CMS
CENTERS FOR MEDICARE & MEDICAID SERVICES

Open Payments

Program Year 2025: Initial Data Publication

OPEN PAYMENTS

CREATING PUBLIC TRANSPARENCY INTO INDUSTRY-PHYSICIAN FINANCIAL RELATIONSHIPS

June 2026
Data Publication Overview

OMB Control No: 0938-1237
Expiration Date: 06/30/2029

Topics

The data publication tutorial outlines what the Open Payments Program is, how the data is submitted to CMS, what data is published and how this data is accessed.

- Open Payments Program Overview
- Publication Rules and Exceptions
- Accessing Published Data
- Online Search and Data Explorer Tools
- Program Resources

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Open Payments Program Overview

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Open Payments Program Overview

- Open Payments is a statutorily-required, national disclosure program that promotes transparency and accountability by making information about the financial relationships between reporting entities and covered recipients available to the public
  - **Reporting Entities** -refers to pharmaceutical and medical device manufacturers and their distributors who are required to report payments and other transfers of value to Open Payments; also referred to as Applicable Manufacturers and Applicable Group Purchasing Organizations (GPOs)
  - **Covered Recipients** -refers to physicians, non-physician practitioners (NPP), and teaching hospitals receiving payments or other transfers of value from Applicable Manufacturers and GPOs
    - NPP - collectively refers to physician assistants, nurse practitioners, clinical nurse specialists, certified registered nurse anesthetists, anesthesiologist's assistants, and certified nurse-midwifes provider types
- The Open Payments data provides health care consumers with information to make informed health care decisions
- Disclosure of the financial relationships between the reporting entity and covered recipients is not intended to signify inappropriate relationships, and Open Payments does not prohibit such transactions

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Data Sources and Types

Reporting entities must enter detailed information about payments, other transfers of value made to covered recipients, and ownership or investment interests held by physicians or physicians' immediate family members into the Open Payments system

There are three major reporting categories:

- **General Payments**: Payments or other transfers of value made that are not in connection with research agreements or research protocol. General payments may include but are not limited to gifts, meals, honoraria, and travel.
- **Research Payments**: Payments or other transfers of value made in connection with a research agreement or research protocol.
- **Physician Ownership Information**: Information about physicians and physicians' immediate family members, who have an ownership or investment interest in the reporting entity.

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Program Year 2025 Timeline

- **Initial publication** contains data submitted and attested to by the Submission End Date (March 31, 2026) and reviewed, edited and re-attested by the Correction End Date (May 30, 2026)
- **Refresh publication** contains data submitted and attested to by the Submission End Date (March 31, 2026) and reviewed, edited and re-attested by the Calendar Year End Date (December 31, 2026)

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Publication Rules and Exceptions

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Publication Exclusions and Limitations

- **Delay in Publication**
  - A delay in publication can be requested for a research record related to research or development of a new drug, biological, device, or medical supply; a new application of an existing drug, biological, device, or medical supply; or clinical investigations regarding a new drug, biological, device, or medical supply
  - Records with a requested a delay in publication will not be published

- **Archived Program Years**
  - Program years that have reached their fifth full year of publication (including data publication and data refresh) are closed and archived.
  - Archived program years are not searchable, but are accessible on the Archived Dataset Page (https://openpaymentsdata.cms.gov/datasets/archived)

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Publication Exclusions and Limitations (cont'd)

- **Late Reporting**
  - Data submitted and attested after the submission deadline is considered late and is not included in initial publication or the next refresh publication
- **Change in covered recipient identifying information**
  - Records in which physician, non-physician practitioner or principal investigator identifying information is changed after the submission end date are not included in the initial publication or the next data refresh publication.
  - Such a change requires the deletion of the original record and submission of a new corrected record; after the submission closing date, the corrected record would be a late submission
  - These corrected records may be eligible for publication in the following calendar year's initial data publication
- **Deleted Records**
  - Deleted records may be published depending on when the record is deleted
    - Records deleted by May 30th are not published in the initial data publication or in any subsequent publications
    - Records deleted between May 31st and December 31st are included in the initial June publication and will be removed during the annual data refresh

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Publication Exclusions and Limitations (cont'd)

- **Changes to Non-disputed records**
  - Records without disputes that are updated after the submission period and before the correction period will not be published in the initial data publication. This is done to allow the required 45 days for a covered recipient to review their records.
  - The updated version of the record will be published in the data refresh publication if it was resubmitted and attested by November 15, which is also called the "modified without dispute cutoff date".
    - Updates to non-disputed records that are resubmitted and attested after the modified-without-dispute cutoff date in November are published the following June.
    - For previously published records that were edited during the current program year, please refer to the Open Payments Data Dictionary and Methodology Document for publishing limitations

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Accessing Published Data

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Accessing the Published Data

- The published data is available on the Open Payments Search Tool at https://openpaymentsdata.cms.gov/
- The Open Payments Search Tool is a one stop shop for access to all the published data
- Users can:
  - View summary data
  - Search the data for providers, teaching hospitals and companies to see individual profiles with detailed information about the reported data.
  - Download full datasets
  - Filter and download datasets
- The Advanced Search - Allows the users to refine their search for more accurate and relevant profile page results

