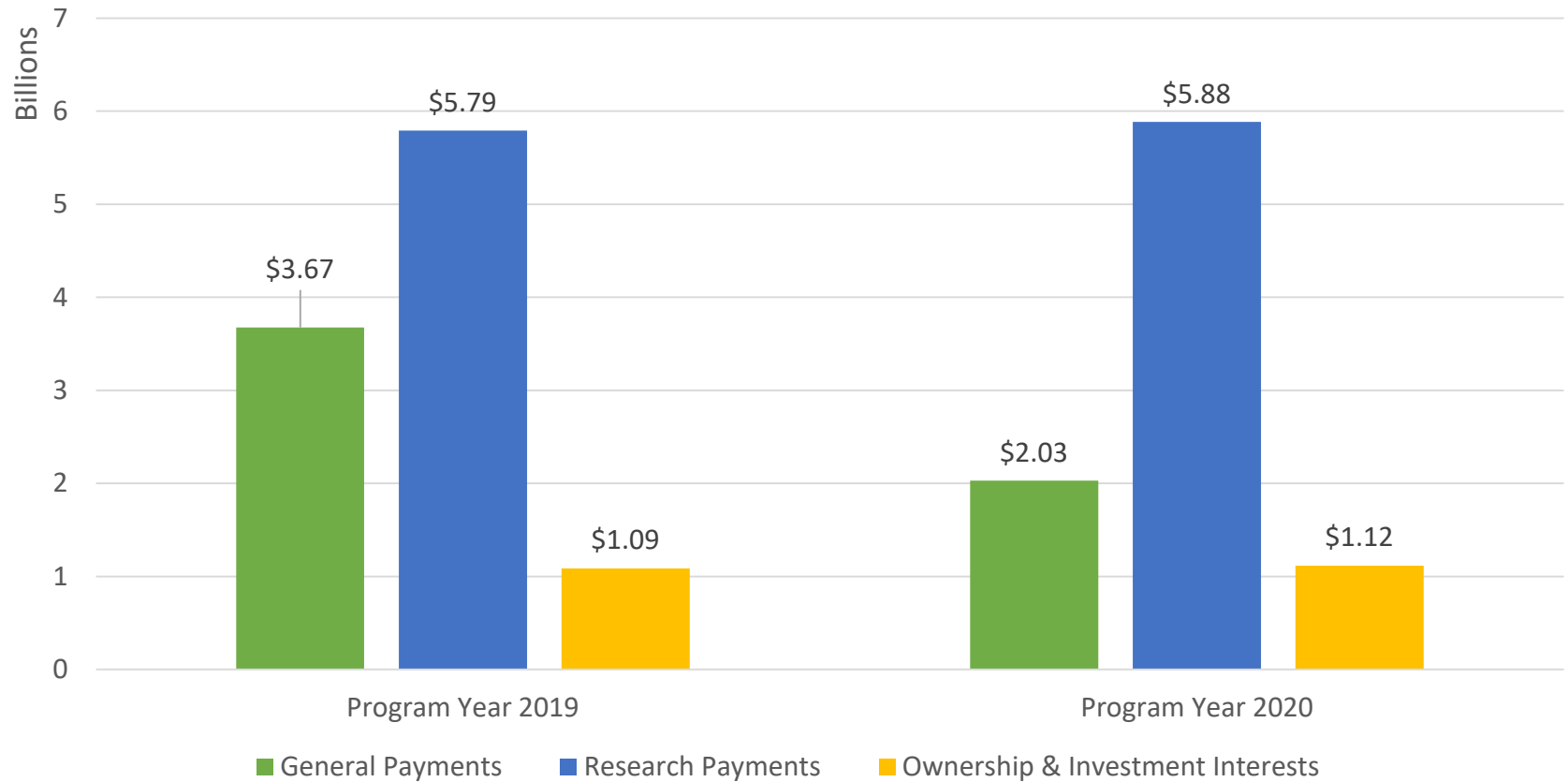
Program Year 2020 Data (Refresh)
Percent Total Value of Payments



