

Open Payments System Quick Reference Guide

Correcting Validation and Matching Errors

Introduction

This quick reference guide provides a high-level overview of how to correct errors in data submitted to the Open Payments system by Applicable Manufacturers and Applicable Group Purchasing Organizations (GPOs), hereafter collectively referred to as “reporting entities”. To determine the steps needed to identify the errors refer to the “Identifying Validation and Matching Errors” quick reference guide available on the Resources page of the Open Payments website (<https://www.cms.gov/OpenPayments/Resources>).

Prerequisites

- User is registered in Centers for Medicare & Medicaid Services (CMS) Identity Management system (IDM) 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 corrects the errors holds the submitter user role for the reporting entity.

Actions

Correcting Records

Records that have warnings but not validation or matching errors should be reviewed and corrected as required; records that are valid as-is do not need to be corrected before proceeding.

Records that contain validation or matching errors must be corrected and re-submitted until the records are free from errors. Once free from errors, complete the submission process for these records. Records can be corrected via bulk file upload or manual editing in the Open Payments system.

Note: Fields that identify the record’s covered recipient or principal investigators cannot be changed once a record is in a “Ready for Attestation” or “Attested” status. If these fields need to be changed in a record that is in a “Ready for Attestation” or “Attested” status, the original record must be deleted and then re-submitted as a new record. The attester is encouraged to use the assumptions statement to denote records that have been deleted and then re-submitted, including if/when those records were re-submitted after the submission deadline. Refer to section 4.14 of the Open Payments User Guide for Reporting Entities for details about the assumptions statement.

The relevant fields that identify the records covered recipient or principal investigators are as follows:

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- For physicians or Non-Physician Practitioners (NPP) including principal investigators: First Name, Last Name, National Provider Identifier (NPI), License State, and License Number.
- For teaching hospitals: Teaching Hospital Name, the hospital address fields, and Taxpayer Identification Number (TIN).

Changing a record may affect the publication of that record, depending on when the changes are made.

For details refer to the “Methodology and Data Dictionary Document” available on the Resources page of the Open Payments website, at <https://www.cms.gov/OpenPayments/Resources>. Note: if a record containing multiple physician/NPP state licenses failed matching due to one of those licenses, and the license information is as accurate as can be determined, it is permissible to remove that license from the record before resubmission, as only one license is required.

Correcting Records via Bulk File Upload

To correct records via bulk file upload:

1. Create a new bulk data file containing the rejected or failed records with the identified errors corrected. In these corrected records, set the Resubmission File Indicator as explained below. All records in a bulk file must have the same value for Resubmission File Indicator.
 - a. If the file failed with validations at file level (e.g., file size and format, number of columns, etc.); validations of the upload process (e.g., payment category selected at file upload matches payment category of file, etc.) or pre-upload validations (e.g. the resubmission Record ID or Resubmission indicator is invalid), the Resubmission File Indicator for the records do not need to be changed from the original submission.
 - b. If the record(s) in the file failed field validation(s) or matching validation(s), the record(s) must undergo resubmission or deletion and new records submitted in their place.
 - i. For resubmissions, each corrected record must have its “Resubmission File Indicator” value set to “Y” and the original record’s Record ID provided in the updated record’s “Resubmitted Payment Record ID” field.
 - ii. If the failed record must be deleted and replaced due to changes in identifying information (Per the boldfaced text in the “Note” section above), consult the quick reference guide “Record Deletion” for instructions. Replacement records will be new submissions and should have a “Resubmission File Indicator” value of “N”.
2. Submit the record through the bulk file upload process. Instructions are available in the quick reference guide “Bulk File Upload.” After the bulk file is uploaded, the records go through field and matching validations. If there are no errors, the record will be “Ready for Submission” and must undergo final submission and attestation. Instructions are available in the quick reference guide

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“Final Submission and Attestation.”

Correcting Records Manually

Users can correct records manually, one at a time. To correct an individual record manually, follow these steps.

1. Log in to the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov/> and select the “Submissions” tab on the toolbar.
2. On the “Review Records - Summary” section, select the entity and program year for the records to be reviewed, then select the “Review Summary” button. On the “Review Records - Summary” page, find the payment category (general, research, or ownership/investment) of the record(s) to be reviewed, and then select the “View All” button. All records submitted for the reporting entity for that payment category and program year will display on the selected Payment Category page.
3. Locate the desired record in the data table at the bottom of the Payment Category page. Use the filtering tools on the page to help find a relevant record. After finding the record, select the “Edit” hyperlink in the “Actions” column for that record.
4. Update the record information. Users can select an icon from the Payment Navigation Bar located on top of the page to go directly to their desired page or go through the pages sequentially to fix the error(s). Once all the validations and errors have been fixed the user can navigate to the “Review & Save” page and select the “Save Record” button. The record will be saved and go through field and matching validations. If there are no errors, the record will be “Ready for Submission”.
5. The edited records must undergo final submission and attestation. Instructions are available in the quick reference guide “Final Submission and Attestation.”

Next Steps

- Correct, resubmit and delete records as needed.
- Submit records for attestation

Additional Resources

All data submission resources and Error and Warning Code Key are available on the Resources page of the Open Payments website at (<https://www.cms.gov/OpenPayments/Resources>).

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

Quick reference guides relevant to identifying and correcting errors and next steps include:

- Data Submission Documents and Resources
- Bulk File Upload
- Manual Data Entry
- Identifying Validation and Matching Errors
- Requesting or Updating a Delay in Publication
- Record Deletion
- Final Submission and Attestation
- Review and Dispute Timing and Data Publication

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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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