Open Payments System Quick Reference Guide

Manual Data Entry

January 2017

Introduction

The Open Payments system allows applicable manufacturers and applicable group purchasing organizations (GPOs), hereafter collectively referred to as reporting entities, to submit payments or other transfers of value and ownership or investment interests information via bulk file uploads or manual data entry. This quick reference guide provides a high-level overview of how to submit data to the Open Payments system via manual data entry.

Prerequisites

- User is registered in CMS Enterprise Identity Management system (EIDM) 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 submits payment information holds the submitter user role for the reporting entity.

Types of Payments

Open Payments categorizes payments and transfers of value into three payment types. For a complete list of all data elements collected for each payment type, including detailed descriptions for each field, refer to the Submission Data Mapping Documents located on the Resources page of the Open Payments website (https://www.cms.gov/OpenPayments/About/Resources.html).

A general description of the payment types is shown below.

- **General Payments**: Payments or other transfers of value **not** made in connection with a research agreement or research protocol.
- **Research Payments**: Payments or other transfers of value made in connection with a research agreement or research protocol.
- **Ownership/Investment Interests**: Information about physicians or their immediate family members who have an ownership or investment interest in an applicable manufacturer or an applicable GPO.

Note: Applicable GPOs cannot submit general or research payment records for physicians without previously submitting an ownership/investment interest record for that same physician.

Actions

Step 1: Confirm Demographic Information in Records

1. Prior to data submission, check the demographic information for each physician (including principal investigator) and teaching hospital, included in the records to ensure that it is current. To assist with this validation, CMS provides a Validated Physician List (VPL) and CMS Teaching Hospital Lists.

    - The Validated Physician List contains **only** information on physicians with an NPI who have been reported on in the Open Payments system; it is **not** an exhaustive list of all physicians who should be included in Open Payments reporting. This list can only be accessed within the Open Payments system, on the “Submissions” tab. Physicians who do not appear on the VPL may still be successfully matched. The VPL is merely a tool to help prepare records. Check with the National Plan and Provider Enumeration System (NPPES) for information on physicians you cannot find on the VPL.

    - The Teaching Hospital Lists (listed by reporting cycle) include all teaching hospitals that should be included in Open Payments reporting. It can be accessed via the Resources page (https://www.cms.gov/OpenPayments/About/Resources.html) on the Open Payments website. Select an appropriate teaching hospital list, based on the program year you are submitting data for, and then select a corresponding teaching hospital from that list.

        - For program year 2013 records, use the hospital’s legal business name as the hospital name in the submitted record.

        - For program years 2014 and later, use the hospital’s “Doing Business As” name as the hospital name in the submitted record. The “Doing Business As” name is found in the Teaching Hospital List under the heading of “Hospital Name.” Use the “NPPES Business Address” in the Teaching Hospital List for the hospital address.

Step 2: Perform Manual Data Entry

You can manually enter one record at a time. The manual entry process will differ slightly depending on the type of payment you are reporting. The process for all three payment types is outlined below. Repeat the steps below for each payment that must be reported. Note that an “Add” button is available in several places during the Manual Data Entry process. You must select the “Add” button to save entered information in those places. If you proceed without selecting “Add,” the information you entered will not be saved and the system will not allow you to continue the data entry process.

Note: Manual data entry does not complete the submission process. Once a record is manually entered, it must then undergo final submission and attestation for the submission to be complete. Refer to the quick reference guide “Final Submission and Attestation” for additional guidance.

Manual Entry of General Payments Data

1. Log in to the Open Payments system via the CMS Enterprise Portal at https://portal.cms.gov/. Select the “Submissions” tab on the menu bar and then select “Manual Data Entry” on the “Submissions” landing page.

2. On the “Enter Records Manually” page, use the drop-down menus to select the payment category, reporting entity name, and program year for the record you wish to enter.

    - “Home System Payment ID” is an optional field that can be used to enter the ID number that your reporting entity uses to identify the payment.

3. Select either “Physician” or “Teaching Hospital” as appropriate from the covered recipient type drop-down, and enter the demographic information related to the physician or teaching hospital. Refer to the Validated Physician List (VPL) and CMS Teaching Hospital Lists.

4. Enter information on “Associated Drug, Device, Biological, or Medical Supply Information” page. All required fields are marked with an asterisk (*). Note that there are significant changes between 2016 and previous program years:

    - For program years 2013 to 2015 you may only enter up to five associated covered drugs/biologicals and up to five devices/medical supplies per record.

