



Open Payments

Applicable Manufacturers & Applicable GPOs:

2014 Program Year Registration, Data Submission, and Attestation

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

**CREATING PUBLIC TRANSPARENCY
INTO INDUSTRY - PHYSICIAN
FINANCIAL RELATIONSHIPS**

February 2015

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

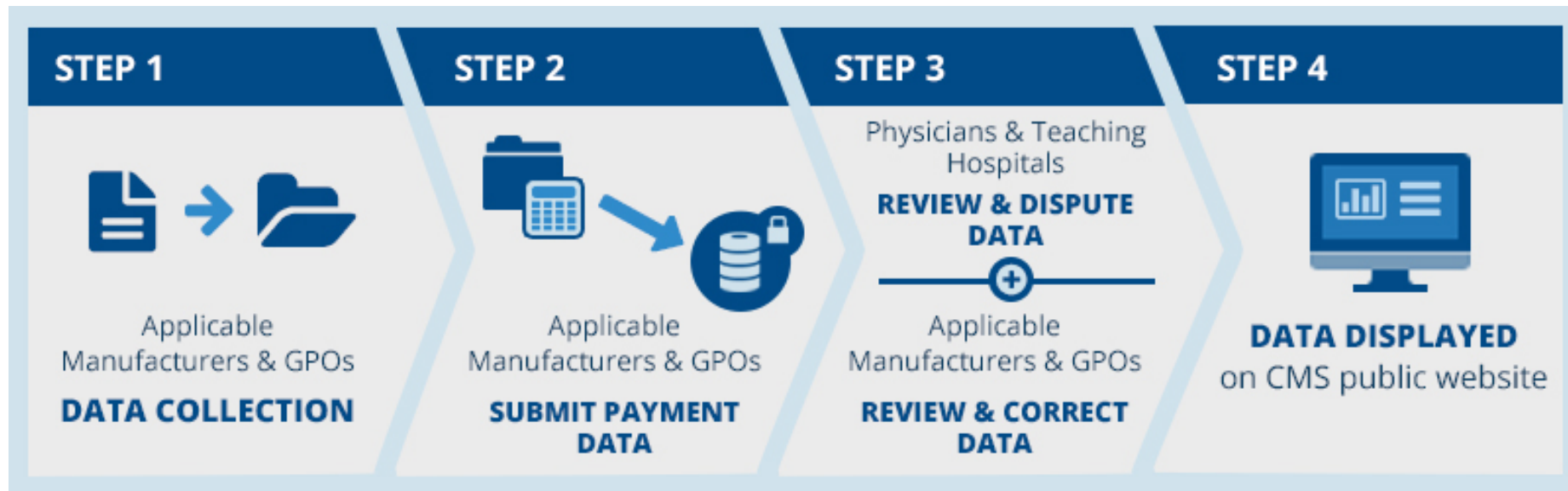
- Program and System Overview
- Reporting Entity Registration and Re-Certification
- Data Submission
- Validation Errors and Resubmissions
- Final Submission & Attestation
- Available Resources and Next Steps

Target Audience & Learning Objectives

- Target audience:
 - Individuals and reporting entities who must submit data to the Open Payments system to comply with regulatory and reporting requirements
- Learning objective:
 - Provide high-level instructions on how to register, submit, and attest to data for the 2014 program year