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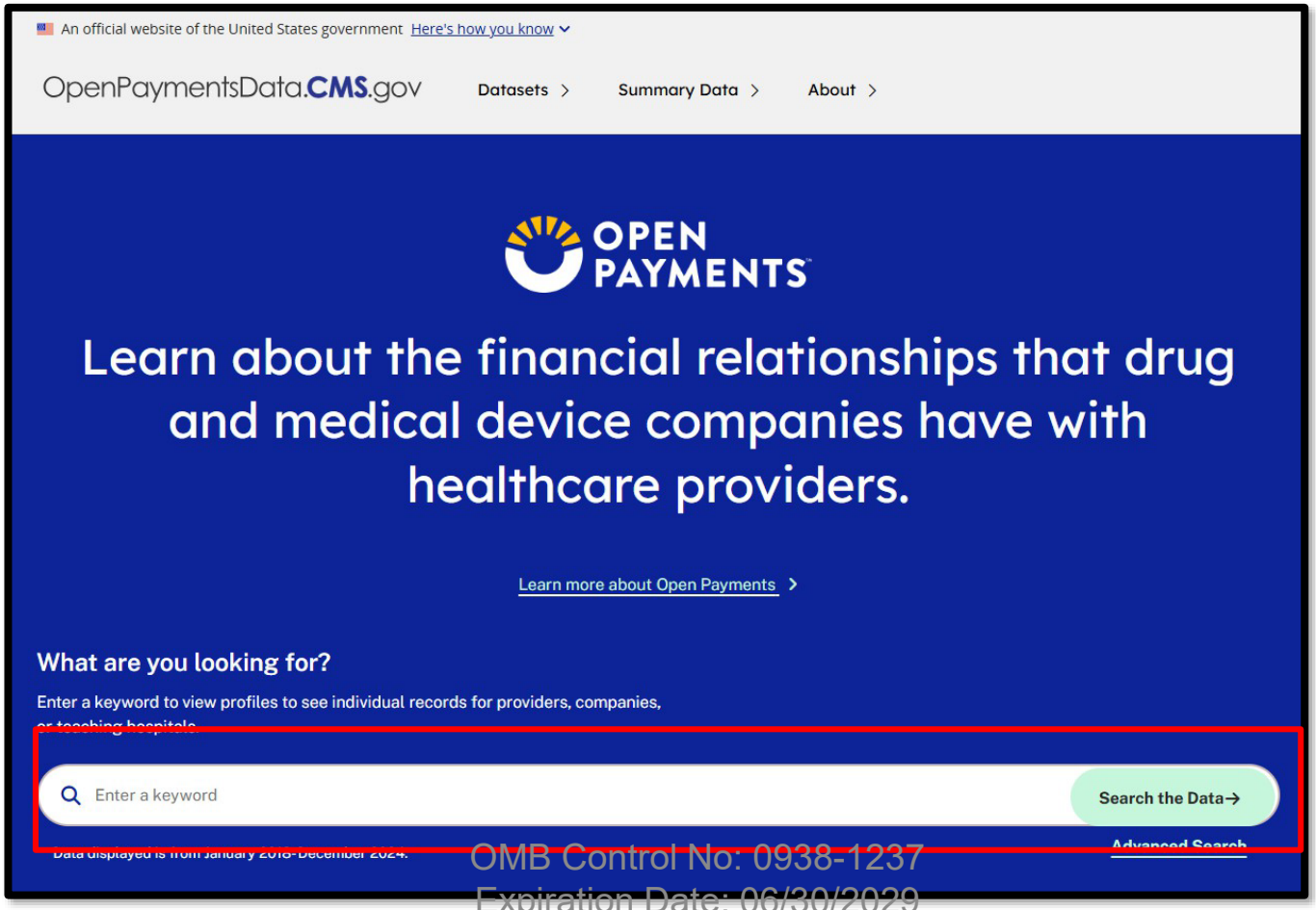
Open Payments Search Tool

- The Open Payments Search Tool provides a search field on the landing page that allows users to perform a quick search for an individual healthcare provider, Teaching Hospital or Company and access profile pages that contain payment data:



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Open Payments Search Tool (cont'd.)

- **Advanced Search** - Allows the users to refinetheirsearch for a particular physician, non- physician practitioner, teaching hospital or company making payments for more accurate and relevant profile page results:

