CMS

Open Payments
Physicians and Teaching Hospitals Registration

OPEN PAYMENTS
CREATING PUBLIC TRANSPARENCY INTO INDUSTRY-PHYSICIAN FINANCIAL RELATIONSHIPS

January 2020

CMS Disclaimer: This information is a summary of the Final Rule implementing Open Payments (Medicare, Medicaid, Children’s Health Insurance Programs; Transparency Reports and Reporting of Physician Ownership or Investment Interests [CMS-5060-F], codified at 42 CFR Parts 402 and 403). The summary is not intended to take the place of the final rule which is the official source for information on the program.
Agenda

• Target Audience and Learning Objectives
• Open Payments Program and System Overview
• Physician Registration in the Open Payments System
• Teaching Hospital Registration in the Open Payments System
• Open Payments System Enhancements
• Next Steps and Available Resources
Target Audience & Learning Objectives

• Target audience:
  – Physicians and teaching hospitals who want to view and possibly dispute information submitted about them in the Open Payments system regarding payments, other transfers of value, or physician ownership or investment interests from Applicable Manufacturers (AM) or Applicable Group Purchasing organizations (GPOs), collectively referred to as “Reporting entities”

• Learning objectives:
  – Understanding of the Open Payments registration process
  – Physicians: Understanding how to register and how to nominate a representative to perform system actions on your behalf
  – Teaching hospitals: Understanding registration, as well as system user roles and how to assign them
Open Payments Program and System Overview
Open Payments Process Flow

Reporting entities collect payment data for a program year, which runs from January 1 to December 31.

Reporting entities submit their data for the program year to the Open Payments system.

Physicians and teaching hospitals review and, if necessary, dispute submitted data. Reporting entities resolve disputes.

Data is published for public viewing in accordance with the publication guidelines.
Note: Review and Dispute activities start on April 1st and can continue until end of the calendar year. The end dates provided on this slide are the cutoff for disputes and corrections to appear in the June 30th 2020 data publication.

*Anticipated date
Purpose of Registration

- Registration is required for a physician or teaching hospital to be able to review and dispute payment records prior to their publication.

- Registration may be done at any time.

- Records submitted by reporting entities will be available for review and dispute beginning in April 2020 and will be eligible for review through the end of the calendar year (December 31, 2020).

- A 45-day Review and Dispute period will begin in April 2020. Note: covered recipients have an opportunity to review and dispute any records during this time before records are published in initial publication.

- Disputes, or changes resulting from disputes initiated after the 45-day review and dispute period will be reflected in subsequent data publications.

- CMS does not mediate dispute resolutions between reporting entities and physicians or teaching hospitals.

- For additional information on the review and dispute process, refer to the quick reference guide “Physician and Teaching Hospital Review and Dispute Process” and the Open Payments User Guide for Covered Recipients.
Two-Step Registration Process for Physicians

Enterprise Identity Management (EIDM)
- Register self in EIDM at the CMS Enterprise Portal (only individuals register in EIDM)
- Request access to the Open Payments system

Open Payments System
- Register yourself as a physician

The CMS Enterprise Portal is located at [https://portal.cms.gov](https://portal.cms.gov)

If you registered in EIDM and requested access to Open Payments last year, it is not necessary to do so again.
Two-Step Registration Process for Teaching Hospitals

Enterprise Identity Management (EIDM)
- Register self in EIDM at the CMS Enterprise Portal (only individuals register in EIDM)
- Request access to the Open Payments system

Open Payments System
- Register a teaching hospital if it is not already registered
- If a teaching hospital is already registered, request a role with the teaching hospital

Note: Hospital-based physicians must register as physicians, unless they are reviewing and disputing records on behalf of the teaching hospital. Users registering as teaching hospital users must be appropriately authorized by the hospital administration to review and dispute payments made to the hospital.

The CMS Enterprise Portal is located at https://portal.cms.gov

If you registered in EIDM and requested access to Open Payments last year, it is not necessary to do so again.
Successful registration in both EIDM and the Open Payments system is required for each individual who wishes to access the Open Payments system.

Individuals who request electronic access to CMS-protected information or systems (such as EIDM) must first have their identities verified.

- Identity verification is the process of providing information (e.g., identity history, credentials, or documents) to prove that a person is the same person he or she claims to be.

EIDM will lock a user account after 60+ days of inactivity; EIDM will deactivate a user account after 180+ days of inactivity.

For step-by-step instructions on how to register in EIDM, refer to the quick reference guide “Enterprise Identity Management System (EIDM) Registration”.

For returning EIDM users who need help with User ID, password, or account deactivations visit https://portal.cms.gov or contact the Open Payments Help Desk at 1-855-326-8366 or 1-844-649-2766 (TTY line).
Physician Registration in the Open Payments System
Physician Registration in Open Payments System

• Hospital-based physicians must register as physicians if they wish to review and dispute records associated with them as physicians.

• A physician may nominate one authorized representative to access the system on their behalf.

• Physicians who serve as principal investigators on any industry-funded research study may be reported as principal investigators associated with research payments; such physicians should register in the physician role to be able to review and, if necessary, dispute their association with any research payments reported by the industry.
Physician Registration in Open Payments System (cont.)

