



Open Payments

Removed Records Correction Process

O P E N P A Y M E N T S

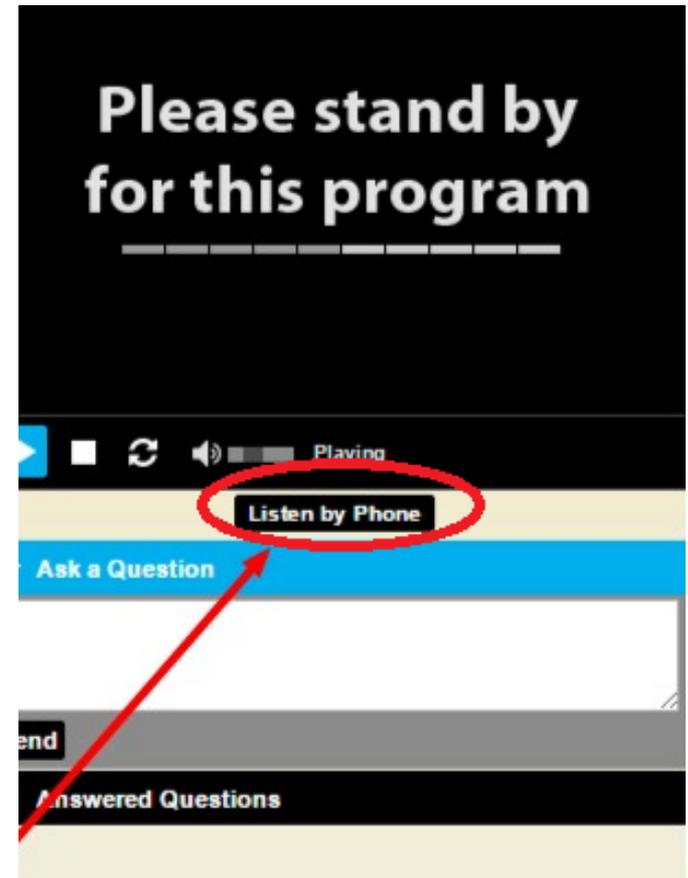
C R E A T I N G P U B L I C T R A N S P A R E N C Y
I N T O I N D U S T R Y - P H Y S I C I A N
F I N A N C I A L R E L A T I O N S H I P S

November 13, 2014

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.

Audio Instructions

- To ensure that this webinar's audio and video are synchronized:
 - **If you are listening through the telephone**, push the “Listen by Phone” button below the video screen
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Agenda

- Related History – Challenges in First Reporting Cycle
- Removed Records Process Overview
- Correcting and Re-Submitting Removed Records
- Next Steps and Available Resources
- FAQs
- Live Q&As

Related History – Challenges in First Reporting Cycle

System Shutdown

- System was shut down between August 3 – August 15, 2014 and CMS began an exhaustive review of all payment records
- Analysis revealed a significant number of inconsistent payment records
- Intermingled physician identifiers resulted in physicians being able to view other physicians' payment records
- CMS implemented strict matching logic to address data inconsistencies

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Analysis During System Shutdown

- CMS implemented more stringent matching criteria to ensure that payment records were attributed to a **single, consistent physician or teaching hospital**
- Based on this strict matching logic, inconsistent records were flagged in the Open Payments system
- In an effort to support transparency and publish as much data as possible, these records were published on September 30, 2014, ***as de-identified***
 - These are the records now included in the Removed Records Reports

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Results of the First Data Reporting Cycle

Value	“Identified” Records	“De-Identified” Records	Total Published	Total Not Published
Number of Records	2.7 million	1.7 million	4.4 million	199,000
Value of payments	\$1.3 billion	\$2.2 billion	\$3.5 billion	\$1.1 billion

Records that were **not published** fall into three categories:

1. Records still in dispute status at the end of the review period, and
2. Records that are marked for delay in publication
3. Any records submitted or attested to on July 7 (last day of data submission and attestation)

