

Open Payments System Quick Reference Guide

Correcting and Resolving Disputes

Introduction

This guide provides instructions on how applicable manufacturers or applicable group purchasing organizations (GPOs), hereafter collectively referred to as “reporting entities,” can correct and resolve disputes initiated by physicians, non-physician practitioners (NPPs), teaching hospitals (including principal investigators) collectively referred to as “covered recipients”.

Prerequisites

- User is registered in the Centers for Medicare & Medicaid Services (CMS) Identity Management (IDM) system and obtained access to the Open Payments system
- Reporting entity is registered 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 from the drop-down menu. When finished, select the “Show Disputes” button.
3. On the “Review and Dispute” page, set the filter for “Review and Dispute Status” to “Acknowledged” and/or “Initiated,” then select the “Search” button. On this page, the user may:
 - View details about a disputed record by selecting the Record ID or the “View” link under the “Actions” column.
 - View the detailed history for a record’s disputes by selecting the “View” link under the “History of Disputes” column.

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Step 2: Correct and Re-Submit Data

Corrections to data can be made manually to individual records or by submitting a bulk file with corrected records.

Option 1: Correct Records Manually

1. On the “Review and Dispute” page, find the record(s) to be corrected and select “Edit” under the “Actions” column.
2. Edit the fields requiring correction, then select the “Save Record” button.

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 File 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 as 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 including 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. Records can also be deleted from the “Review and Dispute” page in response to a dispute.

If a reporting entity user edits or deletes a disputed record, an email notification is sent to the covered recipient who created the dispute. If the individual who created the dispute is a physician’s or NPP’s authorized representative with dispute access, an email notification is sent to the physician or NPP listed on the record as well. Records that are deleted or in the process of being edited will be available for viewing purposes to the covered recipient.

Resubmission and deletion may affect the publication timing of the record. Refer to the Methodology and Data Dictionary document, or the quick reference guide “Review and Dispute Timing and Data Publication” for publication rules.

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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 set to “Resolved.” The physician, NPP, teaching hospital (including principal investigators) who initiated the dispute will receive an email notification that their dispute has been resolved.

Next Steps

- Review disputed data
- Correct data and resolve disputes 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>.

The “Review and Dispute for Applicable Manufacturers and Applicable GPOs” section of the Open Payments User Guide for Reporting Entities 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 next steps include:

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

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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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