Program Year 2015 Open Payments System Enhancements

January 2016

Introduction

The Open Payments system has been enhanced to increase the system functionality and user experience for the 2015 program year. Explanations of the enhancements and improvements that directly affect end users are provided in this document. For step-by-step instructions on system functions with these enhancements included, refer to the Open Payments User Guide, available on the Resources page of the Open Payments website at

https://www.cms.gov/OpenPayments/About/Resources.html.

General

1. All free-form text fields accept all special characters found on a standard U.S. keyboard.

<u>Previous System Behavior</u>: Free-form text fields in the Open Payments system and Open Payments data records allowed a small number of special characters. Entering disallowed special characters in these fields generated errors that the user had to correct by removing the invalid special characters.

<u>Enhanced System Behavior</u>: Free-form text fields in the Open Payments system allow all special characters found on a standard U.S. keyboard. Entering special characters not on a standard U.S. keyboard will generate an error, which the user must correct in order to successfully process the record. Note that field format validations that restrict character use (e.g., phone number fields will only accept numbers) are still in place.

Registration

1. The physician license fields in physician registration allows up to 25 alphanumeric characters to be entered.

<u>Previous System Behavior</u>: Physicians could enter up to 20 alphanumeric characters for each physician license held.

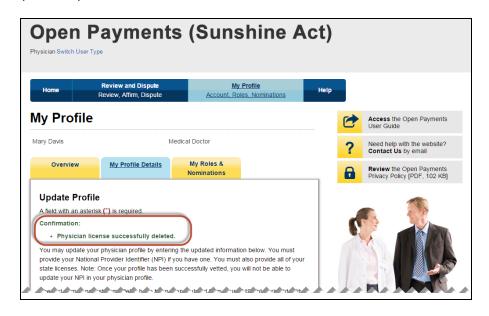
<u>Enhanced System Behavior</u>: Physicians can enter up to 25 alphanumeric characters for each physician license held.



2. An on-screen confirmation message appears when a physician deletes a license from their personal physician profile.

<u>Previous System Behavior</u>: When a physician deleted a license from their personal profile, the license was deleted from the system with no confirmation message displayed.

<u>Enhanced System Behavior</u>: A message appears on-screen when a physician deletes a license from their personal profile to confirm that the selected license has been deleted.



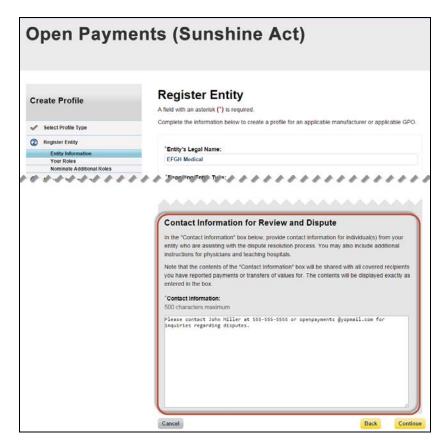
3. Reporting entities must provide review and dispute contact information within the Open Payments system.

<u>Previous System Behavior</u>: Reporting entities were unable to provide review and dispute contact information to covered recipients within the Open Payments system.

<u>Enhanced System Behavior</u>: Reporting entities are required to provide contact information for review and dispute activities as part of their entity profiles in the Open Payments system. For entities registering in 2016 or later, this information must be provided during initial registration. For entities already registered, this information must be provided during annual recertification. This information can be updated at any time. The review and dispute contact information will be displayed on the reporting entity's profile page and will be made available to the covered recipients on the Record ID pages of individual records. Covered recipients will be able to use this contact information to contact reporting entities for more information and to discuss and resolve disputes that have been initiated.



Reporting Entity View



Covered Recipient View





4. A reporting entity's "Registration ID" is displayed on the entity's profile page.

<u>Previous System Behavior</u>: The reporting entity's "Registration ID" was not easily accessible in the Open Payments system.

<u>Enhanced System Behavior</u>: The reporting entity's "Registration ID" can be found on the entity's Manage Entities page and the Entity Details page, and for users holding the role of officer with the reporting entity, the Update Entity page as well.







5. All active users holding an officer role will receive emails when another user accepts a role for which they have been nominated.

<u>Previous System Behavior</u>: Users affiliated with a reporting entity who hold the user role of officer did not receive a notification email when an individual accepted a nomination for a user role with that reporting entity.

