

# Open Payments System Quick Reference Guide

## Bulk File Upload

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### Introduction

The Open Payments system allows applicable manufacturers and applicable group purchasing organizations (GPOs), hereafter collectively referred to as reporting entities, to submit records of payments, other transfers of value, and ownership or investment interests via bulk file uploads or manual data entry. This quick reference guide provides a high-level overview of how to submit data via bulk file upload.

### Prerequisites

- User is registered in CMS Enterprise Identity Management system (EIDM) and has obtained access to the Open Payments system.
- Reporting entity is registered in the Open Payments system.
- Reporting entity has recertified in the Open Payments system, if necessary.
- User who performs bulk file upload holds the submitter user role for the reporting entity.

### Types of Payments and File Formats

Bulk upload files for Open Payments data must be CSV (character-separated value) files.

Sample files for all three payment types – General, Research and Ownership and Investment Interest – are available on the Resources page of Open Payments website

(<https://www.cms.gov/OpenPayments/About/Resources.html>). They can also be accessed by Open Payments submitters through the “Resources” tab within the Open Payments system.

**Note that there are different templates depending upon the program year(s) users are submitting for.**

- **General Payments:** Payments or other transfers of value **not** made in connection with a research agreement or research protocol.
  - Relevant sample files are “PY 2013 – 2015 CSV Sample File: General Payments,” and “PY 2016 and upcoming years CSV Sample File: General Payments” which are also called “2013 - 2015 General Template” or “2016 General Template” within the Open Payments system.
- **Research Payments:** Payments or other transfers of value made in connection with a research agreement or research protocol.

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- The relevant sample files are “PY 2013 – 2015 CSV Sample File: Research Payments,” and “PY 2016 and upcoming years CSV Sample File: Research Payments” which are also called “2013 - 2015 Research Template” and “2016 Research Template” within the Open Payments system.
- **Ownership/Investment Interests:** Information about physicians or their immediate family members who have an ownership or investment interest in an applicable manufacturer or applicable GPO.
  - The relevant sample file is “PY 2013 – 2016 and upcoming years CSV Sample File: Physician Owner/Investor,” which is also called “2013 - 2016 Ownership Investor Template” within the Open Payments system.

Refer to Submission Data Mapping Documents, located on the Resources page of the Open Payments website (<https://www.cms.gov/OpenPayments/About/Resources.html>) for details on filling in the CSV templates. Use “PY 2013 – 2015 Submission Data Mapping Document” to prepare and submit records for program years 2013 to 2015. Refer to “PY 2016 and upcoming years Submission Data Mapping Document” to prepare and submit records for program year 2016.

## Resubmission File Indicator

Records submitted in bulk data files can perform four different actions. Which action a record performs is defined by the value given in the “Resubmission File Indicator” field.

Bulk file submissions can be used to submit new records to the Open Payments system, update information in records previously submitted to the system, update previously submitted records’ delay in publication indicator, or delete previously submitted records. The Resubmission File Indicator values for those actions are as follows:

- “N” – New Submission
- “Y” – Resubmission
- “R” – Renew Delay in Publication
- “D” – Delete

Only one type of action is allowed per file. Accordingly, the same Resubmission File Indicator value must be populated for all records within a file.

Records with “R” or “D” for the Resubmission File Indicator field have a smaller number of fields that are required for file submission. Refer to the Submission Data Mapping documents for details. Data supplied in fields identified as optional for these file types, will not be validated or saved in the Open Payments system.

Refer to the quick reference guide “Requesting or Updating a Delay in Publication” for detailed steps on how to update a delay in publication value via bulk file upload and the quick reference guide “Record Correction and Deletion” for detailed steps on how to delete a record via bulk file upload.

## Actions

### Step 1: Confirm Demographic Information in Records

1. Prior to submitting a data file, check the demographic information for each physician, teaching hospital, or principal investigator included in the records to ensure that it is current. To assist you in creating accurate records, CMS has made profile information available through the Validated Physicians List and the CMS Teaching Hospital List.
  - The Validated Physicians List (VPL) contains **only** information on physicians who have been reported on in the Open Payments system; it is **not** an exhaustive list of all physicians who should be included in Open Payments reporting. The Validated Physicians List can only be accessed within the Open Payments system, on the “Submissions” page.
    - Physicians who do not appear on the VPL may still be successfully matched. The VPL is merely a tool to help prepare records. Check with the National Plan and Provider Enumeration System (NPPES) for information on physicians you cannot find on the VPL.
  - The Teaching Hospital Lists include all teaching hospitals that should be included in Open Payments reporting. They can be accessed via the Resources page on the Open Payments website (<https://www.cms.gov/OpenPayments/About/Resources.html>).
    - For program years 2014 and later, use the hospital’s “Doing Business As” name as the hospital name in the submitted record. The “Doing Business As” name is found in the Teaching Hospital List under the heading of “Hospital Name.”
    - For program year 2013 records, use the hospital’s legal business name as the hospital name in the submitted record.
    - For the address for the hospital in the submitted record, use the “NPPES Business Address” in the Teaching Hospital List.

