



Open Payments

Overview and Enhancements

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

**CREATING PUBLIC TRANSPARENCY
INTO INDUSTRY - PHYSICIAN
FINANCIAL RELATIONSHIPS**

September 2019

CMS Disclaimer: This information is a summary of the final rule implementing Open Payments (Medicare, Medicaid, Children's Health Insurance Programs; Transparency Reports and Reporting of Physician Ownership or Investment Interests [CMS-5060-F], codified at 42 CFR Parts 402 and 403). The summary is not intended to take the place of the final rule which is the official source for information on the program.

Agenda

- Open Payments System Overview
- Open Payments System Enhancements
- Next Steps and Available Resources

Target Audience & Learning Objectives

- Target audience:
 - Applicable manufacturers and applicable group purchasing organizations (GPOs) that need to submit data to the Open Payments system to comply with regulatory and reporting requirements
 - Physicians (including principal investigators) and teaching hospitals who want to review and possibly dispute payment records associated with them that have been reported to Open Payments
- Learning objective:
 - Provide an overview of the Open Payments system and enhancements

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 applicable group purchasing organizations (GPOs)
- **Covered Recipients** – refers to physicians and teaching hospitals receiving payments or other transfers of value from applicable manufacturers and/ GPOs

For a complete list of key terms for Open Payments, refer to the Open Payments User Guide for Reporting Entities or Open Payments User Guide for Covered Recipients

Open Payments System Overview

What is Reported?

- Direct or indirect payments or other transfers of value made to covered recipients (physicians and teaching hospitals), and physician owners or investors
 - A direct payment is a payment or other transfer of value made directly by reporting entities to a covered recipient (or a physician owner or investor)
 - An indirect payment is a payment or other transfer of value made by a reporting entity to a covered recipient (or a physician owner or investor) through a third party, where the entity requires, instructs, directs, or otherwise causes the third party to provide the payment or transfer of value, in whole or in part, to a covered recipient (or a physician owner or investor)
- Certain ownership or investment interests held by physician owners or investors, or their immediate family members

Who is Responsible for Reporting?

Applicable manufacturers of covered products AND entities under common ownership with applicable manufacturers who also provide assistance and support are required to annually report to CMS.

- Operates in the United States
- Engages in the production, preparation, compounding, or conversion of a covered drug, device, biological, or medical supply.
This includes distributors or wholesalers that hold title to a covered drug, device, biological, or medical supply.

Applicable group purchasing organizations (GPOs) are required to annually report to CMS.

- Operates in the United States
- Purchases, arranges for or negotiates the purchase of a covered drug, device, biological, or medical supply for a group of individuals or entities, but not solely for use by the entity itself.

Who is Reported On?

Covered Recipient Physicians

- Doctors of medicine or osteopathy legally authorized to practice medicine or surgery by the state
- Doctors of dental medicine or dental surgery legally authorized to practice dentistry by the state
- Doctors of Podiatric Medicine licensed by the state and legally authorized to practice podiatry by the state
- Doctors of optometry legally authorized to perform as a doctor of optometry by the state
- Chiropractors licensed by the state and legally authorized to perform by the state

Covered Recipient Teaching Hospitals

- The hospitals that CMS has recorded as receiving payment(s) under Medicare Direct Graduate Medical Education (GME), indirect medical education (IME), or psychiatric hospitals IME programs
- Each year, Open Payments publishes a list of these teaching hospitals; the list is available on the Resources page of the Open Payments website at <https://www.cms.gov/OpenPayments/About/Resources.html>