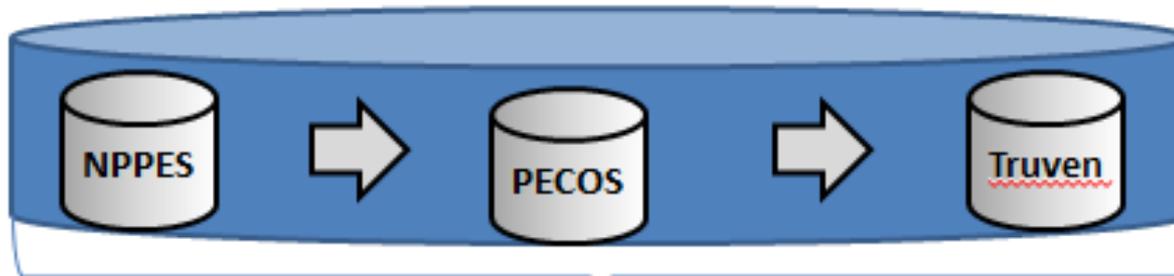
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Previous Data Matching Process

State License Number	XY123456Z
National Provider Identifier (NPI)	0123456789
First Name / Last Name	Jane Smith

Company Submits Record



State License Number	AB123456W
National Provider Identifier (NPI)	0123456789
First Name, Last Name	Jane Smith



State License Number	XY123456Z
National Provider Identifier (NPI)	1122334455
First Name, Last Name	J Smith

Improving Data Quality and Submission with Enhanced Matching

- In determining how best to improve the data quality and submission process via an enhanced matching methodology, we considered various ways to both:
 - Minimize the number and effect that inconsistent submitted data have on the program
 - Efficiently and effectively reduce the rate of data rejection in future submission periods, while preserving data integrity

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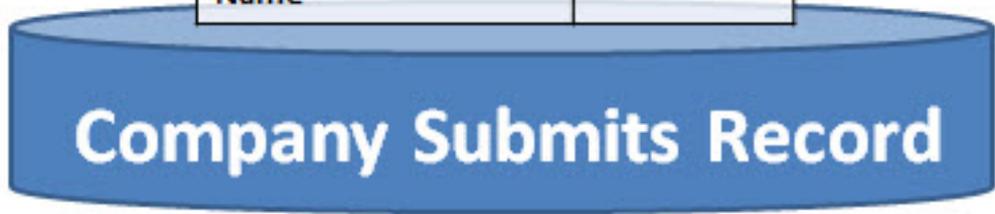
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Enhanced Data Matching Process

Validated
Physician
List

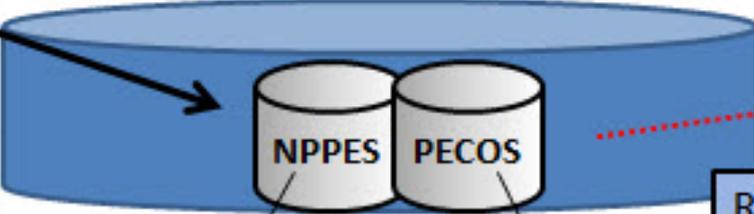


State License Number	XY123456Z
National Provider Identifier (NPI)	0123456789
First Name, Last Name	J Smith



Combine NPPES and PECOS and require:

- First Name – Exact Match
- Last Name – Exact Match
- NPI – Exact Match
- State License – Exact Match, but ignoring special characters, leading zeros, and spaces



Steps to Reduce Inherent Risk:
Provide applicable manufacturers and GPOs with a **Validated Physician List** using combined information from NPPES and PECOS. This allows for:

- Validation of records against NPPES and PECOS in parallel
- Variation on valid first and last names as seen in NPPES and PECOS
- Pre-established profiles within the System, linked on Name, NPI and State License

Jane Smith

J Smith-Carter



Records not validated by NPPES and PECOS will be sent to Truven

State License Number	XY123456Z
National Provider Identifier (NPI)	0123456789
First Name, Last Name	J Smith

Removed Records Process Overview

Notification and Schedule

- Starting on October 30, 2014, a notification was placed on your Open Payments system home page alerting you of removed records
- If you do not see a notification on your home page, no records have been removed for any of the entities you are associated with
- Records should be re-submitted before the 2014 program year data submission deadline: March 31, 2015
 - Note that when you re-submit or enter new records, those records will be in “On Hold” status until early 2015

Correcting and Re-Submitting Removed Records

Identifying and Correcting Removed Records

Step 1:

Locate Removed Records

- Download the Removed Records Report

Step 2:

Determine Corrections Needed

- Review the records
- Review reason for their removal
- Determine corrections to be made

Step 3:

