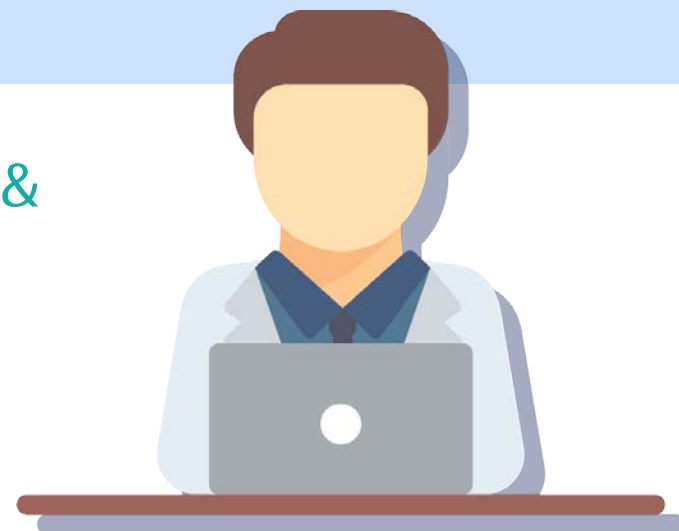


# OPEN PAYMENTS

Creating public transparency into health care industry  
& health care provider financial relationships

Program Year 2020 Data Submission &  
System Enhancements

February 10, 2021  
CMS Open Payments Team



# Program Year 2019 Data Refresh

- On January 22, 2021 the Open Payments Data was refreshed to reflect changes that were made after the initial data publication.



Total U.S. Dollar Value

**\$10.00 Billion**



Total Records Published

**10.96 Million**



General Payments  
**\$3.56 Billion**



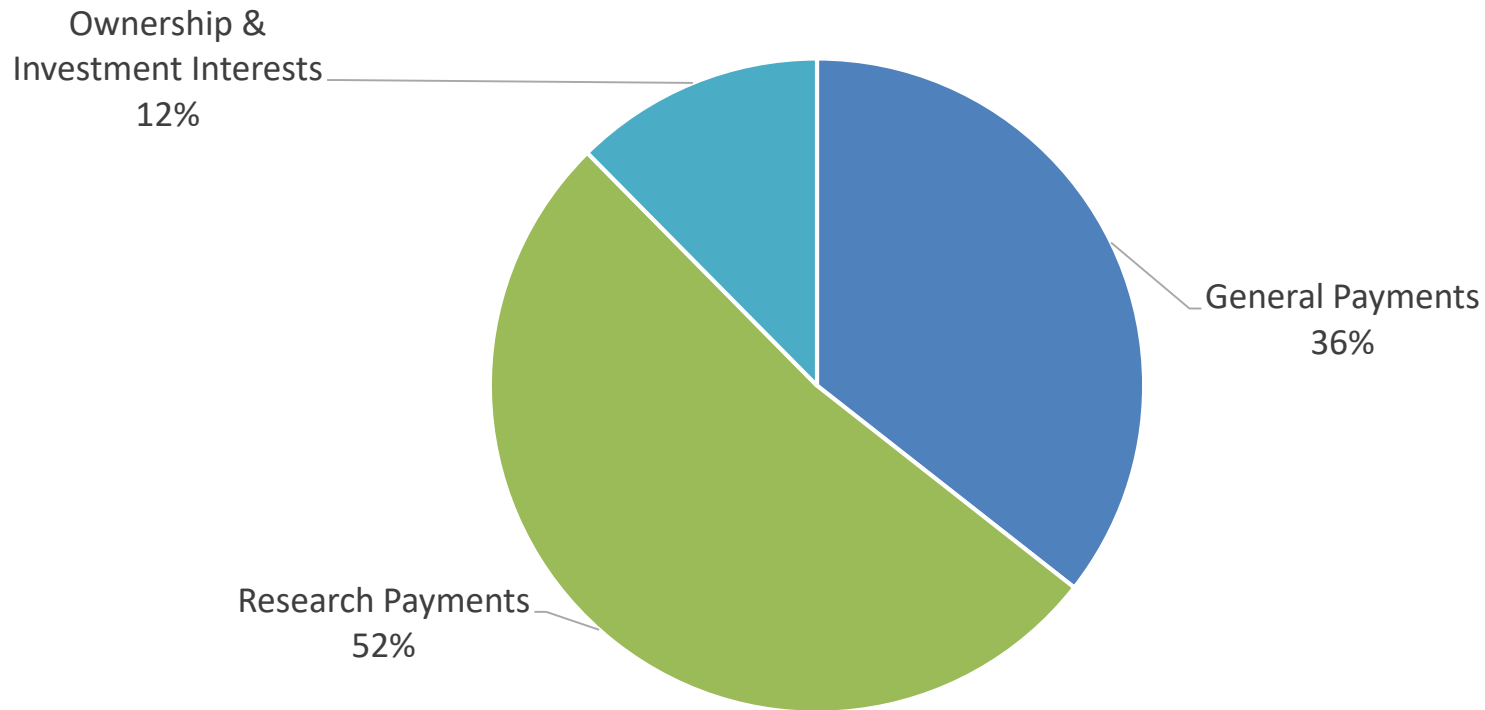
Research Payments  
**\$5.20 Billion**



Ownership & Investment  
**\$1.24 Billion**

# Program Year 2019 At a Glance

Program Year 2019 Data (Refresh)  
Percent Total Value of Payments



# Refresh Reminders

- What's Included:
  - **Record Updates:** changes to non-disputed records that were made on or before November 15, 2020
  - **Dispute Resolutions:** dispute indicators removed for previously disputed records for those resolved on or before December 31, 2020
  - **Record Deletions:** records deleted on or before December 31, 2020 were removed from the Open Payments database
- What's Not Included:
  - records submitted for the first time after the close of the Program Year 2019 submission window (March 31, 2020)
  - Any records that were disputed and for which dispute resolution resulted in a change to the covered recipient.