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Sample Profile Pages

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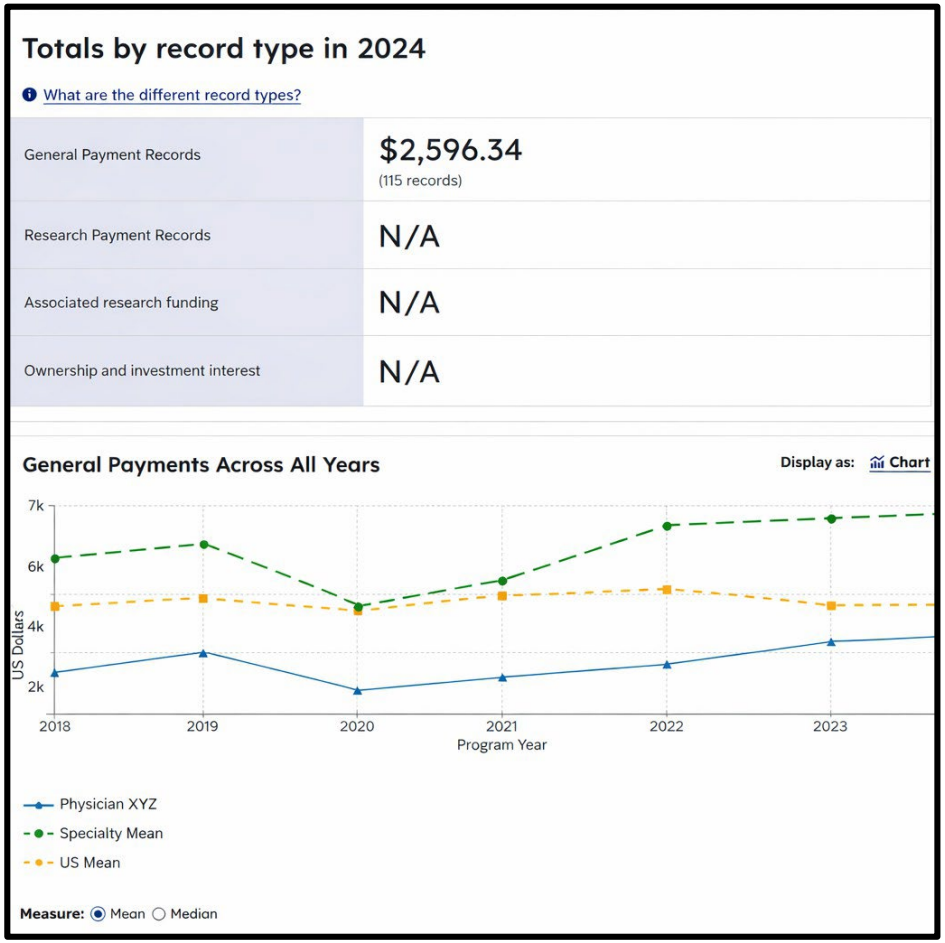
Provider Profile Pages

- The provider profile page displays information about the provider by year, payment type, and other available filters
- The provider is compared to other providers in the same specialty and to all providers nationally



For illustrative purposes only

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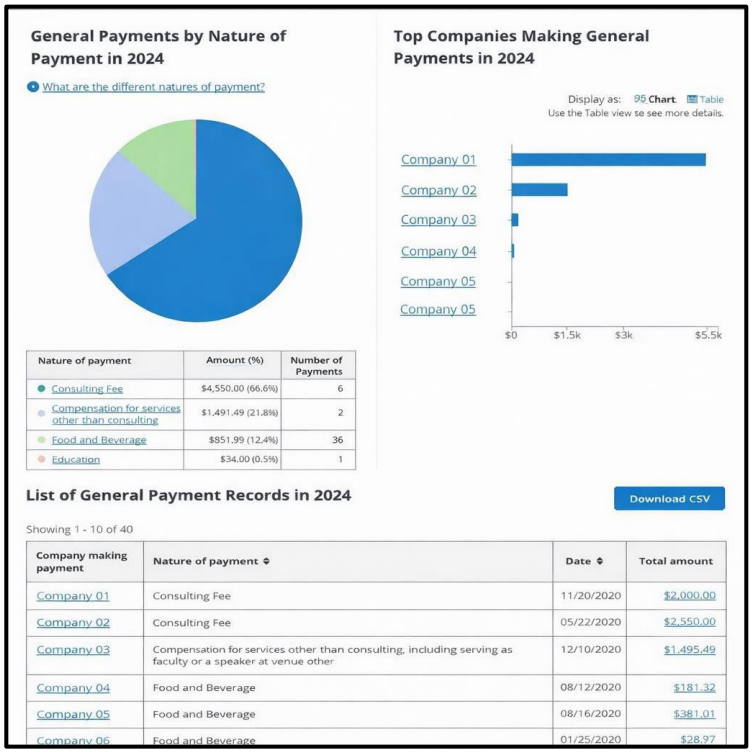
Provider Profile Page (cont'd)

- The provider profile page provides data reported by Nature of Payment
- The user can view the list of payments and download data
- The top companies making payments to the provider are displayed with the amount reported



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Company Profile Page

- The company profile page displays information for payments by year, payment type, and a graphical chart or table to display seven years of payment amounts submitted.

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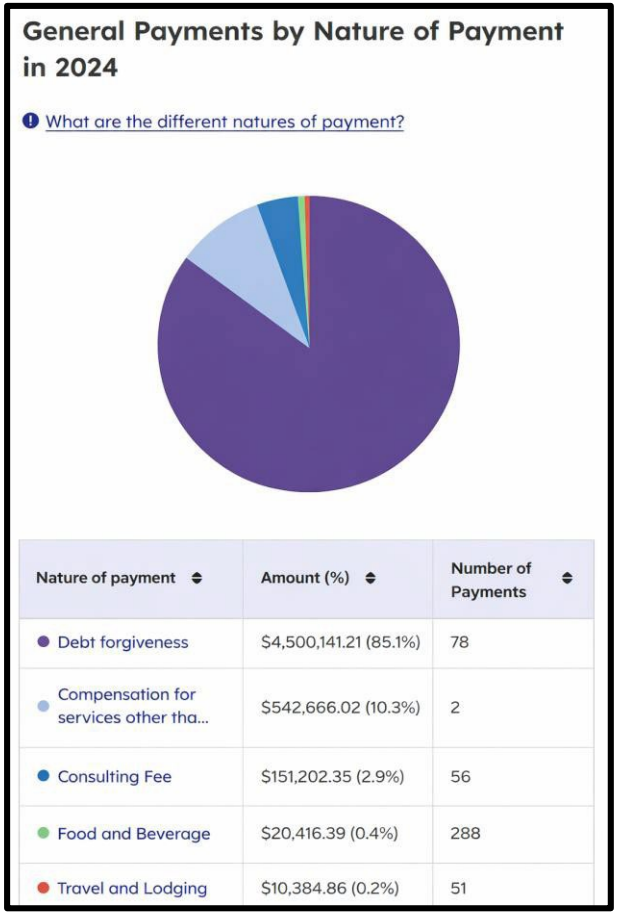
Company Profile Page (cont'd)