<u>Enhanced System Behavior</u>: Users affiliated with a reporting entity who hold the user role of officer will receive an email when an individual accepts a nomination for a user role with that reporting entity.

6. Users no longer associated with a reporting entity will no longer receive email notifications related to that entity.

<u>Previous System Behavior</u>: Users no longer associated with a reporting entity in the Open Payments system continued to receive all notification emails relating to that reporting entity even after ending their association with the entity in Open Payments.

<u>Enhanced System Behavior</u>: Users no longer associated with a reporting entity in the Open Payments system no longer receive email notifications relating to that entity. If the individual is affiliated with other reporting entities within the Open Payments system, they will still receive emails related to those reporting entities.

Data Submission: General

1. Reporting entities can delete records in the record status of "System Processing."

<u>Previous System Behavior</u>: Records in "System Processing" status could not be deleted by the submitter. To delete records in this status, reporting entities had to wait until the Open Payments system completed processing the records and they were no longer in "System Processing" status or contact the Open Payments Help Desk.

<u>Enhanced System Behavior</u>: Users with a submitter role can delete records in "System Processing" status. Reporting entities do not need to wait until the Open Payments system finishes processing the records.

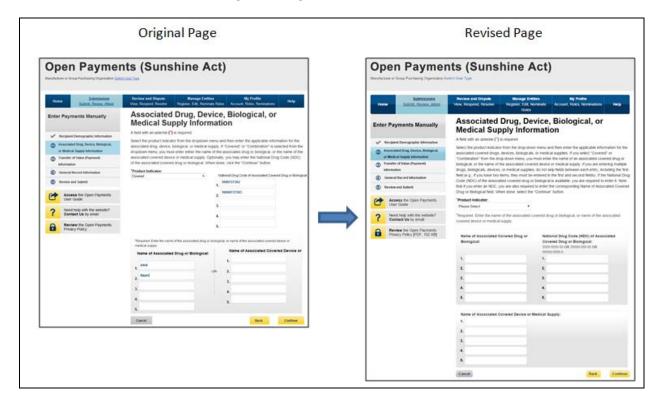
2. The "Associated Drug, Device, Biological or Medical Supply Information" page has been enhanced for clarity and ease of use.

<u>Previous System Behavior</u>: The "Associated Drug, Device, Biological or Medical Supply Information" page, accessed by reporting entities during manual data entry, was not intuitive.

<u>Enhanced System Behavior</u>: This page has been re-designed for ease of use and the on-screen instructions updated to reflect the redesign. In addition, new field validations ensure that data is



entered in the proper format and that National Drug Code numbers are accompanied by the names of the associated drugs or biologicals.



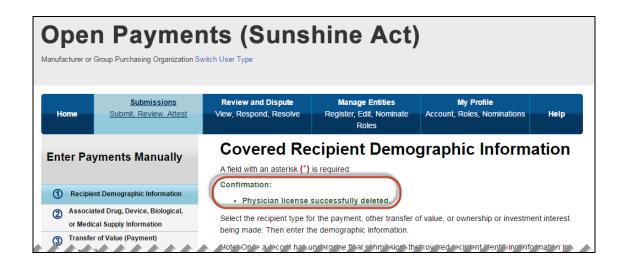
3. An on-screen confirmation message appears when deleting a physician license from a record during manual entry.

<u>Previous System Behavior</u>: During manual entry of a payment made to a physician by a reporting entity, at least one license must be entered for the associated physician. If the reporting entity entered multiple licenses and subsequently deleted one, no confirmation message was displayed.

<u>Enhanced System Behavior</u>: A message appears on-screen when a reporting entity deletes a physician license from a record during manual data entry that confirms that the selected license has been deleted.







4. Records with the recipient type of "Non-Covered Recipient Individual" must include principal investigator recipient information.

<u>Previous System Behavior</u>: During the submission period for program year 2015, the Open Payments system rejected a record when the recipient type was "Non-Covered Recipient – Individual" and the principal investigator information was populated. In addition, the Open Payments system accepted a record when the recipient type is a Non-Covered Recipient-Individual and the Principal Investigator Indicator was set to "No."

