Open Payments System Enhancements

January 2022

Introduction
The Open Payments system (OPS) is enhanced to improve user experience and increase system functionality. This document explains the enhancements and improvements that directly affect end users.

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 covered recipient profile 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.

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.

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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”.
Figure 2 Submission landing Page
Open Payments (Sunshine Act)

Payment Category: General Payments - ABCD Cafe 2020

This table below provides information on submitted records for the selected reporting entity, program year, and payment category.

To export the search results into a CSV file, select the “Download Zip” icon. This provides a compressed zip file containing the search results, permitting you to download more than 100,000 records, will generate an increased error notification. To correct this error, adjust the filtering criteria to create smaller subsets of records and download them in multiple files.

To see all records for a record, select the “Record ID” hyperlink in the table below. Records flagged with a warning icon (yellow) indicate that there are warning messages that should be reviewed and corrected as required. Records with warning messages only do not have validation or matching errors, will not prevent a record from being submitted and allowed, and therefore are not required to be corrected before proceeding if the information is determined to be valid and/or records counted as “Marked for Deletion” are also included in the “Marked for Deletion” record count. If you wish to remove records marked for deletion, find the records with the “Marked for Deletion” status at ‘Yes’, open the details next to them, and then select the “Cancel/Submit” button.

For more information on the buttons you can take on this page, refer to the “Payment Category Page” quick reference guide available on the Resources page of the Open Payments public website. For detailed information on how to edit and submit records, refer to the Open Payments User Guide (PDF).

### General Payments

<table>
<thead>
<tr>
<th>Status</th>
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<th>Action Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Error</td>
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</tr>
<tr>
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</tr>
<tr>
<td>Failed Validation</td>
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<td>Correction</td>
</tr>
<tr>
<td>Failed Matching</td>
<td>0</td>
<td>Correction</td>
</tr>
<tr>
<td>Ready for Submission</td>
<td>0</td>
<td>Priority Resubmission</td>
</tr>
<tr>
<td>Ready for Attestation</td>
<td>0</td>
<td>Attest Prior to Submission</td>
</tr>
<tr>
<td>Attested</td>
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<td>No Action</td>
</tr>
<tr>
<td>Total Payments</td>
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<td>N/A</td>
</tr>
</tbody>
</table>

Note: Previously attested records that have been marked for deletion have not yet been deleted from the Open Payments system. The provider may expect all payments for deleted records to be removed from the Open Payments system. Please visit the Open Payments website for details. All records include the name and date of the record submitter.

### Method for Attestation

<table>
<thead>
<tr>
<th>Method for Attestation</th>
<th>Reason for Attestation</th>
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</thead>
<tbody>
<tr>
<td>Yes</td>
<td>General Practitioner</td>
</tr>
<tr>
<td>Yes</td>
<td>Primary Care Physician</td>
</tr>
<tr>
<td>Yes</td>
<td>Hospitalist</td>
</tr>
<tr>
<td>Yes</td>
<td>Physician Assistant</td>
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</table>

### Physician First Name

<table>
<thead>
<tr>
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<th>Zip Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>State</td>
<td>Number</td>
<td>State</td>
<td>Zip Code</td>
</tr>
<tr>
<td>State</td>
<td>Number</td>
<td>State</td>
<td>Zip Code</td>
</tr>
</tbody>
</table>

### Teaching Hospital Name

<table>
<thead>
<tr>
<th>Teaching Hospital Name</th>
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<th>Teaching Hospital TN</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
<td>EIN</td>
<td>TN</td>
</tr>
<tr>
<td>Name</td>
<td>EIN</td>
<td>TN</td>
</tr>
</tbody>
</table>

### Search

<table>
<thead>
<tr>
<th>Search</th>
<th>Clear All</th>
<th>Download Zip File</th>
</tr>
</thead>
<tbody>
<tr>
<td>Search</td>
<td>Clear All</td>
<td>Download Zip File</td>
</tr>
</tbody>
</table>

Figure 3 Payment Category Page

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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.

Figure 4 Add General Payment Page

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 reference file and Instructions Document is available on the Open Payments System Resources page and the CMS Open Payments website Resources page.

![Figure 5 Medical Device Warning pop-up](image)
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”.

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.
**ABC IDE MEDICAL - Review Records - Summary**

**Confirmation:**
- Your records have been submitted to Open Payments. Once the records have processed successfully, an automated email confirmation will be sent to you.

Below are the records reported by the entity and categorized by the status for the selected program year. To edit records (available only for a user in a "submitter" role) or view the details of the reported records, select the "View All" button under a specific payment category (e.g., Research Payments, General Payments, etc.).

If all the records for the entity are in a "Ready for Attestation", a user in an "attester" role can attest by selecting the "Begin Attestation of All Records" button.

If you have questions on how to complete final submission of records, details on status definitions, or how to attest, use the "Help with this Page" link available on the right-hand navigation.

Select "Notify Attesting" to notify attesters that there are records that require attestation. All active attesters affiliated with the reporting entity will receive an email notification that there are records which require attestation.

**Note:** Previously attested records that have been marked for deletion have not yet been deleted from the Open Payments system. The attester must re-attest to all payments for the selected program year to complete the deletion. Records marked for deletion remain eligible for review, dispute, and publication, until re-attestation is complete.

Records counted as "Marked for Deletion" are also included in the "Attested" (†) record count.

**Program Year: 2021**

**Research Payments**

<table>
<thead>
<tr>
<th>Status</th>
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<tbody>
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<td>System Processing</td>
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</tr>
<tr>
<td>Failed Validation</td>
<td>1</td>
<td>Correction</td>
</tr>
<tr>
<td>Failed Matching</td>
<td>0</td>
<td>Correction</td>
</tr>
<tr>
<td>Ready for Submission</td>
<td>1</td>
<td>Final Submission</td>
</tr>
<tr>
<td>Ready for Attestation</td>
<td>0</td>
<td>Attest</td>
</tr>
<tr>
<td>Returned to Submitter</td>
<td>0</td>
<td>Correction</td>
</tr>
<tr>
<td>Attested †</td>
<td>0</td>
<td>No Action</td>
</tr>
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<td>Total Payments</td>
<td>2</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><em>Marked for Deletion</em></th>
<th>Record Count</th>
<th>Action Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>† Attester to confirm deletion of previously Attested records</td>
<td>0</td>
<td>Attester to Attest deletion action or Reject Deletion</td>
</tr>
</tbody>
</table>

**Figure 8 Review Records Summary Page**

*Last Modified: January 2022*
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
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.

• **Date of document issuance:** January 2022

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

• **Agency Identifier:** CPI DASG/CPI DTP/DASG/CPI 1615

• **Summary of Document:** An overview of the Open Payments system enhancements that were implemented in July 2021.

• **Citation to statutory provision/regulation applicable to this document:**
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  o Rule citation: 42 C.F.R. §403.900-14