

Open Payments System Enhancements

January 2017

Introduction

The Open Payments system has been enhanced to improve user experience and increase system functionality. This document explains the enhancements and improvements that directly affect end users.

Data Submission: General

1. Updated - Submissions Home Page

Previous System Behavior: The Submissions home page provided links to the reporting templates for Program Year (PY) 2013-2015 on the right side of the page under the section titled “Download the Reporting Templates.”

Enhanced System Behavior: The links for the PY 2013-2015 reporting templates, new PY 2016 reporting templates, and the Open Payments User Guide reside in the “Resources” tab (previously the “Help” tab). The “Download the Reporting Templates” section of the Submissions home page refers users to the “Resources” tab.

Note: The “Download the Reporting Templates” section of the page and the templates themselves are only visible to users with a submitter role in the system. Users without a submitter role will see only a link to the Open Payments User Guide on the “Resources” tab.

Sample images of the updated pages are below.

Open Payments (Sunshine Act)

Applicable Manufacturer or Group Purchasing Organization [Switch User Type](#)

| | | | | | |
|----------------------|---|--|---|---|---------------------------|
| Home | Submissions Submit, Review, Attest | Review and Dispute View, Respond, Resolve | Manage Entities Register, Edit, Nominate Roles | My Profile Account, Roles, Nominations | Resources |
|----------------------|---|--|---|---|---------------------------|

Submissions

A field with an asterisk (*) is required.

Applicable manufacturers and applicable GPOs must submit payments, or other transfers of value, and ownership or investment interests to the Open Payments system.

Data Submission

Only users who hold the role of submitter can submit information about payments, or other transfers of value, and ownership or investment interests to the Open Payments system via bulk file upload or manual data entry.

Bulk file upload allows you to submit multiple records in a single CSV file. Manual data entry allows you to submit records manually using the Open Payments system graphic user interface (GUI) rather than creating a data file.

Select Data Submission Method:

Select your preferred method of data submission below.

[Bulk File Upload](#)

[Manual Data Entry](#)

Review Submitted Records

Once data has been submitted, any active user associated with that entity can review all records submitted for that entity. To review records, select the entity whose records you wish to review and the program year for the records from the drop-down lists below, then select "Review Records."

*Select Entity: *Select Program Year: [Review Records](#)

[Access the Open Payments User Guide \[PDF, 37.3 MB\]](#)

[Need help with the website? Contact Us by email](#)

[Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)

Download Physician List

The Validated Physician List below should not be shared publicly.

[Validated Physician List](#)

Download the Reporting Templates

To download reporting templates, see the Resources tab.

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Open Payments Resources

Report templates are available through the links below. Download the template(s) for the program year(s) and payment category/categories for the records to be submitted. The system will reject files prepared with an incorrect payment category or program year template.

Select the link to the User Guide for more information on using the Open Payments system.

Resources

- [Open Payments User Guide \[PDF, 37.3 MB\]](#)

Reporting Templates

Research

- [2013 - 2015 Research Template \[CSV, 2 KB\]](#)
- [2016 Research Template \[CSV, 2 KB\]](#)

General

- [2013 - 2015 General Template \[CSV, 1 KB\]](#)
- [2016 General Template \[CSV, 1 KB\]](#)

Ownership

- [2013 - 2016 Ownership Investor Template \[CSV, 1 KB\]](#)

January 2017

O P E N P A Y M E N T S

C R E A T I N G P U B L I C T R A N S P A R E N C Y
I N T O I N D U S T R Y - P H Y S I C I A N
F I N A N C I A L R E L A T I O N S H I P S

2. The “Submit as Test File” button has been removed

Previous System Behavior: Reporting entity users with the submitter role were able to submit a test file prior to uploading their actual file. The test submission would check that the file header was correct, the file type was .CSV or .ZIP, and the file size did not exceed 250MB.

Enhanced System Behavior: The “Submit as Test File” button is no longer available in the Open Payments system.

3. Reporting entities can delete records via bulk file upload

Previous System Behavior: Reporting entity users were able to delete individual records manually or delete files in their entirety via the user interface. There was no process to delete records via bulk file upload.

