

Open Payments System Quick Reference Guide Identifying and Correcting Validation and Matching Errors

January 2017

Introduction

This quick reference guide provides a high-level overview of how to identify 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, and determine the steps needed to correct the errors.

Prerequisites

- User is registered in the CMS Enterprise Identity Management (EIDM) system 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.
- Reporting entity has submitted data to the Open Payments system.
- User who identifies and corrects errors holds the submitter user role for the reporting entity.

Actions

Understanding Validation Steps

Records submitted to the Open Payments system must pass several validation steps in order to become eligible for final submission and attestation. The steps are the following:



Step 1: File Validation

- Bulk files undergo file validations at upload:
 - Validations of the file itself (e.g., file size and format, number of columns, etc.); and

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- Validations of the upload process (e.g., payment category selected at file upload matches payment category of file, etc.).
- A list of file validations is available in the “Record Validation and Matching” section of the Open Payments User Guide.

Step 2: Pre-Upload Record Validation & Step 3: Record Validation

- Step 2 validations are performed only on records submitted via bulk file, before the records are saved into the Open Payments system.
- Step 3 validations are performed on records submitted via bulk file after the record is saved and on records submitted manually during the record entry process.
- In both steps, individual records are checked to determine their validity, including whether:
 - All required fields are populated;
 - The information in each field meets the formatting requirements of that field; and
 - If the record is submitted to change an existing record (i.e., the record is a resubmission or is intended to delete or renew the delay in publication of an existing record), an original version of the record exists within the Open Payments system.
- Record field requirements are detailed in Submission Data Mapping Documents. Refer to the Submission Data Mapping document that corresponds to the record’s program year.

Step 4: Matching Validation

- The Open Payments system matches the covered recipient identifying information in individual records (e.g., Physician First Name, Teaching Hospital Address, etc.) with valid covered recipients using existing CMS resources and information.
- If the information in a record cannot be matched, the record will fail matching validation.
- More information on matching is available in the “Record Validation and Matching” section of the Open Payments User Guide.

The Open Payments User Guide and the Submission Data Mapping Documents are available on the Resources page of the Open Payments website (<https://www.cms.gov/OpenPayments/About/Resources.html>).

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Identifying Errors – Bulk File Upload

Errors in files or records submitted via the bulk file upload process are communicated to submitters via notification emails.

Determining the Step Where the Error Occurred

You can determine at what step the file or records failed based upon the format of the notification email, as explained below.

- **Step 1 failure:** Email describes a file validation failure, the reason for the failure, and, if applicable, the line number of the submitted data file where the failure occurred.
- **Step 2 failure:** Email lists the reasons for record rejections, the number of records in the file that failed for each reason, and identifies up to a set number of records for each rejection reason.
- **Step 3 or 4 failure:** Email explains that records were rejected, provides instructions for locating Error Log.

Note that if a bulk file submission makes it past Step 1, all of the records within the file are checked individually for Steps 2-4. Therefore, a bulk file that passes Step 1 might include records that fail at Step 2, records that fail at Step 3, records that fail at Step 4, and records that upload successfully. In such an event, you would receive multiple notification emails.

If Errors Occur During File Validation (Step 1):

If your file fails initial validation (Step 1), the entire file will be rejected. No records in the file will be saved in the Open Payments system.

The notification email will state the reason for the failure, and, if applicable, the line number of the file where the failure occurred. Step 1 validations stop upon finding an error.

You will need to correct the error and reload the file to continue with processing. Refer to the “Correcting Records” section of this QRG for more information.

If Errors Occur During Pre-Upload Record Validation (Step 2)

Records that fail pre-upload validation checks (Step 2) will not be saved in the Open Payments system.

The notification email will state the reasons for record failures, the number of records from your file that failed for each reason, and up to a set number of Record ID numbers of records that failed for each reason.

The email will identify whether the number of records rejected exceeds the visible amount. 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.

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You will need to correct record errors and resubmit the records. These records will not be available for review or correction within the Open Payments system, including the error log. Refer to the “Correcting Records” section of this QRG for more information.

If Errors Occur During Record Validation (Step 3) or Matching Validation (Step 4)

Records that fail Steps 3 or 4 will be saved within the Open Payments system and can be reviewed and edited within the system.

The notification email for record failure of Steps 3 or 4 contains instructions on locating and downloading an Error Log that lists and details errors.

You may also identify records that failed Steps 3 and 4 by searching within the Open Payments system. To do so, 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 on the toolbar.
2. On the “Review Submitted Records” section, select the entity and program year for the records you wish to review, then select “Review Records.”
3. On the “Review Records” page, find the payment category (general, research, or ownership/investment) of the record(s) you wish to review, then select “View All.” All records submitted for the reporting entity for that payment category and program year will display on the selected Payment Category page.
4. Use the filters for “Record Status” to search for records in a “Failed Validation” and/or “Failed Matching Validation” statuses.
 - “Failed Validation” means that the data in at least one field in the record does not match the required formatting for that field.
 - “Failed Matching Validation” means that the covered recipient information in the record cannot be matched to a valid covered recipient physician (including principal investigators) or teaching hospital.