Correct and Resubmit Records

- Correct in bulk files and resubmit OR
- Enter manually as new records

Step 1: Locate Removed Records

1. Log into Open Payments via the CMS Enterprise Portal
2. Navigate to the “Records” tab
3. Select the entity you wish to view from the dropdown list and select “Show Summary”
4. From the list of program years displayed, find the program year you wish to view and select “Review Records”
5. On the “Review Records” page, select the link under the “Removed Records Reports” header to download the file

Open Payments (Sunshine Act)

Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home	Records View, Edit, Report	Review and Dispute View, Respond, Resolve	Manage Entities Register, Edit, Nominate Roles	My Profile Account, Roles, Nominations	Help
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ABCDE Medical 2013 - Review Records

Below are the records reported by the entity and categorized by status for the selected program year. To edit records (available only for a user in a “submitter” role) or view the details of the reported records, select the “View All” button under a specific payment category (e.g., Research Payments).

General Payments: 4/1/13
“attester” role can attest by selecting the “Begin Attestation of All Records” button.

If you have further questions on how to make final submission of records, details on status definitions, or how to attest use the link available on the right hand navigation.

[Back to Payments Overview](#)

[View Attestation](#)

[Access the Open Payments User Guide](#)

[Need help with the website? Contact Us by email](#)

Physician List

The Validated Physician List below should not be shared publicly.

[Validated Physician List.csv](#)

Help with this Page

[Record Status Definitions](#)

[What do I do if payments failed validation?](#)

[How do I begin final submission?](#)

[How do I begin attestation?](#)

Removed Records Reports

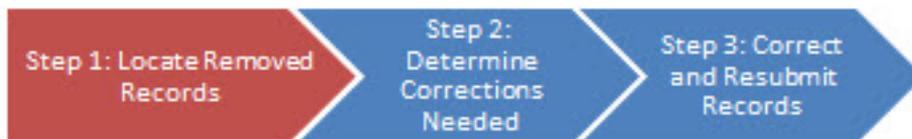
Select the link below to access the Removed Records Report for this entity. Removed Records Reports identify the records associated with this entity that have been categorized as invalid and removed from the Open Payments system. Removed Records Reports are downloadable .CSV files. For information on how to review the reports and take corrective actions, refer to the [Quick Reference Guide - Applicable Manufacturer and GPO Removed Records Report](#).

[ABCDE Medical Removed Records Report \(230 Records\)](#)

Research Payments

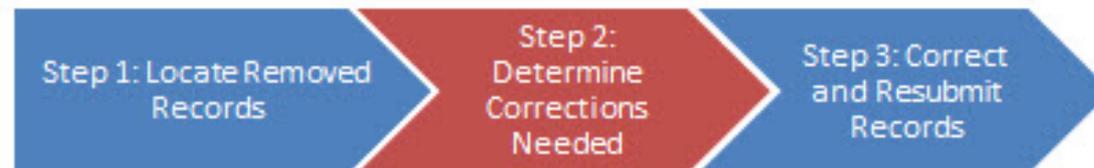
[View All](#)

Status	Record Count	Action Required
Ready for Submission	0	Final Submission
System Processing	0	No Action
On Hold	0	No Action
Ready for Attestation	0	Attest
Failed Validation	0	Correction
Unmatched	0	Correction or Override
Return to Submitter	0	Correction or Override
Attested	14	No Action
Matching in Progress	0	No Action
Total Payments	14	



Step 2: Determine Corrections Needed

- Removed Records Report
 - The Removed Records Report file is in .CSV format
 - One report is created for each “making payment as” reporting entity
 - Each individual record has an error code explaining why it was removed from the Open Payments system
 - All users associated with a reporting entity can download that entity’s report
 - Reporting entities in “failed vetting” or “pending vetting” status will not be able to view their Removed Records Report

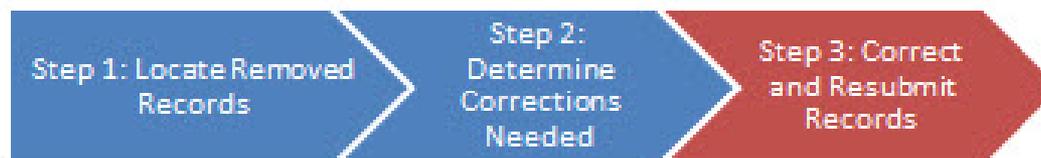


Step 2: Determine Corrections Needed (cont.)