<u>Enhanced System Behavior</u>: Information for at least one principal investigator must be added to records with a recipient type of "Non-Covered Recipient Individual." If a record with a recipient type of "Non-Covered Recipient Individual" is submitted without at least one principal investigator, it will be rejected from the Open Payments system. All principal investigators listed on the record will undergo the matching process to match them to physicians and the records will be available for review and dispute by physicians cited as recipients of the reported payment and principal investigators.

5. The physician and principal investigator state license number fields have been increased to accept additional characters.

<u>Previous System Behavior</u>: The number of accepted characters in the physician and principal investigator license fields were 18 characters for manual data entry and 21 characters for records submitted via file upload (18 for the license number, 2 characters for the state code, and one hyphen to separate the state code and license number).

<u>Enhanced System Behavior</u>: The number of accepted characters in the license fields has been increased. For manual data entry, up to 25 characters can be provided for a license number. Records in bulk data files can have up to 28 characters in each state license field (25 for the



license number, 2 characters for the state code, and one hyphen to separate the state code and license number).

6. The maximum number of records per file has been increased when downloading reports of records from the "Payment Category" page.

<u>Previous System Behavior</u>: Reporting entities could download a CSV file containing up to 100,000 records from the "Payment Category" page.

<u>Enhanced System Behavior</u>: Reporting entities can download a CSV file containing up to approximately 400,000 records from the "Payment Category" page.

7. Teaching Hospital Name is displayed in the data grid on the "Payment Category" page for reporting entities.

<u>Previous System Behavior</u>: The teaching hospital name appeared as N/A in the data grid on the Payment Category page for reporting entities.

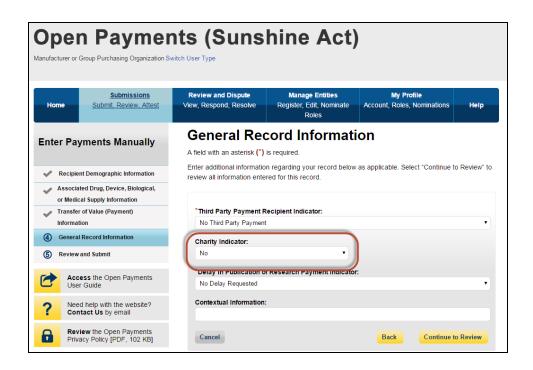
<u>Enhanced System Behavior</u>: The name of the teaching hospital associated with the record is displayed in the Covered Recipient column in the data grid on the "Payment Category" page for reporting entities.

8. During manual entry of a record, the "Charity Indicator" has been changed to a drop-down selection.

<u>Previous System Behavior</u>: When entering records manually, reporting entities were able to select the value of the "Charity Indicator" field by selecting a Yes or No radio button.

<u>Enhanced System Behavior</u>: The "Charity Indicator" in manual data entry is a drop-down field, where reporting entities can select Yes or No, or leave it blank.

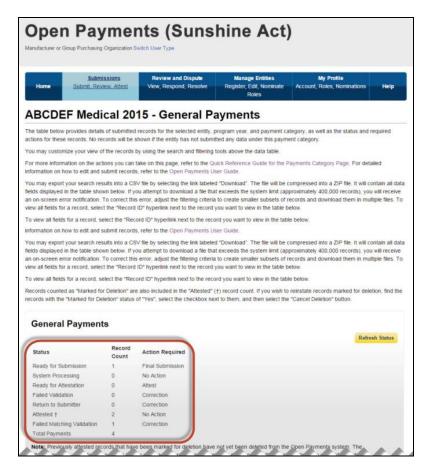




9. The record statuses listed at the top of the "Payment Category" page have been reordered and are listed in the order in which records are processed.

<u>Previous System Behavior</u>: The Open Payments system displayed record statuses, listed above the filter options on the "Payment Category" page, in no particular order.

<u>Enhanced System Behavior</u>: The Open Payments system displays the record statuses at the top of the "Payment Category Page" in the order in which records are processed.



10. Recipient type, recipient details, and covered recipient identifying information cannot be changed after the final submission of a record. Changes to those fields must be addressed by deleting the old record and submitting a new one with the updated information.

<u>Previous System Behavior</u>: Changes made to the recipient type, recipient details, or covered recipient identifying information could be made directly to the submitted record, either by editing the record manually or by resubmitting the record via bulk file upload.

