

OPEN PAYMENTS

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

Review, Dispute & Corrections

March 26, 2020
CMS Open Payments Team



COVID-19 Announcement

- CMS is aware that the COVID-19 pandemic may impact some reporting entities and affect their ability to submit records on or before the March 31, 2020 deadline.
- CMS is unable to extend the submission window past the March 31st deadline.
- CMS is sensitive to the challenges caused by the pandemic and will exercise enforcement discretion with respect to submissions completed after the statutory deadline due to circumstances beyond the reporting entity's control associated with COVID-19.
- If the pandemic has impacted your reporting process, please include the phrase **“COVID-19 Impact”** in your assumptions statement as well as an explanation of the circumstances and any associated help desk ticket numbers.
- Read the full Open Payments COVID-19 Announcement on the Open Payments [Contact Us Page](#)

Timeline Reminders

- **Program Year 2019 Data Submission closes on March 31, 2020**
- Review and Dispute for covered recipients begins on April 1, 2020 and will continue through May 15, 2020
 - In order for a dispute or correction to be reflected in the June 2020 publication, the dispute must be initiated by May 15, 2020
- The additional correction period for reporting entities will continue from May 16, 2020 through May 30, 2020
- Dispute resolution takes place outside of the Open Payments system
 - Reporting entities should work directly with the covered recipient to reach a dispute resolution
- **CMS does not mediate disputes**

Review & Dispute Statuses

- Records in the review and dispute process will have one of the following statuses
 - **Initiated**
 - The dispute has been initiated by the covered recipient
 - **Acknowledged**
 - The reporting entity has acknowledged the dispute
 - **Resolved**
 - The reporting entity and covered recipient have worked together to reach a resolution
 - **Resolved No Change**
 - The reporting entity and covered recipient have worked together and determined the originally reported information is correct and no change is necessary
 - **Withdrawn**
 - The covered recipient withdrew the dispute; no further action is needed

Review & Dispute Impact on publication

- Disputes initiated within the pre-publication 45-day review, dispute, and correction period and resolved by the end of the correction period (May 30, 2020) will be published and identified as non-disputed in the June 2020 data publication
- If an initiated dispute is not resolved by the end of the correction period, the record will be published and identified as disputed
- Disputes initiated or resolved after the full 60-day review, dispute, and correction period will not be reflected in the initial publication of data and will be published as original attested-to data.
 - Those disputes and any related data changes will be published in the next publication which may be a refresh publication or the next program year data publication

Question & Answer Session

- To ask a question:
 - Submit your question via the Q&A box
 - We will try our best to answer all of your questions, however if we do not respond to your question please feel free to reach out to the Open Payments Help Desk for assistance
- Please note:
 - Questions with specific and/or detailed scenarios will be referred to the help desk.

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
 - Call: 1-855-326-8366 (TTY Line: 1-844-649-2766)
 - Help Desk Hours: 8:30am – 7:30pm (ET)