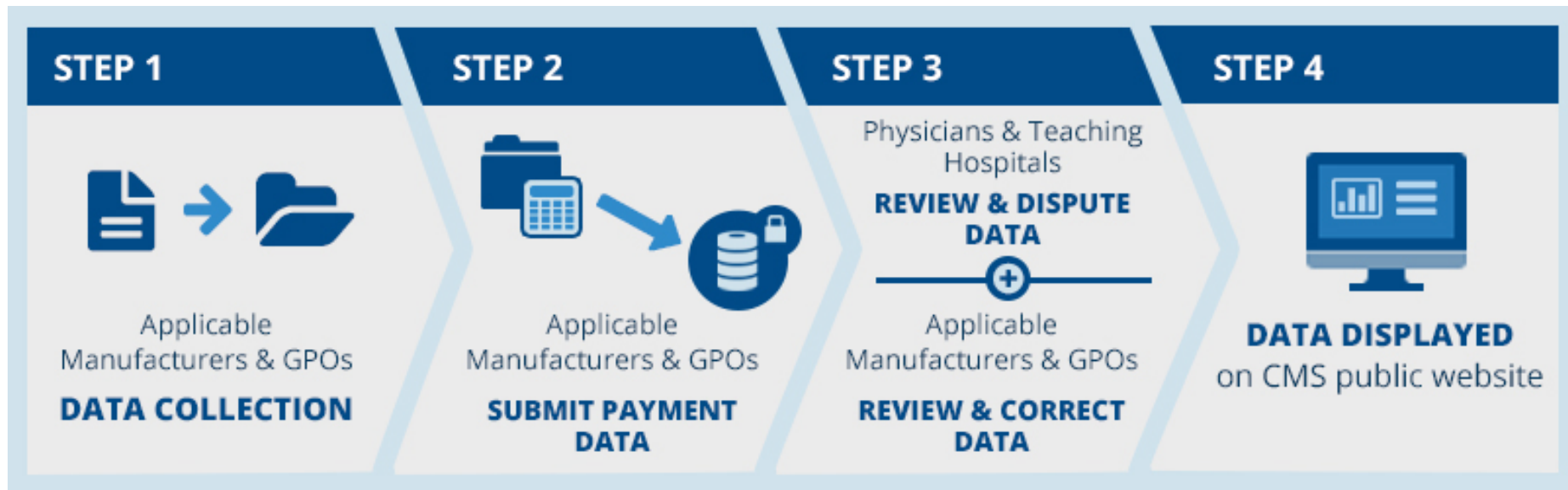
Physician Owners or Investors

- Physicians who are owners or investors of an applicable manufacturer or applicable GPO
- Immediate family members who have ownership or investment interest in an applicable manufacturer or applicable GPO: spouse, natural or adoptive parent, child, or sibling, stepparent, stepchild, stepbrother, or stepsister, father-, mother-, daughter-, son-, brother-, or sister-in-law, grandparent or grandchild, spouse of a grandparent or grandchild

Types of Payments

- General Payments: Payments or other transfers of value made that are not in connection with a research agreement or research protocol
- Research Payments: Payments or other transfers of value made in connection with a research agreement or research protocol
- Ownership or Investment Interest: Information about physicians or their immediate family members who have an ownership or investment interest in an applicable manufacturer or applicable GPO

Open Payments Process Flow



Reporting entities collect payment data for a program year, which runs from January 1 to December 31



Reporting entities submit their data for the program year to the Open Payments system



Physicians and teaching hospitals review and, if necessary, dispute submitted data. Reporting entities resolve disputes.



Data for that program year is published for public viewing in accordance with the publication guidelines

Open Payments System Enhancements

Main Navigation Bar

- The main navigation bar is re-designed for all users by adding icons and removing descriptive text on the main navigation bar as shown below. The descriptive text will be displayed on hover over and focus of the navigation link



Ability to Track Messages for All Users

This enhancement is to allow users (Reporting Entity or Covered Recipient) to view the system generated messages associated with their organization within the application. The following feature is added.

- Introduced the Messages tab to provide a view of all the email messages at the organization level that are generated by the Open Payments system.
Note: these are specifically the system generated emails and are not related to the Open Payments listserv subscription.

Open Payments (Sunshine Act)

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

[Home](#) [Submissions](#) [Review and Dispute](#) [Manage Entities](#) [My Profile](#) [Messages](#) [Resources](#)

Messages

[System](#) [Compliance](#)

The table below provides information on the system generated email messages received by the reporting entity. Search and filtering tools above the table can customize the view of the messages displayed. For more information on the actions you can take on this page, refer to the [Open Payments User Guide for Reporting Entities \(PDF\)](#).

Entity Name:

File ID:
Maximum 38 digits

Record ID:
Maximum 38 digits

Message Category:

Registration
Submissions
Review and Dispute
Nomination
Nomination Reminder
Attestation
File Processing
User/Nomination Deactivation

Payment Category:

[Search](#) [Clear All](#)

Showing Results for:
Entity Name: Trans Healthcare Inc

Showing 10 of 35 Entries Page 1 of 4 Page 1

Message Category	Message Subject	Recipient Role(s)	Payment Category	Date/Time Received
▶ Attestation	Open Payments System Attestation Successful	Submitter, Attester	N/A	07/19/2019 10:32 AM
▶ Submissions	Open Payments System Final Submission Successful	Submitter	Ownership or Investment Interest	07/19/2019 10:31 AM
▼ Attestation	Open Payments System Attestation Successful	Submitter, Attester	N/A	06/26/2019 10:22 AM
The attestation of records for the reporting entity shown below was successful. The following information pertains to the attested or re-attested records. - Reporting entity name: Trans Healthcare Inc - Total value of payments or investments reported: \$1,234,702,933.42 - Total number of records attested: 14403 - Program year: 2017 Attestation date: 06/26/2019				
▶ Submissions	Open Payments System Final Submission Successful	Submitter	Research Payments	06/26/2019 10:21 AM
▶ Review and Dispute	Open Payments Dispute Initiated	Submitter	Research Payments	06/26/2019 10:16 AM
▶ Review and Dispute	Open Payments Dispute Initiated	Submitter	Research Payments	06/26/2019 06:35 AM
▶ Review and Dispute	Open Payments Dispute Initiated	Submitter	Research Payments	06/26/2019 06:28 AM
▶ File Processing	Open Payments System Submitted Records Failed Validation	Submitter	Research Payments	06/10/2019 04:28 PM
▶ File Processing	Open Payments System File Successfully Uploaded Confirmation	Submitter	Research Payments	06/10/2019 04:28 PM
▶ File Processing	Open Payments System Submitted Records Failed Validation	Submitter	Research Payments	06/10/2019 04:17 PM