Enhanced System Behavior: In addition to the current processes to delete records and files via the user interface, users can delete records via bulk file upload. Users must create a bulk file of records to be deleted and set the “Resubmission File Indicator” data element for these records to “D” (Delete). Refer to the Submission Data Mapping Document to see the required fields for record deletion. In addition, users must select “Delete” from the Resubmission File Indicator drop-down menu on the user interface when uploading the file. For more information on deletion, refer to the quick reference guide “Record Deletion,” which can be found on the Resources page of the CMS Open Payments website (<https://www.cms.gov/OpenPayments/About/Resources.html>).

4. Updated – Process for updating a Delay in Publication request

Previous System Behavior: Reporting entity submitters could update the delay in publication indicator of a general or research payment record by manually editing or resubmitting the record via bulk file upload. These records are subject to all data validations and matching rules upon resubmission.

Enhanced System Behavior: In addition to updating the delay in publication indicator through manual data entry using the “Edit” link under the Actions column or resubmitting records via bulk file upload (Resubmission File Indicator = “Y”), users can update the delay in publication field through two new methods. The first method is the new “Update Delay Indicator” button available within the Open Payments system; the second is the submission of a bulk file with the “Resubmission File Indicator” data element set to “R” for the requested records.

The two new methods will only change the Delay in Publication field. Submitted records will be subject to limited data validations and will not undergo matching. To be eligible for this process, records must be in “Ready for Submission,” “Ready for Attestation,” or “Attested” status. Once the Delay in Publication field has been updated, the records will be placed in “Ready for Submission” status.

Note that these new methods cannot be used to change a delay in publication request from “No Delay Requested” to “R&D on New Product” or “Clinical Investigation on New Product.” To take that action, users must manually edit records using the “Edit” link under the Actions column or resubmit records via bulk file upload with the “Resubmission File Indicator” data element set to “Y.”

For more information on the process for updating a delay in publication request, refer to the quick reference guide “Requesting or Updating a Delay in Publication,” which can be found on the Resources page of the CMS Open Payments website (<https://www.cms.gov/OpenPayments/About/Resources.html>).

A sample image of the table with the new button is below.

The screenshot shows a web interface for managing Open Payments records. At the top left, there is a 'Show Entries' dropdown menu set to '10'. Below this are five yellow buttons: 'Update Delay Indicator' (highlighted with a red box), 'Cancel Deletion', 'Return to Attester', 'Delete Selected', and 'Return to Submitter'. The main part of the interface is a table with the following columns: Select, File ID, Record ID, Actions, Home System Payment ID, Payment Date, Amount (\$), Recipient Type, Recipient, Record Status, Marked for Deletion, and Delay in Publication Indicator. Two rows of data are visible, both showing 'No Delay Requested' in the final column. At the bottom, there is a pagination bar showing 'Page 1 of 1' and 'Showing 2 of 2 Entries'.

| Select | File ID: ⚡ | Record ID: ⚡ | Actions: | Home System Payment ID: ⚡ | Payment Date: ⚡ | Amount (\$): ⚡ | Recipient Type: ⚡ | Recipient: ⚡ | Record Status: ⚡ | Marked for Deletion: ⚡ | Delay in Publication Indicator: ⚡ |
|--------------------------|------------|--------------|--------------|---------------------------|-----------------|----------------|-------------------|--------------|------------------|------------------------|-----------------------------------|
| <input type="checkbox"/> | 254 | 4348 | View Edit | 101 | 20160123 | \$9.14 | Physician | Susan Jones | Attested | No | No Delay Requested |
| <input type="checkbox"/> | 254 | 4346 | View Edit | 101 | 20160123 | \$9.14 | Physician | Susan Jones | Attested | No | No Delay Requested |

Navigation: << < Page 1 of 1 > >> Showing 2 of 2 Entries Page 1 Go

5. Updated – New values on the Upload Payments page

Enhanced System Behavior: On the Upload Payments page, reporting entity users must select the appropriate value for the payment category, reporting entity, program year, and resubmission file indicator before submitting their files to the Open Payments system.

A sample image of the Upload Payments page with new values is below.

Upload Payments

A field with an asterisk (*) is required.