Reason for Deletion Value	Meaning
AUG 2014 FIX - NPI/LICENSE MISMATCH	The National Provider Identifier (NPI) and the state license information in the record are not associated with the same physician or teaching hospital; or, the NPI and/or license information in the record is not associated with the physician in the record.
AUG 2014 FIX - NPI NOT PROVIDED	The covered recipient has been identified by Open Payments as having an NPI, but the NPI was not included in the record.
AUG 2014 FIX – FIRST NAME-LAST NAME-ADDRESS-LICENSE MISMATCH	For covered recipients without NPIs, the first name, last name, and state license information included in the record do not match with external sources.
AUG 2014 FIX - NAME MISMATCH	The physician name, NPI, or license information in the record does not match with the physician’s information as listed in either the National Plan & Provider Enumeration System (NPPES) or Provider Enrollment, Chain, and Ownership System (PECOS) systems. The physician list incorporates information from both PECOS and NPPES.

Step 3: Correct and Resubmit Records

- Validated Physician List (**NEW**)
 - A new resource to proactively assist in data matching
 - Includes only physicians with NPIs reported in the Open Payments system
 - Reviewed against PECOS and NPPES to assure data consistency
 - Provides name, NPI, license information for physicians
 - Does not contain all physicians within U.S. – just those reported in the Open Payments system who have an NPI



Step 3: Correct and Resubmit Records (cont.)

- Accessed within the Open Payments system on the “Payments Overview” page
- Available to reporting entities to validate their physician data
- The file is downloaded as a pipe-delimited .CSV file

Open Payments (Sunshine Act)
Manufacturer or Group Purchasing Organization [Switch User Type](#)

Home | **Records** (View, Edit, Report) | Review and Dispute (View, Respond, Resolve) | Manage Entities (Register, Edit, Nominate Roles) | My Profile (Account, Roles, Nominations) | Help

Payments Overview

A field with an asterisk (*) is required.

Applicable manufacturers or applicable group purchasing organizations (GPOs) must submit payments or other transfers of value, or ownership or investment interests in the Open Payments system. There are two methods for data submissions:

- Bulk File Upload (CSV or XML)
- Manual Data Entry

Note: If using the manual data entry option, you may only enter one record can be entered at a time.

Select one of the links above to submit your data to the Open Payments system. Note that to submit and edit data in the system, the user must have a role of “submitter” for the affiliated applicable manufacturer or applicable GPO.

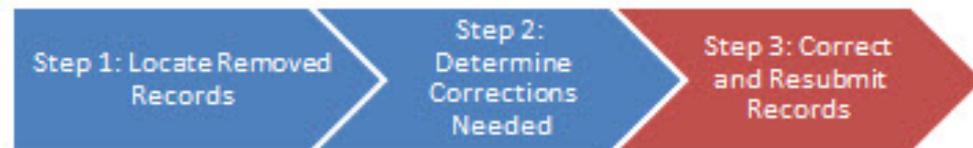
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Physician List

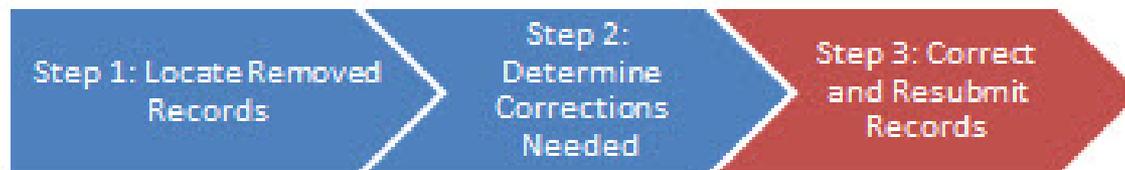
The Validated Physician List below should not be shared publicly.

 [Validated Physician List.csv](#)



Step 3: Correct and Resubmit Records (cont.)