Open Payments Program and System Overview

Open Payments Process Flow



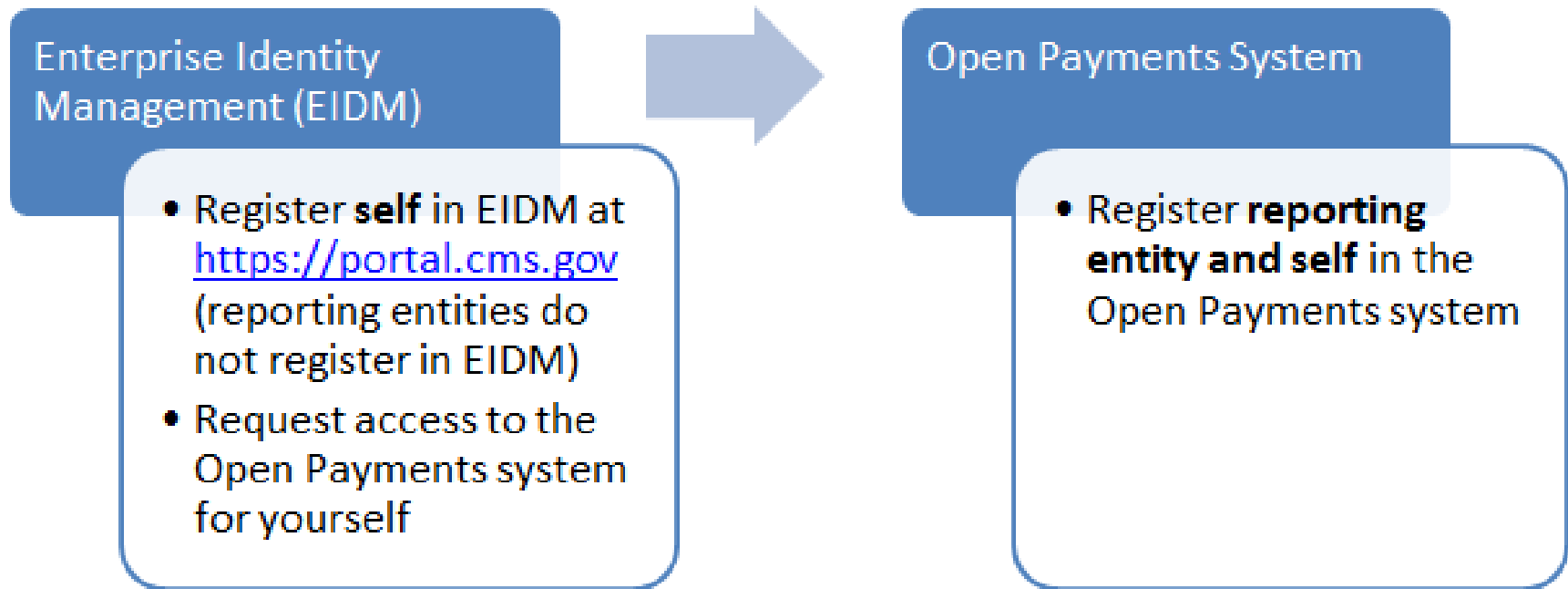
2013 and 2014 Program Year Timelines



*Anticipated date

Reporting Entity Registration and Re-Certification

Two-Step Registration Process



Successful registration in BOTH EIDM and the Open Payments system is required to be able to perform any system-related functions

Enterprise Identity Management System (EIDM)

- Individuals must have their identities verified through EIDM to gain electronic access to CMS-protected information or systems
- Identity verification is the process of providing information (e.g., identity history, credentials, or documents) to verify a person is who he or she claims to be
- EIDM will lock a user account after 60+ days of inactivity; deactivate a user account after 180+ days of inactivity
 - Contact the Open Payments Help Desk for assistance – openpayments@cms.hhs.gov or call 1-855-326-8366
- Individuals with foreign addresses can now enter foreign address when registering
 - Contact the Open Payments Help Desk for instructions
- “Open Payments System Quick Reference Guide: Enterprise Identity Management System (EIDM) Registration” provides detailed EIDM registration instructions (see Resources page of the Open Payments website <http://www.cms.gov/openpayments>)

Reporting Entity Registration in Open Payments System

- Reporting entities required to report payments, other transfers of value, or ownership/investment interests must register in the Open Payments system (after registering in EIDM)
- Open Payments registration involves creating a reporting entity profile as well as an individual profile for the person registering the reporting entity
- The individual who registers the reporting entity will assume the role of officer (authorized official) in the Open Payments system
- Registration must be completed in one session
 - Saving information for later is not available in the registration process and after 30 minutes of inactivity, the session times out
- “Open Payments System Quick Reference Guide: Applicable Manufacturer and Applicable GPO Registration” provides detailed system registration instructions (see “Resources” page of the Open Payments website <http://www.cms.gov/openpayments>)

Reporting Entity Re-Certification

- **Before performing any system-related functions in the Open Payments system in 2015, reporting entities that registered in 2014 must re-certify in the Open Payments system**
- Only officers can re-certify for a reporting entity
- Re-certification confirms reporting entity details in the Open Payments system are accurate
- During re-certification, officers can update outdated or inaccurate reporting entity information
- Re-vetting of the reporting entity will occur if any of the following fields change:
 - Registering Entity Legal Name
 - Tax Identifier Number (TIN)/Employee Identification Number (EIN)
 - Dun and Bradstreet DUNS Number (D&B)
- “Open Payments System Quick Reference Guide: Applicable Manufacturer and Applicable GPO Registration” provides re-certification instructions (see “Resources” page of the Open Payments website <http://www.cms.gov/openpayments>)

