

Open Payments System Quick Reference Guide

Reporting Entities: User Roles, Nominations, Approving/Modifying Nominations, and Deactivating Users

Introduction

This quick reference guide provides instructions on how to nominate other individuals for a user role with an applicable manufacturer or applicable group purchasing organization (hereafter collectively referred to as a “reporting entity”) in the Open Payments system, how to approve or modify a nomination for a user role, and how to deactivate an individual from a reporting entity.

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 and, if necessary, has recertified in the Open Payments system.

User Roles

There are four user roles for reporting entities: officer, submitter, attester, and compliance. Individuals may hold more than one user role. Users holding any of these four roles can nominate individuals for user roles.

1. **Officer:** Manages the reporting entity in the Open Payments system and all user roles associated with the reporting entity, such as approving user role nominations and is permitted to view and download the compliance communications associated with the reporting entity.
2. **Submitter:** Submits data on payments, other transfers of value, and ownership and investment interests for the reporting entity. Submitters also receive notifications of disputes initiated against the reporting entity’s submitted data by physicians, non-physician practitioners (NPPs), and teaching hospitals.
3. **Attester:** Attests to the accuracy of the data that has been submitted by the reporting entity.
4. **Compliance:** Views and downloads compliance communications uploaded and sent by the CMS Compliance Team to the reporting entity.

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Nominate an Individual for a User Role

Users already affiliated with a reporting entity in the Open Payments system may nominate others for user roles within the system. To nominate an individual for a user role:

1. Log in to the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov> and select the “Manage Entities” tab.
2. Indicate the reporting entity for which you will nominate an individual for a user role by selecting the reporting entity’s name.
3. On the “Manage Entity” page, select the “Manage Roles” tab.
4. Select “Nominate New Role.”
5. Enter the required nominee information, then select “Send Nomination.”

If the nominator holds the role of officer, a notification email is sent to the nominee. This email will contain instructions and relevant information he or she will need to accept or reject the nomination.

If the nominator does not hold the role of officer, an email notification is sent to all officers of the reporting entity to approve or modify the nomination. If one of the officer(s) approves the nomination, the Open Payments system sends a notification email to the nominee informing him or her of the approval of their nomination and instructions on how to accept or reject the nomination.

Approve or Modify a Nomination for a User Role (Officers Only)

All nominations must be approved by an officer of the reporting entity. Officers receive email notifications when an individual requests a role in the Open Payments system or an individual is nominated by a user who does not hold the officer user role.

To approve or modify a user role nomination, 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 “Manage Entities” tab from the home page menu bar.
2. Select the reporting entity for which you will be approving or modifying nominations.
3. On the “Entity Details” tab, select the “Manage Roles” tab.
4. View the user role nominations waiting for approval.

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- To approve the nominations with no changes, select “Approve” next to the name and role.
- To modify a user role nomination, select “Modify.” You may then override the nominee information on the screen or modify the requested roles by checking or unchecking the user role boxes. Roles can be removed for an individual user by unchecking the box next to the corresponding user role. After modifying the nomination, select “Submit.” Note that you cannot remove all of a user’s roles via “Modify.”

Deactivate a User (Officers Only)

A user holding the role of officer with a reporting entity can deactivate other individuals for that reporting entity. Deactivation removes the individual’s access to that reporting entity’s information and records. It does not remove the individual from the Open Payments system.

To deactivate an individual from your reporting entity, follow these steps.

1. Log in to the Open Payments system via the CMS Enterprise Portal at <https://portal.cms.gov> and select the “Manage Entities” tab.
2. Select the reporting entity.
3. On the “Entity Details” page, select the “Manage Roles” tab.
4. Select the “Deactivate User” button associated with the individual’s name.
5. The system will ask you to confirm the deactivation. Select “Continue” to confirm deactivation or “Cancel” to return to the Manage Roles page with no action taken. If you confirm deactivation, the Open Payments system will send notification emails to you and the deactivated individual announcing the individual’s deactivation from the reporting entity.

An officer can be deactivated by another officer. Officers cannot deactivate themselves through the Open Payments system. To deactivate yourself, contact the Open Payments Help Desk.

Only active users can be deactivated. Individuals who have not accepted or rejected a user role nomination cannot be deactivated. Individuals who have self-nominated for a user role but have not been approved or denied cannot be deactivated.

Next Steps

- Submitters and Attesters: Submit data and/or attest to payment records
- Submitters: Review and resolve disputes as needed

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- Officers and Compliance Users: View and download compliance communications for the reporting entity

Additional Resources

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

The “Applicable Manufacturers and Applicable GPO Registration,” section of the “Open Payments User Guide for Reporting Entities” covers the entire registration process and provides step-by-step instructions for various scenarios.

Quick reference guides relevant to your next steps include:

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

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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.
- **Activities/persons addressed by this document:** Guidance explaining reporting entity user roles, how to nominate others for a user role, and approving/rejecting self-nominations (for users who are officers).
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