NOTE: You can download the record information returned by your search into a CSV file by selecting the “Download Zip File” link on the Payment Category page. The filters applied on the page will be applied to the download. Downloaded data files cannot exceed the acceptable record limit (approximately 400,000 records). To download more than the acceptable record limit, filter your search results by File ID to create smaller subsets of records and download them in multiple files.

To **download an Error Log** for records that failed Steps 3 or 4 and interpret the error codes it contains:
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1. Go to the table at the bottom of the Payment Category page, which will now be filtered for failed records per the process above. Select the hyperlink in the “File ID” column of a record you wish to examine. This will take you to the “File ID” page.
2. On the “File ID” page, select the “Error Log” hyperlink at the bottom of the page to download the error log.
3. Note the error code displayed in the “Error Message ID” column for each error.
4. Consult the Error Code Key to interpret the Error Message IDs and find steps to correct the errors.

If a record fails Step 4, you can also see details of the failure in the individual record in the Open Payments system. To do so:

1. Go to the table at the bottom of the Payment Category page, which will now be filtered for failed records per the process above. Select the hyperlink in the “Record ID” column for the record you wish to view or select the “View” hyperlink under the “Actions” column. This will take you to the record’s “Record ID” page.
2. On the “Record ID” page, read the error messages listed on the page. Error messages related to matching for this record will be visible.

Note: The Error Code Key is available on the Resources page of the Open Payments website (<https://www.cms.gov/OpenPayments/About/Resources.html>).

You will need to correct record errors and resubmit the records. Refer to the “Correcting Records” section of this QRG for more information.

Identifying Manual Entry Errors

Records entered manually do not undergo Step 1 or Step 2 validations. Step 3 validations are applied during the manual data entry process, and any failures of Step 3 will trigger on-screen error messages. Manual entry of a record cannot be completed until all Step 3 errors are resolved.

Once a manually entered record has been uploaded, it undergoes Step 4 validations. Records that fail Step 4 validations will trigger a notification email alerting you to their failure.

To search the Open Payments system to find which records failed Step 4, 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 on the toolbar.

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2. On the “Review Submitted Records” section, select the entity and program year for the records you wish to review, then select “Review Records.”
3. On the “Review Records” page, find the payment category (general, research, or ownership/investment) of the record(s) you wish to review, then select “View All.” All records submitted for the reporting entity for that payment category and program year will display on the selected Payment Category page.
4. Use the filters for “Record Status” to search for records in a “Failed Matching Validation” status.

NOTE: You can download the record information returned by your search into a CSV file by selecting the “Download Zip File” link on the Payment Category page. The filters applied on the page will be applied to the download. Downloaded data files cannot exceed the acceptable record limit (approximately 400,000 records). To download more than the acceptable record limit, filter your search results by File ID to create smaller subsets of records and download them in multiple files.

To see details of the failure in the individual record in the Open Payments system, follow the steps below:

1. Go to the table at the bottom of the Payment Category page, which will now be filtered for failed records per the process above. Select the hyperlink in the “Record ID” column for the record you wish to view or select the “View” hyperlink under the “Actions” column. This will take you to the record’s “Record ID” page.
2. On the “Record ID” page, error messages related to this record will be visible.

Correcting Records

Records containing errors must be corrected and re-submitted until the records are free from errors. Once free from errors, you can 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 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.

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Changing a record may affect the publication of that record, depending on when the changes are made. Refer to Chapter 8 of the Open Payments User Guide or the Data Dictionary and Methodology document for details.

Correcting Records via Bulk File Upload

To correct records via bulk file upload:

1. Create a new bulk data file with the rejected or failed records with the identified errors corrected.
 - If the failed record was a new record (it had a “Resubmission File Indicator” value of “N”), the changed version of the record must be a resubmission record. The updated record must have the “Resubmission File Indicator” value be “Y” and the original record’s Record ID must be provided in the updated record’s “Resubmitted Payment Record ID” field.
 - If the failed record was submitted to change a record after a previous change, delete an existing record, or update the delay in publication value for an existing record (“Resubmission File Indicator” values of “Y,” “D,” or “R” respectively), the corrected record can be submitted without change to the “Resubmission File Indicator.”
 - If the failed record must be deleted and replaced due to changes in identifying information per the conditions given in the introduction to the “Correcting Records” section above, consult the quick reference guide “Record Deletion” for instructions. The replacement record 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 must undergo final submission and attestation. Instructions are available in the quick reference guide “Final Submission and Attestation.”

Correcting Records Manually

You 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. In the “Review Submitted Records” section, select the reporting entity whose record you wish to view and the program year for that record, and then select “Review Records.”
2. On the “Review Records” page, find the payment category (General, Research, or Ownership/Investment) of the record you wish to correct, and select the button labeled “View All.”

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3. Locate the desired record in the data table at the bottom of the “Payment Category” page. You can use the filtering tools on the page to help find a relevant record. Once you have found the record, select the “Edit” hyperlink in the “Actions” column for that record.
4. Update the record information and select “Submit.”
5. The edited records must undergo final submission and attestation. Instructions are available in the quick reference guide “Final Submission and Attestation.”

Note: All quick reference guides are available on the Resources page of the Open Payments website (<https://www.cms.gov/OpenPayments/About/Resources.html>).

Next Steps

- Correct, resubmit, and delete records as needed.

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 identifying and correcting errors and your next steps include:

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