- Bulk File Record Correction – recommended method
 - Create a data file containing your corrected records, with the “Resubmission Indicator” for those records set to “Y”
 - Step-by-step instructions included in Quick Reference Guide: Applicable Manufacturer and GPO Removed Records Report
- Manual Record Entry
 - Must submit new records because original records are not available in the Open Payments system for editing
 - Follow the standard process for submitting data manually



Records in “On Hold” Status

- As previously explained, another planned matching logic update will be made in January, 2015 – until then, when users re-submit or enter new records, those records will be in “On Hold” status
- Once the new matching logic has been implemented, the “On Hold” status will be removed and users will be allowed to complete submission and attestation for all records previously in the “On Hold” status
- That means that until January, 2015, users will not be able to complete submission and attestation for records they are re-submitting from their Removed Records Report
- An announcement of the lifting of “On Hold” status will be made via the Open Payments listserv

Example Scenario 1

1. In Removed Records Report, one record removed with the reason for deletion “AUG 2014 FIX – NPI/LICENSE MISMATCH”

File ID	OPS System ID	Home System ID	Making Payment Entity Name	Payment Record Type	Physician First Name	Physician Middle Initial	Physician Last Name	Teaching Hospital Name	Teaching Hospital TIN	Date of Payment Record	Amount of Payment Record	Reason for Deletion
12345	12000	1000	ABCDE Medical	General Payment	John	J	Doe			7/7/2013	10000	AUG 2014 FIX - NPI/LICENSE MISMATCH

2. *Quick Reference Guide: Applicable Manufacturer and GPO Removed Records Report* shows deletion description for the reason code listed

Reason for Deletion Value	Meaning
AUG 2014 FIX - NPI/LICENSE MISMATCH	The NPI and the state license information in the record are not associated with the same physician or teaching hospital; or, the NPI and/or license information in the record is not associated with the physician in the record.

Example Scenario 1 (cont.)

3. Compare physician information in the submitted record against the Validated Physician List –make sure the data submission matches the Validated Physician List

Data source	NPI	First Name	Middle Name	Last Name	State	License #
Validated Physicians List	9876543210	John	J	Doe	CO	12341234
Data source	NPI	First Name	Middle Name	Last Name	State	License #
ABCDE Medical data submission	9876543210	John	J	Doe	CO	12345678



Example Scenario 2

1. In Removed Records Report, one record removed with the reason for deletion “AUG 2014 FIX – NPI NOT PROVIDED”

File ID	OPS System ID	Home System ID	Making Payment Entity Name	Payment Record Type	Physician First Name	Physician Middle Initial	Physician Last Name	Teaching Hospital Name	Teaching Hospital TIN	Date of Payment Record	Amount of Payment Record	Reason for Deletion
12346	13456	2000	ABCDE Medical	Ownership/ Investment Payment	Jane	J	Doe			7/30/2013	5700	AUG 2014 FIX - NPI NOT PROVIDED

2. *Quick Reference Guide: Applicable Manufacturer and GPO Removed Records Report* shows deletion description for the reason code listed

Reason for Deletion Value	Meaning
AUG 2014 FIX - NPI NOT PROVIDED	The covered recipient has been identified by Open Payments as having an NPI, but the NPI was not included in the record.

Example Scenario 2 (cont.)

3. Compare physician information in the submitted record against the Validated Physician List – make sure the data submission matches the Validated Physician List

Data source	NPI	First Name	Middle Name	Last Name	State	License #
Validated Physicians List	9876543210	Jane	J	Doe	VA	12341234
Data source	NPI	First Name	Middle Name	Last Name	State	License #
ABCDE Medical data submission		Jane	J	Doe	VA	12341234



Example Scenario 3

1. In Removed Records Report, one record removed with the reason for deletion “AUG 2014 FIX – FIRST NAME-LAST NAME-ADDRESS-LICENSE MISMATCH”

File ID	OPS System ID	Home System ID	Making Payment Entity Name	Payment Record Type	Physician First Name	Physician Middle Initial	Physician Last Name	Teaching Hospital Name	Teaching Hospital TIN	Date of Payment Record	Amount of Payment Record	Reason for Deletion
12348	14965	3000	ABCDE Medical	Research Payment	John	J	Doe			8/5/2013	2579	AUG 2014 FIX – FIRST NAME-LAST NAME-ADDRESS-LICENSE MISMATCH

2. *Quick Reference Guide: Applicable Manufacturer and GPO Removed Records Report* shows deletion description for the reason code listed

Reason for Deletion Value	Meaning
AUG 2014 FIX - FIRST NAME-LAST NAME-ADDRESS-LICENSE MISMATCH	For covered recipients without NPIs, the first name, last name, and state license information included in the record do not match with external sources.

Example Scenario 3 (cont.)

