Open Payments System Enhancements

Introduction
The Open Payments system is enhanced to improve user experience and increase system functionality. This document explains the enhancements and improvements implemented between January 2022 and July 2022 that directly affect end users.

January 2022 Updates

Global

1. Update to Open Payment Supported Browsers:
   Previous System Behavior: The Open Payments web-based application can operate through Google Chrome (Version 89 or higher), Microsoft Edge (Version 89 or higher), Safari (Version 13.1.2), Internet Explorer (Version 11 or higher), and Mozilla Firefox (Version 83 or higher) browsers.

   Enhanced System Behavior: The Open Payments web-based application will no longer support Internet Explorer.

2. Expansion of Covered Recipient - Non-Physician Practitioners:
   Previous System Behavior: Only physicians and teaching hospitals were able to create a profile as a covered recipient in the Open Payment system and register as a new user.

   Applicable manufacturers and applicable group purchasing organizations (AM/GPO’s) attributed general, research and ownership/investment payments to physicians, as well as general and research payments to teaching hospitals.

   Registered covered recipients perform functions like review and dispute, view system messages, and may add, modify or remove Authorized Representatives. Teaching hospitals, may add, modify or remove Authorized Officials. Covered recipients have access to the Open Payment system profile ID lookup utility.
**Enhanced System Behavior:** The Centers for Medicare & Medicaid Services (CMS) expanded the definition of a “covered recipient” in the Open Payments program to include the following Non-Physician Practitioners:

- Physician Assistant (PA)
- Nurse Practitioner (NP)
- Clinical Nurse Specialist (CNS)
- Certified Registered Nurse Anesthetist and/or Anesthesiologist Assistant (CRNA/AA)
- Certified Nurse-Midwife (CNM)

Beginning with Program Year 2021, reporting entities are required to report data for Physicians, Teaching Hospitals, and Non-Physician Practitioners. Similar to the existing functionality for Physicians and Teaching Hospitals, the Non-Physician Practitioners are allowed to create a profile as a covered recipient in the Open Payment system to register as a new user. In addition, registered Non-Physician Practitioner covered recipients can perform functions like review and dispute, view system messages, and have the ability to add, modify or remove an Authorized Representative.

![Figure 1 Select Profile Type Page](image-url)
Data Submission

1. Rework Application and Pages Around View All:

Previous System Behavior: Previously, all user actions related to submissions such as View, Search, Download, Copy, Edit, and Attest, were accessed by selecting the “View All” button. Reporting Entities navigated to the Submissions page, selected an Entity and Program Year, and clicked on the “Review Records” button. From the Review Records page, the Reporting Entities selected the “View All” button to view the individual records.

Enhanced System Behavior:

The Open Payments system allows Reporting Entities to navigate to the Payment Category page in two ways:

1. “Review Submitted Payment Records”:
   On the Submissions landing page under the “Review Submitted Payment Records” section, Reporting Entities may select payment type, reporting entity and program year. This will take them directly to the “Payment Category” page via the “Review Detail” button.

2. “Review Records – Summary”:
   On the Submission landing page under the “Review Records – Summary” section, Reporting Entities can select entity and program year and access the Payment Category page via the “Review Summary” button by selecting “View All”.

Last Modified: July 2022
Figure 2 Submission landing Page
2. **Final Rule Update - Nature of Payment Categories:**

The Open Payments system requires for the Natures of Payment to be specified during the submission of General Payments.
Previous System Behavior: The system listed the following Natures of Payment categories to be selected upon General Payment submission for Program Years 2013 – 2020.

1. Consulting fee.
2. Compensation for services other than consulting, including serving as faculty or as a speaker at an event other than a continuing education program.
3. Honoraria.
5. Entertainment.
6. Food and beverage.
7. Travel and lodging (including the specified destinations).
8. Education.
10. Royalty or license.
11. Current or prospective ownership or investment interest.
12. Compensation for serving as faculty or as a speaker for an unaccredited and non-certified continuing education program.
13. Compensation for serving as faculty or as a speaker for an accredited or certified continuing education program.
14. Grant.
15. Space rental or facility fees (teaching hospital only)

Enhanced System Behavior: There are three new Nature of Payment categories and two Nature of Payment categories have been combined into one.

The following two Nature of Payment categories are combined and named as “Compensation for serving as faculty or as a speaker for a medical education program”

- Compensation for serving as faculty or as a speaker for an accredited or certified continuing education program
- Compensation for serving as faculty or as a speaker for a non-accredited and noncertified continuing education program

The above two Nature of Payment categories are reportable and editable for Program Years 2016 – 2020. Beginning with Program Year 2021 the above two Nature of Payment categories are reportable as “Compensation for serving as faculty or as a speaker for a medical education program” under the new category name.

The following three new Nature of Payment categories are added and reportable beginning with Program Year 2021 and subsequent program years:

- Debt Forgiveness
- Long-Term Medical Supply or Device Loan
- Acquisitions

The three new Nature of Payment categories operate prospectively and are not reportable for program years prior to 2021.
3. Validating and Standardizing Medical Devices Information:

Previous System Behavior: The system validated only that the required field(s) were complete and that it was formatted correctly for the medical device and medical supply information for payments submitted via bulk file upload and manual data entry. Validations were not performed to check the values of the medical device or medical supply name.

