



Open Payments

Physicians and Teaching Hospitals: 2015 Program Year Registration

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

January 2016

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

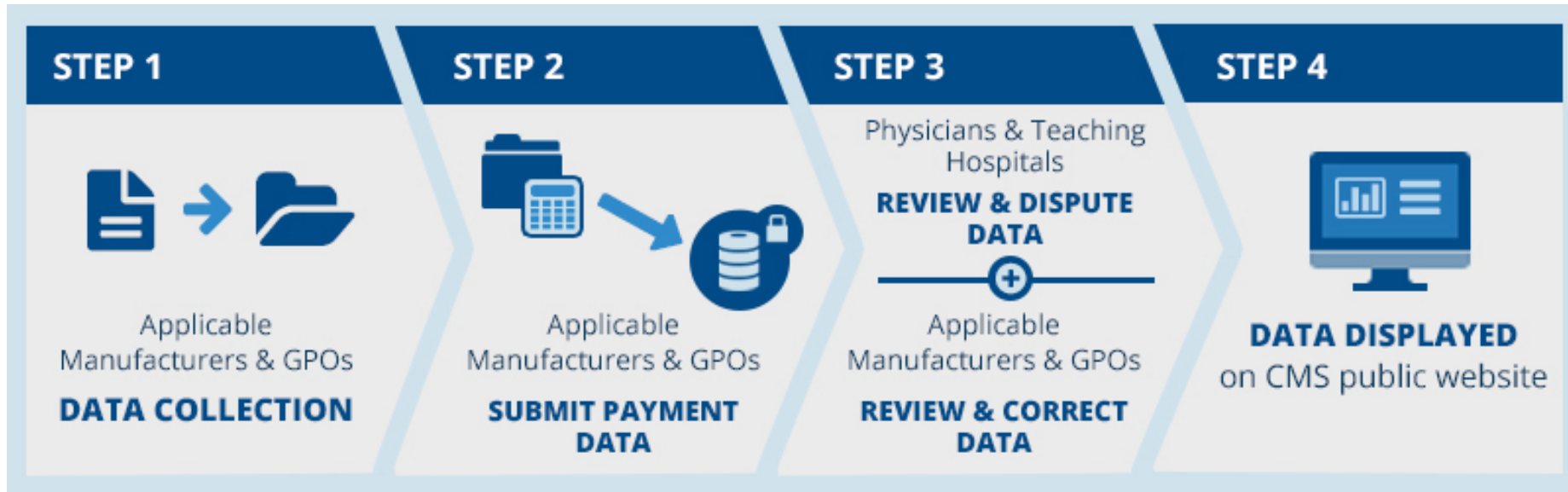
- Target Audience and Learning Objectives
- Open Payments Program and System Overview
- Physician Registration in the Open Payments System
- Teaching Hospital Registration in the Open Payments System
- Program Year 2015 System Enhancements
- Next Steps and Available Resources

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 or applicable GPOs (“reporting entities”)
- Learning objectives:
 - Understanding of the Open Payments registration process
 - Physicians: Understanding how to register yourself and how to nominate a representative to perform system actions on your behalf
 - Teaching hospitals: Understanding of system user roles and how to assign them

Open Payments Program and System Overview

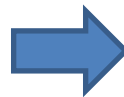
Open Payments Process Flow



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 correct the data to resolve any disputes.



Data for that program year is published for public viewing in accordance with the publication guidelines.