3. Compare physician information in the submitted record against the Validated Physician List – make sure the data submission matches the Validated Physician List

Data source	NPI	First Name	Last Name	State	License #
Validated Physicians List		John	Doe	CO	12341234
Data source	NPI	First Name	Middle Name	Last Name	License #
ABCDE Medical data submission		John	J	Doe	CO 98769876



Example Scenario 4

1. In Removed Records Report, one record removed with the reason for deletion “AUG 2014 FIX – NAME MISMATCH”

File ID	OPS System ID	Home System ID	Making Payment Entity Name	Payment Record Type	Physician First Name	Physician Middle Initial	Physician Last Name	Teaching Hospital Name	Teaching Hospital TIN	Date of Payment Record	Amount of Payment Record	Reason for Deletion
12349	12956	4000	ABCDE Medic	General Payment	Jane	J	Doe			8/11/2013	12890	AUG 2014 FIX - NAME MISMATCH

2. *Quick Reference Guide: Applicable Manufacturer and GPO Removed Records Report* shows deletion description for the reason code listed

Reason for Deletion Value	Meaning
AUG 2014 FIX - NAME MISMATCH	The physician name, NPI, or license information in the record does not match with the physician’s information as listed in either the National Plan & Provider Enumeration System (NPPES) or Provider Enrollment, Chain, and Ownership System (PECOS) systems. The physician list incorporates information from both PECOS and NPPES.

Example Scenario 4 (cont.)

3. Compare physician information in the submitted record against the Validated Physician List – make sure the data submission matches the Validated Physician List

Data source	NPI	First Name	Middle Name	Last Name	State	License #
Validated Physicians List	9876543210	Jane	J	Doe	VA	12341234
Data source	NPI	First Name	Middle Name	Last Name	State	License #
ABCDE Medical data submission	9876543210	Jane	J	Smith	VA	12341234



Next Steps and Available Resources

Next Steps

- Download the Removed Records Report
- Make any necessary corrections to removed records
- Correct and re-submit records
- When “On Hold” status is lifted, attest to accuracy of resubmitted records
 - Lifting of “On Hold” status will be announced via the Open Payments list serv, once the planned matching logic update is made in January, 2015