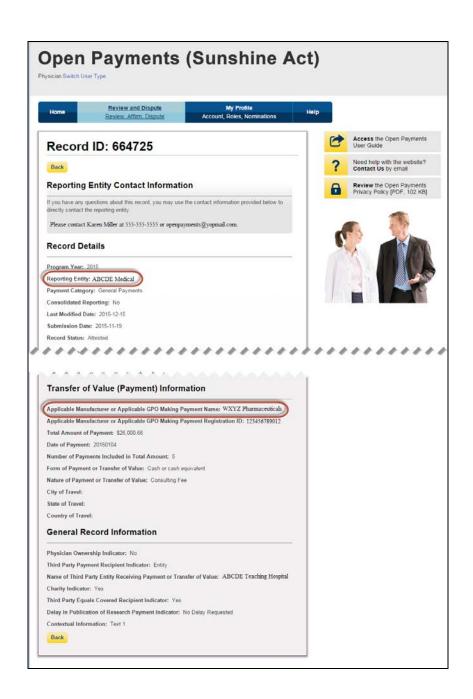
<u>Enhanced System Behavior</u>: If changes are required to these fields for a submitted record, the record containing the information must be deleted and a new record with the updated recipient information submitted. This is necessary to ensure the revised record is appropriately attributed to the correct covered recipient.

11. To clarify information on records submitted as part of a consolidated submission, the "Record ID" and "Recipient Demographic Information" pages clearly identify both the entity that made the payment and the entity that submitted the payment record to Open Payments.

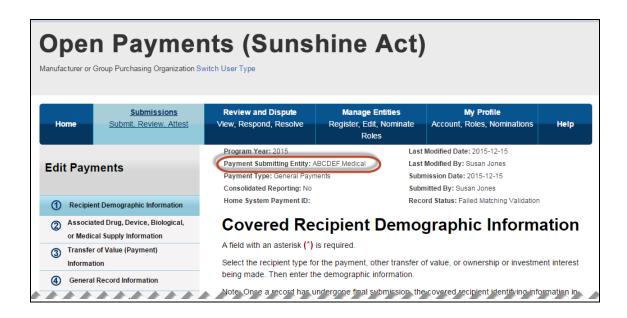
<u>Previous System Behavior</u>: The "Record ID" and "Recipient Demographic Information" pages displayed the name of the entity that made the payment. In cases of a consolidated report, the name of the reporting entity which submitted the record was not displayed on these pages.

<u>Enhanced System Behavior</u>: The "Record ID" and "Recipient Demographic Information" pages display both the name of the entity that made the payment and the name of the entity that submitted the payment. Labels have been updated accordingly to clearly distinguish between these two entities.









12. Delay in publication requests requiring renewal are called out and searchable by type.

<u>Previous System Behavior</u>: Records that were eligible for delay in publication renewal were marked with a Delay in Publication status of "Renew."

<u>Enhanced System Behavior</u>: Records where a delay in publication had been previously been requested that are eligible for renewal are marked with a Delay in Publication status of "Pending Renewal – R&D on New Product," "Pending Renewal – Clinical Investigation on New Product," "Delay Not Renewed – R&D on New Product," or "Delay Not Renewed – Clinical Investigation on New Product" as appropriate. Users can filter search results to find records with any of these Delay in Publication statuses.

13. The list of valid physician specialty codes has been updated for program year 2015. Users must use taxonomy codes from this updated list when reporting payments or registering in the Open Payments system.

<u>Previous System Behavior</u>: Users submitting data or registering in the Open Payments system were able to enter any taxonomy code in the system. The "Medicare Provider/Supplier to Healthcare Provider Taxonomy" list was provided to users to aid in selecting a specialty code; however the Open Payments system did not require that one of these codes be used.

<u>Enhanced System Behavior</u>: The list of physician taxonomy codes accepted by the Open Payments system has been updated. Users can access the updated "Taxonomy/Specialty Lookup" document (also called the "Open Payments Physician Taxonomy Code List") on the Resources page of the Open



Payments website. For reporting entities submitting data for program year 2015, they may refer to the "Taxonomy/Specialty Lookup" document when selecting specialty codes to report for records if the physician's taxonomy code is not provided in the Validated Physicians List. When reporting payments manually, users must select a specialty code from the updated list. Physicians and principal investigators registering in the Open Payments system should use the "Taxonomy/Specialty Lookup" document when adding their taxonomy codes to their profile. Users must select a specialty code from the updated taxonomy code list to successfully register in the Open Payments system.