To submit your payment file, follow the steps identified below. Prior to uploading your payment file, ensure that the file is in a valid file format (.csv or .zip) and conforms to the file specifications. If needed, you may download the latest Open Payments submissions sample files available on the right side of the page.

1. Select the appropriate payment category, reporting entity, program year and resubmission file indicator for which your payments apply.
2. Select the "Browse" button to locate and select your file.

Once the file is selected, submit a file directly to the Open Payments system. Once you select the "Submit File to Open Payments" button, in addition to validating the file format, the records within the file will be submitted for validation and will be viewable within the Open Payments system.

When you upload a payment file, you must first identify the payment category. You can upload more than one file, but no file can be larger than 250 MB.

***Payment Category:**
Please Select

***Reporting Entity:**
Please Select

***Program Year:**
Please Select

***Resubmission File Indicator:**

- Please Select
- New Submission
- Resubmission
- Renew Delay in Publication
- Delete

6. Updated - Form of Payment or Transfer of Value options

Enhanced System Behavior: For PY 2013-2015, the following are the accepted values for the “Form of Payment or Transfer of Value” field in Open Payments:

- Cash or cash equivalent;
- In-kind items and services;
- Stock, stock option, or any other ownership interest; and
- Dividend, profit or other return on investment.

For PY 2016 and upcoming years, the “stock, stock option, or any other ownership interest” option has been split into separate categories. The following are the accepted values for the “Form of Payment or Transfer of Value” field in Open Payments for PY 2016 and beyond:

- Cash or cash equivalent;
- In-kind items and services;
- Stock;
- Stock option;
- Any other ownership interest; and
- Dividend, profit or other return on investment.

A sample image of the General Payment or Other Transfer of Value Information page is below.

Open Payments (Sunshine Act)

Applicable Manufacturer or Group Purchasing Organization [Switch User Type](#)

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Enter Payments Manually

- ✓ Recipient Demographic Information
- ✓ Associated Drug, Device, Biological, or Medical Supply Information
- ③ Transfer of Value (Payment) Information**
- ④ General Record Information
- ⑤ Review and Submit

- [Access the Open Payments User Guide \[PDF, 37.3 MB\]](#)
- [Need help with the website? Contact Us by email](#)
- [Review the Open Payments Privacy Policy \[PDF, 102 KB\]](#)

General Payment or Other Transfer of Value Information

A field with an asterisk (*) is required.

Enter the required payment or transfer of value information. When done, select "Continue" button.

Applicable Manufacturer or Applicable GPO Making Payment Name:
EFGH Medical

Applicable Manufacturer or Applicable GPO Making Payment Registration ID:
100000095001

***Total Amount of Payment:** 99999.99 and maximum 12 digits

***Date of Payment:** yyyyymmdd

***Number of Payments Included in Total Amount:**

***Form of Payment or Transfer of Value**

Please Select

- Cash or cash equivalent
- In-kind items and services
- Stock
- Stock option
- Any other ownership interest
- Dividend, profit or other return on investment

7. Updated – Product-related data elements for PY 2016 and upcoming years

Enhanced System Behavior: New product-related data elements have been added and existing product-related data elements re-purposed for general and research payments or other transfers of value made in PY 2016 and upcoming years.

As a result, there are CSV sample files for creating records for PY 2013-2015 and for PY 2016 and upcoming years, as well as corresponding Submission Data Mapping Documents. All of these resources can be found on the Resources page of the CMS Open Payments website (<https://www.cms.gov/OpenPayments/About/Resources.html>).

The table below provides the complete list of product-related data elements for PY 2016 and upcoming years.

