

Open Payments System Quick Reference Guide

Correcting and Resolving Disputes

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Introduction

This guide provides instructions on how applicable manufacturers or applicable group purchasing organizations, hereafter collectively referred to as reporting entities, can correct and resolve disputes initiated by physicians, teaching hospitals, and principal investigators.

Prerequisites

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

Actions

Step 1: Search for Disputed Records

1. Log in to the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov/> and select the “Review and Dispute” tab.
2. Select the reporting entity and appropriate program year for which you wish to view disputes from the drop-down menu. When finished, select “Show Disputes.”
3. On the “Review and Dispute” page, set the filter for “Review and Dispute Status” to “Acknowledged” and/or “Initiated,” then select “Search.” You can only update and/or correct record(s) with a review and dispute status of “Initiated” or “Acknowledged.” On this page you may also:
 - View details about a disputed record by selecting “View” under the “Actions” column.
 - View the detailed history for a record’s disputes by selecting “View” under the “History of Disputes” column.

Step 2: Correct and Re-Submit Data

To make corrections to your data, you can either make corrections manually to individual records or submit a bulk file with corrected records.

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Option 1: Correct Records Manually

1. On the “Review and Dispute” page, find the record you wish to correct and select “Edit” under the “Actions” column.
2. Edit the fields requiring correction, then select “Save Record.”

Option 2: Correct Records via Bulk File Upload

1. Create a bulk data file that contains records to be corrected. In the bulk file:
 - Set the “Resubmission Indicator” for the records to be corrected to “Y.”
 - Enter the original Record ID created by the Open Payments system in the “Resubmitted Payment Record ID” field. This is necessary for the system to accept the record as a resubmission and not a new record.
2. Submit the file per the standard upload process. Instructions can be found in the quick reference guide “Bulk File Upload.”

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 those fields need to be corrected, the original record must be deleted and then re-submitted as a new record. The relevant fields are as follows:

- For physicians (including principal investigators), these identifying fields are First Name, Last Name, NPI, License State, and License Number.
- For teaching hospitals, these identifying fields are Teaching Hospital Name, the hospital address fields, and Taxpayer Identification Number.

Resubmission and deletion may affect the publication timing of the record. Refer to Chapter 8 of the Open Payments User Guide, the Data Dictionary and Methodology document, or the Quick Reference Guide “Review and Dispute Timing and Data Publication” for publication rules.

Step 3: Re-Attest to the Corrected Data

1. Corrected and deleted data that has previously been attested to must be re-attested to for the updates to be considered complete. See the quick reference guide “Final Submission and Attestation” for instructions.

After re-attestation, the review and dispute status of the corrected records will be automatically set to “Resolved.” The physician, teaching hospital, or principal investigator who initiated the dispute will receive email notification that their dispute has been resolved.

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Next Steps

- Review disputed data
- Correct and resolve data as necessary

Additional Resources

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

Chapter 5 of the Open Payments User Guide, “Review and Dispute for Applicable Manufacturers and Applicable GPOs,” covers the entire review and dispute process in detail and provides step-by-step instructions for various scenarios.

Quick reference guides relevant to resolving disputes and your next steps include:

- Bulk File Upload
- Manual Data Entry
- Final Submission and Attestation
- Identifying and Correcting Validation and Matching Errors
- Record Deletion
- Acknowledging Disputes and Resolving Disputes with No Change