- The company profile page displays payment information by Nature of Payment across the most recent seven program years
- Additional payment data provided on the profile page allows users to view:
  - Top recipients receiving payments for a particular payment category and payment year
  - List of payment records for a particular payment category and payment year



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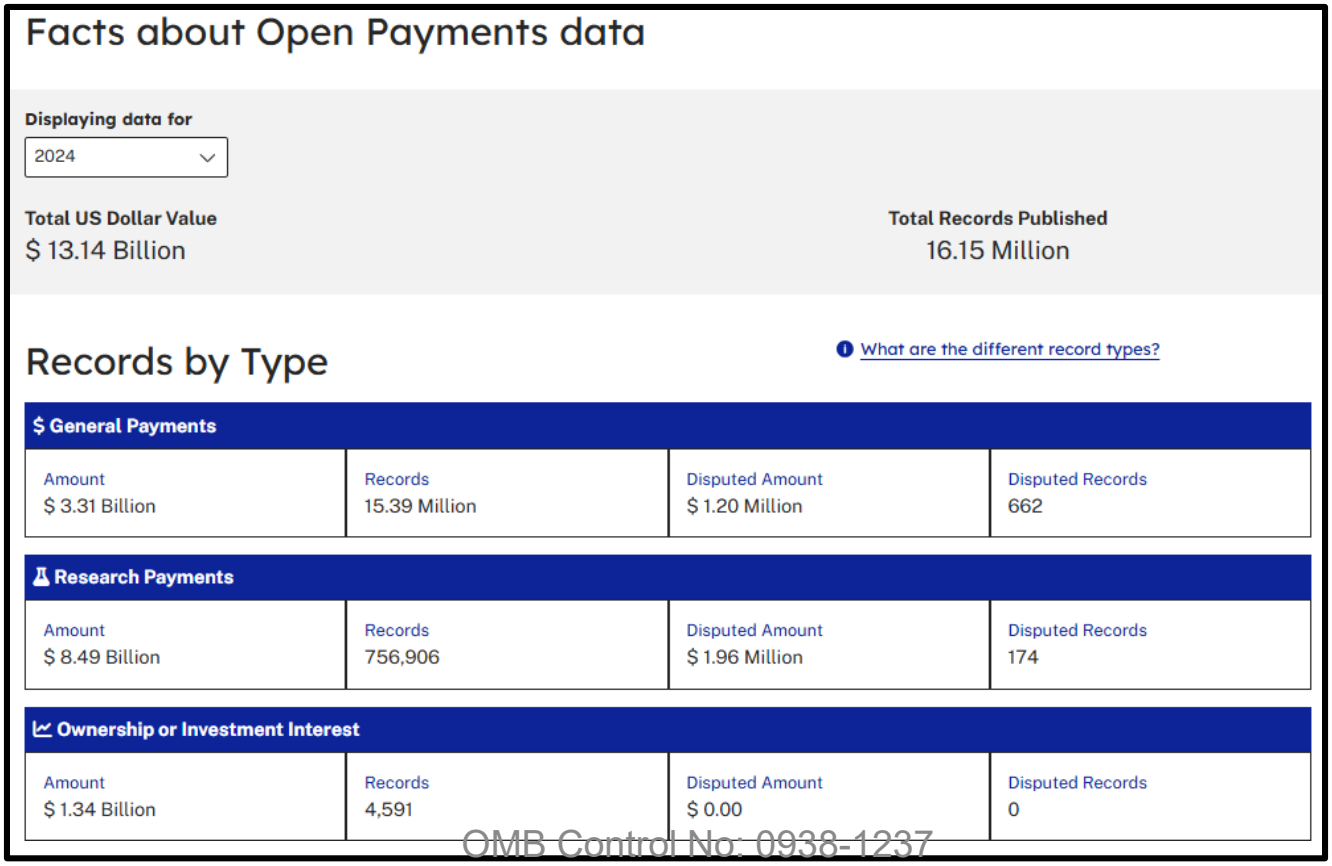
Summary Data: Facts About Open Payments

- The Facts about Opens Payments Data page displays summarized data. Users can view summarized data for individual years or for all active years
- This information is available at: https://openpaymentsdata.cms.gov/summary



Facts about Open Payments data

Displaying data for

2024

Total US Dollar Value

$ 13.14 Billion

Total Records Published

16.15 Million

Records by Type

What are the different record types?