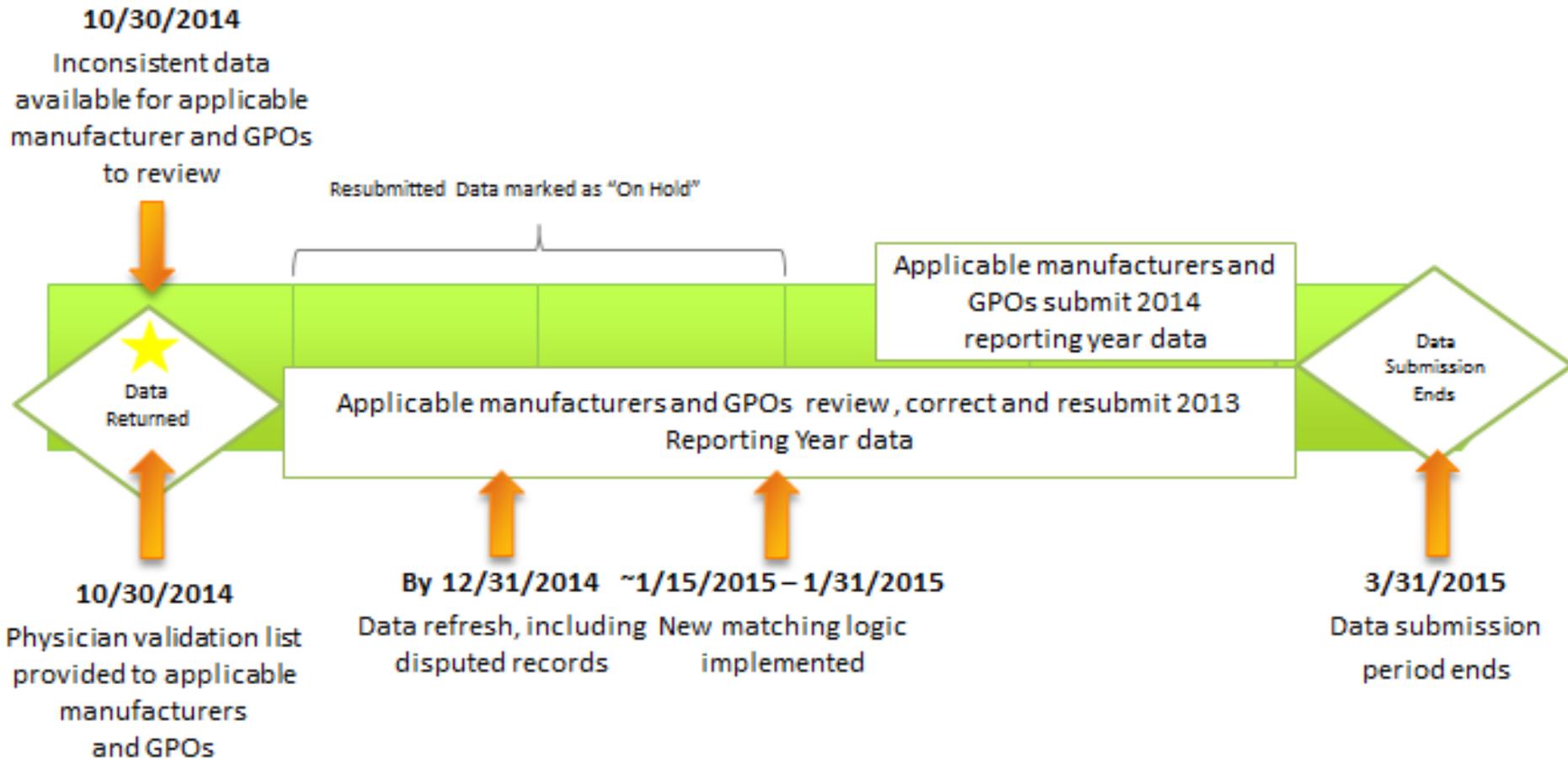
On the Horizon: Data Refresh

All corrective actions taken by industry on disputed records **prior to October 31** will be reflected in the next refreshed data publication, expected by December 31, 2014

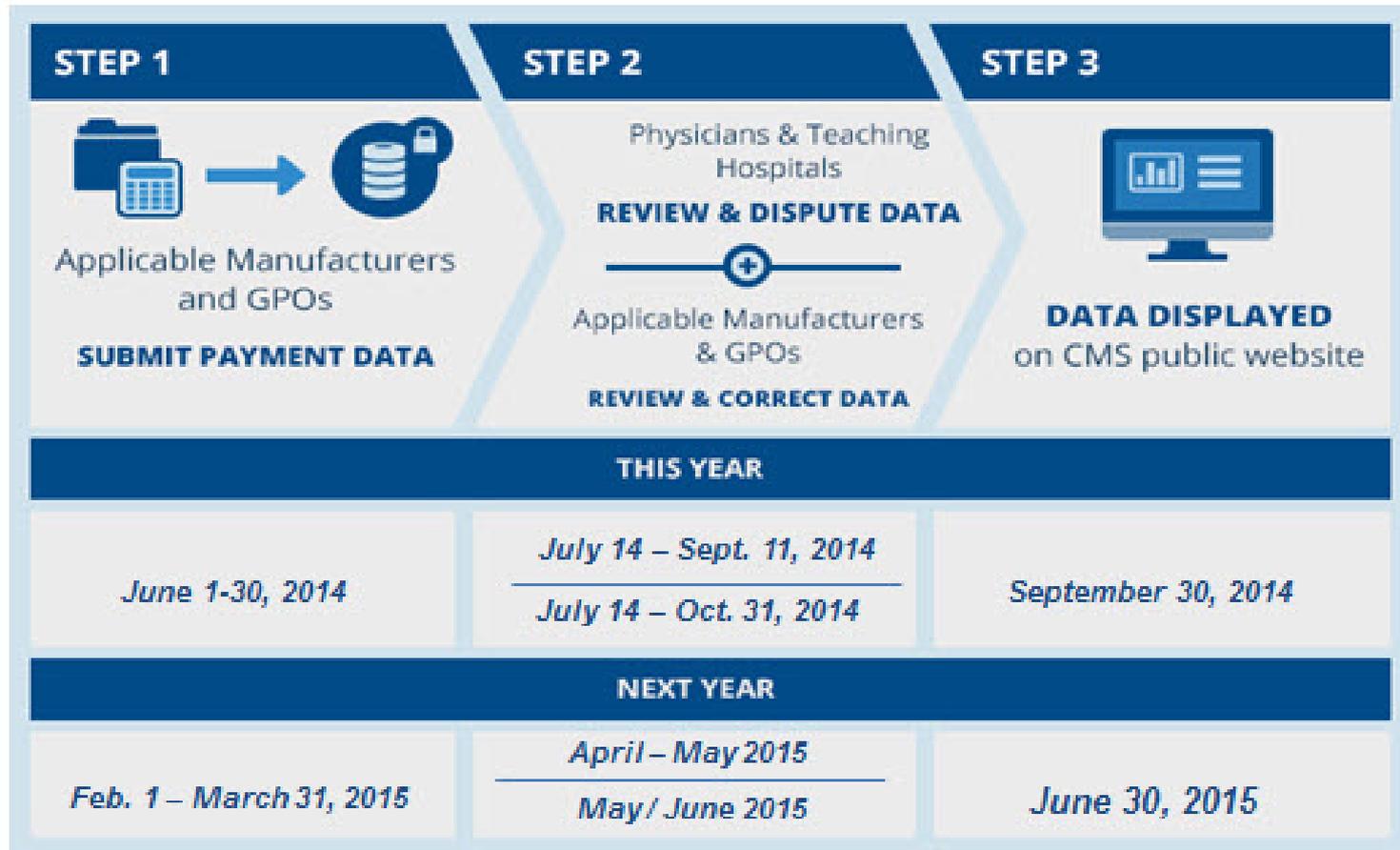
What's Included	What's Not Included ⁺
<ul style="list-style-type: none">• Disputes initiated by physicians and teaching hospitals as of September 11, 2014• Display as “Disputed” if unresolved as of October 31• Display with corrected data if resolved as of October 31	<ul style="list-style-type: none">• Any change to disputed records involving the covered recipient• Any records submitted to the Open Payments system for the first time• Any modifications to records currently on display

