Open Payments
Review Dispute & Corrections Webinar

OPEN PAYMENTS

CREATING PUBLIC TRANSPARENCY
INTO INDUSTRY-PHYSICIAN
FINANCIAL RELATIONSHIPS

March 28, 2018

Program Year 2017 Timeline

* Anticipated Date

Timeline Reminders – Review, Dispute & Corrections

- Review and Dispute for covered recipients will begin on Sunday April 1, 2018 and continue through May 15, 2018

    - In order for the dispute or correction to be reflected in the June 2018 publication, the dispute must be initiated by May 15, 2018

- Extended correction period continues from May 16, 2018 – May 30, 2018

- Dispute resolution takes place outside of the Open Payments System

    - Reporting entities should work directly with the covered recipient or the authorized representatives/authorized officials to reach a resolution

- **CMS does not mediate disputes**

Review and Dispute Statuses

- Records in the review and dispute process will have one of the following statuses:

  - **Initiated** – the dispute has been initiated by a covered recipient

  - **Acknowledged** – the dispute has been acknowledged by the reporting entity

  - **Resolved** – the reporting entity and covered recipient have worked together and reached a dispute resolution

  - **Resolved No Change** – the reporting entity and covered recipient have resolved the dispute in accordance with the Final Rule and no changes to the record were made

  - **Withdrawn** – the dispute has been withdrawn by the covered recipient; no further action required by the reporting entity

Review and Dispute – Impact on Publication

- Disputes initiated <u>within</u> the initial 45-day review, dispute, and correction period and resolved by the end of the correction period (May 30, 2018) will be published and identified as non-disputed in the initial data publication (June 2018)

- If a dispute is not resolved by the end of the correction period, the record will be published and identified as disputed

- Disputes initiated or resolved <u>after</u> the full 60-day review, dispute, and correction period will not be reflected in the initial publication of data and will be published as original attested-to data.

  - Those disputes and any related data changes will be published in the next publication which may be a refresh publication or the next program year data publication

Review and Dispute System Enhancements

- Covered recipients will be able to see and will receive notifications when previously attested records available for review and dispute are deleted or being updated by a reporting entity

- If a reporting entity user edits or deletes a disputed record, an email notification will be sent to the covered recipient who created the dispute.

Question & Answer Session

- To ask a question:
  - Raise your hand and the presenter will call on you and unmute your line
  - Submit your question via the Q&A box
  - Please note:
    - the Open Payments team will refer all questions with specific and/or detailed scenarios to the help desk.

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 or by calling 1-855-326-8366