Data Submission: Data Validation

1. Notification emails are sent to reporting entities if submitted records fail matching validation.

<u>Previous System Behavior</u>: Reporting entities received an email notification if submitted records failed field and format validation, but no notification was sent if records were not successfully matched to a physician or teaching hospital (i.e., failed matching validation).

<u>Enhanced System Behavior</u>: Reporting entities receive an email notification when submitted records fail matching validation. This email is sent to all active users who hold a submitter role for the reporting entity.

2. A record will be rejected if it contains covered recipient information for two different types of recipients (e.g., teaching hospital and physician) and was submitted via bulk file upload.

<u>Previous System Behavior</u>: A record containing identifying information for both a physician and a teaching hospital as the record's covered recipient was accepted by the Open Payments system when submitted in a bulk file.

<u>Enhanced System Behavior</u>: A record containing both a physician and a teaching hospital as the record's covered recipient is rejected. A record may contain data only in the fields applicable to the selected recipient type.

3. For payments reported as Travel and Lodging under "Nature of Payment," the "State of Travel" is captured only if the "Country of Travel" is the United States.

<u>Previous System Behavior</u>: A record containing a "Country of Travel" other than the United States required that the "State of Travel" field be populated.

<u>Enhanced System Behavior</u>: A record containing a "Country of Travel" other than the United States that has data in the "State of Travel" field will be rejected. "State of Travel" is required only if the "Country of Travel" is the United States.



4. The Open Payments system rejects records where the total amount of the record is zero dollars (\$0.00). That includes records where the "Total Amount of Payment" or "Total Amount of Research Payment" field is populated with zero dollars (\$0.00). For ownership records, if both "Value Of Interest" and "Dollar Amount Invested" fields have values of zero dollars (\$0.00) the record will be rejected.

<u>Previous System Behavior</u>: The Open Payments system accepted records where the total payment amount of the record was equal to \$0.00.

<u>Enhanced System Behavior</u>: General payment records in which the "Total Amount of Payment" field contains zero dollars and research payment records in which the "Total Amount of Research Payment" field contains zero dollars will be rejected. Ownership payment records where the "Value of Interest" and "Dollar Amount Invested" fields both contain zero dollars will also be rejected; at least one of these fields must have a value greater than \$0.00 for the record to be accepted.

5. Records that indicate a "Y" in the "Principal Investigator Covered Recipient Physician Indicator" field must provide the corresponding principal Investigator identifying information, which cannot be the same as the covered recipient physician's information (i.e., the physician and principal investigator in a record cannot be the same individual).

<u>Previous System Behavior</u>: Records submitted for covered recipient physicians that contained a value of "Y" in the "Principal Investigator Covered Recipient Physician Indicator" field and no principal investigator identifying information were accepted by the Open Payments system. Also, records submitted with the same identifying information in the physician fields and any principal investigator fields of research payment records were accepted.

<u>Enhanced System Behavior</u>: Records that contain a value of "Y" in the "Principal Investigator Covered Recipient Physician Indicator" field must also contain principal investigator identifying information. Records that do not contain this information will generate an error and must be corrected before final submission.

In addition, when reporting research payments, the identifying information reported in the covered recipient physician fields must be different than the identifying information reported in the principal investigator fields. The Open Payments system will generate an error if the covered recipient information is duplicated for any reported principal investigators. If the covered recipient physician is also a principal investigator, that individual should be listed only as the covered recipient. If the covered recipient physician is the only principal investigator, the value of "Principal Investigator Covered Recipient Physician Indicator" should be set to "N."



6. Validations have been added to the "Associated Drug, Device, Biological, or Medical Supply Information" page to ensure accurate information is captured for all covered products reported.

<u>Previous System Behavior</u>: National Drug Code's (NDC) of Associated Covered Drug or Biological data element could not exceed 10 characters without dashes or 12 characters including dashes.

Data Submission: Attestation

1. Deleting records that have been attested requires the re-attestation before the records are removed from the system.

<u>Previous System Behavior</u>: Attested records could be deleted at any time and did not require reattestation to confirm the action.