2015 Program Year Timeline

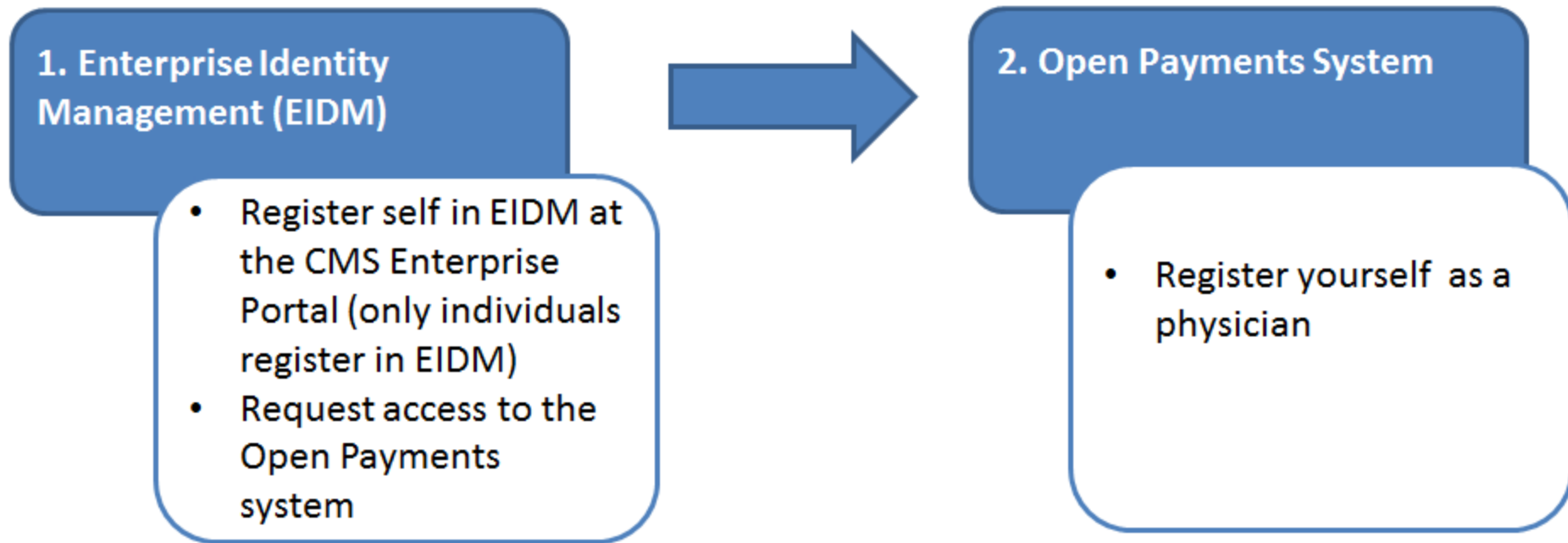


*Anticipated dates

2015 Program Year Review and Dispute Period

- In order to participate during the review and dispute period, physicians and teaching hospitals **MUST** register in the Open Payments system. They can register at any time.
- Physicians and teaching hospitals may initiate disputes at any time after the 45 day review and dispute period begins, but before the end of the calendar year.
 - Note that any changes resulting from disputes initiated after the 45 day review and dispute period may not be made public until the next time the data is refreshed.
- Program Year 2015 records submitted by reporting entities will **not** be visible to physicians and teaching hospitals in the Open Payments system until the review and dispute period begins in April 2016.
- Additional information regarding review and dispute is on the Resources page of the Open Payments website.

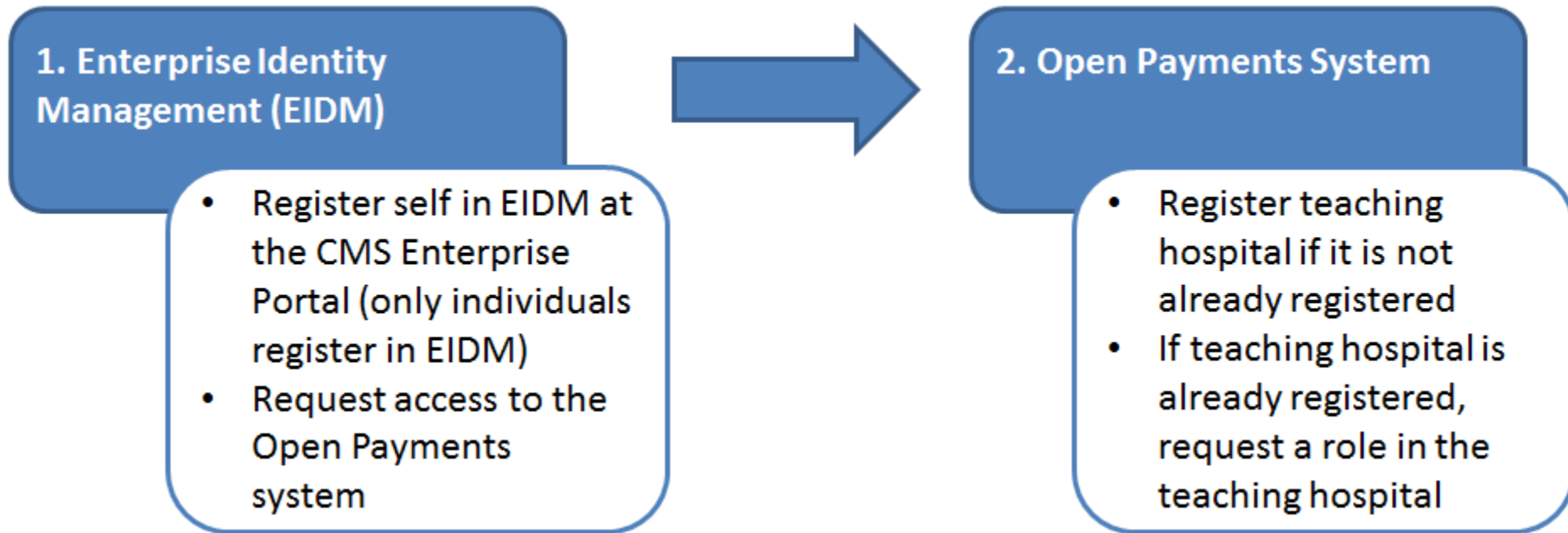
Two-Step Registration Process for Physicians



The CMS Enterprise Portal is 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.

