# Open Payments–Phase 2 Industry Registration and Data Submission

# Centers for Medicare & Medicaid Services

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**Open Payments—Phase 2 Industry Registration, Data Submission & Attestation**
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This document lists the instructions for completing Phase 2 of industry registration, data submission, and attestation in the Open Payments system.

**Step 1: Now through June 30, authorized officials from applicable manufacturers and applicable GPOs will be able to:**

A. **Complete Open Payments system registration for authorized officials of applicable manufacturers and applicable GPOs and their reporting entity.**
Required action: Authorized officials must log into the Open Payments system using their CMS user ID (created in Phase 1), and complete Open Payments registration for the reporting entity and for themselves. They will be required to provide additional profile information within the Open Payments system, in addition to what was submitted for Phase 1. Note: In order to access Phase 1 pre-populated data for the reporting entity, the authorized official who registered in Phase 1 must be the first person to log into the Open Payments system for the reporting entity, using their same EIDM ID established in Phase 1;

- o Authorized officials who did not register in CMS' Enterprise Portal in Phase 1 (the gateway to CMS' Enterprise Identity Management system), must complete that registration first, in order to access the Open Payments system in Phase 2. Review these step-by-step screenshot instructions to guide users through the CMS Enterprise Portal registration process.
- o Authorized officials who did not complete Phase 1 reporting requirements will need to create a new reporting entity profile. They will not complete the next step, which is to confirm the accuracy of the reporting entity profile data submitted for Phase 1.

B. **Confirm the accuracy of the reporting entity profile data submitted for Phase 1.**
Required action: Confirm the accuracy of the reporting entity profile data submitted for Phase 1, which will be pre-populated in the Open Payments system for Phase 2 (in order to access Phase 1 pre-populated data, the authorized official who registered the reporting entity in Phase 1 must be the first person to log into the Open Payments system for the reporting entity).

C. **Delegate roles and responsibilities by nominating system users to fill specific user roles.**
Required action: Delegate roles and responsibilities within the Open Payments system by nominating system users to fill specific user roles. When going through this first-time registration in the Open Payments system, the authorized official **must** identify him/herself or other individuals to fill all three available user roles (officer, submitter, or attester). Explanations of the responsibilities associated with these roles are included in the Open Payments system. These individuals will then be able to perform the required actions associated with their user role, such as submitting and attesting to the data for the 2013 program year.

System users in the role of submitter should:

D. **Perform test file uploads and submit data files to validate the file structure and contents of the file.**
Optional action: Perform test file upload. If the submitter wants to validate that the data file is formatted correctly, users have an opportunity on the Upload Payments page in the Open Payments system to upload a test file, and select "Submit as Test File" instead of "Submit File to Open Payments." By completing this step, the Open Payments system

will validate the structure of the file to determine if the formatting of the file is acceptable. Data submitted during the test submission will not be uploaded for reporting. For more information on the process for creating data files for upload into the Open Payments system, review the video tutorial, [Phase 2 CSV & XML Tutorial: Preparing Data Files for Submission](#), available on the Open Payments website.

E. **Utilize the error report produced by the Open Payments system to fix any data errors (if any) in submitted files.**
Required action: Submit the file to Open Payments by selecting "Submit File to Open Payments" on the Upload Payments page. Submitting the file to Open Payments first validates the file structure (same as in the Optional action #D, above). If the structure check passes, the contents of the file (such as all required fields are populated, contain valid characters, are of required length, etc.) are also validated. If submitted files contain content errors, users will receive an email alerting them that errors were detected, along with instructions for how to retrieve the error report from the Open Payments system. Users will then be able to download the error report and use error descriptions included in the User Guide to fix the errors either manually or through re-submitting the file.

Once the test data files have been successfully uploaded and validated at this step, industry users can move on to Step 2.

**Step 2: Starting June 9 through June 30, authorized officials and/or authorized representatives from applicable manufacturers and applicable GPOs will be able to complete the following steps:**

F. **Submitters should perform final data submission (which includes a series of checks to match the reported data to the appropriate physicians and teaching hospitals).**
Required action: Perform final data submission for the detailed 2013 payment or other transfer of value data, or ownership/investment interest data. Starting June 9, "Final Submission" functionality will be available in the Open Payments system. To be able to perform final submission, all validation errors identified in Step 1 when "Submit Files to Open Payments" was completed (Required action #E above), need to be fixed and all records need to be in "Ready for Submission" status. After final submission is performed, submitted records will be matched to physician and teaching hospital profiles. If the system is unable to match some or all of the reported transactions, the reporting entity will be notified and will have the opportunity to either correct the data and repeat the matching process by again performing the final data submission, or overriding the failed matching status and proceeding with submission.

G. **Attesters should attest to the accuracy of their submitted detailed 2013 payment or other transfer of value data, or ownership/investment interest data.**
Required action: Attest to submitted data. After all records successfully complete the matching process (or unmatched status is manually overridden) and are in "Ready for Attestation" status, they must be attested to by the reporting entity's authorized official or representative. Review the User Guide for details on the attestation process. **Note: Open Payments reporting will not be considered complete until the official attestation is received. Official attestation must be received by June 30.**

**All Phase 2 activities (Steps 1 and 2) must be completed by June 30.**