$ General Payments			
Amount	Records	Disputed Amount	Disputed Records
$ 3.31 Billion	15.39 Million	$ 1.20 Million	662

Research Payments			
Amount	Records	Disputed Amount	Disputed Records
$ 8.49 Billion	756,906	$ 1.96 Million	174

Ownership or Investment Interest			
Amount	Records	Disputed Amount	Disputed Records
$ 1.34 Billion	4,591	$ 0.00	0

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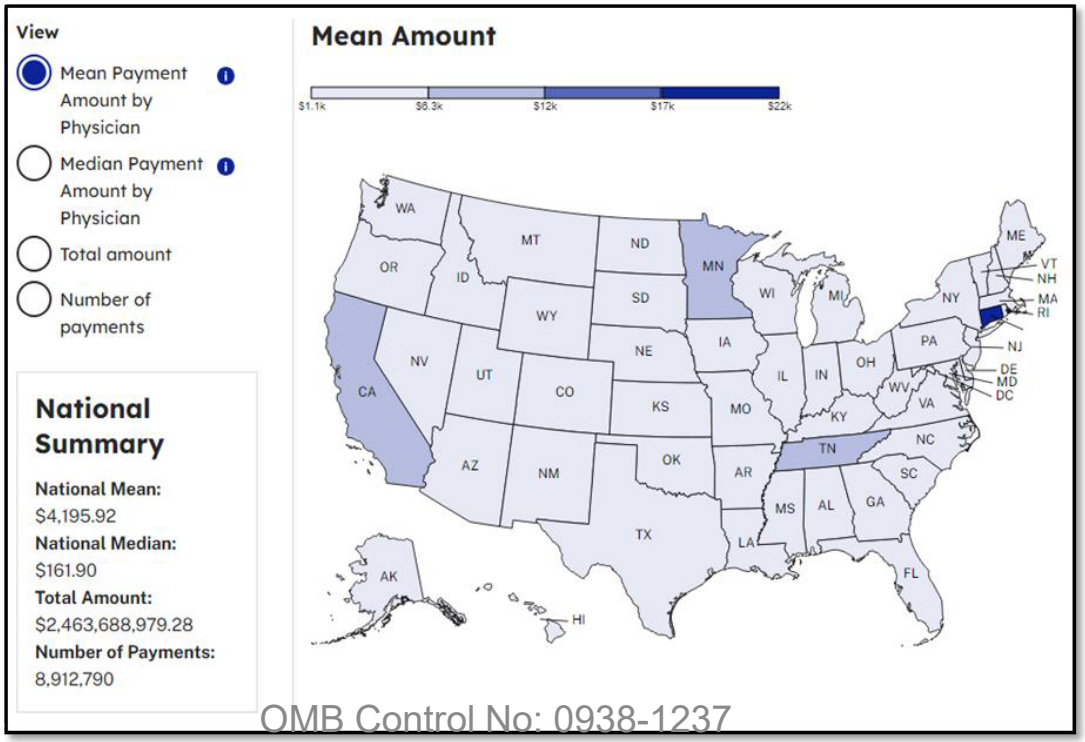
Summary Data: Payments by State

- The Summary of Payments by State page displays general and research payments received by physicians and non-physician practitioners in each state at https://openpaymentsdata.cms.gov/summary-by-state.

- A payment is associated with a state based on the covered recipient's most recent practice address identified in CMS sources.