Program Years 2019 & 2020

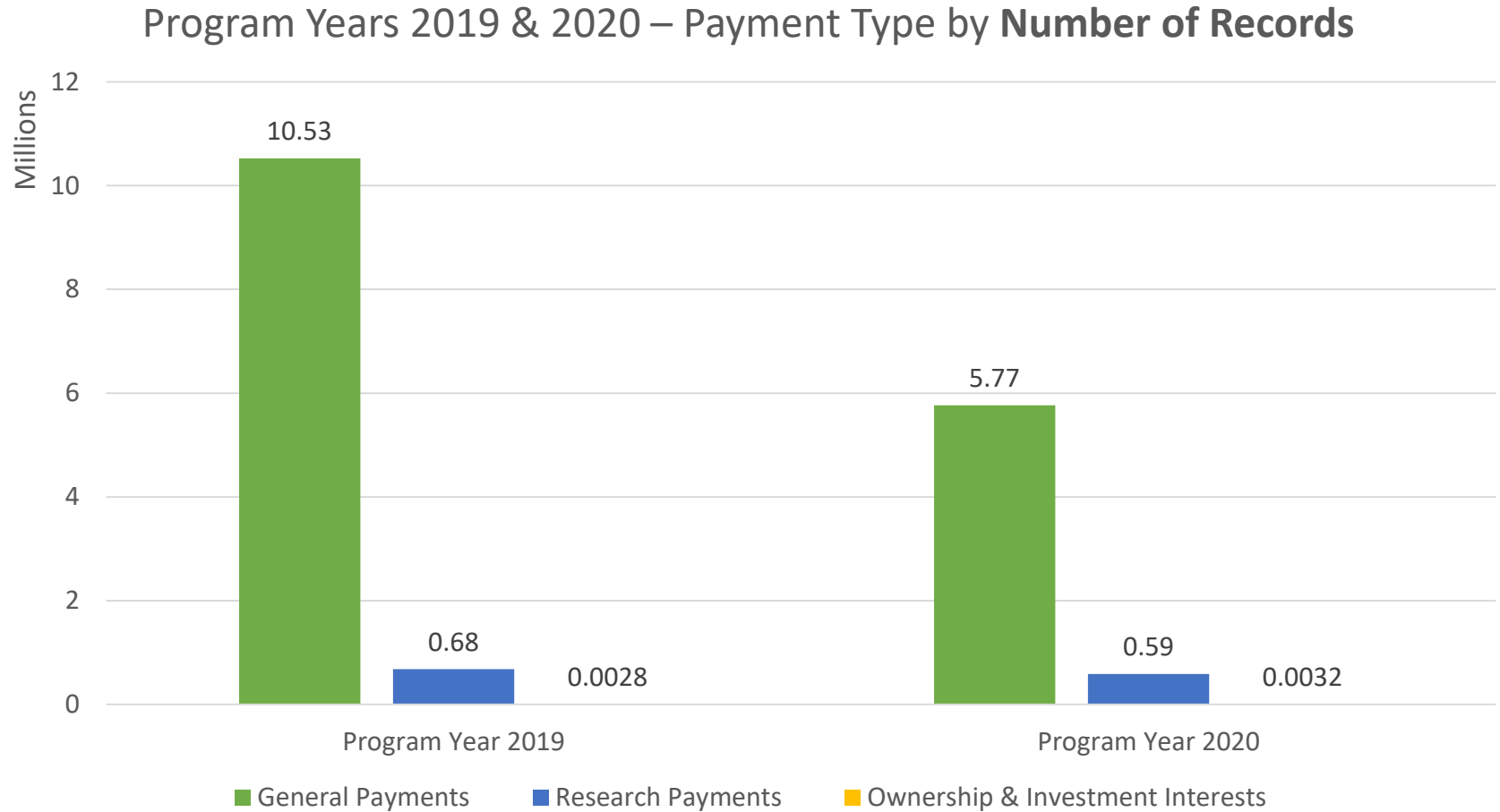
Data Trends

Program Years 2019 & 2020 – Payment Type by Total Dollar Value



Program Years 2019 & 2020

Data Trends

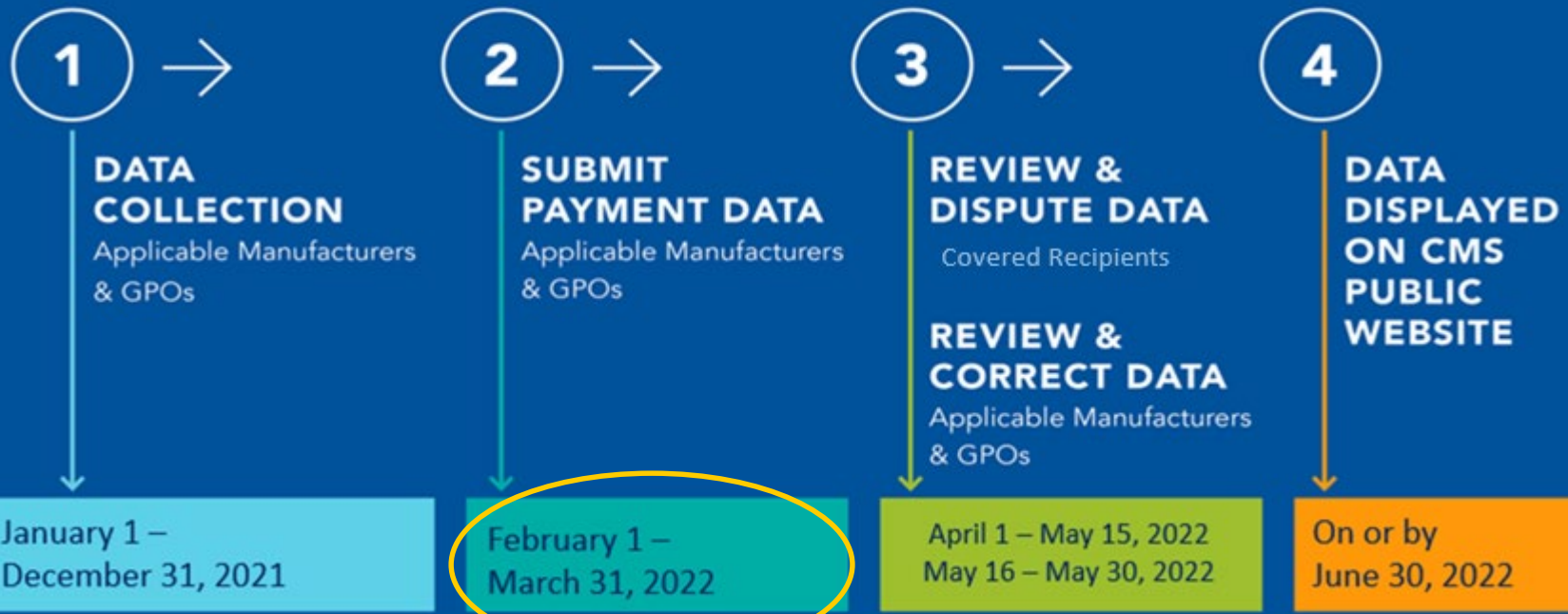


Program Year 2021 Data Submission

Program Year 2021 Timeline

OPEN PAYMENTS

Program timeline



Reporting Entity Recertification

- **Reporting entities that registered in any previous calendar year must recertify to perform any Open Payments system functions**
 - Recertification confirms that details in the Open Payments system are accurate
 - Reporting entities due for recertification are given a status of “Pending Recertification”
 - Recertification can only be performed by an active user who holds an officer role
 - If a reporting entity does not have an active officer, contact the Open Payments Help Desk for assistance
 - Outdated or inaccurate reporting entity profile information can be updated during recertification
 - Changes to the entity’s Legal Name, Tax Identification Number (TIN), or DUNS number will require re-vetting of the entity

Data Submission Reminders

- **Delay in Publications Renewal Limit Reached Validation**

- The four year limit has been reached for payments made in the 2017 calendar year
- Records with previously requested delays that may no longer be delayed will be identified on the record listing page with a “Delay Limit Reached” status
- If there are attempts to renew a publication delay for a record ineligible for delay, an error message will be presented