<u>Enhanced System Behavior</u>: Attested records that are subsequently deleted are initially identified as "Marked for Deletion" but not yet deleted. The deletion is not considered complete (e.g., records are not removed from the system and remain visible to covered recipients) until the deletion is attested. Until re-attestation, these records remain in the system and are both visible to covered recipients and eligible for publication. Records marked for deletion can be unmarked for deletion by users holding the submitter or attester role with the reporting entity by selecting the "Cancel Deletion" button on the "Payment Category" page.

Review and Dispute

1. Review and dispute contact information for a reporting entity is displayed to the covered recipient on the "Record ID" page of each individual record.

<u>Previous System Behavior</u>: Reporting entities were unable to provide review and dispute contact information to covered recipients within the Open Payments system.



<u>Enhanced System Behavior:</u> The Open Payments system requires reporting entities to provide review and dispute contact information in their Open Payments entity profiles. Covered recipients will be able to use this contact information to contact reporting entities for more information and to discuss and resolve disputes that have been initiated. This information is displayed to covered recipients on their records to assist with review and dispute activities. Covered recipients can view this contact information on the "Record ID" page for each record the entity has submitted.

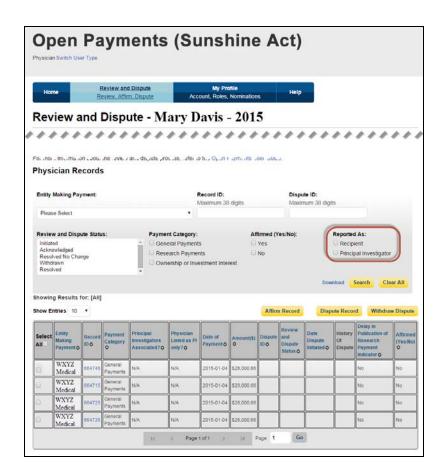


2. The Review and Dispute interface for principal investigators is more intuitive and user -friendly.

<u>Previous System Behavior</u>: The Review and Dispute interface did not provide an easy way for physicians to differentiate between research records in which they were reported as the recipient of the payment and those in which they were reported as a principal investigator on the study that received reported funding.

<u>Enhanced System Behavior</u>: The Review and Dispute pages have a filter to allow users to search for records in which they are listed as the recipient of the payment or as only a principal investigator on the study that received the funding.



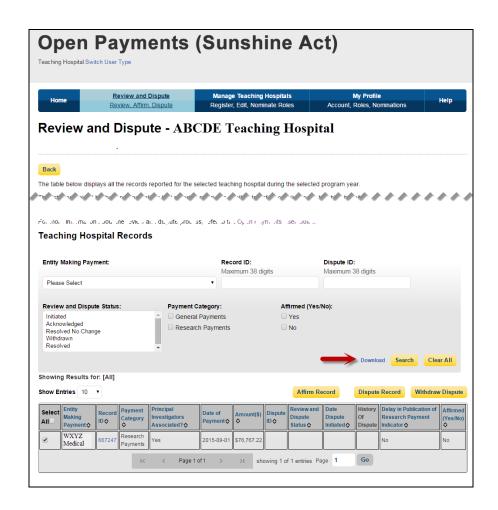


3. Physicians, teaching hospitals, and principal investigators can download records associated with them into a CSV file, as well as information on any disputes they have initiated.

<u>Previous System Behavior</u>: Physicians, teaching hospitals, and principal investigators could view records associated with them in the system but could not export these records from the system. Information on disputes was also not downloadable.

<u>Enhanced System Behavior</u>: Physicians, teaching hospitals, and principal investigators can export records associated with them into a downloadable CSV file. Similarly, physicians, teaching hospitals, and principal investigators can download information on disputes they have initiated, which includes contact information for the reporting entities that submitted the records. Downloaded data files cannot exceed the acceptable record limit (approximately 400,000 records). To download more than the acceptable record limit, filter your search results to create smaller subsets of records and download them in multiple files.







4. Reporting entities can download a report containing information on disputes initiated on records they reported.

<u>Previous System Behavior</u>: Reporting entities could view disputes within the Open Payments system but could not export the records into a downloadable file.

<u>Enhanced System Behavior</u>: Reporting entities can download a CSV file containing disputerelated information. The report can contain up to approximately 400,000 records.

Open Payments (Sunshine Act) Manufacturer or Group Purchasing Organization Switch User Type								
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