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Downloadable Data Files

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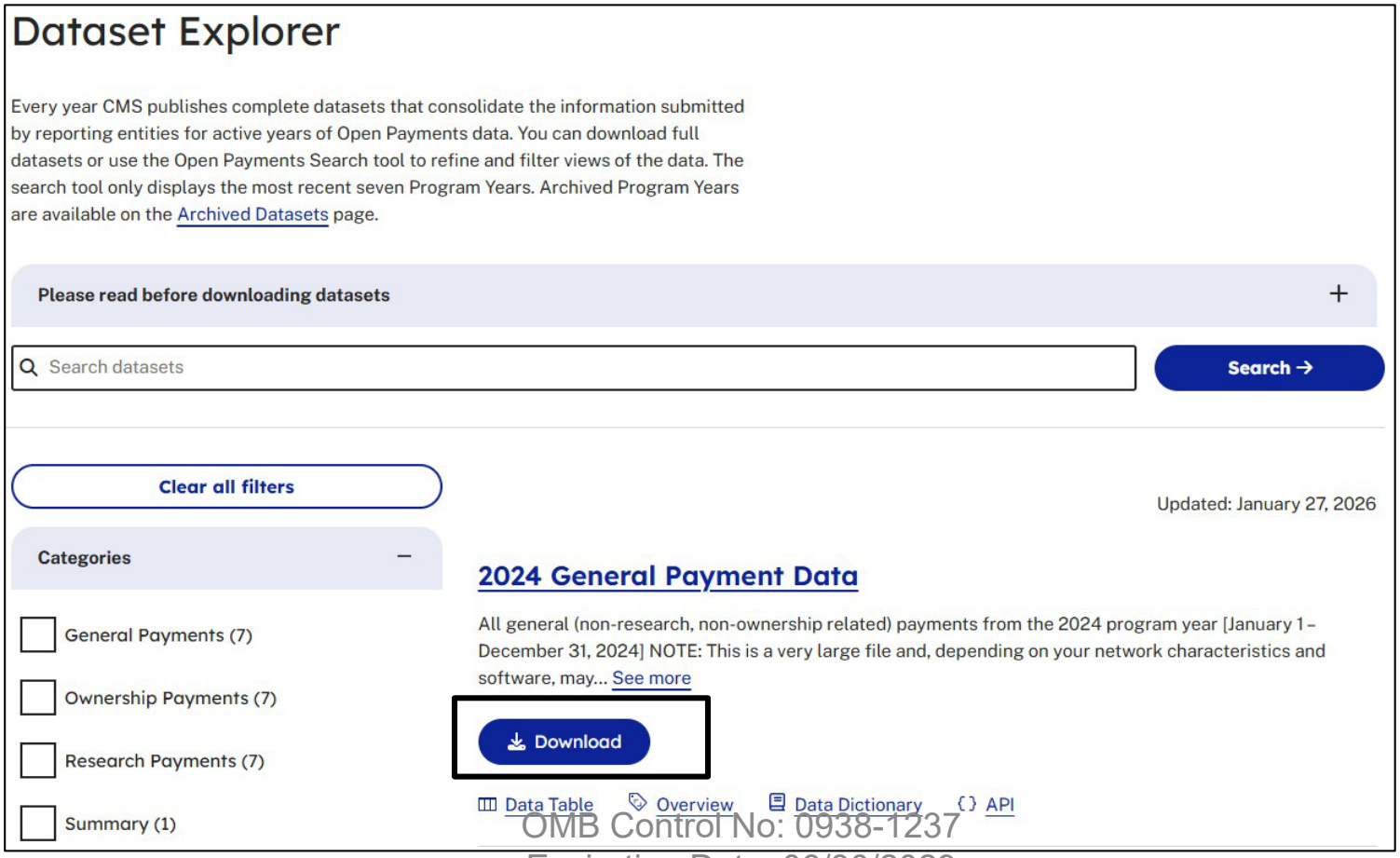
Downloadable Data Files

- Downloadable Data Files are available at: https://openpaymentsdata.cms.gov/datasets, by clicking on the following "Download" button for each individual dataset:



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Downloadable Dataset Files

- Each program year has downloadable(CSV) dataset files: General, Research, and Ownership payment data
- Dataset files provide payment information that can be imported into an alternative program database or a spreadsheet for easier reading and interaction
- The "Covered Recipient Profile Supplement File", is a ZIP file that contains information about physicians and non-physician practitioners who are identified as recipients of payments, other transfers of value, or ownership and investment interest in payment records
- Please note: some datasets, particularly the general payments datasets, are extremely large and may be difficult to download and/or cause computer performance issues. CMS recommends using WinZip, WinRAR, or 7-Zip for file decompression

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Downloadable Data Files: *"Change Type" Indicator*

- Each record in a CSV file includes a Change Type indicator. This indicator explains the record's status in relation to previous publications
- The possible values for the Change Type indicator are:

Change_Type Value	Meaning of Value
NEW	The payment record was submitted during the current program year submission period and is being published for the first time
ADD	The payment record was submitted during a previous submission period but was not eligible to be published in that period; it is being published for the first time
CHANGED	Changes were made by the reporting entity to the payment record since the previous publication, which may include a change to a record's dispute status; the current publication includes these changes
UNCHANGED	No changes were made to the payment record since the last publication

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Downloadable Data Files: *"Deleted and Removed Records File"*

- A Deleted and Removed Records file is available for each program year that identifies records previously published by the Open Payments program that are not in the current publication due to their deletion or removal
  - The Downloadable Data File for Program Year 2025 does not include a Deleted and Removed Records file as none of its records have been previously published
- The only identifying information included in the Deleted and Removed Records file is Open Payments Record ID, Payment Type, and Payment Category for those records
- A program year's Deleted and Removed Records file is included in that program year's publication data download ZIP file
  - If any program year does not have deleted and removed records for the current publication, then the Deleted and Removed Records file will not be included in the program year's publication data download ZIP file
- Records in a Deleted and Removed Records file also contain a "Change_Type" field with one of two possible values:

Change_Type Value	Meaning of Value
DELETED	The reporting entity deleted the previously published record
REMOVED	The previously published record is ineligible for publication

