

Open Payments System Quick Reference Guide: Acknowledging Disputes and Resolving Disputes with No Changes to Data

February 2021

Introduction

This guide provides an overview for how applicable manufacturers and applicable group purchasing organizations (GPOs), hereafter collectively referred to as “reporting entities,” in the Open Payments system, can acknowledge disputes and resolve disputes with no change to data.

Prerequisites

- User is registered in the CMS Identity Management (IDM) system and has obtained access to the Open Payments system.
- Reporting entity is registered in the Open Payments system.
- User addressing disputes holds the submitter role for the reporting entity.

Actions

Acknowledging a Dispute

Acknowledging a dispute triggers an email notification to the covered recipient who initiated the dispute, informing the recipient that the dispute has been received by the reporting entity.

Acknowledging a dispute is optional. Only disputes with a review and dispute status of “Initiated” can be acknowledged. To acknowledge a dispute, follow the steps below.

1. Access the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov/> and select the “Review and Dispute” tab.
2. From the drop-down menus select the reporting entity and the appropriate program year to view disputes. When finished, select the “Show Disputes” button.
3. On the “Review and Dispute” page, find the disputed record(s) to acknowledge. Users may filter the records using the search criteria options to help locate the correct record(s), such as filtering for records with a Review and Dispute status of “Initiated.”

February 2021

- View details about a disputed record by selecting the “View” hyperlink for the record under the “Action” column or by selecting the “Record ID” hyperlink under the “Record ID” column.
 - View the detailed history for a record’s disputes by selecting the “View” hyperlink for the record under the “History of Disputes” column.
4. Select the disputed record(s) to acknowledge, and then select “Acknowledge Dispute.” Note: Record(s) must be in “Initiated” status to acknowledge dispute(s).
 5. Review the information displayed on the “Acknowledge Dispute” page. When finished, select the “Acknowledge” button.

A message is displayed on the screen confirming that the dispute has been acknowledged and an email is sent to the covered recipient(s) notifying them of the acknowledgement.

Resolving a Dispute with No Changes to Records

It is possible that applicable manufacturers or applicable GPOs may resolve a dispute with a covered recipient without having to change the record in the Open Payments system. This outcome can be recorded in the Open Payments system by setting the Review and Dispute status of the record to “Resolved No Change.” The covered recipients may initiate a new dispute for the same record if the dispute has not been resolved to their satisfaction.

Follow the steps below to set a record’s Review and Dispute status to “Resolved No Change”.

1. Access the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov/> and select the “Review and Dispute” tab.
2. From the drop-down menus select the reporting entity and the appropriate program year to view disputes. When finished, select the “Show Disputes” button.
3. On the “Review and Dispute” page, find the disputed record(s) to resolve without changing. Users may filter the records using the search criteria options to help locate the correct record(s), such as filtering for records with a Review and Dispute status of “Initiated” or “Acknowledged.”
 - View details about a disputed record by selecting the “View” hyperlink for the record under the “Action” column or by selecting the “Record ID” hyperlink under the “Record ID” column.

February 2021

- View the detailed history for a record’s dispute by selecting the “View” hyperlink for the record under the “History of Disputes” column.
4. Select the disputed record(s) users wish to resolve with no changes, and then select the “Resolved No Change” button.
Note: Disputed record(s) must be in “Initiated” or “Acknowledged” status to resolve with no changes.
 5. In the “Reason for dispute resolution with no change to the data” box, enter the reason the dispute has been resolved with no changes. When finished, select the “Resolved No Change” button.

The record’s review and dispute status will change to “Resolved No Change.” An email notification will be sent to the covered recipient(s) to inform them that their dispute has been resolved with no changes made to the record(s). This email contains any text entered in the “Reason for dispute resolution with no change to the data” text box. If records have different reasons for being resolved without change to the data, perform the steps above separately for each dispute to ensure the correct reasons are provided to the covered recipient(s).

Next Steps

- None

Additional Resources

All review and dispute resources are available on the Resources page of the Open Payments website at <https://www.cms.gov/OpenPayments/About/Resources.html>.

The “Review and Dispute for Applicable Manufacturers and Applicable GPOs” section of the Open Payments User Guide for Reporting Entities covers the entire review and dispute process in detail and provides step-by-step instructions for various scenarios.

Quick reference guides relevant to review and dispute activities include:

- Correcting and Resolving Disputes
- Review and Dispute Timing and Data Publication

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 for acknowledging a dispute and resolving it with no changes made to the data in the Open Payments system.
- **Date of document issuance:** 2/15/2021
- **Replacement / Revision Status:** Revision to previous versions
- **Agency Identifier:** CPI DASG/CPI DTP/DASG/CPI 1057
- **Summary of Document:** Instructions for acknowledging a dispute and resolving it with no changes made to the data in the Open Payments system.
- **Citation to statutory provision/regulation applicable to this document:**
 - **Statute citation:** SEC. 1128G. [42 U.S.C. 1320a-7h]
 - **Rule citation:** 42 C.F.R. §403.900-14

February 2021