



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

---

CREATING PUBLIC TRANSPARENCY  
INTO INDUSTRY - PHYSICIAN  
FINANCIAL RELATIONSHIPS

**The Open Payments Team Presents:**

**Program Year 2017 Data Submission &  
System Enhancements Webinar**

**February 7, 2018**

*CMS Disclaimer: This information is a summary of sections of the NPPTP. This information is a summary of the final rule implementing the National Physicians Payment Transparency Program (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.*

# Data Refresh

- On January 17, 2018 the Open Payments data was refreshed
  - Refreshed data reflects changes made to the data after the initial data publication (June 30, 2017)
  - Payments in the three major categories are reflected as:
    - \$2.78 billion in general payments
    - \$4.37 billion in research payments
    - \$1.03 billion of ownership or investment interests held by physicians or their immediate family members
- As a reminder, the following was not included in the refresh, but will be included in the June 2018 data publication:
  - Any records submitted to the Open Payments system for the first time after the close of Program Year 2016 submission (March 31, 2017)
  - Any records that were disputed and for which dispute resolution resulted in a change to the covered recipient

# Upgraded Data Search Tool

- The Open Payments search tool was enhanced to increase user accessibility, improve user experience and provide a more robust search tool.
- Enhancements to the search tool include
  - Homepage redesign
  - New Map Search Feature
  - Fully mobile responsive site



# Program Year 2017 Timeline



\* Anticipated Date

# Reporting Entity Recertification

## **Reporting entities that registered in any previous calendar year must recertify to perform any Open Payments system functions**

- Recertification confirms that details in the Open Payments system are accurate
- Recertification can only be performed by an active user who holds an officer role
- If a reporting entity does not have an active officer, contact the Open Payments Help Desk for assistance
- Outdated or inaccurate reporting entity profile information can be updated during recertification
  - Changes to the entity's Legal Name, Tax Identification Number (TIN), or DUNS number will trigger re-vetting of the entity
- Reporting entities due for recertification are given a status of "Pending Recertification"

# System Enhancements

- **Expired Physician License Warning**

- Will provide a warning message if physician license appears to be expired in the year for which the record is submitted
- Provided as a warning only; submission and attestation will still be permitted
- For bulk submissions the warning will appear in the error log
- For manual submissions the warning will appear on the record detail page

*Note: The latest VPL does not contain licenses that have been expired in all years, but does contain licenses that were expired in only some of the program years*

# System Enhancements

- **Delay in Publications Renewal Limit Reached Validation**
  - Delay in publication of payments may be requested and delays may be held up to four years
  - The four year limit has now been reached for payments made in the 2013 calendar year
  - Records with previously requested delays that may no longer be delayed will be identified on the record listing page with a “Delay Limit Reached” status
  - If there are attempts to renew a publication delay for a record ineligible for delay, an error message will be presented

# System Enhancements

- **Other System Enhancements:**
  - Assumptions text character limit increased from 4,000 to 8,000
  - Assumptions text box will now accept converted characters from MS Word without presenting errors
  - Multiple usability improvements for page navigation, on-screen informational messages and system – generated email content



# System Enhancements: Coming Soon & Notable Mentions

- Covered recipients will now be able to see and will receive notifications when previously attested records available for review and dispute are deleted or being updated by reporting entity
- Notes:
  - Open Payments system maintenance is performed regularly on Sundays from 12:00 am – 7:00 am (ET)
  - There is a possibility of slower processing speeds for larger file uploads during peak program times. Please be conscientious of the program timeline. We recommend starting submissions and completing attestation as early in the submission window as possible.

# Your Next Steps

New or Returning?	Next Steps
<b>New</b>	<ul style="list-style-type: none"><li>• Register in EIDM and request access to the Open Payments system</li><li>• Register self and reporting entity (if applicable) in the Open Payments system</li><li>• Assign user roles</li><li>• Continue collecting 2017 payment data, and prepare to report it in early 2018</li></ul>
<b>Returning</b>	<ul style="list-style-type: none"><li>• Ensure EIDM account not deactivated due to inactivity, reset password if necessary</li><li>• Recertify reporting entity information and provide required review and dispute contact information</li><li>• Confirm user roles</li><li>• Continue collecting 2017 payment data and prepare to report it in early 2018</li></ul>

# Data Submission Resources

- Resources to help reporting entities ensure accurate data submission:
  - Validated Physician List
    - Accessed through the Open Payments system
  - Teaching Hospital Lists
    - 2018 Teaching Hospital list is now available for use when collecting data for January 1, 2018 – December 31, 2018
    - All Teaching Hospital Lists are available on the Resources page of the Open Payments website

# Question & Answer Session

- During the Question and Answer session the Open Payments team received many great questions and was happy to respond to these.
- The following slides highlight the most frequently asked questions during this session.