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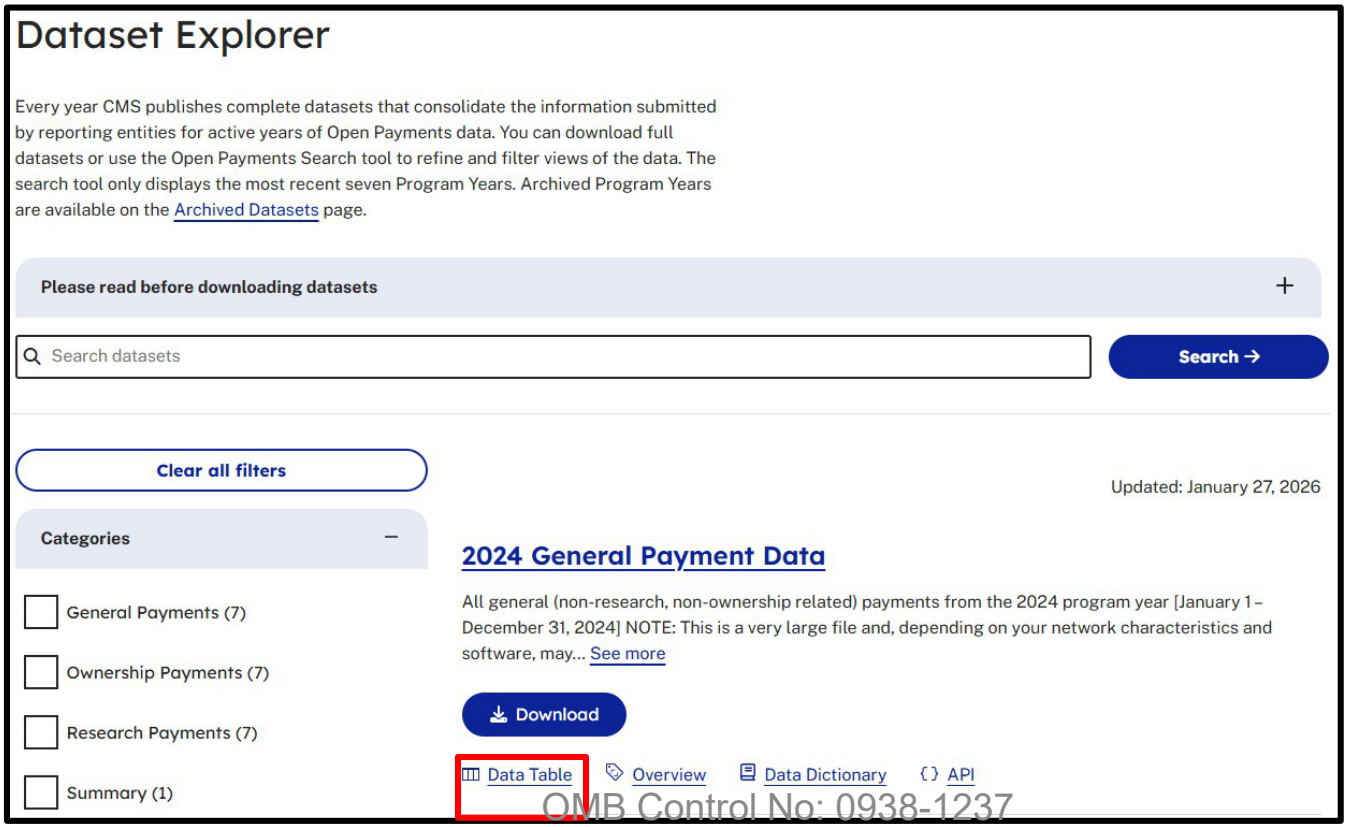
Open Payments Data Explorer Tool

Data Explorer Tool - Allows the user to explore and filter full data sets by program year and payment category in tabular format by following the steps below:

- Step 1: Click on the "Data Table" button below under the desired payment category and payment year dataset:



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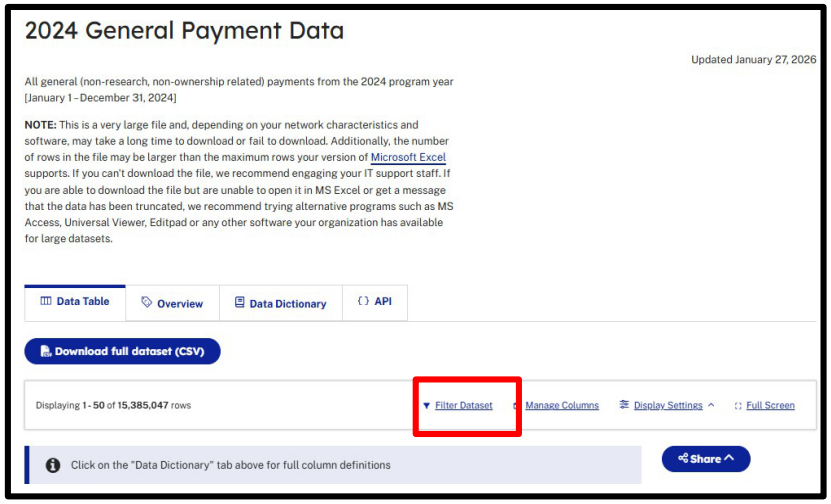
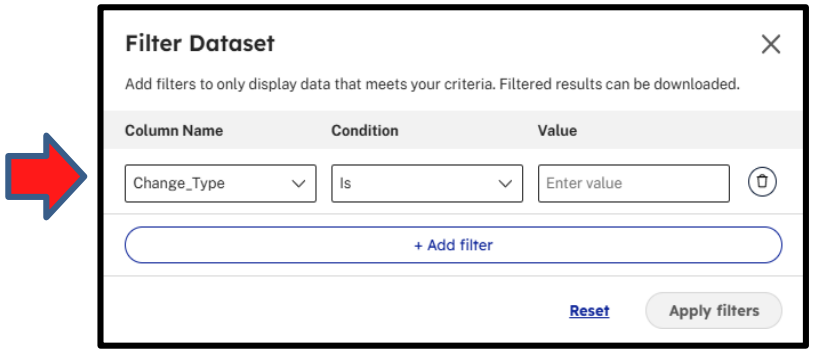
Open Payments Data Explorer Tool (cont'd.)