Reporting Entity Vetting

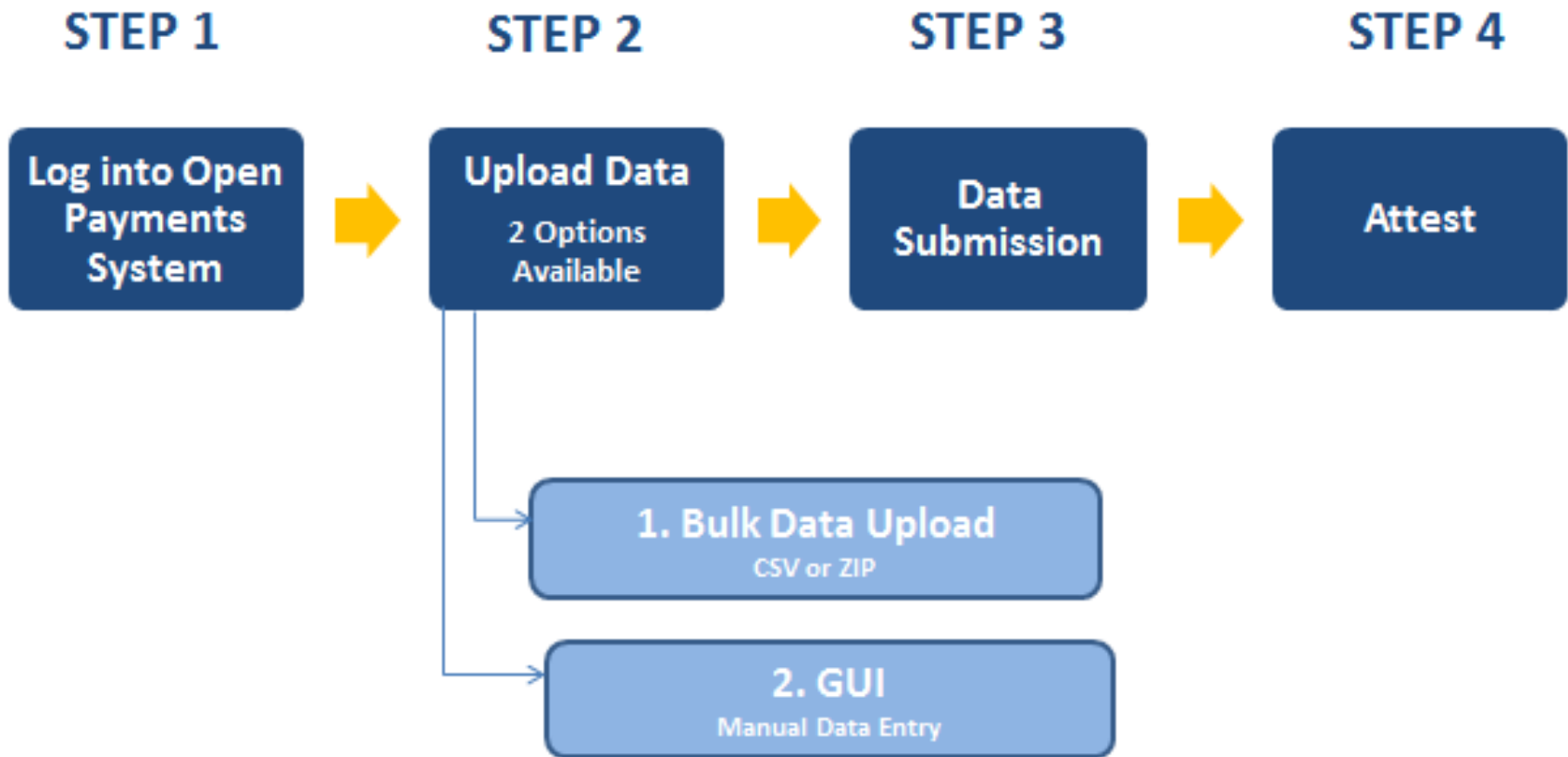
- Vetting is the process of verifying the applicable manufacturer or applicable GPO as a valid reporting entity
- The authorized official will receive an email confirming vetting success or failure
- If vetting fails, the authorized official may update the reporting entity profile information and re-submit the reporting entity for vetting
- If vetting fails after three re-submissions, the authorized official must contact the Open Payments Help Desk for assistance
- **Registration is not considered complete until vetting is successful**
- Refer to the Open Payments User Guide for more information on vetting (see Resources page of the Open Payments website <http://www.cms.gov/openpayments>)