Showing 10 of 35 Entries Page 1 of 4 Page 1

Download Compliance Communications

- This enhancement is to provide the ability for the reporting entity Officers and Compliance users to view the compliance communication information and download associated PDF files uploaded by the CMS Open Payments compliance team.
- The system will allow a reporting entity to assign two users the compliance role.
- An email notification will be sent to the reporting entity's Officer, Compliance User(s) and the Primary Point of Contact when a new compliance communication is uploaded by CMS.

Open Payments (Sunshine Act)

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

Home

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Compliance

The table below provides the ability to view and download electronic compliance communication uploaded by CMS for the reporting entity. The "Download PDF" button will allow users to download PDF correspondence in regards to that compliance communication.

For more information on the actions you can take on this page, refer to the [Open Payments User Guide for Reporting Entities \[PDF\]](#).

Showing 10 of 1 Entries Page 1 of 1 Page 1			
Subject	Receiving Entity	Date Received	Attachment
Madwords Audit Communication	Madwords	06-18-2019	Download PDF
Showing 10 of 1 Entries Page 1 of 1 Page 1			

Physician's Profile ID Lookup Utility

- This utility is for the Teaching Hospital users to look up Physician's Open Payments Profile ID by the National Provider Identifier (NPI) via bulk upload. The added features are:
 - On the Teaching Hospital UI, a new "Utilities" tab is added. The Teaching Hospital users can access this Utilities tab to navigate to the Utilities page as shown below.
 - A new template, "Physician's_Profile_ID_Lookup_Template.csv", is made available for the users to download from Utilities tab and use the same to upload the physician's NPI.

The screenshot displays the 'Open Payments (Sunshine Act)' interface for Teaching Hospitals. At the top, there is a header with the title and a link to 'Switch User Type'. Below this is a navigation bar with seven tabs: Home, Review and Dispute, Manage Teaching Hospitals, My Profile, Utilities (which is highlighted in blue), Messages, and Resources. The main content area is divided into two sections. On the left, the 'Utilities' section is titled and contains a description: 'Teaching Hospitals can use Utilities to look up information in the Open Payments System.' Below this, the 'Physician's Profile ID Lookup Utility' is highlighted with a box. It includes instructions: 'To look up Physician's Open Payments Profile IDs corresponding to the National Provider Identifier for a physician, select the "NPI Upload" button. Ensure to download the "Physician's_Profile_ID_Lookup_Template.csv" to prepare your input file.' A yellow 'NPI Upload' button is located at the bottom of this section. On the right side of the main content area, there are three links with icons: 'Access the Open Payments User Guide [PDF]' (with a document icon), 'Need help with the website? Contact Us by email' (with a question mark icon), and 'Review the Open Payments Privacy Policy [PDF]' (with a padlock icon).

Open Payments (Sunshine Act)
Teaching Hospital [Switch User Type](#)

Home Review and Dispute Manage Teaching Hospitals My Profile **Utilities** Messages Resources

Utilities

Teaching Hospitals can use Utilities to look up information in the Open Payments System.

Physician's Profile ID Lookup Utility

To look up Physician's Open Payments Profile IDs corresponding to the National Provider Identifier for a physician, select the "NPI Upload" button. Ensure to download the "Physician's_Profile_ID_Lookup_Template.csv" to prepare your input file.

[NPI Upload](#)

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

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

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

Physician's Profile ID Lookup Utility (cont.)

- Upon successful upload of the NPI list, a downloadable results link is available. The result file will include the associated Open Payments Physician Profile ID for the NPI if there are any payments reported for the covered recipient NPI listed in the input file.
- The result file is available only until the new file is uploaded or the user logs out of the Open Payments application.