Two-Step Registration Process for Teaching Hospitals



Hospital-based physicians must register as physicians. 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 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.

EIDM Overview

- 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 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.
- For step-by-step instructions on how to register in EIDM, refer to the quick reference guide “Enterprise Identity Management (EIDM) Registration,” available on the Resources page on the Open Payments website.

Physician Registration in the Open Payments System

Physician Registration in Open Payments System

- A physician may nominate one authorized representative to interact with the system on their behalf.
- Upon registration in the Open Payments system, physician profiles are vetted against CMS data to confirm that the registrant is a covered recipient physician.
 - This step is performed in addition to identity verification performed during EIDM registration.
 - More information is provided on the Physician Vetting slide.
- Hospital-based physicians must register as physicians.
- Physicians who served as principal investigators on any industry-funded research studies 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 your name in the National Plan and Provider Enumeration System (NPPES).
- Enter NPI exactly as listed in NPPES for the current calendar year and enter all active state licenses.
- Quick Reference Guides “Physician Registration” and “Nominating a Physician Authorized Representative and Accepting/Rejecting Nominations” provide additional guidance (see Resources page of Open Payments website <http://www.cms.gov/openpayments>).

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.
- If vetting is unsuccessful, physicians should contact the Open Payments Help Desk for assistance (openpayments@cms.hhs.gov or 1-855-326-8366).

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 the 2013 - 2016 program years are on the Resources page of the Open Payments website.
- For the 2015 program year, the hospital's "doing business as" (DBA) name and Taxpayer Identification Number (TIN) will be used for reporting and searching purposes in the Open Payments system.
 - 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 Registration (cont.)

- Teaching hospital users can hold one of two user roles: Authorized official and/or authorized representative (see next slide for details). These roles can carry over to the next program year.
- Individuals may also be nominated to fill one of these roles and act on behalf of the teaching hospital in the Open Payments system.
- Teaching hospitals can have up to 10 individuals associated with them in the Open Payments system and up to five authorized officials.
- Quick Reference Guide “Teaching Hospital Registration” and “Teaching Hospital User Roles and Nominations” provide additional guidance (see Resources page of Open Payments website <http://www.cms.gov/openpayments>).

Teaching Hospital User Roles and Nominations

User Role	Function
Authorized Official	<ul style="list-style-type: none">• Registers the teaching hospital in the Open Payments system• Modifies the teaching hospital's profile in the Open Payments system• Nominates other users and modifies existing user roles• Reviews and disputes records associated with the teaching hospital
Authorized Representative	<ul style="list-style-type: none">• Reviews and disputes records associated with the teaching hospital• Nominations must be approved by the authorized official

Program Year 2015 System Enhancements

Program Year 2015 System Enhancements Overview

- This section provides a high-level overview of the Program Year 2015 Open Payments system enhancements relevant to physicians and teaching hospitals.
- For a detailed list of all enhancements, refer to the Program Year 2015 Open Payments System Enhancements document on the Open Payments website.

Open Payments System Enhancements: Registration, Data Submission, and Attestation

- Special characters are now allowed in all fields throughout the Open Payments system
 - All special characters listed on the United States keyboard layout (ANSI) are permitted
 - Excludes fields where specific formatting is required
- Physician and principal investigator license number field character limit increased to 25 characters

Open Payments System Enhancements: Review and Dispute

- Reporting Entity Review and Dispute contact information, provided during registration, is now made available to physicians and teaching hospitals through the “Record ID” page.
- Physicians and teaching hospitals can now download up to 400k records from the Review and Dispute page into a CSV file.
- The physician user interface is now equipped to identify whether a physician was reported as a recipient of a payment or as a principal investigator affiliated with a research payment.

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 authorized officials
- Begin reviewing data when it is made available in April 2016

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 when it is made available in April 2016

Available Resources

- Review available resources on the Resources page of the CMS Open Payments website at <http://www.cms.gov/openpayments>.
 - Open Payments User Guide
 - Tutorials
 - Quick Reference Guides
 - Teaching Hospital lists
 - Register for the CMS listserv 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