# Program Expansion Reminder

- Effective January 1, 2021, the Open Payments definition of a covered recipient expanded to include five new provider types:
  - Physician assistants
  - Nurse practitioners
  - Clinical nurse specialist
  - Certified registered nurse anesthetists (including anesthesiologist assistants)
  - Certified nurse-midwives
- The expansion applies to data collection beginning in Program Year 2021; this data will be submitted and published in calendar year 2022.

# Tips for Program Year 2021

- Familiarize yourself and your teams with the new reporting requirements and definitions.
- Share the expansion information with the providers you interact with
  - A “Newly Added Covered Recipient” Page is available for providers. We encourage you to refer them to this page to help them learn more about the program and how they can prepare for these changes.  
<https://www.cms.gov/OpenPayments/Program-Participants/Newly-Added-Covered-Recipients>
  - A one-page hand out is available for download and print. This can be shared with covered recipients to help them learn about the program.
    - Download at: <https://www.cms.gov/files/document/open-payments-overview-handout.pdf>
- Review the latest Open Payments regulatory provisions in the [Final Rule](#) (see 42 C.F.R. §403.900-914)

# Program Year 2020 Timeline

## OPEN PAYMENTS

### Program timeline



# 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 require re-vetting of the entity
  - Reporting entities due for recertification are given a status of "Pending Recertification"



# Data Submission Reminders

- **Delay in Publications Renewal Limit Reached Validation**

- The four year limit has now been reached for payments made in the 2016 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

- **Program Year 2013 Data Archived**

- Program Year 2013 data will be archived beginning this year (2021)

- **Program Year 2014 Record Submission**

- Beginning with the Program Year 2020 Data Submission Period (February 1, 2021 – March 31, 2021) reporting entities are no longer able to submit records for Program Year 2014

# COVID-19 Reporting Impacts

- Include the phrase “COVID-19 Impact” in your assumptions statement with the explanation of circumstances and, if applicable, include reference to any related help desk ticket numbers. This will be used to help evaluate potential cases of non-compliance.
- *Remember: your organization is still required to submit and attest to all reportable calendar year 2019 data as soon as possible.*
- The full Open Payments COVID-19 announcement is available at: <https://www.cms.gov/OpenPayments/FAQs/FAQs-openpayments>
- CMS will not know the full impacts of COVID-19 on reporting trends until the data is analyzed after the June 2021 publication.

# 2021 System Enhancements

- The Compliance Portal is updated with new document types, including Word, Excel and PDF
- System enhancements which enable better handling of unexpected errors during vetting
- Upcoming Enterprise Identity Management System (EIDM) updates to safeguard the data

# Next Steps

New or Returning?	Next Steps
<b>New Reporting Entity</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>• Submit Program Year 2020 data by March 31, 2021 (if applicable)</li><li>• Collecting Program Year 2021 payment data and report it in early 2022</li></ul>
<b>Returning Reporting Entity</b>	<ul style="list-style-type: none"><li>• Ensure EIDM account is active</li><li>• Recertify reporting entity information and provide required review and dispute contact information</li><li>• Confirm user roles</li><li>• Submit Program Year 2020 data by March 31, 2021</li><li>• Collect Program Year 2021 payment data and report it in early 2022</li></ul>

# Data Submission Resources

- Validated Physician List
- Teaching Hospital List
- Data Submission Suggestions
- Quick Reference Guides
  - Registration & Recertification
  - Data Submission
  - Bulk File Uploads
  - Manual Data Entry

# Stay Connected

- **VISIT THE OPEN PAYMENTS WEBSITE**

- For resources including Open Payments FAQs and more information about the program visit <https://cms.gov/openpayments>

- **SUBSCRIBE TO THE LISTSERV**

- Receive program updates through the Open Payments listserv
- Subscribe at our Contact Us page

- **SEARCH THE DATA**

- Access the Open Payments data at <https://openpaymentsdata.cms.gov>

- **HAVE QUESTIONS OR NEED HELP?**

- Email: [openpayments@cms.hhs.gov](mailto:openpayments@cms.hhs.gov)
- Call: 1-855-326-8366 (TTY Line: 1-844-649-2766)
- Monday through Friday, from 8:30 a.m. to 7:30 p.m. (ET), excluding Federal holidays.

# Talk to You Soon!

- **Review, Dispute & Corrections Webinar**
  - March 10, 2021 2:00pm – 3:00pm (ET)
    - Registration, agenda items, and call-in information to follow
    - Subscribe to the Open Payments Listserv to ensure you and your team receive updates