

# Applicable Manufacturer and GPO Actions for Review and Dispute

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## Overview

This serves as a high-level guide for review and dispute actions for applicable manufacturers and GPOs. For detailed steps and screenshots, please refer to Chapter 5: Review and Dispute for Applicable Manufacturers and GPOs in the [Open Payments User Guide](#).

## Acknowledging a Dispute

To acknowledge a dispute, follow the steps below. Note that only records with a review and dispute status of *“Initiated”* can be acknowledged. Also, acknowledging a dispute is only required when changing a dispute status to *“Resolved, No Change.”*

- Log into the Open Payments system via [CMS’ Enterprise Portal \(https://portal.cms.gov/\)](https://portal.cms.gov/) and select the *“Review and Dispute”* tab.
- From the *“Show Disputes for”* and *“Program Year”* drop-down menus, select the applicable manufacturer or GPO name and appropriate program year. When finished, select *“Show Disputes.”* This will show you a list of all disputes for the selected applicable manufacturer or GPO.
- To view details about a disputed record, scroll to the right of the table using the bottom scroll bar and select *“View”* under the *“Action”* column.
- Select the disputed record(s) you wish to acknowledge by selecting the checkbox next to the record and select *“Acknowledge Dispute.”*
- Review the disputed record information as displayed on the Acknowledge Dispute page. When finished, select *“Acknowledge.”* A confirmation message will appear indicating you have successfully acknowledged the dispute.
- The review and dispute status of the record will then be updated to *“Acknowledged.”*
- An email notification will be sent to the physician or teaching hospital notifying them of the updated record status.

## Resolving a Dispute with No Change to the Record

To resolve a dispute with no change to the record, follow the steps below. Note that only records that have a Review and Dispute Status of *“Acknowledged”* can be set to *“Resolved, No Change.”* This status is used to acknowledge that the applicable manufacturer or applicable GPO and the physician or teaching hospital have resolved the dispute in accordance with the guidance in the Final Rule. This action should only be taken when dispute resolution does not require a change to the data by the reporting entity.

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# Applicable Manufacturer and GPO Actions for Review and Dispute

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- Log into the Open Payments system via [CMS' Enterprise Portal \(https://portal.cms.gov/\)](https://portal.cms.gov/) and select the "Review and Dispute" tab.
- From the "Show Disputes for" and "Program Year" drop-down menus, select the applicable manufacturer or GPO name and appropriate program year. When finished, select "Show Disputes."
- On the Review and Dispute page, you will see a list of all disputes initiated. To view details about a disputed record, scroll to the right of the table using the bottom scroll bar and select "View." This will take you to the Record page where you can review the information. When finished, select "Back" to return to the Review and Dispute landing page.
- Select the dispute record(s) you wish to resolve with no changes. Once you have selected all appropriate record(s), select "Resolved No Change."
- This will take you to the Resolved No Change page. You must provide a reason why the records are being resolved without a change in the "Reason for dispute resolution with no change to the data" text box. The text box can contain up to 4,000 characters, including spaces. Special characters allowed in the box are limited to apostrophes or single quotes ('), periods (.), ampersands (&), hyphens (-), and commas (,). The contents of the "Reason for dispute resolution with no change to the data" box will be sent in an email to the physician or teaching hospital.
- When finished, select "Resolved No Change" at the bottom of the page.
- A confirmation message will appear indicating you have successfully resolved the dispute with no change to the record.
- The review and dispute status of the record(s) will then be updated to "Resolved No Change."
- An email notification will be sent to the physician or teaching hospital notifying them of the updated record status.

## Resolving a Dispute with a Change to the Record

To resolve a dispute with a change to the record, follow the steps below. You may only resolve a dispute with a Review and Dispute status of "Initiated" or "Acknowledged." Note that you may edit records manually through the Graphic User Interface (GUI) or through Bulk File Upload.

### To Resolve via Manual Entry:

- Log into the Open Payments system via [CMS' Enterprise Portal \(https://portal.cms.gov/\)](https://portal.cms.gov/) and select the "Review and Dispute" tab.
- From the "Show Disputes for" and "Program Year" drop-down menus, select the applicable manufacturer or GPO name and appropriate program year. When finished, select "Show

December 2014

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FINANCIAL RELATIONSHIPS

# Applicable Manufacturer and GPO Actions for Review and Dispute

---

*Disputes.*” This will show you a list of all disputes for the selected applicable manufacturer or GPO.

- You may use the filtering functions to show only “*Initiated*” and/or “*Acknowledged*” disputes, select “*Initiated*” and/or “*Acknowledged*” from the “*Review and Dispute Status*” menu list (located next to the “*Dispute ID*” field), and select “*Search*.” Only records with a review and dispute status of “*Initiated*” or “*Acknowledged*” will be shown on the screen.
- Using the scroll bar to the right of the table, select “*Edit*” under the “*Action*” column. This will take you to a series of screens that will allow you to edit payment fields. Follow the on-screen instructions for correcting and reviewing each field. When finished, review all the details for the record and select “*Save Record*.”
- Records will now go through the matching and validation process. Any records that fail validation will be placed in a status of “*Failed Validation*.”
  - An error report will be generated containing error codes for each validation issue. The error report can be downloaded in a CSV format from the “*File Properties*” page.
  - Use the [Error Code File document](#), to view details for all of the error messages generated and perform the necessary corrections for each validation error.
  - Errors can be corrected via bulk file upload by following the bullets above. Repeat these steps until all validation errors listed in the error report have been corrected.
  - Additional details can be found in the [Open Payments Phase 2 Industry Data Submission webinar](#).
- Once all records have been successfully validated, they will be placed in “*Ready for Submission*” status and the “*Final Submission*” button will be enabled.
- Select “*Final Submission*” to start the final validation and matching process. Once the records make it through the final submission process successfully, the records will be ready for attestation.
- Once re-attestation is complete, the updated record(s) with associated dispute(s) will be automatically placed in a review and dispute status of “*Resolved*.” No further action is needed from the applicable manufacturer or applicable GPO.

## To Resolve via Bulk File Upload:

- Correct the data in the original bulk data file. You must indicate that it is a resubmission by setting the Resubmission Indicator in the record to “Y” and enter the original Record ID in the “*Resubmitted Payment Record ID*” field for each record in the file. The “*Resubmitted Payment Record ID*” field must be filled in with the original Record ID for the system to accept the record as a resubmission.
- Log into the Open Payments system via [CMS’ Enterprise Portal \(https://portal.cms.gov/\)](https://portal.cms.gov/) and navigate to the “*Records*” tab.

December 2014

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FINANCIAL RELATIONSHIPS

## Applicable Manufacturer and GPO Actions for Review and Dispute

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- Select the *“Bulk File Upload (CSV or XML)”* hyperlink on the Payments Overview page. Select the appropriate *“Payment Category,” “Entity,”* and *“Program Year”* from the drop-down menus. Then, click on *“Browse”* to locate the applicable file on your computer you want to submit, and select *“Submit File to Open Payments.”* Repeat as necessary until all files have been submitted.
- Records will now go through the matching and validation process. Any records that fail validation will be placed in a status of *“Failed Validation.”*
  - An error report will be generated containing error codes for each validation issue. The error report can be downloaded in a CSV format from the *“File Properties”* page.
  - Use the [Error Code File document](#), to view details for all of the error messages generated and perform the necessary corrections for each validation error.
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