<h3>Physician's Profile ID Lookup Utility</h3> <p>A field with an asterisk (*) is required.</p> <p>To submit your file(s), follow the steps identified below.</p> <p>Prior to uploading a file, ensure the following:</p> <ol style="list-style-type: none">1. File(s) is only in .csv format.2. The Header in the file is valid (Includes Only PHYSICIAN_NPI)3. File(s) does not contain any Virus.4. File(s) for upload does not exceed 20,000 rows. <p>To upload a file, follow the steps identified below.</p> <ol style="list-style-type: none">1. Choose your file from your computer by selecting the browse/choose file.2. Select the "Upload File" button to start the upload process. <p>Once the file upload is successfully completed, the file will be available to download as a hyperlink. The download link will be available only during the single session in which the file upload is completed and until the user logs off the session or new file is uploaded while user logged in.</p> <p>*File: Must be a valid .csv file.</p> <p><input type="button" value="Choose File"/> No file chosen</p> <p><input type="button" value="Upload File"/></p> <h3>Physician's Profile ID Result File Download</h3> <p>Physician's_Profile_ID_Lookup_Template_(6)_Result.csv</p>	<h3>Download the Physician's Profile ID Lookup Template</h3> <p>Physician's_Profile_ID_Lookup_Template.csv</p>
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Validation Utility for Matching Physician Information

This system enhancement allows reporting entity submitters to validate the physician profile information prior to using it on the payment record by navigating to the Submission Tab. At the conclusion of this validation process, the user can download the results file for physicians that failed the matching process. The features are:

- Reporting entity submitters can submit physician information using the upload functionality on the Physician Validation page.
- A file named as “Physician _Validation_Template.csv” is made available. It can be accessed from the right sidebar of the Physician Validation page under the “Download the Validation Template” section.
- The submitter can download the result file which will contain the profiles that failed matching and related error code(s) comma separated in case of multiple matching errors. The successfully matched profiles will not be part of the result file.

Validation Utility for Matching Physician Information (Conti.)

- The downloadable result file will be available for 90 days from the upload date.

Open Payments (Sunshine Act)

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

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Physician Validation

A field with an asterisk (*) is required.

To submit your physician matching validation file, follow the steps identified below. Prior to uploading your validation file, ensure that the file is in a valid .csv file format and conforms to the file specifications. If needed, you may download the Open Payments Physician Validation Template available on the right sidebar on this page.

1. Select the "Browse..." button to locate and select your file. Note: Individual data files cannot be larger than 50 MB.
2. Select the "Upload File" button.

Once you select the "Upload File" button, the file will be submitted for validation and matching. You will see the file details and results in the table below for 90 days after the upload. The results will only include the physician profiles with error(s) and their respective error codes. Select the "Refresh Status" button to refresh file status. A downloadable results file link in the results file column will be available upon successful processing of the file.

***File:**
Must be a valid .csv file. Maximum of 50 MB per file.

[Choose File](#) No file chosen

[Upload File](#)

[Refresh Status](#)

File Name:	File Status:	Submitted Date:	Submitted By:	Results File:
chingelements_invalidmatchingelements_inv....csv	Submitted Successfully	05/06/2019	Amgpo15.1	Download
	Submitted Successfully	04/26/2019	Amgpo15.1	Download
	Submitted Successfully	04/26/2019	Amgpo15.1	Download

[Cancel](#)

Download the Physician List

The Validated Physician List below should not be shared publicly.

[Validated Physician List](#)

Download the Validation Template

The physician validation template is available through the link below.

[Physician Validation Template](#)

Next Steps and Available Resources

Next Steps for Reporting Entities

New or Returning?	Next Steps
New Reporting Entities	<ul style="list-style-type: none">• Register in EIDM and request access to the Open Payments system• Register self and reporting entity (if applicable) in the Open Payments system• Assign user roles
Returning Reporting Entities	<ul style="list-style-type: none">• Ensure EIDM account has not been deactivated due to inactivity and reset password if necessary• Recertify reporting entity information and provide required review and dispute contact information• Confirm user roles

Next Steps for Covered Recipients

New or Returning?	Next Steps
New Physicians and Teaching Hospitals	<ul style="list-style-type: none">• Register in EIDM and request access to the Open Payments system• Register self and teaching hospital (if applicable) in the Open Payments system
Returning Physicians and Teaching Hospitals	<ul style="list-style-type: none">• Ensure EIDM account has not been deactivated due to inactivity and reset password if necessary• No other action is required at this time

Available Resources

- Review available resources on the Resources page of the CMS Open Payments website at <https://www.cms.gov/OpenPayments/About/Resources.html>
 - Open Payments User Guide for Reporting Entities
 - Open Payments User Guide for Covered Recipients
 - Tutorials
 - Quick Reference Guides
- Register for CMS email notifications via the Open Payments website to receive e-mail updates about Open Payments
- For additional questions, contact the Open Payments Help Desk:
 - Email: openpayments@cms.hhs.gov
 - Phone: 1-855-326-8366 or for TTY line call 1-844-649-2766