

Open Payments System Quick Reference Guide

Applicable Manufacturer and Applicable GPO Registration and Recertification

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Introduction

This guide provides an overview for how to register Applicable Manufacturers and Applicable Group Purchasing Organizations (hereafter collectively referred to as “reporting entities”), in the Open Payments system. The guide also provides steps on how to recertify a previously registered reporting entity.

Prerequisites

- The user is registered in CMS Identity Management (IDM) and has obtained access to the Open Payments system.

Actions

Registering a Reporting Entity

1. Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using IDM credentials and navigate to the Open Payments home page.
 - For first-time system users: Select the button “Create My Profile.” On the “Create Profile” page, scroll to the bottom of the page and select “Start Profile.”

Note: A list of the information required for registration is available in the “Required Information for Registration” quick reference guide, available on the “Create Profile” page. The guide can also be found on the Resources page of the Open Payments website (<https://www.cms.gov/openpayments/about/resources.html>).
 - For returning system users: Select the “Manage Entities” tab from the menu bar on the Open Payments home page. On the “Manage Entities” tab, select “Register New Entity.”
2. On the “Select Profile Type” page, select the “Applicable Manufacturer or Applicable GPO” radio button and select “Continue” to begin the registration process.
3. Enter the Taxpayer Identification Number (TIN)/Employer Identification Number (EIN) of the reporting entity you want to associate yourself with, then select “Find.” The format for the TIN/EIN is XX-XXXXXXX.

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- If the TIN/EIN returns a match, the reporting entity has already been registered. You may either continue to register and nominate yourself for a user role with the reporting entity, register an affiliate with the same TIN/EIN, or you can log off of the Open Payments system and ask a user already affiliated with the entity in Open Payments to nominate you for a user role. Refer to the quick reference guide “Self-Nominations, and Accepting/Rejecting Nominations” for guidance on the self-nomination process.
- If no match is found for the TIN/EIN, select the “Register your Entity on Open Payments” hyperlink to continue with reporting entity registration.

The individual who registers a reporting entity should be an official highly placed within the entity (e.g., a Chief Executive Officer, Chief Financial Officer, Chief Compliance Officer, or other Officer of the applicable manufacturer or applicable GPO). If you’re not a highly placed official with the entity, please contact an individual who meets those specifications to register the entity.

4. To continue registering your entity, enter the required reporting entity information on the “Register Entity” page. Reporting entities must provide two points of contact to receive notification emails. Open Payments also requires that reporting entities provide at least one review and dispute point of contact during registration. The review and dispute point of contact field is a required free-form text field. This information is made available to covered recipients to assist in the dispute resolution process. Note that neither the entity points of contact nor the review and dispute point of contact needs to be registered Open Payments system users. When the information is entered, select “Continue.”
 - Note: Entities with foreign addresses will need to contact the Open Payments Help Desk upon completion of registration for assistance with manual vetting.
5. On the “Your Role” page, enter in the required fields and select an officer user role and any other user roles, as appropriate, for yourself. Select “Continue.”
 - Note: When registering a new reporting entity, you must select the role of officer for yourself.
6. Nominate users to serve in the officer, submitter, and attester roles (if applicable). At least one person must be assigned to each of these roles in order to proceed with registration. You can hold all three roles yourself, and/or nominate others for these roles. You may also nominate additional users after registration is completed.
7. Review the information on the “Review and Submit Profile” page and select “Continue” to complete registration.

Once you have submitted the entity profile, the Open Payments system will vet the reporting entity using the information provided during registration to verify the entity's validity. If the reporting entity's registration is successful, Open Payments will send an email notification to the officer(s) as well as the primary and backup points of contact stating the entity has been successfully registered.

If the reporting entity's registration is unsuccessful, Open Payments will send an email notification to the officer(s) and points of contact stating the entity could not be successfully verified and registered. Contact the Open Payments Help Desk at openpayments@cms.hhs.gov or 1-855-326-8366 or for TTY line call 1-844-649-2766 for assistance.

Reporting Entity Recertification

Reporting entities already registered in Open Payments must recertify themselves annually. Recertification requires entities to review the information in their profiles, make updates as necessary, and confirm that the information is accurate. Recertification can only be performed by a user who holds an officer role with the reporting entity in the Open Payments system.

Reporting entities can recertify beginning January 1st of each calendar year.

While an entity is pending recertification, users can perform only the following user management activities:

- Make new nominations
- Accept/Reject roles
- Officers can deactivate a user or change user roles

After a reporting entity has been recertified, users can perform the following actions for that entity:

- Continue to perform User Role management activities
- View previously submitted data
- Download submitted data
- View records under dispute
- Download records under dispute

Data submission cannot be performed until the data submission period is open.

When an entity is pending recertification and the submission window is not open, neither the Bulk File Upload nor the Manual Data Entry buttons will be available on the "Submissions" page.

To recertify a reporting entity, follow these steps:

1. Log in to the CMS Enterprise Portal at <https://portal.cms.gov> using your EIDM credentials and navigate to the Open Payments home page.

2. Under the “Manage Entities” tab, select the reporting entity you would like to recertify. The system will display “Pending Recertification” next to each entity that needs to be recertified.
3. Select the “Update Entity” button.
4. Review the on-screen entity information and make any necessary changes. Note that changes to any of the following fields will trigger re-vetting of the reporting entity:
 - Entity Legal Name, State and Country;
 - Tax Identifier Number (TIN)/Employee Identification Number (EIN); and
 - DUN & Bradstreet (D&B) D-U-N-S Number.
5. If your entity recertification is successful, the system will display the name of the officer who recertified the reporting entity, as well as the date and time the reporting entity was recertified. If re-vetting is required, the Open Payments system will begin the vetting process and notify users associated with the entity once vetting is either successful or unsuccessful.

Vetting Process

Users may contact the Open Payments Help Desk after the first or second, failed vetting attempt for assistance with vetting. After the third failed vetting attempt, users **must** contact the Open Payments Help Desk to complete entity vetting. Entities vetted with the assistance of the Open Payments Help Desk will be given a status of “Conditionally Active” in the Open Payments system. This status will allow the users to perform tasks within the system, though the system will note that the entity could not be fully vetted. No system actions can be performed for the reporting entity until the entity has been successfully vetted or granted “Conditionally Active” status.

The Open Payments system displays the vetting status of all entities undergoing vetting on the home page in the “Vetting Status” section.

If the vetting status remains in “Vetting in Progress” for 48 hours, contact the Open Payments Help Desk at openpayments@cms.hhs.gov or 1-855-326-8366, or for TTY line call 1-844-649-2766 for assistance.

Next Steps

- Nominate additional users
- Approve or reject self-nominations for user roles
- Accept, reject, and/or deactivate user roles
- View and download previously submitted records
- View and download disputed records

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- Submit and edit records as needed
- Review and resolve disputes as needed

Additional Resources

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

The “Applicable Manufacturer and Applicable GPO Registration,” section of the Open Payments User Guide for Reporting Entities, covers the entire registration process in detail and provides step-by-step instructions for various scenarios.

Quick reference guides relevant to registration and your next steps include:

- Required Information for Registration
- Self-Nominations and Accepting/Rejecting Nominations
- Bulk File Upload
- Manual Data Entry
- Consolidated Reporting
- Final Submission and Attestation

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.
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