### Step 2: Prepare Files

Bulk file uploads in the Open Payments system must be in CSV (character-separated value) format with the field delimiter set to pipe (|). Instructions on how to set the field delimiter on your computer can be found in Chapter 4 of the Open Payments User Guide, “Data Submission and Attestation.”

The maximum file size for a submitted file is 250 MB. Larger files should be divided into multiple files that fall under 250 MB. CSV data files can be zipped and submitted as ZIP files as long as all of the files

contained within the ZIP file are of the same payment category type. Submitted ZIP files must be under 250 MB after compression. There is no limit to how many files you can upload into the system.

### Step 3: Upload Bulk Data File

To submit data via bulk file upload, follow the steps below.

1. Log in to the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov/> and select the “Submissions” tab.
2. From the “Submissions” page, select “Bulk File Upload” under the “Data Submission” header.
3. On the “Upload Records” page, select the Payment Category, Reporting Entity, Program Year, and Resubmission File Indicator values for the bulk file. The Resubmission File Indicator drop-down field identifies the type of file you are submitting and must correspond to the “Resubmission File Indicator” field within the file (see “Resubmission File Indicator” section above, for an explanation of these actions):
  - New Submission;
  - Resubmission;
  - Renew Delay in Publication; or
  - Delete.

(Note: Ownership or Investment Interests records are not eligible for delays in publication. If you select “Ownership or Investment Interest” for the field “Payment Category”, the option “Renew Delay in Publication” will not appear in the “Resubmission File Indicator” field.)

4. Select the appropriate file to upload. Each file will be treated as a separate upload. The file extension must be .CSV for CSV files and .ZIP for ZIP files.
5. Select “Submit File to Open Payments.”

Repeat the steps above for each file that needs to be uploaded.

Upon upload, your file will go through several validations.

- First are file-level validations that, if failed, will cause the Open Payments system to reject the entire file. If this occurs, you will receive an email notifying you of the file validation failure, the reason for the failure, and, if applicable, the line number of the file where the failure occurred.
- If the file passes the initial file validations, each record will be subject to a series of record-level validations. Record level validations are broken into two phases.
  - The first phase of validations determines if the record can be loaded into the system. Records that fail this phase are not loaded into the system. They will **not be viewable in the**

**Open Payments system and no error log will be produced for them.** Instead, you will receive an email that identifies the rejected records and the reasons for their rejection.

- The emails will identify up to a set number of records for each rejection reason. If more records are rejected for a reason than can be displayed, contact the Open Payments Help Desk for the complete list of records rejected for that reason. The email will identify whether the number of records rejected exceeds the visible amount.
- The second phase of validations are applied after the records are loaded into the system. If your file contains records that fail this level of validation, you will receive an email notifying you of such. The failed records **will be viewable in the Open Payments system and the errors will be listed in a downloadable error log.**
- New or resubmitted records that pass the record-level validations will be subject to matching validations, in which the Open Payments system attempts to match the covered recipient information in the record (e.g., Physician First Name, Teaching Hospital Address, etc.) with a valid covered recipient using existing CMS resources and information. If the information in the record cannot be matched, the record will fail matching validation. If any records in the file fail matching validation, you will receive a notification email. The failed records **will be viewable in the Open Payments system and the errors will be listed in a downloadable error log.**

Records with validation and/or matching errors must be corrected before they can undergo final submission. Refer to the quick reference guide “Identifying and Correcting Validation and Matching Errors” or the Open Payments User Guide for instructions on how to identify and correct errors.

**Note: Records with Resubmission File Indicator values of “R” or “D” (for “Renew Delay in Publication and “Delete”, respectively) do not go through validations and matching process.**

### Record Upload Statuses

If your file passed file-level validations, you may check the status of your upload at any time via the “Review Records” page. Below is a summary of the processing statuses related to data submission:

- **Ready for Submission** - Records which are successfully validated and matched, and ready for final submission.
- **System Processing** – Records which the Open Payments system is still processing and validating.
- **Failed Validation** – Records which did not pass field validation checks.
- **Failed Matching Validation** – Records which were not successfully matched to a valid covered recipient.

Note: records with errors that failed validations that prevent them from being loaded into the system are not saved in the Open Payments system and will not appear on the Review Records page.

#### **Step 4: Perform Final Submission and Attestation**

Performing a bulk file upload only **uploads** the data to the system. **You must complete the final submission and attestation process for the data to be considered reported.**

Refer to the quick reference guide “Final Submission and Attestation” or Chapter 4 of the Open Payments User Guide, “Data Submission and Attestation,” for instructions on how to complete the final data submission and attestation process.

#### **Next Steps**

- Correct file level validation errors if necessary
- Correct record level data submission errors if necessary
- Complete final submission and attestation

#### **Additional Resources**

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

Chapter 4 of the Open Payments User Guide, “Data Submission and Attestation,” covers the entire data submission process in detail and provides step-by-step instructions for various scenarios.

Quick reference guides relevant to bulk file upload and your next steps include:

- Identifying and Correcting Validation and Matching Errors
- Record Deletion
- Consolidated Reporting
- Payment Category Page
- Requesting or Updating a Delay in Publication
- Final Submission and Attestation