- **Archived Data**

- Program Year 2013 data has been archived and Program Year 2014 will be archived during the upcoming data publication
 - Archived datasets are accessible on the Open Payments Archived Datasets Page. (<https://www.cms.gov/OpenPayments/Archived-Datasets>)

- **Program Year 2015 Record Submission**

- Beginning with the Program Year 2021 Data Submission Period (February 1, 2022 – March 31, 2022) reporting entities are no longer able to submit records for Program Year 2015

Open Payments System Enhancements

System Enhancements: *Program Expansion*

- The definition of a covered recipient is updated to include the following Non-Physician Practitioners (NPPs):
 - Physician Assistant (PA)
 - Nurse Practitioner (NP)
 - Clinical Nurse Specialist (CNS)
 - Certified Registered Nurse Anesthetist and /or Anesthesiologist Assistant (CRNA/ AA)
 - Certified Nurse-Midwife (CNM)
- Beginning with Program Year 2021, reporting entities are required to report data attributed to these NPPs in addition to physician and teaching hospital covered recipients
 - The NPPs are able to create profiles within the Open Payments System and will have the ability to participate in review and dispute activities.
- As a reminder, reporting on the NPP covered recipients is applicable to Program Year 2021 and subsequent program years. These reporting requirements are not retroactive and are therefore not applicable to program years prior to the 2021 reporting cycle.

Open Payments System Enhancements: *Nature of Payment Categories*

- The following Nature of Payment categories are added and reportable beginning with Program Year 2021 data submission:
 - Debt Forgiveness
 - Long-term Medical Supply or Device Loan
 - Acquisitions
- The accredited / certified and unaccredited / non-certified continuing education program categories are combined into one, “Compensation for serving as faculty or as a speaker for a medical education program”
- The changes to the Nature of Payment categories operate prospectively and are not reportable for program years prior to 2021

Open Payments System Enhancements: *Validating & Standardizing Medical Device Information*

- The Open Payments system is enhanced to validate the medical device or medical supply name.
 - The new field “Primary Device Identifier” is added to the Associated Related Products page for general and research payments only.
- The name of the marketed medical device or medical supply must be provided when:
 - The product indicator is selected as “covered”
 - The product indicator is selected as “non-covered” and the Primary Device Identifier is provided
- On general and research payment records, the system generates a warning if the Medical Device or Medical Supply Name and Primary Identifier combination is not valid
- The “List of Medical Device or Supply Name and Primary Device Identifier” CSV reference file and Instructions Document is available on the Open Payments System Resources page and the CMS Open Payments Resources page

Open Payments System Enhancements: *Rework Application & Pages around View All*

- Reporting Entities may navigate to the Payment Category page in two ways:
 - Review Submitted Payment Records:** On the Submissions landing page under the “Review Submitted Payment Records” section, Reporting Entities may select payment type, reporting entity and program year. This will take them directly to the “Payment Category” page via the “Review Detail” button
 - Review Records – Summary:** On the Submission landing page under the “Review Records – Summary” section, Reporting Entities can select entity and program year and access the Payment Category page via the “Review Summary” button by selecting “View All”.

The screenshot shows the 'Submissions' page in the Open Payments System. The navigation bar at the top includes: Home, Submissions, Review and Dispute, Manage Entities, My Profile, Messages, and Resources. The 'Submissions' section is active. Below the navigation bar, there are several sections:

- Submit Payment Data:** Includes 'Bulk File Upload' and 'Manual Data Entry' buttons.
- Review Submitted Payment Records:** This section is circled in blue. It contains three dropdown menus: '*Select Payment Type:', '*Select Entity:', and '*Select Program Year:'. A 'Review Detail' button is to the right.
- Review Records - Summary:** This section is also circled in blue. It contains two dropdown menus: '*Select Entity:' (with 'Alex's Cafe' selected) and '*Select Program Year:' (with '2020' selected). A 'Review Summary' button is to the right.
- Review Submitted File(s) Status:** Includes a 'Review File Status' button.
- Download Recipients Missing Ownership Record:** Includes a 'Download Report' button.
- Covered Recipient Validation Utility:** Includes a 'Validate Covered Recipient' button.