| Data Element Name | Format | Required? |
|--|--|--|
| Related Product Indicator | "Y" = Yes "N" = No | Yes |
| Covered or Non-covered Product Indicator | "1" for covered "2" for non-covered | Yes IF <ul style="list-style-type: none"> • Related Product Indicator is "Y" |
| Indicate Drug, Device, Biological, or Medical Supply | "1" for drug "2" for device "3" for biological "4" for medical supply | Yes IF <ul style="list-style-type: none"> • Related Product Indicator is "Y" • Covered or Non-covered Product Indicator is "1" |
| Product Category or Therapeutic Area | Free form text | Yes IF <ul style="list-style-type: none"> • Related Product Indicator is "Y" • Covered or Non-covered Product Indicator is "1" |
| Marketed Name of Drug, Device, Biological, or Medical Supply | Free form text | Yes IF <ul style="list-style-type: none"> • Related Product Indicator is "Y" • Covered or Non-covered Product Indicator is "1" • Indicate Drug, Device, Biological, or Medical Supply is "1" or "3" |
| Associated Drug or Biological NDC | 10-digit numeric code with three segments divided by dashes, grouped in one of three ways: 9999-9999-99 99999-999-99 99999-9999-9 | Yes IF <ul style="list-style-type: none"> • Related Product Indicator is "Y" • Covered or Non-covered Product Indicator is "1" • Drug or Biological has an NDC |

Note: For PY 2013-2015, users can continue to submit up to five drugs or biologicals and up to five devices or medical supplies (maximum of ten products). For PY 2016 and upcoming years, users can submit up to five drugs, biologicals, devices, or medical supplies (maximum of five products).

A sample image of the Associated Drug, Device, Biological, or Medical Supply Information page for PY 2016 and upcoming years is below.

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|------|--|---|--|--|-----------|

Enter Payments Manually

- Recipient Demographic Information
- 2 Associated Drug, Device, Biological, or Medical Supply Information**
- 3 Transfer of Value (Payment) Information
- 4 General Record Information
- 5 Review and Submit

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Associated Drug, Device, Biological, or Medical Supply Information

A field with an asterisk (*) is required.

Select "Yes" or "No" from the Related Product Indicator drop-down menu and then enter the applicable information for the associated covered drugs, devices, biologicals, or medical supplies as required. To enter multiple drugs, biologicals, devices, or medical supplies, complete all required fields and then select "Add" after completing each entry. At least one product must be added if the Related Product Indicator value is set to "Yes". You may enter up to five drugs, biologicals, devices, or medical supplies for each record. When done, select "Continue".

*Related Product Indicator: Yes

*Covered or Non-Covered Product Indicator:

*Indicate Drug, Device, Biological, or Medical Supply:

*Product Category or Therapeutic Area:

*Marketed Name of Drug, Device, Biological, or Medical Supply:

Associated Drug or Biological NDC:

9999-9999-99 OR 99999-999-99 OR 99999-9999-9

Data Submission: Data Validation

1. Updated – Record Validation Process

Enhanced System Behavior: Records submitted in the Open Payments system must pass several validation steps in order to become eligible for final submission and attestation, including an additional record validation that is performed before the record is loaded into the Open Payments system for final validations.

Step 1: File Validation (bulk files only)

- Validations of the file itself (e.g., file size and format, number of columns, etc.).
- Validations of the upload process (e.g., payment category selected at file upload matches payment category of file, etc.).
- A list of file validations is available in the “Record Validation and Matching” section of the Open Payments User Guide.

Step 2: Pre-Upload Record Validation & Step 3: Record Validation

- Validations of individual records to determine if all required fields are filled; if the information in the fields meet formatting requirements; and, if the record is a resubmission or has been submitted to delete or renew the delay in publication request for an existing record, an original version of the record exists within the Open Payments system.
- Step 2 validations are performed only on records submitted via bulk file, before the records are saved into the Open Payments system. Users will be notified via email only if any records fail the validations performed at this step; error messages for these errors are not available on the user interface.
- Step 3 validations are performed on records submitted via bulk file after the record is saved and on records submitted manually during the record entry process.
- Record field requirements are detailed in Submission Data Mapping Documents. Refer to the Submission Data Mapping Document that corresponds to the record’s program year.

Step 4: Matching Validation

- The Open Payments system matches the covered recipient identifying information in individual records (e.g., Physician First Name, Teaching Hospital Address, etc.) with valid covered recipients using existing CMS resources and information.
- If the information in a record cannot be matched, the record will fail matching validation.
- More information on matching is available in the the “Record Validation and Matching” section of the Open Payments User Guide.

Errors in files or records submitted via bulk file upload will be communicated to users via notification emails. Step 3 errors in records submitted manually will be communicated via on-screen messages during the entry process. Manually entered records that fail matching validation (Step 4) will trigger a notification email.