- Step 2: Click on Filter Dataset. Apply filters to refine and filter views of the dataset selected





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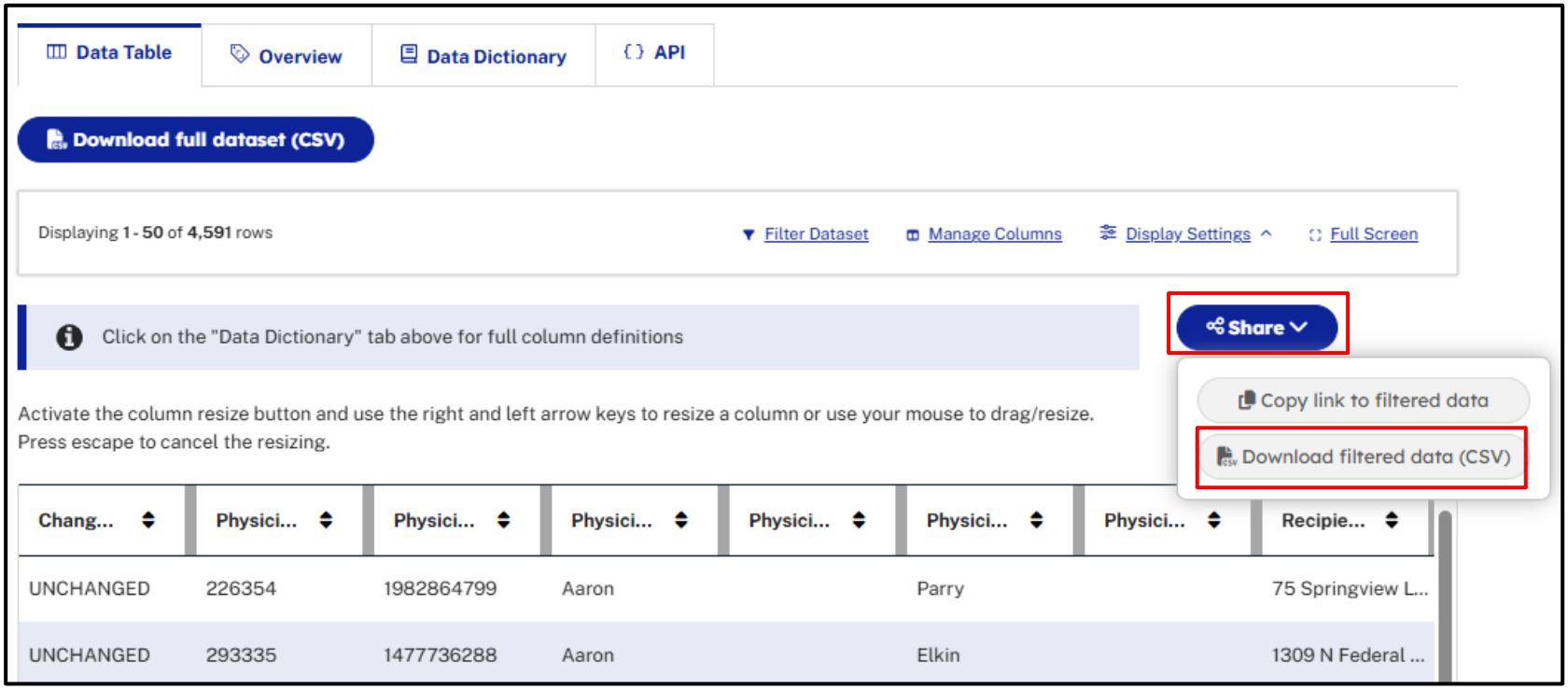
Open Payments Data Explorer Tool (cont'd.)

- Step 3: Download filtered data (CSV) by clicking on Share:



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Available Resources

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Available Resources

Review available resources on the CMS Open Payments website Resources page at https://www.cms.gov/openpayments/resources

- Open Payments Data Dictionary and Methodology Document: https://www.cms.gov/files/document/open-payments-methodology-data-dictionary-document-january-2026.pdf
- Open Payments FAQs: https://www.cms.gov/OpenPayments/Downloads/open-payments-general-faq.pdf
- Open Payments User Guide For Reporting Entities, PDF page link: https://www.cms.gov/files/document/open-payments-user-guide-reporting-entities.pdf
- Open Payments User Guide For Covered Recipients, PDF page link: https://www.cms.gov/files/document/open-payments-user-guide-covered-recipients.pdf
- For additional questions, contact the Open Payments Help Desk at:
  - openpayments@cms.hhs.gov
  - 1-855-326-8366 or for TTY line call 1-844-649-2766
- For press inquiries, contact the CMS Office of Communications at:
  - press@cms.hhs.gov

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Disclosure

- Disclaimer: The contents of this document do not have the force and effect of law and are not meant to bind the public in any way, unless specifically incorporated into a contract. This document is intended only to provide clarity to the public regarding existing requirements under the law.
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- Replacement/Revision Status: Revision to previous version
- Agency Identifier: OHEI TDG 4951
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  - Rule citation: 42 C.F.R. §403.900-14