On the right side of the page, there are three download links:

- Download the Physician List:** The Validated Physician Lists and Physician with Inactive License(s) Supplement File per Program Year below should not be shared publicly.
- Download the Non-Physician Practitioner List:** The Non-Physician Practitioner List per Program Year below should not be shared publicly.
- Download the Reporting Templates:** To download reporting templates, see the Resources tab.

Open Payments System Enhancements: Supported Browsers

- The Open Payments web-based application no longer supports Internet Explorer (IE)
- For optimum user experience, the following web browsers should be used:
 - Google Chrome (Version 89 or higher)
 - Microsoft Edge (Version 89 or higher)
 - Safari (Version 13.1.2)
 - Mozilla Firefox (Version 83 or higher)

Additional PY2021 Information

- There are resources available on the CMS Open Payments Resource page and the Changes for Reporting Entities Page, to help you prepare for the new device reporting requirements.
- **Medical Device and Medical Supply Reference Data**
 - Includes medical device and medical supply names and Primary Device Identifier Information for all the medical device and medical supplies listed in the Food & Drug Administration (FDA) Global Unique Device Identification Database Directory (GUDID) through June 30, 2020.
- **Medical Device and Medical Supply Name and Primary Device Identifier Instructions Document**
 - The instructions document provides details about the use of the Device Name and Primary Device Identifier dataset.
- **Program Year 2021 Physician and Non-Physician Practitioner Taxonomy List**
 - This resource contains the full set of taxonomies for Open Payments reporting of Program Year 2021, including taxonomy codes for physician covered recipients and the new provider types

Next Steps

New or Returning?	Next Steps
New Reporting Entity	<ul style="list-style-type: none">• Register in IDM and request access to the Open Payments System• Register self and reporting entity (if applicable) in the Open Payments System• Assign user roles• Submit and attest Program Year 2021 data by March 31, 2022• Collect Program Year 2022 data (January 1, 2022 – December 31, 2022)
Returning Reporting Entity	<ul style="list-style-type: none">• Ensure IDM account is active<ul style="list-style-type: none">• Accounts are locked after 60 days of inactivity and deactivated after 180 days of inactivity. If your account is deactivated call the Open Payments Help Desk for assistance.• Recertify your reporting entity information and provide required review and dispute contact information• Confirm user roles• Submit and attest Program Year 2021 data by March 31, 2022• Collect Program Year 2022 data (January 1, 2022 – December 31, 2022)

Data Submission Resources

- Validated Physician List and Non-Physician Practitioner List
 - The VPL and NPPL are only accessible within the Open Payments System
- Teaching Hospital List
- Error Code Key
- Quick Reference Guides
 - Registration & Recertification
 - Data Submission
 - Bulk File Uploads
 - Manual Data Entry
- *Please ensure you are using the most recent versions of the Open Payments Resources; they have been updated to account for the program expansion.*

Stay Connected

- **VISIT THE OPEN PAYMENTS WEBSITE**
 - For resources and more information about the program visit <https://cms.gov/openpayments>
- **SUBSCRIBE TO THE LISTSERV**
 - Receive program updates through the Open Payments listserv
 - Subscribe at our Contact Us page
- **SEARCH THE DATA**
 - Access the Open Payments data at <https://openpaymentsdata.cms.gov>
- **HAVE QUESTIONS OR NEED HELP?**
 - Email: openpayments@cms.hhs.gov
 - Call: 1-855-326-8366 (TTY Line: 1-844-649-2766)
 - The Help Desk is offering extended hours and is available Monday through Friday, from 8:30 a.m. to 7:30 p.m. (ET), excluding Federal holidays.

Talk to You Soon!

- **Review, Dispute & Corrections Webinar**
 - Wednesday March 9, 2022 1:00pm – 2:00pm (ET)
 - Registration, agenda items, and call-in information to follow
 - Subscribe to the Open Payments Listserv to ensure you and your team receive updates