

Open Payments System Quick Reference Guide

Physician and Teaching Hospital Review and Dispute Process

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Introduction

The purpose of this quick reference guide is to provide an overview of the review and dispute process for physicians (including principal investigators) and teaching hospitals. This guide will cover how to review and affirm data submitted by applicable manufacturers and applicable group purchasing organizations (GPOs), hereafter collectively referred to as reporting entities. It also covers how to initiate and withdraw disputes on submitted data.

Prerequisites

- User is registered in CMS Enterprise Identity Management system (EIDM) and obtained access to the Open Payments system
- Physician or teaching hospital has records eligible for review and dispute in the Open Payments system

Actions

Reviewing Submitted Data

Follow the steps below to review data submitted to the Open Payments system.

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 on the toolbar.
2. Select from the first drop-down menu the physician or teaching hospital whose records you wish to review. From the second drop-down menu, select the program year of the records you wish to review. Select “Show Records.”
 - You may filter the results shown on the “Records” page by selecting from the search criteria displayed on the screen. If you are reviewing physician records, you have the option to filter records by recipient or principal investigator. Select the “Recipient” checkbox to display only records on which the physician is reported as a recipient. Select the “Principal Investigator” checkbox to display only records on which the physician is reported as a principal investigator.
3. View details for an individual record by selecting “View” under the “View Record” column.

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Initiating Disputes

If you find errors in records submitted by a reporting entity, you can initiate a dispute on those record(s). 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 “Review and Dispute” tab on the toolbar.
2. Select from the first drop-down menu the physician or teaching hospital whose records you wish to review. From the second drop-down menu, select the program year of the records you wish to review. Select “Show Records.”
3. You may filter the results shown on the “Records” page by selecting from the search criteria displayed on the screen. Select the checkbox next to the record(s) you wish to dispute. When the record(s) has been selected, select “Dispute Record.”
4. Enter the reason the dispute has been initiated in the “Dispute Details” text box. When finished, select “Send Dispute.”
 - The text box can contain up to 4,000 characters, including spaces, and allows all special characters on a standard U.S. keyboard (not including ALT+NUMPAD ASCII Key characters). **It is recommended that you add review and dispute contact information, such as an email address and/or phone number, within the “Dispute Details” text box, as this will assist the reporting entity in resolving the dispute in a timely manner.**

When you select “Send Dispute,” the system will send an email to the reporting entity or entities notifying them that a dispute has been initiated. This email will include the contents of the “Dispute Details” text box. If a dispute is initiated for multiple records across multiple reporting entities simultaneously, all reporting entities referenced in the dispute will receive the same email notification including the “Dispute Details” text. **If the reasons for dispute vary for each disputed record, perform the actions above separately for each dispute to ensure the correct reasons are provided to each reporting entity.**

Withdrawing a Dispute

Physicians (including principal investigators) and teaching hospitals may withdraw a dispute if they no longer want to dispute a record. To withdraw a dispute, 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 “Review and Dispute” tab on the toolbar.
2. Select from the first drop-down menu the physician or teaching hospital whose records you wish to review. From the second drop-down menu, select the program year of the records you wish to review. Select “Show Records.”

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3. You may filter the results shown on the “Records” page by selecting from the search criteria displayed on the screen. Select the checkbox next to the record(s) for which you wish to withdraw the dispute. You may only withdraw disputes on records with a review and dispute status of “Initiated” or “Acknowledged.” When the record(s) have been selected, select “Withdraw Dispute.”
4. Review the information on the “Withdraw Disputes” page. When finished, select “Withdraw Disputes.”

An email notification will also be sent to the reporting entity informing them that a dispute has been withdrawn.

Affirming Submitted Data

If no errors are found in the submitted data, the record(s) can be affirmed. Affirming the data is completely voluntary, and means that the physician/principal investigator or teaching hospital agrees with the reported information. Note that records cannot be affirmed if there is an active dispute for the record. Follow the steps below to affirm data 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 on the toolbar.
2. Select from the first drop-down menu the physician or teaching hospital associated with the records you wish to review. From the second drop-down menu, select the program year of the records you wish to review. Select “Show Records.”
3. You may filter the results shown on the “Records” page by selecting from the search criteria displayed on the screen. Select the checkbox next to the record(s) you wish to affirm. You may affirm records where the review & dispute status is blank, “Resolved, No Change,” “Withdrawn,” or “Resolved.”
4. Select “Affirm Record.”
5. On the “Affirm Records” page, when finished reviewing your information, select “Affirm Records.” The record’s “Affirmed Yes/No” indicator, visible in the “View Records” table, will be set to “Yes.”

Next Steps

- Work with reporting entities to resolve disputes, if 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>.

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Chapter 7 of the Open Payments User Guide, “Review and Dispute for Physicians, Teaching Hospitals, and Principal Investigators,” covers the entire review and dispute process in detail and provides step-by-step instructions for various scenarios.

Quick reference guides relevant to review and dispute activities for physicians and teaching hospitals include:

- Review and Dispute Timing and Data Publication