- Make sure the name used for registration matches exactly with the name in the National Plan and Provider Enumeration System (NPPES), if applicable.
- Enter the National Provider Identifier (NPI), if applicable, exactly as listed in NPPES for the current calendar year and enter at least one active state license.
- Physicians and their Authorized Representatives can use foreign address during registration within the Open Payments system.
- Quick reference guides “Physician Registration” and “Nominating a Physician Authorized Representative and Accepting/Rejecting Nominations” provide additional guidance.
Physician Vetting

- Physicians are vetted using information supplied during Open Payments system registration, including:
  - First and last name
  - National Provider Identifier (NPI)
  - State license(s) information
  - Primary type (if no NPI is provided)

- Physicians will receive an email confirming vetting success or failure

- Provide as much information as possible – more information can speed vetting and ensure all records associated with the physician will be accurately matched to them

- Successful vetting is required for the physician to perform any actions within the Open Payments system

- Physicians cannot edit their first name, last name, or NPI after vetting is successful; they must contact the Open Payments Help Desk to edit this information

- If vetting is unsuccessful, physicians should contact the Open Payments Help Desk for assistance (1-855-326-8366 or 1-844-649-2766 TTY line)
Teaching Hospital Registration in the Open Payments System
Teaching Hospital Registration in Open Payments System

• Only teaching hospitals listed on the CMS teaching hospital lists can register in the Open Payments system
  – Teaching hospital lists for individual program years are available on the Resources page of the Open Payments website

• For Program Year 2014 and onwards, teaching hospitals must register using the hospital’s “doing business as” (DBA) name
  – DBA name is listed in the “Hospital Name” field in the teaching hospital list

• Teaching hospitals not on the current program year list, but found on a prior year’s teaching hospital list, can register for that prior program year
Teaching hospital users can hold one of two user roles: Authorized official and/or Authorized representative.

Individuals may nominate themselves or be nominated for one of these roles.

Teaching hospitals can have up to 10 individuals associated with them in the Open Payments system, up to five of whom may be authorized officials.

Refer to the quick reference guides “Teaching Hospital Registration” and “Teaching Hospital User Roles and Nominations” for additional guidance.
# Teaching Hospital User Roles and Nominations

## User Role Function

<table>
<thead>
<tr>
<th>User Role</th>
<th>Function</th>
</tr>
</thead>
</table>
| Authorized Official        | • Registers the teaching hospital in the Open Payments system  
• Approves or modifies nominations made by others and requests for user roles made by others, including self-nominations  
• Nominates other users, modifies existing user roles, and deactivates users (if necessary)  
• Reviews and disputes records associated with the teaching hospital  
• Views and downloads the system generated messages |
| Authorized Representative  | • Reviews and disputes records associated with the teaching hospital  
• Nominates other individuals for user roles with teaching hospital (nominations must be confirmed by an authorized official)  
• Views and downloads the system generated messages |
Open Payments System Enhancements
This system is enhanced to allow the reporting entity’s nominees (Officer, Submitter, Attester and Compliance), Physicians and Authorized Representatives to register/ nominate with a foreign address in the Open Payments system.
ZIP Code Validation

• The system is enhanced to verify the 5-digit ZIP code entered by the user is a valid United States ZIP code and is within the boundaries of the state entered during registration and/or submissions process.

• The user will receive an error message if the validation fails.
Next Steps & Available Resources
Next Steps

For New Physicians and Teaching Hospitals:
• Register self in EIDM and request access to the Open Payments system
• Register self and teaching hospital (if applicable) in Open Payments system
• Assign user roles to serve on your behalf
  — Physicians: You may assign an authorized representative
  — Teaching hospitals: You may assign authorized representatives and/or authorized officials
• Begin reviewing data once it is made available in April 2020

For Returning Physicians and Teaching Hospitals:
• Contact Open Payments Help Desk for assistance with deactivated accounts, if necessary
• Confirm user roles and/or assign additional individuals to user roles
  — Physicians: Confirm and/or assign an authorized representative
  — Teaching hospitals: Confirm and/or assign authorized representatives and authorized officials
• Begin reviewing data once it is made available in April 2020
Available Resources

- Review available resources on the Resources page of the CMS Open Payments website at
  https://www.cms.gov/OpenPayments/About/Resources.html
  - Open Payments User Guide for Covered Recipients
  - Tutorials
  - Teaching Hospital Lists
  - Quick Reference Guides
    - Physician and Teaching Hospital Review and Dispute Process
    - Enterprise Identity Management System (EIDM) Registration
    - Physician Registration
    - Nominating a Physician Authorized Representative and Accepting/Rejecting Nominations
    - Teaching Hospital Registration
    - Teaching Hospital User Roles and Nominations
Available Resources

• Register for CMS email notifications via the Open Payments website to receive e-mail updates about Open Payments

• Open Payments Help Desk:
  – openpayments@cms.hhs.gov
  – 1-855-326-8366
  – 1-844-649-2766 (TTY line)