Enhanced System Behavior: CMS enhanced the Open Payments system to validate the medical device or medical supply name. The new field of “Primary Device Identifier” is added to the Associated Related Products page for general and research payments only. The name of the marketed medical device or medical supply must be provided when the product indicator is selected as “covered” and the product indicator is selected as “non-covered” and the Primary Device Identifier is provided.

On general and/or research payment records, the system generates a warning, if the Medical Device or Medical Supply Name and Primary Device Identifier combination is not valid. However, the user can continue with the record submission without fixing the warning message(s). The “List of Medical Device or Supply Name and Primary Device Identifier” CSV
Figure 5 Medical Device Warning pop-up
4. **Hard Error for Drug Validation**

**Previous System Behavior:** When the submitter submits related product information on general and/or research payment record(s), the system validated the Drug or Biological Name and National Drug Code (NDC) against the CMS-approved reference data set and generated a warning message if the provided information was not valid as per the reference dataset. It was not necessary for the user to correct this warning before proceeding to submission.

**Enhanced System Behavior:** CMS enhanced the Open Payments system to generate new hard errors for failed validation of Drug or Biological Name and NDC. The reporting entity user must correct the field(s) for successful validation before proceeding with the submission process. Reporting Entity users will not be able to access the Review & Save page until validation is successful on the Products page.

5. **Separate Error and Warning Logs for Download in the Application:**

**Previous System Behavior:** The system allowed the users to download the warnings and errors received from bulk file submissions, in a single log file from the system.

**Enhanced System Behavior:** CMS enhanced the Open Payments system to separate the errors and warnings into two individual .csv files that will be available for the users to download. The error and warning logs will be available for download on the same screens where the current error/warning log is available. There are no changes to the navigation steps to get to this page.
On this page, users will be able to download the log file with all the errors by clicking the hyperlink corresponding to “Error Log”. They will also be able to download the log file with all the warnings by clicking the hyperlink corresponding to “Warning Log”.

![Figure 7 File ID Page](image)

6. **Final Submission Improvement:**

   **Previous System Behavior:** Upon selection of final submission, the system would process the file and upon the successful completion of processing, the user was navigated to the Review Records – Summary Page. If the file submitted for final submission was a large payment file, a timeout of the system was triggered due to the longer processing time.

   **Enhanced System Behavior:** CMS enhanced the Open Payments system to display an updated confirmation message as in the below image, to the reporting entity user after the user clicks the “Submit as Final Submission” on the Final Submission Confirmation page.
While the records are processing, the user will have the ability to navigate within the Open Payments system. After the final submission process is complete, an email notification will automatically be sent to the reporting entity’s submitters, informing them that the final submission was successfully processed.

**Figure 8 Review Records Summary Page**
Compliance Messages

**Previous System Behavior:** The system allowed the reporting entity officer or compliance user to view the compliance-related messages by navigating to the “Compliance” sub-tab under the “Messages” tab.

**Enhanced System Behavior:** CMS enhanced the Open Payments system for the reporting entities:

- To be able to respond to CMS communication with a file to be viewed by the CMS.
- To be able to view a chain of communications via the Communication ID

The users can respond to CMS communication along with a file from the “Upload Response to Compliance Communication” page as displayed as below.

![Figure 9 Compliance Messages tab – Upload Response to Compliance Communication](image_url)
July 2022 Updates

Resources

1. **Open Payments CMS Resources page:**
   
   **Previous System Behavior:** The Open Payments [CMS resources page](#) had materials that include information about Program Years 2013 to the current program year.

   **Enhanced System Behavior:** Program Years 2013-2015 are closed for submission. The Open Payments [CMS resources page](#) will no longer have materials that include information about Program Years 2013-2015.

2. **Open Payments Application Resources page:**

   **Previous System Behavior:** The Open Payments application resources page for reporting had materials that include information about Program Years 2013 to the current program year.

   **Enhanced System Behavior:** Program Years 2013-2015 are closed for submission. The Open Payments application resources page for reporting entities will no longer have materials that include information about Program Years 2013-2015.
Open Payments (Sunshine Act)

Open Payments Resources

Links to the Open Payments resources are available below.
For help obtaining a PDF viewer, go to the CMS.gov Help page.

Resources
- Open Payments User Guide for Reporting Entities [PDF]
- Open Payments User Guide for Covered Recipients [PDF]
- Open Payments FAQ's [PDF]
- CMS Resources Website
- Error and Warning Codes Key [XLSX]
- List of Drug Names and National Drug Codes (NDC)
- List of Medical Device or Medical Supply Names and Primary Device Identifier

Reporting Templates

Report templates are available through the links below. Download the template(s) for the program year(s) and payment category/categories for the records to be submitted. The system will reject files prepared with an incorrect payment category or program year template.

Research
- PY 2016 - 2020 CSV Template File: Research Payments [CSV]
- PY 2021 and Onwards CSV Template File: Research Payments [CSV]

General
- PY 2016 - 2020 CSV Template File: General Payments [CSV]
- PY 2021 and Onwards CSV Template File: General Payments [CSV]

Ownership
- PY 2016 and Onwards CSV Template File: Physician Owner/Investor [CSV]

Figure 10 Open Payments Application Resources Page for Reporting Entities
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.

• **Activities/persons addressed by this document**: Guidance for applicable manufacturers and applicable group purchasing organizations on overview of the Open Payments system and enhancements.

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• **Replacement / Revision Status**: Revision to previous versions

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• **Summary of Document**: An overview of the Open Payments system enhancements that were implemented between January and July 2022.

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