        - A maximum of **ten** products (i.e. drug, device, biological or medical supply) can be added for a record.

          Note: You must provide the name of the covered drug or biological when providing a National Drug Code (NDC) for that covered drug or biological in a valid format.

    - For program year 2016 and upcoming years, “Product Category or Therapeutic Area” information is required. Based on your selections on the page, corresponding fields are displayed for data selection/entry. If the product has an NDC, enter it in the “Associated Drug or Biological NDC” field.

- A maximum of **five** products (i.e. drug, device, biological or medical supply) can be added for a record.

Note: Special characters not present on standard English-language keyboards are not permitted in the text fields.

5. Enter all required information on the "General Payment or Other Transfer of Value Information" page.

6. Enter all required information on the "General Record Information" page.

    - You may request a delay in publication if the payment meets certain conditions. Refer to the quick reference guide "Request or Renew a Delay in Publication" for details on what records are eligible and how delays function.

7. Review the information entered and save the record.

Manual Entry of Research Payments Data

1. Log in to the Open Payments system, via the CMS Enterprise Portal at https://portal.cms.gov/. Select the "Submissions" tab on the menu bar and then select "Manual Data Entry" on the "Submissions" landing page.

2. On the "Enter Records Manually" page, use the drop-down menus to select the payment category, reporting entity name, and program year for the record you wish to enter.

    - "Home System Payment ID" is an optional field that can be used to enter the ID number that your reporting entity uses to identify the payment.

3. Select "Covered Recipient Physician," "Covered Recipient Teaching Hospital," "Non-covered Recipient Entity," or "Non-covered Recipient Individual" from the recipient type drop-down. Enter corresponding demographic information related to the recipient.

    Note: Demographic information is not requested for "Non-covered Recipient Individual". Proceed to Step 4.

4. Enter information on "Associated Drug, Device, Biological, or Medical Supply Information" page. All required fields are marked with an asterisk (*). Note that there are significant changes between 2016 and previous program years:

    - For program years 2013 to 2015 you may only enter up to five associated covered drugs/biologicals and up to five devices/medical supplies per record.

- A maximum of **ten** products (i.e. drug, device, biological or medical supply) can be added for a record.

  Note: You must provide the name of the covered drug or biological when providing a National Drug Code (NDC) for that covered drug or biological in a valid format.

- For program year 2016 and upcoming years, “Product Category or Therapeutic Area” information is required. Based on your selections on the page, corresponding fields are displayed for data selection/entry. If the product has an NDC, enter it in the “Associated Drug or Biological NDC” field.
  - A maximum of **five** products (i.e. drug, device, biological or medical supply) can be added for a record.

Note: Special characters not present on standard English-language keyboards are not permitted in the text fields.

5. Enter all required information on the “Research Payment or Other Transfer of Value Information” page.
   - At least one Principal Investigator is required when the recipient type is “Non-covered recipient Entity” or “Non- covered Recipient Individual.”
   - You may request a delay in publication if the payment meets certain conditions. Refer to the quick reference guide “Requesting or Updating a Delay in Publication” for details on what records are eligible and how delays function.
6. Review the information entered and save the record.

Manual Entry of Ownership/Investment Interests Data

1. Log in to the Open Payments system via the CMS Enterprise Portal at https://portal.cms.gov/. Select the “Submissions” tab on the menu bar and then select “Manual Data Entry” on the “Submissions” landing page.
2. On the “Enter Records Manually” page, use the drop-down menus to select the payment category, reporting entity name, and program year for the record you wish to enter.
   - “Home System Payment ID” is an optional field for you to provide the identification number that your reporting entity uses to identify the payment.
3. Enter all required information on the “Physician Demographic Information” and “Ownership or Investment Information” pages.

4. Review the information entered and save the record.

Step 3: Perform Final Submission and Attestation

1. Manual data entry only uploads the records; they must be submitted as final into the Open Payments system where it will undergo record matching. Refer to the quick reference guide "Final Submission and Attestation" for additional guidance.

Next Steps

- Correct data submission errors, if necessary
- Complete final submission and attestation

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.

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 data submission and your next steps include:

- Identifying and Correcting Matching and Validation Errors
- Record Deletion
- Consolidated Reporting
- Payment Category Page
- Requesting or Updating a Delay in Publication
- Final Submission and Attestation