Data Submission, Error Correction, and Attestation

Data Submission

- Data submission may be done in two ways:
 - Bulk file upload (CSV files or ZIP containing CSV files)
 - Manual data entry (through a Graphic User Interface)
- Records go through validation and matching prior to final submission
- Submitters will receive email notification of accepted submission or errors that prevented submission acceptance
- Third-party organizations may format, prepare, and submit data on behalf of a reporting entity
- Refer to the submissions-related Quick Reference Guides for more information on data submission (see Resources page of the Open Payments website <http://www.cms.gov/openpayments>)

Open Payments System Data Submission Process Flow



Bulk File Upload

- Recommended for submitting large volumes of data
- Two file formats are allowed:
 - CSV (Character-Separated Values)
 - Three CSV sample files are available on the “Resources” page of the Open Payments website, one for each of the payment types (general, research, ownership/investment)
 - ZIP (must contain only CSV submission files)
- Maximum file size is 250MB; larger datasets must be split into multiple files under 250MB
 - Submitted ZIP files must be under 250 MB when zipped
- Each file should contain only one payment type (general, research, ownership/investment)
- “Open Payments System Quick Reference Guide: Bulk File Upload” provides additional guidance (see Resources page of the Open Payments website <http://www.cms.gov/openpayments>)

Manual Data Entry

- Recommended for submitting smaller volumes of data
- Data entries made via Open Payments system Graphic User Interface (GUI)
- Can be used in conjunction with bulk data file uploads
- “Open Payments System Quick Reference Guide: Manual Data Entry” provides additional guidance (see Resources page of the Open Payments website <http://www.cms.gov/openpayments>)

Validation and Matching Errors

- File format errors
 - File size is greater than 250MB
 - Any file format other than CSV or ZIP
 - Header row is not included in the file
 - Not all columns are included in the file
 - CSV sample file used to create data file does not match the payment category being submitted
- File content errors
 - Invalid characters are included in the data element
 - Required data element is left blank
 - Too many or too few characters in the data element
- Data matching errors
 - Covered recipient matching is unsuccessful

Submission Error Notifications

- Notification of submission errors depends on data submission method
 - Bulk file upload: Notification via email of detailed error report
 - Error reports contain all validation and matching errors for records submitted via bulk file upload
 - Error reports contain error codes that explain errors; codes are explained in the Error Code Key
 - Manual data entry: Onscreen, real-time notifications of data entry errors
- Submission errors must be corrected and the records re-submitted
- “Open Payments System Quick Reference Guide: Identifying and Correcting Errors” and the Open Payments User Guide provide additional guidance (see “Resources” page of the Open Payments website <http://www.cms.gov/openpayments>)

Final Data Submission

- All records uploaded to the Open Payments system, either via bulk file upload or manual entry, must go through a final data submission
- Final data submission can begin when all records are free of errors and are in “Ready for Submission” status
- Records submitted through bulk file upload and manual entry will go through final submission **simultaneously**

Attestation

- Attestation legally affirms and certifies that information submitted on behalf of a reporting entity is accurate and complete – only attester may attest
- Attestation occurs after all errors are corrected, matching is successful, records have undergone final submission, and are in “Ready for Attestation” status
- Attesters will receive email notification when there are records in “Ready for Attestation” status
- Attestation must be done for **all** records submitted for a program year; **not** individual records, file submissions, or payment types
- Attestation must be completed within the deadline for the program year
- Data submissions that are not attested to by the reporting deadline will be considered non-compliant and may be subject to civil monetary penalties
- “Open Payments System Quick Reference Guide: Final Submission and Attestation” provides additional guidance (see “Resources” page of the Open Payments website <http://www.cms.gov/openpayments>)

Next Steps & Available Resources

Next Steps

For New Reporting Entities

- Individuals register in EIDM and request access to the Open Payments system
- Register self and reporting entity in Open Payments system
- Assign reporting entity user roles in Open Payments system
- Report 2014 data in Open Payments system

For Returning Reporting Entities

- Re-certify reporting entity information in Open Payments system
- Confirm reporting entity user roles
- Report 2014 data in Open Payments system

Available Resources

- Resources which are on the CMS Open Payments website (<http://www.cms.gov/openpayments>) “Resources” page include:
 - Open Payments User Guide
 - Video tutorials
 - Open Payments System Quick Reference Guides
 - Enterprise Identity Management System (EIDM) Registration
 - Applicable Manufacturers and Applicable GPOs Registration and Re-Certification
 - User Roles, Self-Nominations, and Accepting/Rejecting Nominations
 - User Roles, Nominations, and Approving/Rejecting Self-Nominations
 - Bulk File Upload
 - Manual Data Entry
 - Final Submission and Attestation
 - Record Correction & Deletion
 - Identifying and Correcting Validation and Matching Errors

Available Resources

- 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
 - Help Desk hours are noted on the Open Payments website