# Q&A: Data Refresh

- Did the data refresh only include changes made to physician records via the formal dispute process? Sometimes physicians contact reporting entities directly and changes are made without the formal dispute process, however these changes did not appear in the refreshed data? When will they be published?
  - The refresh included all changes to existing records that were completed and attested to prior to November 15, 2017 except records where covered recipient's identifying information was changed. Records for which covered recipient identifying information was changed will be published during the next full data publication.

# Q&A: Data Submission

- The Program Year 2017 submission deadline of March 31<sup>st</sup> is on a Saturday. Will this remain the deadline given that it is on a weekend?
  - Yes, the Program Year 2017 submission deadline will still be March 31, 2018
- Will the help desk be open on Saturday March 31, 2018?
  - Yes, the Open Payments Help Desk will be open on Saturday March 31, 2018 to provide assistance if needed.
- Is the March 31<sup>st</sup> deadline for both submission and attestation?
  - Yes. In order for data submission to be considered timely, data must be submitted and attested to by March 31, 2018.

# Q&A: Physician Taxonomy

- Will the taxonomy code “specialist” cause a record to fail record matching validation?
  - For manual submissions, yes it will cause an error. For bulk upload, it will not cause an error, but the invalid taxonomy information will not be shown when data is published.
- What should be done if a health care provider has a taxonomy code of “specialist” or “student” and the record cannot be successfully submitted?
  - Refer to the published Open Payments accepted taxonomy list and replace the failing taxonomy code with one from the list that you believe most closely matches the specialty in which the provider practices

# Q&A: Timing of Record Submissions

- Do all records have to be submitted at once or can they be submitted at various times? For example some companies may still be working on finalizing fourth quarter payments but other data is ready to be submitted. Can ready to submit records be submitted now, and other records submitted later?
  - Records do not all need to be submitted at once. In fact, reporting entities are encouraged to submit records as early as possible. Per the example above records for quarters that are already prepared for submission may be submitted when they are ready and those still being prepared can be submitted at a later time.  
NOTE: In order for data submission to be considered timely, the records must be submitted and attested to by March 31, 2018



# Q&A: Physician License Expiration

- Will records be rejected due to expired physician license?
  - No. Records submitted with an associated expired physician license will receive a warning message, but will not be rejected.
    - For bulk submissions the warning message will appear in the error log
    - For manual submissions the warning message will appear on the record's detail page
- For additional questions regarding the Physician License Expiration please refer to the Open Payments full list of FAQs located on the Open Payments website.

# Q&A: National Provider Identifier (NPI)

- Are NPIs required to be reported?
  - Yes
- Will records submitted without an NPI be rejected?
  - If the provider has NPI but no NPI was submitted, the record will fail validation.

# Q&A: Frequent Topics at the Help Desk

- What do I do if my password needs to be reset?
  - If it's been over 180 days since you've logged into the Enterprise Identity Management System, your account has been de-activated for security reasons.
  - If your account has been deactivated, contact the Open Payments help desk for assistance with re-activating your account.
  - Just a reminder – the user whose account has been de-activated must be the one to contact the help desk. The help desk cannot reset a password for someone calling on behalf of someone that has an Open Payments role.

# Q&A: Frequent Topics at the Help Desk

- How do you remove a user role from your entity in the Open Payments system?
  - A user holding the role of officer with a reporting entity can deactivate other individuals' user roles with that reporting entity. Deactivation removes an individual's association with a reporting entity in the Open Payments system, including removing the individual's access to that reporting entity's information and records.
  - To deactivate an individual's user role, navigate to the "Manage Entities" page and then to the "Manage Roles" tab. You can use the "Deactivate User" button on this screen.
  - If you need further assistance, please don't hesitate to contact the Open Payments help desk.
  - Just a couple reminders: you cannot deactivate yourself. You may contact the Open Payments help desk if you wish to deactivate yourself.
  - Also, if your entity does not have an active officer in the Open Payments system, contact the help desk for assistance in adding an officer role to your entity. There is a standard process that needs to be followed in order for a new officer to be approved in the system.

# Available Resources

- Stay connected through the Open Payments listserv!
  - Subscribe at our Contact Us page on the Open Payments website.
- Learn more about the Open Payments Program at <http://www.cms.gov/openpayments>
- Have more Questions?
  - Contact our Help Desk at [openpayments@cms.hhs.gov](mailto:openpayments@cms.hhs.gov) or by calling 1-855-326-8366