⁺ This data will be published during a future cycle

Operational Timeline



Planning for 2015



Coming Soon:

New Open Payments recorded tutorial to review 2015 timeline

Available Resources

- Quick Reference Guide: Applicable Manufacturer and GPO Removed Records Report Available on the Review Records page
- CMS Open Payments website <http://www.cms.gov/openpayments>
 - Resources Page:
 - Open Payments User Guide
 - Quick Reference Guides
 - Register for the CMS list serv to receive e-mail updates about Open Payments
- Open Payments Help Desk:
 - openpayments@cms.hhs.gov
 - 1-855-326-8366
 - Hours: Monday-Friday, 7:30 a.m. - 6:30 p.m. (CT)

Frequently Asked Question

Frequently Asked Questions

- *Q: Were the removed records published in September 2014? When will they be eligible for publication?*
- A: Yes. The removed records were published in the de-identified data set, with all physician and teaching hospital identifiers removed from the publication. Records marked for delay in publication or records disputed prior to their removal from the system were not published. All resubmitted records will be eligible for publication in the 2015 publication.
- *Q: Will the “Removed Records Report” prevent me from submitting for the 2014 reporting year?*
- A: No. This report will not affect your ability to submit your records for the 2014 program year.

Frequently Asked Questions (cont.)

- *Q: I analyzed my data and the information I originally submitted is accurate. What should I do?*
- A: If you revalidate the information and confirm that the entered information is accurate per the resources available (e.g., the Validated Physician List), you may resubmit your records with the information you believe is accurate. The records will be revalidated using this data and you will be notified of the success or failure once the records have been processed, after the planned data refresh in January, 2015.
- *Q: I am responsible for submitting records for several entities. How do I see the data for all of my entities?*
- A: A report will be created for each of the “Making Payment As” entities. You will be able to access each report by selecting the appropriate entity on the “Records” tab in the Open Payments system.

Frequently Asked Questions (cont.)

- *Q: NPI is not a required field. Why did you remove records where the NPI was not included?*
- A: The field is not categorized as required because some physicians do not have NPIs. However, if a physician has a NPI, that value must be entered. Records where a physician has a NPI but it was not reported were removed so the NPI can be provided for that physician.
- *Q: When will these re-submitted records be available for physicians and teaching hospitals to review and dispute?*
- A: The records will be available during the next review and dispute period, projected for April, 2015.

Live Q&A Session