

Open Payments System Quick Reference Guide

Consolidated Reporting

January 2017

Introduction

One reporting entity under common ownership with other reporting entities may submit and attest to data in the Open Payments system on behalf of other reporting entities under that common ownership. This process is called consolidated reporting, and this quick reference guide provides a high-level overview of this process. Consolidated reporting can only be done through bulk file upload and is not available through manual entry.

Prerequisites

- User is registered in CMS Enterprise Identity Management system (EIDM) and has obtained access to the Open Payments system.
- All applicable manufacturers/applicable group purchasing organizations (GPOs) in the consolidated report are registered in the Open Payments system
- The individual submitting the consolidated report must hold the user role of submitter for all reporting entities included in the consolidated report
- The individual attesting to the consolidated report must hold the user role of attester for all entities included in the consolidated report. Note: the attester must hold an “officer” position (e.g., Chief Executive Officer, Chief Financial Officer, etc.) with the entity that submits the report but does not need hold such a position within all of the entities included in the report

Actions

Perform Consolidated Reporting

1. Create bulk file uploads for the payment types (general, research, or ownership/investment) that contain payment data from all of the reporting entities included in the consolidated report. For each record:
 - Set the “Consolidated Indicator” field to “Y.”
 - Provide the name and Open Payments registration ID for the entity submitting the consolidated report in the fields “Applicable Manufacturer or Applicable GPO Name” and “Applicable Manufacturer or Applicable GPO Registration ID.”

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- Provide the name and Open Payments registration ID for the entity that made the individual payment or other transfer of value in the fields “Applicable Manufacturer or Applicable GPO Making Payment Name” and “Applicable Manufacturer or Applicable GPO Making Payment Registration ID.” This may be the same as the entity submitting the file.
2. Submit the bulk files normally. Refer to the quick reference guide “Bulk File Upload” for instructions.

Next Steps

- Perform final submission and attestation of the submitted records. Refer to the quick reference guide “Final Submission and Attestation” for instructions
- Address disputes against records initiated by physicians, teaching hospitals, and principal investigators

Additional Resources

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

The Open Payments User Guide, Chapter 4, “Data Submission and Attestation,” provides detailed, step-by-step instructions for file uploads and consolidated reporting.

Quick reference guides relevant to consolidated reporting include:

- Bulk File Upload
- Record Deletion
- Identifying and Correcting Validation and Matching Errors
- Payment Category Page
- Final Submission and Attestation
- Acknowledging Disputes and Resolving Disputes With No Changes to Data
- Correcting and Resolving Disputes